

Honey, Kelly

From: Dregne, James
Sent: Friday, March 19, 2010 4:20 PM
To: Honey, Kelly
Subject: FW: HOWCO ENVIRONMENTAL SERVICES (ST. PETERSBURG) - FLD152764767
Attachments: FLD 152764767.pdf

FYI

From: Kothur, Bheem
Sent: Friday, March 19, 2010 2:25 PM
To: Dregne, James
Cc: Graves, Aprilia
Subject: FW: HOWCO ENVIRONMENTAL SERVICES (ST. PETERSBURG) - FLD152764767

FYI

From: Hornbrook, Frank
Sent: Friday, March 19, 2010 2:21 PM
To: Kothur, Bheem
Subject: HOWCO ENVIRONMENTAL SERVICES (ST. PETERSBURG) - FLD152764767

Mr. Kothur,

The above referenced facility has submitted an adequate financial assurance update in the amount of the approved 2010 cost estimates. Assuming no changes, the facility is in financial compliance until 3/1/11 when 2011 cost estimates are due.

Frank Hornbrook

Send Correspondence to:

Solid Waste Financial Coordinator
Florida Department Of Environmental Protection
2600 Blair Stone Rd. MS 4565
Tallahassee, Florida 32399-2400
Att: Frank Hornbrook, Environmental Specialist

Contact Information:

Phone: (850) 245-8745
Fax: (850) 245-8811
E-mail: Frank.Hornbrook@dep.state.fl.us

Please note: Florida has a very broad public records law. Most written communications to or from state officials are public records and may be made available to the public or media upon request. This e-mail communication, your reply, and future e-mails to my attention may therefore be subject to public disclosure.



Florida Department of Environmental Protection

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

March 19, 2010

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

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

Re: FLD 152764767 – HOWCO Environmental Services Waste Processing Facility

Dear Mr. Dillen:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. Synovus Bank letter of credit amendment dated January 28, 2010, increasing the credit amount of letter of credit number 296-01 to \$105,000, adequately covers the Department approved closing cost estimate dated February 18, 2010. Therefore, HOWCO Environmental Services Waste Processing Facility is in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, at this time.

If you have any questions, please contact me at (850) 245-8745.

Sincerely,

Frank Hornbrook
Environmental Specialist
Solid Waste Section

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

"More Protection, Less Process"

[HTTP://WWW.DEP.STATE.FL.US/WASTE/CATEGORIES/SWFR](http://www.dep.state.fl.us/waste/categories/swfr)

Printed on Recycled Paper

Honey, Kelly

From: Dregne, James
Sent: Wednesday, March 03, 2010 5:18 PM
To: Honey, Kelly
Subject: FW: Howco Environmental Services;FLD 152 764 767;Renewal Permit Application Reminder Letter

FYI

From: Kothur, Bheem
Sent: Wednesday, March 03, 2010 1:45 PM
To: 'Richard Dillen'
Cc: Tim Hagan; Dregne, James; Tripp, Anthony; Graves, Aprilia; Martin, Lee
Subject: RE: Howco Environmental Services;FLD 152 764 767;Renewal Permit Application Reminder Letter

Mr. Dillen,

If you all remember during last renewal process, we all agreed and issued a single permit after all the negotiations involved with all the parties. Therefore, in this renewal process, you are obligated to renew your combined (two in one) permit.

If there are no changes at the site and the process, you may simply apply UO, processing permit application, Part I and DEP Form 62-710.901(6), F.A.C. with all the signatures; and for Solid Waste, processing permit application DEP Form 62-701.900(4), F.A.C. with all the signatures.

Please make sure to indicate your cover letter that there are no other changes to these applications. Yes, you need to apply for both the permits and we will issue both the permit numbers this time in one permit. Example: 33721-HO-002 and 33721-SO-004; Fee is \$2000.00 and \$1,000.00;

Also, same procedures applies to Howco, Astor facility which is in Central District.

If you have any further questions, please call me or send me an e-mail.

Bheem

From: Richard Dillen [mailto:rdillen@howcousa.com]
Sent: Wednesday, March 03, 2010 1:06 PM
To: Kothur, Bheem
Cc: Tim Hagan; Dregne, James
Subject: RE: Howco Environmental Services;FLD 152 764 767;Renewal Permit Application Reminder Letter

Mr. Kothur,

In response to letter concerning the Permit Renewal we ask for some clarification.

It is HOWCO's understanding that the current Permit (33721-HO-001) allows for management of solid waste under the "Used Oil" regulations rather than "Solid Waste" regulations and therefore no separate Solid Waste Permit is necessary. HOWCO's management of various oily wastes is primarily focused on recycling and not disposal. Does HOWCO need to apply for both Used Oil and Solid Waste?

Richard Dillen
Q.A.O.
HOWCO Env. Services
(727)-437-4059



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 3, 2010

SENT VIA E-MAIL
thagan@howcousa.com

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

RE: Howco Environmental Services
EPA I.D. No. FLD 152 764 767
Permit Number: 33721-HO-001
Renewal Permit Application Reminder Letter

Dear Mr. Hagan:

Your permit for the referenced facility will expire on August 3, 2010. The renewal permit application is due 60 days prior to the expiration of your current permit. Therefore, the renewal permit application is due on or before June 3, 2010. A renewal Used Oil permit fee of \$2000.00 must be submitted along with the renewal permit application. For a renewal to process solid waste at the facility you must also submit a solid waste processing application and solid waste permit fee of \$1000.00 to the Solid Waste Section, Tallahassee.

Should you like to arrange a pre-application meeting or if you have any questions, please contact me at (850) 245-8781, or e-mail: bheem.kothur@dep.state.fl.us.

Sincerely,

Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/

cc: James Dregne, DEP/Tampa, james.dregne@dep.state.fl.us
Augusta Posner, OGC/Tallahassee, augusta.posner@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Richard Dillen, Howco/Tampa, RDILLEN@HOWCOUSA.com
Lee Martin, DEP/Tallahassee, lee.martin@dep.state.fl.us

Honey, Kelly

From: Dregne, James
Sent: Tuesday, February 23, 2010 12:27 PM
To: Honey, Kelly
Subject: FW: PCW letter
Attachments: PCW_2009scan0001.pdf

FYI

From: Richard Dillen [mailto:rdillen@howcousa.com]
Sent: Tuesday, February 23, 2010 11:31 AM
To: Graves, Aprilia
Cc: Dregne, James
Subject: PCW letter

Mrs. Graves,

Attached is the corrected letter concerning the management of PCW during calendar year 2009. HOWCO uses a standard letter and although the data is correct, the letter should have stated, "For calendar year 2009.....".
I apologize for any inconvenience.

Richard Dillen
Q.A.O.
HOWCO Environmental Services
(727)-437-4059



February 23, 2010

Used Oil Coordinator, MS4555
Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

To whom it may concern:

This letter is intended to respond to HOWCO Environmental Services' requirement to file an annual report on PCW activity by the company. The PCW is accumulated and processed at our St. Petersburg facility. Our process is thermal and therefore recovers the majority if not all product present in PCW streams collected and brought to our facility.

For calendar year 2009 HOWCO Environmental Services collected **24,307 gallons of PCW**. HOWCO recovered approximately **1,215 gallons of product** that was blended into our #5 fuel oil.

We trust that this letter will answer any questions regarding PCW activity by HOWCO Environmental Services. If we can be of further assistance please do not hesitate to contact us at (727) 437-4059.

Sincerely,

A handwritten signature in dark ink, appearing to read 'RDillen', is placed below the word 'Sincerely,'.

Richard Dillen
Quality Assurance Officer
HOWCO Environmental

Cc: Mr. Jim Dregne, FDEP-Tampa
File

Honey, Kelly

From: Dregne, James
Sent: Tuesday, February 10, 2009 5:35 PM
To: Honey, Kelly
Subject: FW: Howco Environmental Services, Closure Cost Estimates, Dated January 30, 2009

FYI

From: Kothur, Bheem
Sent: Tuesday, February 10, 2009 3:24 PM
To: 'RDILLEN@HOWCOUSA.COM'
Cc: Hornbrook, Frank; Dregne, James; Wick, Fred; Graves, Aprilia; White, John; Waters, Jeff T.
Subject: Howco Environmental Services, Closure Cost Estimates, Dated January 30, 2009

Hello Richard:

I have received your revised closure cost estimates for both the facilities, reviewed and approved. The submitted closure cost estimates are and accepted for the Year 2009.

1. Howco Environmental Services
843 43rd Street South
St. Petersburg, FL 33711

The approved amount \$99,829.00

2. Howco Environmental Services
24133 State Road 40
Astor, FL 32102

The approved amount \$23,753.00

Please contact Frank Hornbrook, FA coordinator on Solid Waste Section to comply with FA for the year 2009.

Rick,

If you need any further information, please call me or Frank Hornbrook or you may e-mail us.

Thanks.

Bheem R. Kothur, P.E., DEE
Professional Engineer III
DWM/BS&HW/HW Regulation Section
Florida Department of Environmental Protection
MS# 4560, 2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Tel: 850-245-8781, FAX: 850-245-8810
Email: Bheem.Kothur@dep.state.fl.us



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 24, 2008

Dept. Of Environmental Protection

APR 28 2008

Southwest District

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

Re: FLD 152 764 767 – HOWCO Environmental Services Waste Processing Facility

Dear Mr. Hagan:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. Synovus Bank of Tampa Bay letter of credit amendment dated April 18, 2008, increasing the credit amount of letter of credit number 296-01 to \$97,393.71, is in the amount of the Department approved closing cost estimate dated January 31, 2008. Therefore, HOWCO Environmental Services Waste Processing Facility is in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, at this time.

If you have any questions, please contact me at (850) 245-8740.

Sincerely,

Chad Fetrow
Environmental Specialist
Solid Waste Section

CWF

cc: Susan Pelz, DEP/TPA
James Dregne, DEP/TPA
Fred Wick, DEP/TLH
Bheem Kothur, DEP/TLH



Dept. Of Environmental Protection

MAR 10 2008

Southwest District

March 7, 2008

Department of Environmental Protection
Division of Waste Management
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Mr. Rick Neves:

This letter is intended to respond to HOWCO Environmental Services' requirement to file an annual report on PCW activity by the company. The PCW is accumulated and processed at our St. Petersburg facility. Our process is thermal and therefore recovers the majority if not all product present in PCW streams collected and brought to our facility.

For calendar year 2006 HOWCO Environmental Services collected **42,490 gallons of PCW**. HOWCO recovered approximately **2,100 gallons of product** that was blended into our #5 fuel oil.

We trust that this letter will answer any questions regarding PCW activity by HOWCO Environmental Services. If we can be of further assistance please do not hesitate to contact us at (727) 327-8467.

Sincerely,

A handwritten signature in black ink, appearing to read 'RD', is written over a horizontal line.

Richard Dillen
Quality Assurance Officer
HOWCO Environmental

Cc: Mr. Jim Dregne, FDEP-Tampa
File

Honey, Kelly

From: Dregne, James
Sent: Friday, February 29, 2008 9:08 PM
To: Honey, Kelly
Subject: FW: Annual Used Oil Report
Attachments: coverletter 2008.pdf; REGISTER 08.pdf; ANLRPT 08.pdf; CERT-INS 08.pdf

FYI

From: Neves, Richard
Sent: Thursday, February 28, 2008 11:21 AM
To: 'Richard Dillen'
Cc: 'Tim Hagan'; Dregne, James; Bolton Sebrena
Subject: RE: Annual Used Oil Report

Thank you for your email regarding the Used Oil Registration Renewal Forms for 2008-2009 (attached to this email).

As per your request, HOWCO's March 1, 2008 due date is hereby extended until April 4, 2008.

Please feel free to contact me if I can be of any further assistance.

Rick Neves
Environmental Specialist
Hazardous Waste Management Section (MS 4555)
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Phone: (850) 245-8755
Fax: (850) 245-8811
Web Page: http://www.dep.state.fl.us/waste/categories/used_oil/default.htm

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

From: Richard Dillen [mailto:rdillen@howcousa.com]
Sent: Thursday, February 28, 2008 11:14 AM
To: Neves, Richard
Cc: Tim Hagan; Dregne, James
Subject: Annual Used Oil Report

Rick,

HOWCO did not receive the Annual Used Oil Report package yet and requests an extension of the March 1st due date.

Once received, the forms will be returned to you as soon as possible.

Richard Dillen
HOWCO Env. Services
(727)-328-7403



February 16, 2009

Used Oil Coordinator, MS4555
Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

To whom it may concern:

This letter is intended to respond to HOWCO Environmental Services' requirement to file an annual report on PCW activity by the company. The PCW is accumulated and processed at our St. Petersburg facility. Our process is thermal and therefore recovers the majority if not all product present in PCW streams collected and brought to our facility.

For calendar year 2008 HOWCO Environmental Services collected **37,406 gallons of PCW**. HOWCO recovered approximately **1,870 gallons of product** that was blended into our #5 fuel oil.

We trust that this letter will answer any questions regarding PCW activity by HOWCO Environmental Services. If we can be of further assistance please do not hesitate to contact us at (727) 327-8467.

Sincerely,

A handwritten signature in dark ink, appearing to read 'D. Dillen', is written over a faint, circular official stamp.

Richard Dillen
Quality Assurance Officer
HOWCO Environmental

Dept. of Environmental Protection

FEB 19 2009

Southwest District

Cc: Mr. Jim Dregne, FDEP-Tampa
File

3701 Central Avenue - St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213

Operations: Tampa Bay - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467

A small, handwritten mark or signature in the bottom right corner of the page, possibly initials.

Thursby, Kim

From: Epost HWRS
Sent: Tuesday, July 10, 2007 1:05 PM
To: thagan@howcousa.com
Cc: Dregne, James; mayor@stpete.org; countycommissioners@co.pinellas.fl.us; heath_rauschenberger@fws.gov; maryann.poole@myfwc.com; raoul.clark@dep.state.fl.us; Wick, Fred; johnmjonespe@sbcglobal.net; Martin, Lee; Bahr, Tim; Kothur, Bheem; Baker, Bryan; Tripp, Anthony
Subject: HOWCO Environmental Services;FLD 152 764 767;Permit Number: 33721-HO-001
Attachments: 7-10-07 HOWCO Permit.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 10, 2007

SENT VIA EMAIL

thagan@howcousa.com

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

SUBJECT: HOWCO Environmental Services
Facility Permit Renewal
EPA I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Pinellas County

Dear Mr. Hagan:

Enclosed is Permit Number 33721-HO-001 issued to HOWCO Environmental Services pursuant to Section 403.815, Florida Statutes (F.S.), and Chapter 62-4, and Chapter 62-710, Florida Administrative Code (F.A.C.).

This permit is final and effective on the date filed with the Clerk of the Department. When the permit is final, any party to the permit has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice to Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by applicable filing fees with the appropriate District Court of Appeal.

The notice of Appeal must be filed within thirty (30) days from the date the final permit is issued. If you have any questions, please contact Bheem Kothur at (850) 245-8781 or via e-mail: bheem.kothur@dep.state.fl.us.

Sincerely,

Tim J. Bahr, Administrator
Hazardous Waste Regulation

TJB/bk
Enclosure

Mr. Timothy Hagan, President
July 9, 2007
Page Two

cc: Jim Dregne, DEP/Tampa, james.dregne@dep.state.fl.us
Mayor, City of St. Petersburg, mayor@stpete.org
Chair, Pinellas County Board of Commissioners, countycommissioners@co.pinellas.fl.us
Heath Rauschenberger, U. S. Fish and Wildlife Services, heath_rauschenberger@fws.gov
Mary Ann Poole, Florida Fish and Wildlife Conservation Commission,
maryann.poole@myfwc.com
Raoul Clarke, DEP/Tallahassee raoul.clark@dep.state.fl.us
Fred Wick, DEP/Tallahassee fred.wick@dep.state.fl.us
John Jones, Miramar, johnmjonespe@sbcglobal.net
Lee Martin, DEP/Tallahassee, lee.martin@dep.state.fl.us

FACT SHEET

July 9, 2007

HOWCO Environmental Services

St. Petersburg, Florida

EPA I.D. No: FLD 152 764 767

Permit No: 33721-HO-001

Used Oil Processing and Waste Handling Facility Permit Renewal Final

1. This facility has a permit to operate a Used Oil Processing Facility consisting of drum storage area, storage area and processing area. The facility has 21 above ground storage tanks with sufficient capacity to store and process approximately 360,000 gallons of used oil.
2. The Permittee has complied with the closure cost estimate and financial assurance requirements of the new Rule dated June 9, 2005. Financial Assurance Mechanism and annual closure cost estimate adjustment conditions are added to this permit renewal.
3. The final permit contains minor edits and clarifications.
4. There are no issues with this permit.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:

Hagan Holding Company
d/b/a Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

Attention:

Mr. Arthur Timothy Hagan, President

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Issue: July 10, 2007
Date of Expiration: August 3, 2010
County: Pinellas County
Lat./Long: 27°45'47"N / 82°41'32"W
Project: Operation of a Used Oil and Waste Material
Processing Facility

This permit renewal is issued under the provisions of Sections 403.707 and 403.769, Florida Statutes (F.S.), and Florida Administrative Code Chapters (F.A.C.) 62-4, 62-701, 62-710, 62-730, 62-740 and 40 Code of Federal Regulations (CFR) Part 279. The above named Permittee is hereby authorized to perform the work or operate the Facility shown on the application dated July 11, 2005 and as revised on January 9, 2006; and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof. The Used Oil and Waste Material Processing Facility ("Facility") is located on an approximately five acre parcel of land owned by Timco Real Estate, Inc., in Pinellas County at 843 43rd Street South, St. Petersburg, Florida. A diagram of the site layout is included as **Attachment A** of this permit. The Permittee is authorized to process and market used oil, oily wastewater, and petroleum contact water in the tanks and other ancillary equipment listed in **Attachment B** of this permit.

The Facility consists of 47 Aboveground Storage Tanks ("ASTs") inside secondary containment. This may be used to store or process used oil, petroleum contact water, oily wastewater and other non-hazardous wastewater. Presently, nine tanks are dedicated to used oil, one tank is dedicated to water/antifreeze, and one tank is dedicated to burner fuel; however, the contents of each tank may change from time-to-time based on market conditions, provided appropriate marking/placarding is provided in accordance with applicable law. The use and capacities of the ASTs and related appurtenances currently not in use at the Facility are listed in **Attachment B** of this permit.

OTHER ACTIVITIES

This permit authorizes the Permittee to operate a waste processing Facility for other petroleum non-hazardous solid wastes not constituting "used oil", subject to the conditions set forth in Part III. The Facility also manages petroleum contact water ("PCW") set forth in Part IV.

The following documents were used in preparation of this permit:

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

1. Permit Renewal Application dated July 11, 2005 and additional information submitted dated January 9, 2006 and December 1, 2006.
2. HOWCO Solid Waste Processing estimate document drafted in September 2006.
3. Used Oil Processing Facility Permit 92465-HO06-001, issued August 3, 2000.

This Renewal Permit replaces Permit #92465-HO06-001.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

TABLE OF CONTENTS

GENERAL CONDITIONS (PURSUANT TO CHAPTER 62-4, F.A.C.):	4
SPECIFIC CONDITIONS:	6
PART I – STANDARD REQUIREMENTS:	6
PART II – USED OIL PROCESSING REQUIREMENTS:	11
PART III – WASTE PROCESSING ACTIVITIES:	14
PART IV – PETROLEUM CONTACT WATER PROCESSING REQUIREMENTS:	15
PART V – TANKS AND CONTAINERS:	16
PART VI – CLOSURE REQUIREMENTS:	17
ATTACHMENT A – SITE LAYOUT: D-8-2 AREA LOCATION MAP	20
ATTACHMENT B – TANK TABLE	22

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

GENERAL CONDITIONS (PURSUANT TO CHAPTER 62-4, F.A.C.):

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 403.759, F.S. 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 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 acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest has 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, 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 and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (a). Have access to and copy any records that must be kept under 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 with Department rules.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

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 noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.
9. 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 revocation of this permit.
10. 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 proscribed by Sections 403.111 and 403.73, 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.
11. 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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
12. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-710.800, F.A.C., as applicable. The Permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
13. This permit or a copy thereof shall be kept at the work site of the permitted activity.
14. This permit also constitutes:
 - (a). Determination of Best Available Control Technology (BACT);
 - (b). Determination of Prevention of Significant Deterioration (PSD);
 - (c). Certification of compliance with state Water Quality Standards (Section 401, PL 92-500); and
 - (d). Compliance with New Source Performance Standards.
15. The Permittee shall comply with the following:

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

- (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 this 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; and
 - (c). Records of monitoring information shall include:
 1. The date, exact places, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The date(s) analyses were performed;
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used; and
 6. The results of such analyses.
16. When requested by the Department, the Permittee shall within a reasonable time furnish any information required by law that 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.

SPECIFIC CONDITIONS

PART I – STANDARD REQUIREMENTS

1. All documents submitted pursuant to the conditions of this permit shall be accompanied by a cover letter stating: the name and date of the document submitted; the EPA I.D. number of the Facility; the number(s) of the Specific Condition(s) affected; the permit number and project name of the permit involved. Submittals in response to these conditions shall be submitted as follows:

Copies of all documents must be submitted to FDEP in accordance with Rule 62-730.225(2)

- (a). One hard and one electronic copy shall be sent to:

Environmental Administrator
Hazardous Waste Management Section
MS 4560
Bureau of Solid and Hazardous Waste

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

Florida Department of Environmental Protection
2600 Blair Stone Road,
Tallahassee, Florida 32399-2400

(b). One hard and one electronic copy shall be sent to:

Department of Environmental Protection
Hazardous Waste Section Manager
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637

(c). The Permittee shall submit one copy of the cover letter for any application to renew and or/modify this permit along with the appropriate fee to:

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

The Permittee shall submit the full renewal/modification application as instructed in this Specific Condition

2. Before transferring ownership or operation of the Facility during its operating life, the Permittee must notify the new owner or operator in writing of the requirements of 40 CFR Part 279 and Rule 62-710, F.A.C. The Permittee shall also submit an application for transfer of this permit on DEP Form 62-1.201(1) accompanied with an appropriate application fee. This permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C. The Permittee shall be liable for any noncompliance with the permitted activity until the transfer is approved by the Department.
3. The Department may modify, revoke, reissue, or terminate for cause, this permit in accordance with the provisions of Section 403.087(7), F.S., and Rules 62-4.080, 62-4.100, or 62-710.800, F.A.C. The filing of a request for a permit modification, revocation and re-issuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee may submit any subsequent revisions to the Department for approval. These revisions shall meet the requirements of F.A.C., Rules 62-4.050 and 62-710.800(6), and must be accompanied with an appropriate application fee.
4. Prior to 60 days before the expiration of this permit, the Permittee shall submit a complete application for renewal of the permit on DEP form 62-710.901(6) in accordance with Rules 62-710.800(4) and 62-4.090, F.A.C., and in a manner prescribed by the Department, unless the Facility is to be closed prior to the expiration date of this permit in accordance with the requirements of Rule 62-710.800(5), F.A.C.
5. The Permittee shall comply with all requirements of 40 CFR Part 279 and Chapters 62-4, 62-701, 62-710 and 62-740, F.A.C., and all other applicable requirements of Department Rules.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

6. By acceptance of this permit, the Permittee certifies that he has read and understands the obligations imposed by the Specific and General Conditions contained herein, including the date of permit expiration and renewal deadlines. It is a violation of this permit to fail to comply with all conditions and deadlines.
7. The Permittee shall operate, modify, or close the Facility only pursuant to a permit issued by the Department in accordance with Chapter 62-710 F.A.C. The Permittee shall submit any substantial revisions in the permitted operation or design of the Facility to the Department for approval prior to implementation.
8. Before closing or making any substantial modifications to the Facility, the Permittee shall submit to the Department the Used Oil Processing Facility Permit Modification Request, pursuant to Rules 62-710.800(3) and 62-4.050(6) and (7), F.A.C.
 - (a). Pursuant to Rules 62-710.800(3) and 62-4.050(6) and (7), F.A.C., a substantial modification means a modification that is reasonably expected to lead to substantially different environmental impacts that requires a detailed review. For purposes of this subsection, an increase in storage capacity of the Facility by 25% or 25,000 gallons, whichever is less, is considered a substantial modification. Permit application fee for a substantial permit modification is listed in 62-710.800(4), F.A.C.
 - (b). Pursuant to Rules 62-4.050(4) and 62-710.800(3), F.A.C., a minor modification means a modification that does not require substantial technical evaluation by the Department, may not require a new site inspection by the Department, and will not lead to substantially different environmental impacts or will lessen the impacts of the original permit. For purposes of this subsection, replacement of existing tanks with new tanks is considered a minor modification.
 - (c). Pursuant to Rule 62-710.800(3), F.A.C., changes at the Facility which involve routine maintenance, such as repair of equipment, replacement of equipment with similar equipment, aesthetic changes, or minor operational changes are not considered modifications, do not have to be reported to the Department, and require no permit fee. The Permittee should contact the Department if there are questions as to whether a change would be considered routine maintenance.
9. All requests for permit modifications shall be certified by the owner and operator and signed, sealed, and certified by a Professional Engineer registered in the State of Florida, in accordance with Chapter 471, F.S. All submittals incorporating interpretation of geological data shall be signed and sealed by a Professional Geologist registered in the State of Florida in accordance with Chapter 492, F.S.
10. The Permittee shall submit a revised "Part I" of the Application Form for a Used Oil Processing Facility Permit to the Department within 30 days of any changes in the information stated in Part I.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

11. All Facility operations personnel involved in used oil or PCW activities must successfully complete the training program identified in the Training Plan (Attachment 9) of the permit application dated July 11, 2005 as revised on January 9, 2006, once every 12 months. The training plan must be reviewed and updated by Facility personnel at least annually. Verification of this training must be kept with the personnel training records and maintained on-site or at the Permittee's corporate headquarters in St. Petersburg.
12. Except as permitted under Rule 62-701.320(15), personnel involved in solid waste activities shall not work unsupervised until training has been completed.
13. The Permittee shall maintain an updated list of personnel handling used oil and their respective job titles at the site or at the Permittee's corporate headquarters in St. Petersburg.
14. The Permittee must comply with General Facility Standards pursuant to 40 CFR 279.52 and Rule 62-710.300(1)(e), F.A.C., as follows:
 - (a). Maintenance and operation of the Facility: The Facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of oily waste, oily wastewater, PCW, used oil, sludges, residues, or constituents to air, soil, or surface water which could threaten human health or the environment. [40 CFR 279.52(a)(1)]
 - (b). Required equipment [40 CFR 279.52(a)(2)]: The Permittee shall equip and maintain the Facility with the following:
 1. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to Facility personnel as described in Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006;
 2. A device, such as a telephone (at the on-site Facility operations office) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams as described in Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006;
 3. Portable fire extinguishers and associated equipment as described and depicted in Attachment 6 and Appendix 1 (drawing D-4-1) of the permit application dated, July 11, 2005, and as revised on January 9, 2006; and
 4. Water at volume and pressure as supplied by Pinellas County Utilities.
 - (c). Testing and maintenance of equipment: All Facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. [40 CFR 279.52(a)(3)]
 - (d). Access to communications or alarm systems: Whenever used oil is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee. If there is ever just one employee on the

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

premises while the Facility is operating, the employee must have immediate access to a device capable of summoning external emergency assistance. [40 CFR 279.52(a)(4)]

- (e). Required aisle space: The Permittee must maintain aisle space sufficient to inspect drums and read labels.
 - (f). Arrangements with local authorities: The Permittee shall maintain arrangements with local authorities, listed in Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006 to familiarize police, fire departments, local hospitals, and emergency response teams with the layout of the Facility, properties of used oil handled at the Facility and associated hazards, places where Facility personnel would normally be working, entrances to roads inside the Facility and possible evacuation routes. [40 CFR 279.52(a)(6)]
15. The Permittee shall comply with the "Specific Spill Containment Procedures" of Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006. In the event of a spill or other emergency:
- (a). The Permittee shall immediately carry out the provisions of the "Contingency Plan", Attachment 6, of the permit application dated July 11, 2005 as revised on January 9, 2006 and follow the emergency procedures described by 40 CFR 279.52 (b) (6), whenever there is a fire, explosion, or release of used oil, oily waste, oily wastewater, PCW, residues, sludges or constituents which threatens or could threaten human health or the environment. The Permittee shall give proper notification if an emergency situation arises, and within 15 days must submit to the Department a written report which includes all the information required in 40 CFR 279.52 (b) (6);
 - (b). Within seven days of meeting any criteria listed in 40 CFR 279.52 (b) (4), the Permittee shall notify the Department of its intent to revise the plan and provide an estimated schedule. Any other changes to the plan must be submitted to the Department within seven days of the change in the plan. All amended plans must be distributed to the appropriate agencies;
 - (c). When the contingency plan is implemented, the Permittee shall call the Department of Environmental Protection's 24 hour emergency telephone number which is (850) 413-9911 or (800) 320-0519 or, during normal business hours, the DEP Southwest District Office may be contacted at (813) 632-7600; and
 - (d). A copy of the contingency plan and all revisions to the plan must be maintained at the Facility. [40 CFR 279.52(b)(3)]
16. The Permittee may claim confidential any information required to be submitted by this permit in accordance with Section 403.111 and 403.73, F.S.
17. The conditions in this permit shall take precedence over the permit application documents where there are differences between these documents and the permit conditions.
18. This permit does not authorize the Permittee to accept or store any hazardous waste at this Facility. In the event that Permittee receives a shipment that is refused due to failure to meet pre-screening requirements, the Permittee must completely comply in a timely manner with the

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

provision of Attachment 3 of the permit application dated July 11, 2005, in order not be subject to permitting or regulation as a hazardous waste storage, treatment or disposal facility.

PART II – USED OIL PROCESSING REQUIREMENTS

1. The Permittee, pursuant to 40 CFR 279.55, shall follow the procedures described in Attachment 2 of the permit application dated July 11, 2005 as revised on January 9, 2006 and the following:

- (a). The Permittee shall sample and analyze each incoming shipment for the parameters listed in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006; and
- (b). Any incoming containers of used oil which fail the analysis required by this condition shall be rejected by the Facility (unless exempt under applicable law). The Permittee shall maintain documentation in the Facility operating record of any shipment of used oil not exempt under applicable law and suspected to be mixed with hazardous waste and shall manage such waste in accordance with the provisions of Paragraph 18 of Part I, above.

Prior to shipment off-site, the Permittee shall sample and analyze one tank (i.e. batch) of processed used oil once every two weeks for the constituents/properties of concern. The analysis shall be for the parameters listed in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006 to determine whether the used oil is on-specification or off-specification. This condition is not required if the outgoing shipment is sold to another used oil processor who will make the on or off specification determination.

2. Pursuant to 40 CFR 279.56 (Tracking) and Rule 62-710.510(1), F.A.C., the Permittee must comply with the following tracking requirements.
 - (a). Acceptance: The Permittee shall 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 or electronic media. Records for each shipment must include the following information:
 - (1). The name, address and EPA identification number (if applicable) of the transporter who delivered the used oil to the processor/re-refiner, oil-burner or disposal Facility;
 - (2). The name, address and EPA identification number (if applicable) of the generator or processor/re-refinery from whom the used oil was received for processing/re-refining; and
 - (3). The quantities of used oil accepted and date of acceptance.
 - (b). Delivery: The Permittee shall 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 or electronic media. Records for each shipment must include the following information:

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

- (1). The name, address and EPA identification number (if applicable) of the transporter delivering the used oil to the receiving facility;
 - (2). The name, address and EPA identification number (if applicable) of the oil-burner, processor/re-refinery or disposal facility receiving the shipment;
 - (3). The quantities of used oil shipped and date of shipment; and
 - (4). The laboratory analytical number.
- (c). Rejected shipments: The Permittee shall maintain documentation of any shipment of used oil that is refused due to failure to meet pre-screening requirements set forth in Attachment 3 of the permit application dated July 11, 2005.
3. The Permittee, pursuant to 40 CFR 279.57, must keep a written or electronic operating record for the current year at the Facility. Previous years' records can be kept either at the Facility or at the Permittee's corporate headquarters in St. Petersburg, and maintained for three years or until closure of the Facility (whichever comes first). The records shall include the following information:
 - (a). Records and results of used oil analyses performed as described in the analysis plan in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006 and as required under 40 CFR 279.55;
 - (b). Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 279.52(b); and
 - (c). All records required by Condition 2 of this Part.
4. The Permittee shall maintain as part of the operating record of the Facility the inspection records and release detection monitoring records required in Rule 62-761.710, F.A.C., for aboveground storage tanks, integral piping, and process tanks. Reports of releases greater than 25 gallons to pervious surfaces (i.e. outside containment) shall include the amount, time of the release, time of the response and a description of the response. The Permittee shall inform the Department of any release in accordance with applicable law.
5. Pursuant to Rule 62-710.300(3), F.A.C., used oil storage and process tanks must meet the requirements of 40 C.F.R. Part 279.54 and Chapter 62-762, F.A.C., Above Ground Storage Tank Systems, as applicable.
6. The Permittee shall manage residues generated from the storage and processing of used oil in accordance with 40 CFR 279.10 (e) and Attachment 4 of the permit application dated July 11, 2005 as revised on January 9, 2006. The Permittee shall analyze outgoing sludge/residues annually.
7. The Permittee shall maintain, in good standing, the financial assurance mechanisms established to demonstrate proof of financial assurance. Support documentation and required adjustments shall be submitted within the time frames specified in Rule 62-701.630, F.A.C. as adopted by reference

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

in Rule 62-710.800(6), F.A.C. All submittals in response to this specific condition shall be sent to:

Florida Department of Environmental Protection
Financial Coordinator - Solid Waste Section
Twin Towers Office Building
2600 Blair Stone Road, MS 4565
Tallahassee, Florida 32399-2400

The Permittee shall annually adjust the closing cost estimate for inflation using Form 62-710.901(7). Adjustments shall be made in accordance with Rule 62-710.800(6), F.A.C. The Permittee shall submit the adjusted cost estimate between January 1 and March 1. All submittals in response to this specific condition shall be sent to the addresses on the cost estimate form.

8. The Permittee shall annually register its used oil handling activities with the Department on DEP Form 62-710.901(1) by March 1 of each year and shall display the validated registration form and identification number in a prominent place at the Facility location [Rule 62-710.500(4), F.A.C.].
9. No later than March 1 of each year, the Permittee shall submit an annual report covering used oil processing Facility activities conducted during the previous calendar year to the Department on DEP Form 62-710.901(3) in accordance with Rule 62-710.510(5), F.A.C. The report shall summarize the records kept pursuant to Rule 62-710.510, F.A.C. The records described in this paragraph shall include:
 - (a). The EPA identification number, name, and address of the processor or re-refiner;
 - (b). The calendar year covered by the report; and
 - (c). The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed.

PART III – WASTE PROCESSING ACTIVITIES

1. The Permittee may accept petroleum contaminated non-hazardous solid wastes including without limitation those generated from petroleum contaminated soils, sludges, debris, Personal Protection Equipment (PPE) or other petroleum non-hazardous waste streams. Such wastes not containing removable used oil can be sent to the Facility for bulking and/or sent directly to a permitted Solid Waste Disposal facility. Permittee shall bulk and/or process such waste for acceptance at permitted solid waste disposal or processing facilities.
 - (a). Permittee shall receive all wastes delivered to the Facility for solidification and processing in drums, roll-offs, and/or vacuum trucks. All drums and roll-offs will be temporarily stored on the solid waste pad. Vacuum truck waste will be off-loaded into treatment tank #111 or cone bottom tank #110. Further processing shall be in accordance with Attachment 4.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

- (b). Permittee shall analyze all waste in accordance with the Analysis Plan in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006. Only non-hazardous waste may be processed. Waste that is characterized as being hazardous shall be properly transported to a facility permitted to accept hazardous waste, in accordance with the provisions of Paragraph 18 of Part I.
- (c). The amount of waste at the Facility shall not exceed 120 tons of solids in drums and roll off containers, plus 22,000 gallons of liquids in drums (not including used oil filters in drums and containers).
- (d). Permittee shall perform Solid Waste Processing as follows:
 - (1). A maximum of 20% (40,000 gallons) of the solid waste accepted at the facility annually can be disposed of with little or no processing to a permitted solid waste landfill. Solid waste qualifying for this disposal option includes petroleum contaminated soils, petroleum contaminated debris, and drums of grease and asphaltic material.
 - (2). A maximum of 80% (200,000 gallons) of solid waste accepted at the facility annually must be processed for oil reclamation and water recovery. The solids remaining following processing must go for energy recovery.
 - (3). Waste water treatment sludges generated at the facility will not be counted towards the facility annual solid waste accepted total. It is a solid waste generated at the facility.

PART IV – PETROLEUM CONTACT WATER PROCESSING REQUIREMENTS

- 1. The Permittee shall ship or accept petroleum contact water (PCW) only by using a transporter who is a registered hazardous waste transporter in compliance with Rule 62-730.170, F.A.C., or who has received a DEP/EPA ID number by notifying the Department on EPA Form 8700-12 of its intent to transport PCW. [62-740.200(2), F.A.C.]
- 2. The Permittee shall store PCW only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored. PCW received into the Facility may be commingled and stored in Facility tanks with other petroleum- or used oil-contaminated water for processing and recovery in accordance with Attachment 2 of the permit application.
- 3. If a container holding PCW is not in good condition (e.g. rusting, bulging) or begins to leak, the Permittee shall either over pack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]
- 4. The Permittee shall store PCW in tanks registered under the requirements of Rule 62-761, F.A.C. or in containers or tanks that do not require registration but meet the requirements of Rule 62-740.100(2), F.A.C. [62-740.300(2)(a) and (b), F.A.C.]
- 5. The Permittee shall test and manage all waste residuals in accordance with the requirements of specific condition 6 of Part II.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

6. The Permittee shall maintain the following records for a minimum of three years. [62-740.300(2)(c), F.A.C.]
 - (a). For each shipment of PCW received:
 1. Name and address of the PCW producer;
 2. Name and address of the PCW transporter;
 3. Date of receipt of the PCW shipment;
 4. Volume of PCW received;
 5. A copy of the shipping paper used for shipment of the PCW; and
 6. Have on file written assurances from the producer that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW. [62-740.300(4), F.A.C.]
 - (b). Records to demonstrate that, under normal operating practices, the Facility recovers product from PCW as described in Attachment 2 of the permit application dated July 11, 2005 and as revised on January 9, 2006. [62-740.300(3), F.A.C.]
7. The Permittee shall submit an annual report covering petroleum contact water (PCW) activities for the previous year by March 1 of each year. The report shall include:
 - (a). The total quantity of PCW received during the previous calendar year; and
 - (b). An estimate of the total quantity of product recovered from the PCW as described in Attachment 2 to the permit application dated July 11, 2005 and as revised on January 9, 2006 and pursuant to 62-740.300(5), F.A.C.

PART V – TANKS AND CONTAINERS

“Tank system”, for the purpose of Part V of this permit, is defined as the storage tank(s), appurtenant equipment and secondary containment structures comprising the Permittee’s Facility.

1. The Permittee shall prevent the release of PCW, used oil, oily waste or oily wastewater, residues, sludges and constituents to the environment. The secondary containment system shall be maintained in accordance with the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:
 - (a). All new components shall have secondary containment as required by 40 CFR 279.54 and Rule 62-761, F.A.C. prior to being put into service; and
 - (b). The secondary containment system shall meet the requirements of 40 CFR 279.54 and Rule 62-761, F.A.C.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

2. The Permittee shall, in the event of a release:
 - (a). Stop the release;
 - (b). Contain the release;
 - (c). Clean up and manage properly the released waste and other materials; and
 - (d). If necessary, repair or replace any leaking storage containers or tanks prior to returning them to service. [40 CFR 279.54(g)]
3. The Permittee shall, as part of the general operating requirements:
 - (a). Not place PCW, used oil, other wastes, or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail;
 - (b). Use appropriate controls and practices to prevent spills and overflows;
 - (c). Follow the Operating Procedures described in Attachment 2 of the permit application dated July 11, 2005 as revised on January 9, 2006; and
 - (d). Comply with the requirements of 40 CFR 279.54(g) if a leak or spill occurs.
4. The Permittee shall label or mark all above ground tanks and containers used to store or process used oil, with the words "Used Oil". [40 CFR 279.54(f)]
5. The Permittee shall store used oil only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored.
6. If a container holding used oil is not in good condition (e.g. rusting, bulging) or begins to leak, the Permittee shall either over-pack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]
7. The Permittee shall inspect all regulated tank systems in accordance with procedures presented in Attachment 7 of the permit application dated July 11, 2005 as revised on January 9, 2006.
8. Spilled or leaked waste must be removed from the secondary containment areas within three days of discovery [Rule 62-761.820(1)(d), F.A.C.]. Accumulated precipitation must be removed from the secondary containment areas within one week after a rainfall event [Rule 62-761.700(3)(a), F.A.C.]. Removed materials shall be managed in accordance with Attachment 2 of the permit application dated July 11, 2005 as revised on January 9, 2006.
9. The Permittee shall keep containers closed except when adding or removing waste.

PART VI – CLOSURE REQUIREMENTS

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

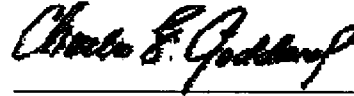
1. The Permittee shall close the Facility in compliance with 40 CFR 279.54(h), 62-710.800(5), F.A.C. and the closure plan found in Attachment 8 of the application dated July 11, 2005 as revised on January 9, 2006.
2. The Permittee shall maintain an approved written closure plan and it must demonstrate how the Facility will be closed in accordance with Attachment 8 of the permit application dated July 11, 2005 as revised on January 9, 2006.
 - (a). The closure plan, as described in Attachment 8, "Closure Plan" of the application dated July 11, 2005 as revised on January 9, 2006, and associated cost estimates shall be updated whenever significant operational changes occur or design changes are made.
 - (b). The closure plan shall be maintained with records required under Rule 62-710.510, F.A.C.
 - (c). The Permittee shall submit an updated and detailed closure plan to the Department at least 60 days prior to the scheduled date of closing the Facility.
 - (d). Within 30 days after closing the Facility, the Permittee shall submit a certification of closure completion to the Department that demonstrates that the Facility was closed in substantial compliance with the approved closure plan.
3. Within 90 days of determining that the Facility cannot be clean closed under this permit, the Permittee shall submit a permit application to close the tank system(s) and perform postclosure care in accordance with Chapter 62-770, F.A.C.
4. Containers: Permittees who store used oil in containers must, pursuant to closure requirements of 40 CFR 279.54(h), comply with the following requirements:
 - (a). At closure, containers holding used oils or residues of used oil must be removed from the site; and
 - (b). The Permittee must remove or decontaminate used oil residues, contaminated containment system components, contaminated soils, and structures or equipment contaminated with used oil, and manage them as hazardous waste unless the materials are not hazardous waste as defined in 40 CFR 261 or determined, pursuant to 40 CFR 261.11.
5. Solid Waste: All solid waste will be removed from the site and recycled or disposed in accordance with the requirements of Chapter 62-701.710(6).
6. At closure, containers, drums, and disposal quantities are as identified in HOWCO's letter dated December 1, 2006 and DEP approval letter dated December 22, 2006.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

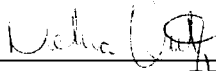
Issued July 10, 2007

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Charles F. Goddard, Chief
Bureau of Solid and Hazardous Waste

Filing and Acknowledgment
Filed on this date, pursuant to
Section 120.52, Florida Statutes,
with the designated Clerk, receipt
of which is acknowledged.



DEPUTY CLERK

July 9, 2007

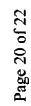
DATE

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

ATTACHMENT A – SITE LAYOUTS

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010



Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

ATTACHMENT B – TANK TABLES

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

HOWCO
Used Oil Permit Application

Revision 2
January 9, 2006

Table 1
Processing Tanks - Containment #1

Tank Number	Capacity (gallons)	Product
100	30300	Used oil treatment
101	28800	Used oil treatment
130	7950	Oil receiving
131	3950	Oil receiving
132	3950	Oil receiving
133	3950	Oil receiving
134	3950	Oil receiving
135	5000	Separated oil
136	10000	Light ends, condensate
137	10570	Light ends
170	11150	Burner fuel oil
120	13550	Used oil, water soluble oil, antifreeze or wastewater
121	28900	Unprocessed oil
122	29730	Processed oil
123	29730	Processed oil
124	29730	Processed oil
125	19210	Processed oil
126	20820	Processed oil
127	13470	Processed oil
128R1	13470	Receiving oil
129	23460	Processed oil

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

Containment area 4 has no tanks, and is used for the storage of Solid Waste

Containment area 2 and 3 are used for water treatment only

Table 2
Sludge Separation Area - Containment #5

Tank Number	Capacity (gallons)	Product
108	9980	TWPP Sludge
109	3225	Oil filter crusher
110	6415	Cone bottom
111	19380	Oily solids batch treatment



May 14, 2007

Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Tampa, FL 33637-0926

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

MAY 15 2007

SOUTHWEST DISTRICT
TAMPA

Mr. James Dregne
Ms. Susan Pelz;

This letter is intended to notify the Department of HOWCO's change to its EMERGENCY COORDINATOR INFORMATION Plan as part of the Used Oil Permit Application submitted to the Department July 11, 2005 and updated January 9, 2006. Please amend the name of the Recycling Facility Emergency Coordinator (Primary PIC) to read Lee Morris. Lee's Cell Phone # remains the same as the submittal, 727-543-5429. This information can be found in "Attachment 6, Spill Prevention and Emergency Preparedness" page 15 titled "Emergency Coordinator (PIC) Information.

If there are any questions please do not hesitate to contact us at (727) 327-8467.

Sincerely,

Michael Wolfe
Vice President Sales and Business Alliances
HOWCO Environmental Services

Cc; Mr. Bheem Kothur
Mr. Rick Neves

AP 5/23



Dept. of Environmental
Protection

FEB 27 2007

Southwest District

February 21, 2007

Department of Environmental Protection
Division of Waste Management
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Mr. Rick Neves:

This letter is intended to respond to HOWCO Environmental Services' requirement to file an annual report on PCW activity by the company. The PCW is accumulated and processed at our St. Petersburg facility. Our process is thermal and therefore recovers the majority if not all product present in PCW streams collected and brought to our facility.

For calendar year 2006 HOWCO Environmental Services collected **72,845 gallons of PCW**. HOWCO recovered approximately **3,600 gallons of product** that was blended into our #5 fuel oil.

We trust that this letter will answer any questions regarding PCW activity by HOWCO Environmental Services. If we can be of further assistance please do not hesitate to contact us at (727) 327-8467.

Sincerely,

Richard Dillen
Quality Assurance Officer
HOWCO Environmental

Cc: Mr. Jim Dregne
File



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 6, 2007

Dept. of Environmental
Protection

FEB 09 2007

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

Southwest District

Re: WACS 00047469 – HOWCO Environmental Services Waste Processing Facility

Dear Mr. Hagan:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. Synovus Bank of Tampa Bay (fka United Bank & Trust Company) letter of credit amendment dated January 10, 2007, increasing the credit amount of letter of credit number 296-01 to \$94,557, adequately covers the Department approved closing cost estimate dated December 1, 2006. Therefore, HOWCO Environmental Services Waste Processing Facility is in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, at this time.

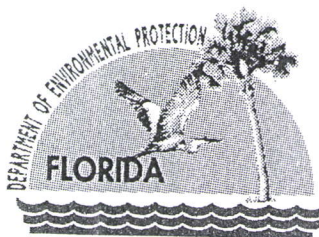
If you have any questions, please contact me at (850) 245-8740.

Sincerely,

Chad Fetrow
Environmental Specialist
Solid Waste Section

CWF

cc: Susan Pelz, DEP/TPA
James Dregne, DEP/TPA
Fred Wick, DEP/TLH
Bheem Kothur, DEP/TLH



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

December 22, 2006

CERTIFIED – RETURN RECEIPT
7002 2410 0003 9935 2937

Mr. Timothy Hagan, President
Hagan Holding Company
HOWCO Environmental Services
3701 Central Ave.
St. Petersburg, FL 33713

Subject: Closure Cost Estimate Approval
HOWCO Environmental Services, St. Petersburg Facility
EPA I.D. FLD 152 764 767; Permit No. 33721-HO-001

Dear Mr. Hagan:

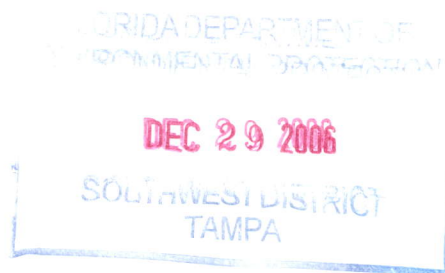
The Florida Department of Environmental Protection (Department) has received your facility closure cost estimate submittals dated December 1, 2006. The Department has the following Comments and Recommendations:

HOWCO submitted cost estimates, quotes, rates, and quantities provided by Monarch Environmental Services in a letter dated November 10, 2006, and by Standard Demolition Corporation in a letter dated October 13, 2006. The Department accepts their quotes. However, a credit of \$10,000.00 or \$5000.00 is not guaranteed for the steel according to Standard Demolition Corporation letter dated December 19, 2006, because of future uncertainty. Therefore, HOWCO's approved closure cost estimates for the St. Petersburg facility are \$94,557.00 instead of \$84,557.00. The Department will incorporate the disposal quantities provided in HOWCO's estimate as permit conditions in the Draft permit.

As soon as you receive this letter, please contact Chad Fetrow at (850) 245-8740 to comply and provide Financial Assurance for the St. Petersburg facility no later than January 26, 2007.

"More Protection, Less Process"

Printed on recycled paper.




Handwritten signature and date 12/29

Mr. Timothy Hagan, President
December 22, 2006
Page Two

If you have any questions, please contact me at (850) 245-8781.

Sincerely,

 12/22/06
Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp

cc: Jim Dregne, DEP/Tampa
Steve Morgan, DEP/Tampa
Chris McGuire, OGC/Tallahassee
Augusta Posner, OGC/Tallahassee
Raoul Clarke, DEP/Tallahassee
Fred Wick, DEP/Tallahassee
Chad Fetrow, DEP/Tallahassee
Mike Wolfe, HOWCO/St. Petersburg
John Jones, TES/Miami
Mike Petrovich, HG&S/Tallahassee



October 12, 2006

Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
OCT 13 2006
SOUTHWEST DISTRICT
TAMPA

Mr. Bheem Kathur
Mr. Doug Outlaw

Re: Addendum of Notice of Deficiency
Astor Facility
Permit Number 27221-HO-003

HOWCO has reviewed the Department's September 29, 2006 letter and the calculations and resulting cost estimates the Department provides therein. HOWCO believes that the numbers it has furnished as the basis for its closure cost estimates are closer to the actual costs in the event the HOWCO St Petersburg facility were to close. As we discussed by telephone, HOWCO is working with other third party contractors to develop additional cost estimates. HOWCO will provide these cost estimates to the Department for review and comparison to the Department's projected cost estimates. This will be done as quickly as possible with the hope that the Department and HOWCO can mutually agree on the appropriate closure cost estimate for the facility.

Thank you for your assistance and cooperation regarding this matter. We look forward to working with the Department on its resolution.

Sincerely

Michael Wolfe

cc: James Dregne, FDEP
Al Gephart, FDEP
Chris McGuire, FDEP
Mike P. Petrovich, Hopping Green & Sams, P.A.

De
10/13



Dept. of Environmental
Protection

AUG 02 2006

Southwest District

July 31, 2006

Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Tampa, FL 33637-0926

Mr. James Dregne
Mr. Al Gephart
Ms. Susan Pelz;

This letter is intended to notify the Department of HOWCO's change to its Contingency Plan to go from use of a public address system or loud speaker system to several bullhorns strategically located in the management office, the lab and one in the plant. We did not believe this system would be viewed as a significant change and has the positive benefit of being a wireless loud speaker system as opposed to a wired loud speaker system. We believe that this system will adequately and appropriately address any issues which might have to be conveyed to the public or plant personnel in the unlikely event of an emergency.

HOWCO will notify all parties holding a copy of the Contingency Plan of this change.

If there are any questions please do not hesitate to contact us at (727) 327-8467.

Sincerely,

Michael Wolfe
Vice President Sales and Business Alliances
HOWCO Environmental Services

Gephart, Albert

From: Kothur, Bheem
Sent: Thursday, June 22, 2006 9:18 AM
To: White, John; Prusty, Rabin; Putcha, Subra
Cc: Bradner, James; Gephart, Albert; Burson, Lu; Kraemer, Janine
Subject: RE: Electronic Manifesting

Hello John: Thanks for quick response. However, these issues belong to Saint Petersburg UO Facility and the Facility Owner likes to have similar conditions into this permit like Astor UO facility.

Subra, please review John White comments and address as appropriate in the Saint Petersburg Permit whenever you are drafting the permit and in the mean time you may response to their request after your review is complete.

Bheem

From: White, John
Sent: Thursday, June 22, 2006 8:53 AM
To: Kothur, Bheem; Prusty, Rabin; Putcha, Subra
Cc: Bradner, James; Gephart, Albert; Burson, Lu; Kraemer, Janine
Subject: RE: Electronic Manifesting
Importance: High

I do not have any issues with the plan; however, I do have the following comments:

The proposed "ATTACHMENT 5; TRACKING PLAN"

Product Collection

When the oil product, antifreeze, oil filters, or contaminated water is collected at the generator's facility, a copy of a non-hazardous waste manifest is provided to the generator. The non-hazardous manifest includes the generator's name, address, EPA ID number (if applicable), the quantity of used oil product or other oil related wastes accepted, and date of acceptance, and the name, address and EPA ID number of the transporter. A copy is kept at the Corporate Office or an offsite storage facility for a minimum of three years[jw1] . The driver will also note on the manifest that the used oil was tested for halogens prior to collection.

Also, equipment must be made available to the inspectors to review, print, or save electronic copies (for example saving records to a USB thumb-drive provided by inspector) of manifests during an inspection.

Thank You

John White

From: Kothur, Bheem
Sent: Thursday, June 22, 2006 7:49 AM
To: White, John; Prusty, Rabin; Putcha, Subra
Cc: Bradner, James; Gephart, Albert
Subject: FW: Electronic Manifesting

Hello John: Please review the attached submittal and provide your comments if you have any problems with their request? Thanks.

6/22/2006

Bheem

From: Mike Wolfe [mailto:mikewolfe@howcousa.com]
Sent: Wednesday, June 21, 2006 2:46 PM
To: Neves, Richard; Outlaw, Douglas; Kothur, Bheem; Putcha, Subra
Cc: Dregne, James; Gephart, Albert; Pelz, Susan; steven.morgan@dep.state.fl.us
Subject: Electronic Manifesting

While it is acceptable for a COPY to be maintained at the Corporate Office, 40 CFR 279.56 requires the manifest to be maintained at the Used Oil Processing Facility.

6/22/2006

Gephart, Albert

From: Kothur, Bheem
Sent: Wednesday, June 21, 2006 4:10 PM
To: Kothur, Bheem; Putcha, Subra; Outlaw, Douglas; Gephart, Albert
Cc: Posner, Augusta; Simmons, Juliette
Subject: RE: Howco's, Saint Petersburg; UO Closure Cost Estimates Submitted By Fax on June 16, 2006

To File: John Jones called and asked about their cost estimates and what is wrong with the estimates? I said they are appears to be too-low and I repeated the same answers what I told to Mike Wolfe.

That's all
Bheem

From: Kothur, Bheem
Sent: Wednesday, June 21, 2006 12:04 PM
To: Putcha, Subra; Outlaw, Douglas; Gephart, Albert
Cc: Posner, Augusta; Simmons, Juliette
Subject: Howco's, Saint Petersburg; UO Closure Cost Estimates Submitted By Fax on June 16, 2006

To File: Mike Wolfe faxed me an unofficial revised closure cost estimates on 6/16/06 to review before he sends an official submittal. I called Mike on June 19, 2006 and told him that estimates are too low. Anyhow, Subra Putcha is the PM for this facility and I will check with Doug Outlaw who is his supervisor and I will get back to you ASAP. Today I discussed with Augusta Posner, that these cost estimates are appears to be too-low and we are not going to review the documents and I will tell Mike Wolfe know about the status.

I called Mike Wolfe today and he was not in his office and left the message stating that we are not reviewing these documents and it is up to you what to do next.

That's all
Bheem

6/22/2006



Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL. 32399-2400

June 16, 2006

Attn: Rick Neves, Bheem Kothur

The attached documents are from the approved Astor Permit and the pending St. Petersburg permit application. We would like to amend the St. Petersburg permit application to allow for using an electronic version of a manifest. The electronic version will contain all required information as set forth in the regulations and as stated in HOWCO's submittals. We will use a hardware device that allows us to electronically capture the generators signature. The generator will be left with a hard copy of the document while HOWCO will store all documents in an electronic format. We will keep electronic copies of all manifests for the required three (3) years. HOWCO will back up the electronic system information nightly and retain an off-site updated version monthly. We have chosen this format to reduce paper usage and file space while still complying with the regulatory requirements. This will additionally allow us to maintain electronic files at all HOWCO locations that are connected to the corporate system. In the event that FDEP requests a copy of a manifest it will expedite and simplify our ability to produce the manifest. We believe that several counties in the state have gone to a similar system for documents requiring signatures and document retention (Lake County is one that we are aware of). Additionally, Federal EPA is working on an approval for an e-manifest and record system for hazardous waste shipments and transfers. This project has been on-going since 2004.

Please let me know if there are any questions that we may address.

Thank you in advance for your assistance.

Sincerely,

Michael Wolfe

Michael Wolfe
V.P. Sales
HOWCO Environmental Services

Cc; James Dregne
Susan Pelz

ATTACHMENT 5

TRACKING PLAN

Product Collection

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

Incoming Shipments

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

Outgoing shipments

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

(Attachment 5 from St. Petersburg Permit Application)

Hagan Holding Company
d/b/a Howco Environmental Services
24133 State Road 40
Astor, Florida 32102

I.D. Number: FLD 101 828 689
Permit Number: 27221-HO-003
Date of Expiration:

- (a). Acceptance: Used oil processors/re-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:
1. The name, address and EPA identification number (if applicable) of the transporter who delivered the used oil to the processor/re-refiner, oil-burner or disposal Facility;
 2. The name, address and EPA identification number (if applicable) of the generator or processor/re-refinery from whom the used oil was received for processing/re-refining; and
 3. The quantities of used oil accepted and date of acceptance.
- (b). Delivery: 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 or electronic media. Records for each shipment must include the following information:
1. The name, address and EPA identification number (if applicable) of the transporter delivering the used oil to the receiving Facility;
 2. The name, address and EPA identification number (if applicable) of the oil-burner, processor/re-refinery or disposal Facility receiving the shipment;
 3. The quantities of used oil shipped and date of shipment; and
 4. The laboratory analytical number.
- (c). Rejected shipments: The Permittee shall maintain documentation of any shipment of used oil that is refused due to failure to meet pre-screening requirements set forth in Attachment 3 of the permit application dated August 15, 1997 as revised on April 16, July 1, September 30, 2004 and April 21, 2005.
- (d). Record Retention: The records described in paragraph (a), (b) and (c) of this condition must be maintained for at least three years. The records shall be kept at the permitted Facility or at the Permittee's corporate headquarters in St. Petersburg excepting current year's records must be kept at the facility, and shall be available for inspection by the Department during normal business hours.
3. The Permittee, pursuant to 40 CFR 279.57, must keep a written or electronic operating record for the current year at the facility. Previous years' records can be kept either at the facility or at the Permittee's corporate headquarters in St. Petersburg, and maintained for three years or until closure of the Facility (whichever comes first). The records shall include the following information:

Gephart, Albert

From: Griffith, John
Sent: Monday, June 12, 2006 10:35 AM
To: Gephart, Albert; Dregne, James; Posner, Augusta; Bahr, Tim; Griffin, John; Outlaw, Douglas
Cc: Clarke, Raoul; Price, John L.
Subject: EQ

Al and Jim,

I can't seem to get EQ interested in completing and correcting their Biennial Report. They have passed 2 deadlines from me with only partial responses and I can't seem to get them to understand the report actually **MUST** be corrected. Can you get them interested? Isn't failure to submit a correct report a major violation? Can't they go to jail for a knowing violation? I want to get annual reporting into their permit requirements. Every report they do the same thing, I'm tired of having to fight them every time for their data.

Jack Griffith
Florida Department of Environmental Protection
MS 4555
2600 Blair Stone Road
Tallahassee FL, 32399-2400
850-245-8748

Please note: Florida has a very broad public records law. Most written communications to or from state officials are public records and may be made available to the public or media upon request. This e-mail communication, your reply, and future e-mails to my attention may therefore be subject to public disclosure.

HOWCO Permit Renewal Application

SWD Hazardous Waste Section Remaining Issues

ATTACHMENT #3, ANALYSIS PLAN

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

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

PERMITTEE:

HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

Attention:
Mr. Tim Hagan
President

PERMIT/CERTIFICATION:

I.D. Number: FLD 152 764 767
Permit No: 92465-HO
County: Pinellas
Issue Date: **Draft**
Expiration Date: August 3, 2010
Latitude / Longitude:
27°54'0"N / 82°38'11"W
Section / Township / Range:
10 1/2 / 31 S / 22 E
Project: **Operation of a Used
Oil Processing Facility.**

This permit is issued under the provisions of Chapter 403.75 through 403.769, Florida Statutes (FS), and Rules 62-710 and 62-4, Florida Administrative Code (FAC). The above named permittee is hereby authorized to perform the work or operate the facility shown on the "Used Oil Processing Facility Permit Application" and approved drawings, plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To operate a Used Oil Processing Facility located at 843 43rd Street South, St. Petersburg, Pinellas County, Florida. A diagram of the site layout is included as **Attachment A**.

Used Oil Activities

The facility is authorized to process used oil and used oil filters (as described in 40 CFR 279 and 62-710, FAC) solely for the purpose of energy recovery. Also covered under this permit are materials generated from facility processing operations such as sludges, residues, and by-products from filters, tank bottoms and/or storage tanks which are also destined for energy recovery and used antifreeze for recycling. This permit does not authorize the consolidation and/or processing of solid wastes as described in 62-701, FAC.

The facility has 47 Aboveground Storage Tanks that may be used to store or process used oil, petroleum contact water, oily wastewater and other non-hazardous wastewaters. These tanks are shown in **Attachment B** of the permit.

Other Activities

The facility also manages petroleum contact water (PCW), industrial wastewater and rain water which is pretreated in its wastewater treatment process (which consists of flow equalization, gravity separation, chemical treatment, flocculation, coagulation, oxidation, filtration and air stripping) prior to discharge to the St. Petersburg sewer system (performed pursuant to a permit issued by the City of St. Petersburg) and drum recycling.

The permit application and related attachments first submitted on July 26, 2005 and all subsequent submittals and revisions thereafter were utilized in the preparation of this document and are considered a part thereof.

Upon issuance, this permit replaces expired permit No. 92465-HO06-001

HOWCO USED OIL PROCESSOR PERMIT

SPECIAL CONDITIONS

- All solid waste streams at the facility shall be characterized, at least annually, prior to the addition of any solidification agents.
- HOWCO shall maintain records of waste determinations or certifications from each generator for all potential waste streams (e.g. waste antifreeze) received at the facility that are not recycled.
- HOWCO shall sample and analyze each batch (tank) of processed used oil for off-site shipment to determine if the processed oil meets the on-specification criteria. This classification of on-specification used oil fuel must meet the requirements of the rebuttable presumption and the analytical parameters shown in Table 4-1 of the application and listed in 40 CFR Part 279. HOWCO shall duly note the batch number of any batch (tank) that does not meet the on-specification used oil fuel criteria and the disposition of that batch (tank) in the facility's daily operating logs. The processed oil tank sampled for off-site shipment shall not have additional used oil added to the tank once the sample has been obtained. The tank shall be tagged out to prevent the addition of other wastes or processed used oil that would invalidate the analysis.
- Solid Waste -



Mr. Albert F. Gephart
Engineering Specialist IV
Hazardous Waste Management
Florida Department of Environmental Protection

Dear Al,

Per your comments and HOWCO's agreement to the issues highlighted, we are submitting the attached changes and additions to our application. Please replace the attached pages, 2, 6, 10, 19, in our application, add the tank and containment calculations and the additional drawings. Attached is also a copy of the FDEP Application Form revised to reflect the fact that HOWCO's maintenance facility generates used oil and used oil filters.

We apologize for not incorporating these changes and additions in our submittal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Wolfe'.

Michael Wolfe
V.P. Sales and Business Alliances

Cc; Mr. Doug Outlaw

1-27-06
TO MIKE WOLFE

HOWCO Permit Renewal Application July 15, 2005

SWD Hazardous Waste Section Comments*

HIGHLIGHTED AREAS ARE THOSE ISSUES NOT ADDRESSED IN REVISED APPLICATION OF 1/18/06

GENERAL

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

Please provide a Table of Contents.

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

APPLICATION FORM, PART 1

Part I, A, page 8, Item #3

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

ATTACHMENT #2, DETAILED PROCESS DESCRIPTION

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

Page 6, Tables 1,2 and 3.

The drawings included in the renewal application do not indicate the location of the three containment areas denoted in the Tables. Please submit facility drawings that depict the location of the containment areas, the dimensions of the containment areas and the dimensions of the tanks within them. ***IF Drawing D-4-3 is meant to be the drawing to depict these, the areas do not match the containment area numbers on the Tables. For example Area 4 on the drawing is the container storage area and solid waste processing area, on the Table it is described as water treatment only.***

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

ATTACHMENT #3, ANALYSIS PLAN

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

Page 8, 4th paragraph. Please revise the analysis to reflect the sampling plan agreed to by FDEP and the facility. One batch (tank) of processed used oil is to be tested EVERY TWO WEEKS using the following procedure that

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

randomly selects a sample from one of the ten (10) tanks and tested to determine if it meets the on-spec criteria in 40 CFR 279.11 (Table 1).

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

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

ATTACHMENT #4, SOLID WASTE HANDLING

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

ATTACHMENT #5, TRACKING PLAN

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

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

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

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

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

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

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

Page 18, Item 6.1, paragraph 1 and Item 6.2, paragraph 1. Please add to the text that the PIC will activate facility emergency alarms and notify facility personnel. *See Page 19 #1 -evacuation of the local area may be advisable" - add a sentence that PIC will notify employees by use of electronic bull horn.*

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

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

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

ATTACHMENT #7, UNIT MANAGEMENT DESCRIPTION

Please revise this attachment to address the following:

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

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

ATTACHMENT #8, CLOSURE PLAN

Please add a timeline to the Closure Schedule.

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

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

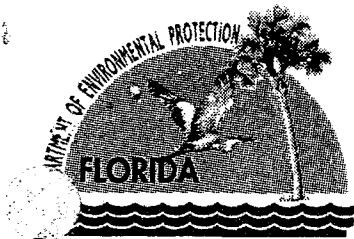
Page 25. More detail is needed in the solid waste closure cost estimate. The 7/21/99 permit application has a solid waste closing cost of \$58,760. Please justify why this cost is only \$11,500 in the 7/5/05 permit renewal application.

Reference is made to drawing 10-2. This drawing was not provided in the 1/18/06 application.

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

ATTACHMENT #9, TRAINING

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



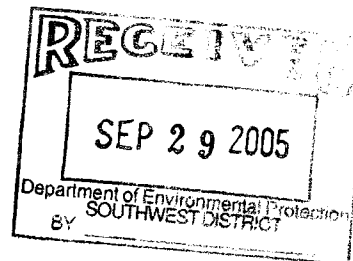
Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

September 22, 2005



CERTIFIED - RETURN RECEIPT

7000 0600 0026 4130 8142

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

Subject: Howco Environmental Services;
EPA I.D. Number FLD 152 764 767;
Application for Permit Renewal;
Existing Permit Number 92465-HO06-001;
Pinellas County.

Dear Mr. Hagan:

The Florida Department of Environmental Protection (Department) has received your permit renewal application dated July 15, 2005.

A review of the permit renewal application shows that it is incomplete. Please provide the information requested in the enclosed summary. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three (3) copies of your written response within 30 days of receipt of this notice. If you cannot submit this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted. Comments on the solid waste portion of the permit renewal application are separately mailed to you by our Southwest district office.

"More Protection, Less Process"


Printed on recycled paper.

2

Mr. Tim Hagan
September 22, 2005
Page 2

Should you like to arrange a meeting or if you have any questions, please contact Subra Putcha at (850) 245-8776 or Bheem Kothur at (850) 245-8781.

Sincerely,


Doug G. Outlaw
Professional Engineer
Hazardous Waste Regulation

DO/sp

Enclosure

cc: ✓ Al Gephart, DEP/Tampa
Susan Pelz, DEP/Tampa
Raoul Clarke, DEP/Tallahassee
Fred Wick, DEP/Tallahassee
John Jones, Total Environmental Solutions/Miami

ATTACHMENT

September 22, 2005

Hagan Holding Company d/b/a HOWCO Environmental Services, St. Petersburg

EPA ID. No. FLD 152 764 767

Notice of Deficiency

GENERAL

- OK a. If the renewal application is to be a "stand-alone" document, not pages to be inserted into the previous application, there are several items missing. Please submit the following: Emergency Containment #1 (Drawing D-6-1), Emergency Containment #1, 2 and 3 (Figure D-6-2), Process and Equipment Storage Plan (Drawing D-8-1), Sampling Locations For Closure (Drawing 10-1), Traffic Routing, Fire Protection Equipment and Escape and Evacuation Routes (Drawing D-8-2).
- OK b. Please provide a Table of Contents in the application.
- OK c. Please revise the Revision Numbers to be consistent. There are pages with revision number mw1 and some with revision number 0, both having the same date.

SPECIFIC COMMENTS:

1. APPLICATION FORM - PART 1

- OK a. **Part I, A, page 8, Item #3:** Please add to the text that HOWCO is a generator of used oil (vehicle maintenance).

2. ATTACHMENT #2 - DETAILED PROCESS DESCRIPTION

→ a. **Page 3, 1st paragraph:** It is stated that, "the facility receives petroleum product water (PPW)." Please revise the sentence to state that it receives, "petroleum contact water (PCW)." *aly water - regulated*

b. **Page 6, Tables 1, 2 and 3:** The drawings included in the renewal application do not indicate the location of the three containment areas denoted in the Tables. Please submit facility drawings that depict the location of the containment areas, the dimensions of the containment areas and the dimensions of the tanks within them.

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

In Table 2 Tank Number 123 is repeated twice, please make the correction as necessary.

one is 124

3. **ATTACHMENT #3 - ANALYSIS PLAN**

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

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

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

1400 c. **Page 8:** The renewal application has a section titled, "Incoming non-hazardous solids." Please change the title of this section to, "Incoming Oily Solid Wastes." This section does not apply to solid wastes in the solid waste portion of the permit.

OK d. **Page 9:** Please delete the sentence "The waste approval will be valid and acceptable for a period of five years."

4. **ATTACHMENT #4 - SOLID WASTE HANDLING**

1400 a. **Page 10, "Removal of oily solids from used oil processing":** Please revise the 3rd paragraph to state, ".... to be analyzed for TCLP Metals and VOCs" and fill the blanks that were left out.

5. **ATTACHMENT #5 - TRACKING PLAN**

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

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

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

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

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

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

OK e. **Page 17, Section 4.0:** This section designates Richard Dillen or Tim Hagan as the secondary emergency coordinator. If Tim Hagan is to be listed, please designate him as the third emergency coordinator.

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

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

OK h. **Page 18, Item 6.2:** Please change the Florida Department of Environmental Protection's phone number to (813) 741-6100 (refer to page 22).

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

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

OK 7. **ATTACHMENT #7 - UNIT MANAGEMENT DESCRIPTION**

Please revise this attachment to address the following:

- a. Personnel are to ensure that used oil containers are properly labeled; and
- b. Provide site diagrams, a listing of tanks and their respective containment areas and the design, dimensions and calculations to support that the secondary containment areas are sufficient.

8. **ATTACHMENT #8 - CLOSURE PLAN**

OK a. Please add a timeline to the Closure Schedule.

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

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

not
a
permit
issue

d. **Page 25, Solid Waste Closure Cost Estimate:** The Department recently promulgated changes to Rule 62-710 F.A.C., Used Oil Management, which were adopted by the Environmental Regulation Commission on April 7, 2005, and became effective on June 9, 2005. All Used Oil Processing Facilities must now provide financial assurance sufficient to cover the cost of closing the facility. The closing cost estimate must be annually adjusted for inflation in accordance with the provisions of this Rule. The Facility should consider submitting a Closure Cost Estimate Form [62-710.901(7)] for the used oil processing portion of the facility since it will be due in December 2005.

e. There are also some mathematical errors in the estimate, please revise.

9. **ATTACHMENT #9 - TRAINING**

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

Checked items are added to or revised in 4/18/06 Application Revision Rev 2 1/4/06

HOWCO Permit Renewal Application July 15, 2005

SWD Hazardous Waste Section Comments*

GENERAL

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

✓ Please provide a Table of Contents.

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

APPLICATION FORM, PART 1

Part I, A, page 8, Item #3 *of the four*
Please add to the text that HOWCO is a generator of used oil (vehicle maintenance).

ATTACHMENT #2, DETAILED PROCESS DESCRIPTION

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

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

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

Page 6, Tables 1,2 and 3.

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

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

ATTACHMENT #3, ANALYSIS PLAN

Page 7, Used Oil, Item #1, Sampling, 2nd sentence. Please re-write the sentence to state, "The bailer and/or caliwasa will be inserted into the bottom of the vehicle *NO* or container and"

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

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

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

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

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

ATTACHMENT #4, SOLID WASTE HANDLING

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

ATTACHMENT #5, TRACKING PLAN

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

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

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

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

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

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

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

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

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

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

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

ATTACHMENT #7, UNIT MANAGEMENT DESCRIPTION

Please revise this attachment to address the following:

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

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

ATTACHMENT #8, CLOSURE PLAN

Please add a timeline to the Closure Schedule.

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

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

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

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

ATTACHMENT #9, TRAINING

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

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

DEP

JAN 30 2006

SOUTHWEST DISTRICT

Part I

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

A. General Information

1. New _____ Renewal ☒ Modification _____ Date old permit expires _____

2. Revision number 0

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

- ☒ generators (Subpart C)
☒ transporters (Subpart E)
☒ burners of off-spec used oil (Subpart G)
☒ marketers (Subpart H)
 or
 _____ are disposing of used oil (Subpart I)

4. Date current operation began: 1972

5. Facility name: Howco Environmental Services-St. Petersburg

6. EPA identification number: FLD 152 764 767

7. Facility location or street address: 843 43rd St. South, St. Petersburg, FL 33711

8. Facility mailing address:

3701 Central Ave, St Petersburg, FL 33713
 Street or P.O. Box City State Zip Code

9. Contact person: Tim Hagan Telephone: 727 327-8467

Title: President

Mailing Address:
3701 Central Ave, St. Petersburg FL 33713
 Street or P.O. Box City State Zip Code

10. Operator's name: Howco Environmental Telephone: ()

Mailing Address:
3701 Central Ave, St. Petersburg FL 33713
 Street or P.O. Box City State Zip Code

11 Facility owner's name: Hagan Holding Co. Telephone: 727 327-8467

Mailing Address:
3701 Central Ave, St Petersburg FL 33713
 Street or P.O. Box City State Zip Code

12 Legal structure:

- ☒ 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: _____

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 _____

Name: _____

Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

- 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: _____

Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

- 14 Name of professional engineer John Jones Registration No. 50227

Mailing Address: _____

11587 W. Atlantic Blvd. #27 Coral Springs, FL 33071

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Associated with: Jones Ecosystem Management

B. SITE INFORMATION

1. Facility location:

County: Pinellas

Nearest community: City of St. Petersburg

Latitude: 27° 45' 47" Longitude: 82° 41' 32"

Section: 10 12 Township: 315

Range: 16E

UTM # _____ / _____ / _____

2. Facility size (area in acres): 3.2

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) CESQG

2. List applicable EPA hazardous waste codes:

Possible- D001, D007, D008

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 1,0

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 2,0

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 finger, lot 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 3,0

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 4,0

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 5,0

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing HCC 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 6,0

7. 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 6,0

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.

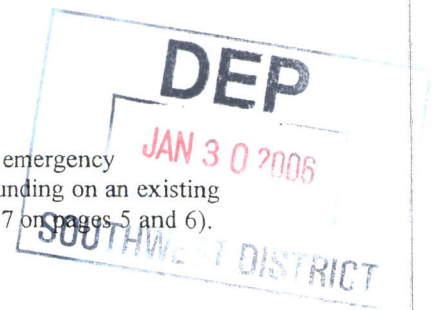
The unit management description is labeled as Attachment 7

9. 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 8

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 9



APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New _____ Renewal ☒ Modification _____ Date old permit expires 8/3/05

2. Revision number 0

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

- ☐ generators (Subpart C)
☒ transporters (Subpart E)
☐ burners of off-spec used oil (Subpart G)
☒ marketers (Subpart H)
or
_____ are disposing of used oil (Subpart I)

4. Date current operation began: 1972

5. Facility name: Howco Environmental Services-St. Petersburg

6. EPA identification number: FLD 152 764 767

7. Facility location or street address: 843 43rd St. South, St. Petersburg, FL 33711

8. Facility mailing address:

3701 Central Ave, St Petersburg, FL 33713
Street or P.O. Box City State Zip Code

9. Contact person: Tim Hagan Telephone: (727) 327-8467

Title: President

Mailing Address:
3701 Central Ave, St. Petersburg FL 33713
Street or P.O. Box City State Zip Code

10. Operator's name: Howco Environmental Telephone: ()

Mailing Address:
3701 Central Ave, St. Petersburg FL 33713
Street or P.O. Box City State Zip Code

11 Facility owner's name: Hagan Holding Co. Telephone: (727) 327-8467

Mailing Address:
3701 Central Ave, St Petersburg FL 33713
Street or P.O. Box City State Zip Code

12 Legal structure:

- ☒ 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: _____

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 _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

- 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: _____

Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

- 14 Name of professional engineer John Jones Registration No. 50227
Mailing Address: _____
11587 W. Atlantic Blvd, #27 Coral Springs, FL 33071
Street or P.O. Box _____ City _____ State _____ Zip Code _____
Associated with: Jones Ecosystem Management

B. SITE INFORMATION

1. Facility location:

County: Pinellas

Nearest community: City of St. Petersburg

Latitude: 27° 45' 47" Longitude: 82° 41' 32"

Section: 10 12 Township: 315

UTM# _____ / _____ / _____

Range: 16F

2. Facility size (area in acres): 3, 2

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) CESQG

2. List applicable EPA hazardous waste codes:

Possible- D001, D007, D008

IGNITABILITY, CITRONE, LEAD

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 1,0

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 2,0

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 3,0

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 4,0

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 5,0

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 6,0

7. 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 6, 0

← CP WAS 8

8. Attach a description of the facility's unit management for tanks and containers holding used oil. The attachment must describe secondary containment specifications, inspection and monitoring schedule 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 7

← WAS 9

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and 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 8

← WAS 10

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 9

← WAS 11

DEP Form#	62-710.901(a)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

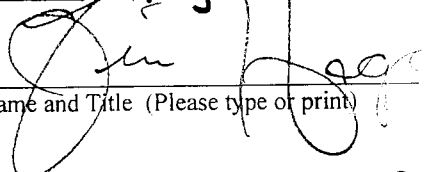
Form 62-710.901(a). Operator Certification

Facility Name: _____ EPA ID# _____

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

Signature of the Operator or Authorized Representative*

Tim Hagan - President & CEO


Name and Title (Please type or print)

Date: July 11, 2005 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(a)
Form Title	Used Oil Processing Facility
	Permit Application
Effective Date	December 23, 1996

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

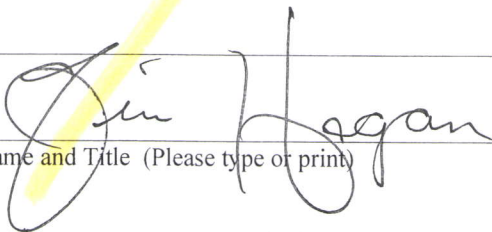
TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: _____ EPA ID# _____

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

Signature of the Operator or Authorized Representative*



Name and Title (Please type or print)

Date: _____ Telephone: () _____

* 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

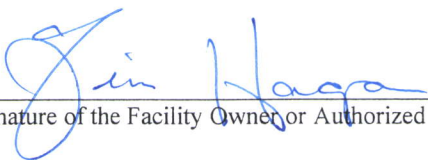
APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: Howco - St. Petersburg EPA ID# FLD 152764767

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



Signature of the Facility Owner or Authorized Representative*

Tim Hagan - Owner

Name and Title (Please type or print)

Date: 7-18-5 Telephone: (727) 327-8467

* 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

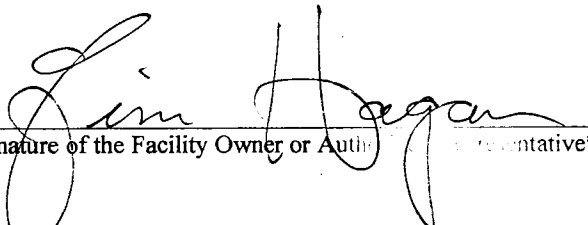
APPLICATION FROM FOR USED OIL PROCESSING PERMIT

PART I CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: _____ EPA ID# _____

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


Signature of the Facility Owner or Authorized Representative*

Tim Hagan - President & CEO
Name and Title (Please type or print)

Date: July 11, 2005 Telephone: (727) 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

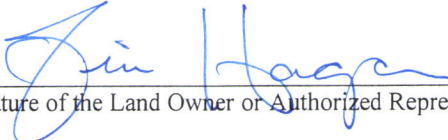
APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: Hawco - St. Petersburg EPA ID# FLD 152764767

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 - Owner
Name and Title (Please type or print)

Date: 7-18-95 Telephone: ⁷²⁷~~(954)~~ 327-8407

* 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

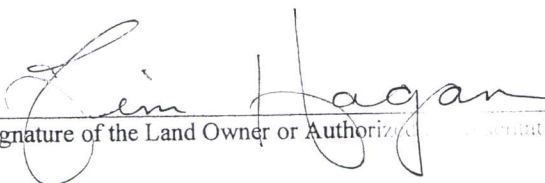
APPLICATION FROM FC USED OIL PROCESSING PERMIT

PART I CERTIFICATION

Form 62-710.901(c) Land Owner Certificate

Facility Name: _____ EPA ID# _____

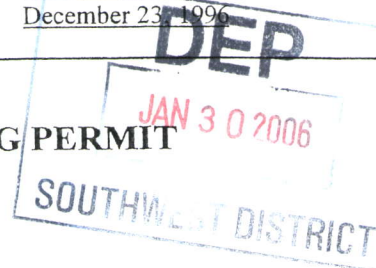
This is to certify that I, as land owner, under the _____ this application is submitted for the purpose of obtaining a permit to construct, or operate a _____ processing facility on the property as described.


Signature of the Land Owner or Authorized Representative*

Tim Hagan - President & CEO
Name and Title (Please type or print)

Date: July 11, 2005 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.



DEP Form#	62-710.901(d)
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(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, 62-701 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

_____ Initial Certification _____ X _____ Recertification

1. DEP Facility ID Number: FL
2. Tank Numbers: See Tables 1, 2 & 3 in Attachment 2
3. Facility Name: Howco - St. Petersburg
4. Facility Address: 843 43rd Street South, St. Petersburg, FL 33713

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature

John M. Jones

Name (please type)

Florida Registration Number: 50227

Mailing Address: 11587 W. Atlantic Blvd, #27

Street or P. O. Box

Coral Springs, FL 33071

City State Zip

Date: July 10/2005 Telephone 954 817-2273

[PLEASE AFFIX SEAL]

TABLE OF CONTENTS

Description of Facilities	p 1-2
Detailed Process Description	p. 3-6
Waste Analysis Plan	p. 7-9
Solid Waste Handling Description	p. 10-11
Tracking Plan	p. 12
Emergency Preparedness and Contingency Plan ...	p. 13-22
Unit Management Description	p. 23
Closure Plan	p. 24-31
Training Plan	p. 32

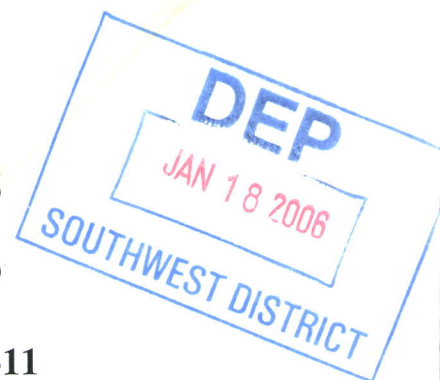
Appendix 1 –Drawings and Figures

Used Oil Closure Cost Estimate Form

Appendix 2- Attachments

Emergency Contact List

UAUOS Training Manual (as amended to include 2005 rule)



ATTACHMENT 1

DESCRIPTION OF FACILITY OPERATIONS

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

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

OIL RECOVERY

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

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

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

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

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

SOLIDS

The solids processed are generated from the following;

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

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

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

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

Solidification agents may be added to enhance the process.

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

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

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

HOWCO operates an equipment repair and maintenance facility for the repair and maintenance of trucks and rolling yard equipment. This facility generates used oil, used oil filters that are processed through the HOWCO St. Petersburg processing facility.

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

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

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

Solidification agents may be added to enhance the process.

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

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

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

HOWCO operates an equipment maintenance facility for repair and maintenance of trucks and rolling yard equipment. This facility generates used oil and oil filters processed through the St Petersburg processing facility.

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

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

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

Solidification agents may be added to enhance the process.

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

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

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

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
MAR 23 2006
SOUTHWEST DISTRICT
TAMPA

ATTACHMENT 2 DETAILED PROCESS DESCRIPTION

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

Collection Process

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

Receiving Shipments

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

Used oil testing

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

Used oil unloading

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

Used Oil Processing

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

1. Distillation and/or Chemical Separation Process

Oil is processed utilizing the following equipment:

Tank # 100 & 101

Heat exchanger

Vibrating mesh screen
Thermal oil heater
Storage tanks

Various pumps, piping, valves, strainers
and filter

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

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

Oil Storage Tanks

Refer to Tables 1, 2, & 3.

Removal and disposal of oily solids from used oil process

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

Used oil reprocessing

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

Processed oil shipment and identification

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

Used oil transportation

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

Waste Antifreeze

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

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

Used Oil Filters

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

Table 1
Processing Tanks - Containment #1

Tank Number	Capacity (gallons)	Product
100	30300	Used oil treatment
101	28800	Used oil treatment
130	7950	Oil receiving
131	3950	Oil receiving
132	3950	Oil receiving
133	3950	Oil receiving
134	3950	Screened oil
135	6000	Light ends, condensate
136	10000	Light ends
137	10570	Burner fuel oil
170	11150	Used oil, water soluble oil, antifreeze or wastewater
120	19550	Unprocessed oil
121	28900	Processed oil
122	29730	Processed oil
123	29730	Processed oil
124	29730	Processed oil
125	19210	Processed oil
126	20820	Processed oil
127	19470	Processed oil
128R1	19470	Receiving oil
129	23460	Processed oil

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

Containment area 2 has no tanks, and is used for sludge drying only.

Containment areas 3 and 4 are used for water treatment only.

Table 2
Sludge Separation Area – Containment #5

Tank Number	Capacity (gallons)	Product
108	9980	IWPP Sludge
109	3225	Oil filter crusher
110	6415	Cone bottom
111	19380	Oily solids batch treatment

Table 1
Processing Tanks - Containment #1

Tank Number	Capacity (gallons)	Product
100	30300	Used oil treatment
101	28800	Used oil treatment
130	7950	Oil receiving
131	3950	Oil receiving
132	3950	Oil receiving
133	3950	Oil receiving
134	3950	Screened oil
135	6000	Light ends, condensate
136	10000	Light ends
137	10570	Burner fuel oil
170	11150	Used oil, water soluble oil, antifreeze or wastewater
120	19550	Unprocessed oil
121	28900	Processed oil
122	29730	Processed oil
123	29730	Processed oil
124	29730	Processed oil
125	19210	Processed oil
126	20820	Processed oil
127	19470	Processed oil
128R1	19470	Receiving oil
129	23460	Processed oil

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

Containment area 2 has no tanks, and is used for sludge drying only.

Containment areas 3 and 4 are used for water treatment only.

Table 3
Sludge Separation Area - Containment #5

Tank Number	Capacity (gallons)	Product
108	9980	IWPP Sludge
109	3225	Oil filter crusher
110	6415	Cone bottom
111	19380	Oily solids batch treatment

Secondary Containment Calculations
Howco-St. Petersburg

I, Containment Area 1 A

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

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

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

2. Less area occupied by tank bases and vertical tanks

Tanks 130 – 137 concrete saddles

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

Tanks 100- 101 concrete saddles

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

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

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

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

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

II. Containment Area 1B

1. Outside containment wall

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

2. Less area occupied by tanks

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

$$\text{Subtotal} = 871 \text{ square feet}$$

John M. Jones
12/28/05

Net Area of 1B = $3122 - 871 = 2251$ square feet
Volume of 1B = $2251 \times 2.25 = 5064$ cubic feet = 37,884 gallons

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

III. Containment Area 3

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

2. Less area of tanks

151 = 78.5 square feet

152 = 113 square feet

153 = 177 square feet

154 = 78.5 square feet

155 = 78.5 square feet

160 = 78.5 square feet

161 = 78.5 square feet

162 = 78.5 square feet

163 = 78.5 square feet

164 = 78.5 square feet

165 = 78.5 square feet

Subtotal = 996.5 square feet

Net Area of Containment Area 3 = $2,816 - 997 = 1,819$ square feet
Volume = $1,819 \times 4.25$ feet high = 7,730 cubic feet = 57,826 gallons

IV. Containment Area 4

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

2. Less area of tanks

166 = 92 square feet

191 = 78.5 square feet

192 = 78.5 square feet

Subtotal = 249 square feet

Net Area of Containment Area 4 = $2,640 - 249 = 2,391$ square feet
Volume = $2,391 \times 4.25$ feet high = 10,162 cubic feet = 76,010 gallons

12/23/05
John M. Jones

V. **Containment Area 5**

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

Subtotal of area = 151.5 square feet

Net area of Containment Area 5 = 1634 - 151.5 = 1482.5 square feet
Containment volume = 1482.5 x 3 = 4447.5 cubic feet = 33,890 gallons

John M. Jones 12/28/03

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

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

John M. Jones
12/28/05

Table 1
Processing Tanks - Containment #1A

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

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

Table 2
Processing Tanks - Containment 1B

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

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

Containment area 2 has no tanks, and is used for sludge drying only.

Containment areas 3 and 4 are used for water treatment only.

Table 3
Sludge Separation Area – Containment #5

Tank Number	Capacity (gallons)	Product
108	9980	IWPP Sludge
109	3225	Oil filter crusher
110	6415	Cone bottom
111	19380	Oily solids batch treatment

ATTACHMENT 4 SOLID WASTE HANDLING

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

Removal of oily solids from used oil processing

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

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

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

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

Non-hazardous and Petroleum Contaminated Solids From Customers

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

Receiving and Processing of Oily Solids

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

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

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

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

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

Design Requirements

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

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

Operational Requirements

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

A trained spotter will be present when waste is being received to inspect the waste streams for unauthorized, non-approved and nonconforming waste streams. The spotter will identify and stop the following waste from entering the facility: hazardous waste, PCB's, asbestos waste, explosives, putrescible, toxic waste, biohazardous waste, non-approved and nonconforming waste streams. The spotter duties will be completed in the receiving area where the waste containers are opened up for incoming inspection.

Unauthorized wastes non-approved and nonconforming waste streams will be placed in a proper D.O.T. shipping container. The containers are placed in a portable secondary containment unit, which will be located between the west loading/unloading area and the drum storage area. The unauthorized waste will be marked "UNAUTHORIZED WASTE" and will be wrapped with yellow caution tape. The unauthorized waste will be shipped to a properly permitted treatment, storage or disposal facility. The unauthorized waste will be shipped off site as soon as it can be scheduled and when it is economically feasible possible. The waste generator and the Florida Department of Environmental Protection will be notified of the unauthorized waste.

The operation hours of the facility will be clearly posted where they are visible. The spotter will be trained in accordance with F.A.C. 62-701.320(15). The spotter will be present when the facility is open to receive solid waste.

Financial Assurance

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

Stormwater

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

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

Record Keeping

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

Enforcement History

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

ATTACHMENT 4 SOLID WASTE HANDLING

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

Removal of oily solids from used oil processing

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

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

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

A representative sample will be taken annually by a plant technician or chemist. Each sample will be collected in an 8 ounce jar using a scoop. The properly preserved sample will be sent to an outside lab to be analyzed for constituents as stated in CFR 40 261.24. This analysis will be used to provide the base information for "Generator Product Knowledge".

Non-hazardous and Petroleum Contaminated Solids From Customers

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

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded on a coated concrete pad prior to processing. The solids from the drums may be bulked in roll-off containers or dump trailer where oil and oily liquids may be removed for recycling or further processing. Solidification agents may be added to these containers prior to off-site shipment to a permitted thermal unit or landfill.

ATTACHMENT 4 SOLID WASTE HANDLING

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

Removal of oily solids from used oil processing

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

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

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

A representative sample will be taken annually by a plant technician or chemist. Each sample will be collected in an 8 ounce jar using a scoop. The properly preserved sample will be sent to an outside lab to be analyzed for constituents as stated in CFR 40 261.24 and PCB's. This analysis will be used to provide the base information for "Generator Product Knowledge".

Non-hazardous and Petroleum Contaminated Solids From Customers

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

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded on a coated concrete pad prior to processing. The solids from the drums may be bulked in roll-off containers or dump trailer where oil and oily liquids may be removed for recycling or further processing. Solidification agents may be added to these containers prior to off-site shipment to a permitted thermal unit or landfill.

ATTACHMENT 4 SOLID WASTE HANDLING

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

Removal of oily solids from used oil processing

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

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

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

A representative sample will be taken annually by a plant technician or chemist. Each sample will be collected in an 8 ounce jar using a scoop. The properly preserved sample will be sent to an outside lab to be analyzed for TCLP metals and VOC's as stated in Table _____ page _____. This analysis will be used to provide the base information for "Generator Product Knowledge".

Non-hazardous and Petroleum Contaminated Solids From Customers

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

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded on a coated concrete pad prior to processing. The solids from the drums may be bulked in roll-off containers or dump trailer where oil and oily liquids may be removed for recycling or further processing. Solidification agents may be added to these containers prior to off-site shipment to a permitted thermal unit or landfill.

ATTACHMENT 4 SOLID WASTE HANDLING

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

Removal of oily solids from used oil processing

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

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

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

A representative sample will be taken annually by a plant technician or chemist. Each sample will be collected in an 8 ounce jar using a scoop. The properly preserved sample will be sent to an outside lab to be analyzed for constituents as stated in Table _____ page _____. This analysis will be used to provide the base information for "Generator Product Knowledge".

Non-hazardous and Petroleum Contaminated Solids From Customers

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

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded on a coated concrete pad prior to processing. The solids from the drums may be bulked in roll-off containers or dump trailer where oil and oily liquids may be removed for recycling or further processing. Solidification agents may be added to these containers prior to off-site shipment to a permitted thermal unit or landfill.

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

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

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

ATTACHMENT 5
TRACKING PLAN

THE ACCEPTANCE CRITERIA
LISTED IN 40 CFR 279.561

Product Collection

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

Incoming Shipments

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

Outgoing shipments

A manifest/shipping document is completed for outgoing shipments. The document will contain the name, address, and EPA ID number of the transporter. The date, volume, driver's name and the destination of the shipment will also be provided.

EPA ID# Receiver
Name Address of receiver

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

Table of Contents

- 1.0 Introduction
- 2.0 General Information
- 3.0 Spill Prevention & Emergency Preparedness
- 4.0 Emergency Coordinator Information
- 5.0 Arrangements with Local Authorities
- 6.0 Emergency Procedures
- 7.0 Decontamination
- 8.0 Reporting & Record keeping
- 9.0 Tank Closure
- 10.0 Amendments

1.0 INTRODUCTION

1.1 Purpose

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

1.2 Areas of Concern:

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

1.3 Responsibilities

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

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

2.0 GENERAL INFORMATION

Facility Name: HOWCO

Location: 843 43rd Street South, St. Petersburg, Florida 33711

Telephone No.: (727) 327-8467

Facility Activities: The facility is a used oil processing facility that can operate 24 hours per day, 7 days per week. Used oil, oil filters, antifreeze and petroleum contaminated water are collected from various clients. The materials are delivered to the facility and tested. Based on the test results, the materials are transferred into holding tanks, processed, and then shipped to suppliers and/or disposal/recycling facilities.

3.0 SPILL PREVENTION and EMERGENCY PREPAREDNESS

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

General Spill Prevention Measures

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

Material Transport and Transfer

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

Prevention and Protective Measures

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

Emergency Equipment Available (see site plan for locations)

Training

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

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

Spill Abatement Activities

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

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

- Do not risk human life or health in an attempt to control a spill
- Shut off pumps and close all lines serving a leaking container or tank
- Shut off electricity to the affected area, if necessary
- Mobilize emergency response personnel
 - o Normal working hours – the plan will be activated by use of an electronic loudspeaker
 - o Off-shift hours – control team personnel will be notified by telephone or pager
- Contain the spill as close to its source as possible
- Assemble required clean-up equipment and order clean-up
- In addition to the PIC, operating personnel will, under the direction of the PIC, position the absorbent materials in strategic points to contain the spill as needed.
- Response team members will operate pumps and man hoses to further contain and capture the spill
- Team members will perform other assigned tasks needed as directed by the PIC

4.0 EMERGENCY COORDINATOR (PIC) INFORMATION

Duties of the Emergency Coordinator or Designee

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

The following identifies the primary and alternate emergency coordinators:

Recycling Facility Primary Emergency Coordinator (Primary PIC)

Juan Rollier

Cell Phone # 727-543-5429

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

Recycling Facility Secondary Emergency Coordinator (Secondary PIC)

Tim Morris

Cell Phone # 727-385-1510

Or

Tim Hagan

Cell Phone # 727-804-4446

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

5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

Arrangements with authorities are established by providing appropriate agencies with a copy of the plan and a letter requesting their assistance in the event of an emergency. In the event

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

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

The following items will be completed by the PIC:

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

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

6.0 EMERGENCY PROCEDURES

6.1 Identifying Releases and Hazards

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

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

6.2 Notifications and Reporting

In the event of an imminent or actual emergency, the PIC or First Responder will immediately dial 911. The facility communication system includes a telephone, cellular phones, and an electronic loudspeaker. 40 CFR Table 302.3 will be consulted when any hazardous materials are

spilled. If the hazard material that was released meets or exceeds the Reportable Quantity (RQ), the agencies below will be notified immediately:

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

Notification of additional local authorities listed on page 22 may be conducted, as deemed necessary by the PIC or First Responder.

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

- 1) If the PIC or First Responder's assessment indicates that evacuation of the local area may be advisable, the PIC or First Responder will immediately notify the local authorities identified above. Additional assistance from local authorities listed on page 22 may be obtained, as deemed necessary by the PIC or First Responder. The PIC or First Responder will notify employees by use of a bull horn. The PIC or First Responder will be available to assist local authorities in deciding whether evacuation of the immediate area is needed.
- 2) The PIC or First Responder will report the following information:
 - a) Name and telephone number;
 - b) Name and address of facility;
 - c) Time and type of incident;
 - d) Name and quantity of material involved, to the extent known;
 - e) The possible hazards to human health and the environment.

6.3 Emergency Procedures

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

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

spilled. If the hazard material that was released meets or exceeds the Reportable Quantity (RQ), the agencies below will be notified immediately:

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

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

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

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

6.3 Emergency Procedures

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

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

Emergency Communication System

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

Fire Control Systems

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

Site Control Systems

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

Maintenance and Testing

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

Equipment Handling Procedures

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

Removal of Oil/Water from Containment

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

1. Accumulated water is inspected for the presence of a sheen.
2. If a sheen is present, the water is considered to be contaminated and will be transferred into a storage tank.

3. The water is not considered contaminated; it may be discharged to grade.
4. The following records must be maintained for each discharge event:
 - a. Date
 - b. Time
 - c. Estimated quantity of accumulation
 - d. Presence or absence of petroleum or sheen
 - e. Person removing the accumulation

Off-site Emergency Response Procedures - during transport

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

7.0 DECONTAMINATION

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

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

8.0 REPORTING

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

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

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

9.0 TANK CLOSURE PLAN

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

10.0 AMENDMENTS to CONTINGENCY PLAN

This plan will be revised, if necessary, whenever:

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

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES

<u>Local Authority/Agency</u>	<u>Phone Number</u>	<u>Contact Period</u>
Any Emergency	911	
FL. Department of Environmental Protection		
Tallahassee (24 hour line)	800-320-0519	
Southwest District	813-632-7600	
National Response Center	800-424-8802	
CHEMTREC (Chemical Information)	800-424-9300	
Division of Emergency Response	800-635-7179	
Department of Community Affairs (DCA)	800-320-0519	
Pinellas County Emergency Management	727-464-3800	
Florida Marine Patrol	800-342-5367	
Coast Guard	727-896-6187	
St Petersburg Fire Department	727-893-7272	
Department of Transportation	813-632-6859	
FL. Highway Patrol	813-632-6859	
OSHA	813-626-1177	
Department of Environmental Management		
Division of Air Quality	727-464-4422	
Bayfront Medical Center	727-893-6714	
Bayfront Convenient Care	727-526-3627	
Edward White Hospital	727-323-1111	
Convenient Care (Company Doctor)	727-347-9719	

9.0 TANK CLOSURE PLAN

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

10.0 AMENDMENTS to CONTINGENCY PLAN

This plan will be revised, if necessary, whenever:

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

~~APPENDIX~~ B

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES

<u>Local Authority/Agency</u>	<u>Phone Number</u>	<u>Contact Period</u>
Any Emergency	911	
FL. Department of Environmental Protection		
Tallahassee (24 hour line)	800-320-0519	
Southwest District	813-632-7600	
National Response Center	800-424-8802	
CHEMTREC (Chemical Information)	800-424-9300	
Division of Emergency Response	800-635-7179	
Department of Community Affairs (DCA)	800-320-0519	
Pinellas County Emergency Management	727-464-3800	
Florida Marine Patrol	800-342-5367	
Coast Guard	727-896-6187	
St Petersburg Fire Department	727-893-7272	
Department of Transportation	813-632-6859	
FL. Highway Patrol	813-632-6859	
OSHA	813-626-1177	
Department of Environmental Management		
Division of Air Quality	727-464-4422	
Bayfront Medical Center	727-893-6714	
Bayfront Convenient Care	727-526-3627	
Edward White Hospital	727-323-1111	
Convenient Care (Company Doctor)	727-347-9719	

ATTACHMENT 7 UNIT MANAGEMENT DESCRIPTION

Drums

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

Piping

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

Storage Tanks

Above ground storage tanks were installed at the time of purchase of the facility. Therefore, it is not possible to certify that they meet the requirements of Rules 62-762.510 and 762.520.

Storage tanks, process tanks and process equipment are periodically inspected in accordance with Rule 62-762.600. The inspection records maintained on-site. Tanks are labeled according to their contents.

Removal of oil/water from containment

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

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

Table of Contents

- 1.0 Introduction
- 2.0 General Information
- 3.0 Spill Prevention & Emergency Preparedness
- 4.0 Emergency Coordinator Information
- 5.0 Arrangements with Local Authorities
- 6.0 Emergency Procedures
- 7.0 Decontamination
- 8.0 Reporting & Record keeping
- 9.0 Tank Closure
- 10.0 Amendments

1.0 INTRODUCTION

1.1 Purpose

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

1.2 Areas of Concern:

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

1.3 Responsibilities

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

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

2.0 GENERAL INFORMATION

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

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

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

3.0 SPILL PREVENTION and EMERGENCY PREPAREDNESS

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

General Spill Prevention Measures

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

Material Transport and Transfer

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

Prevention and Protective Measures

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

Emergency Equipment Available (see site plan for locations)

Training

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

- Operations Personnel
 - o Emergency Response Procedures

- PPE use
- Containment procedures
- Record keeping and reporting policies
- Operating & Inspection procedures
- Loading and unloading procedures
- Acceptance and processing procedures

Spill Abatement Activities

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

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

- Do not risk human life or health in an attempt to control a spill
- Shut off pumps and close the lines serving a leaking container or tank
- Shut off electricity to the affected area, if necessary
- Mobilize emergency response personnel
 - Normal working hours – the plan will be activated by use of an electronic loudspeaker
 - Off-shift hours – control team personnel will be notified by telephone or pager
- Contain the spill as close to its source as possible
- Assemble required clean-up equipment and order clean-up
- In addition to the PIC, operating personnel will, under the direction of the PIC, position the absorbent materials in strategic points to contain the spill as needed.
- Response team members will operate pumps and man hoses to further contain and capture the spill
- Team members will perform other assigned tasks needed as directed by the PIC

4.0 EMERGENCY COORDINATOR (PIC) INFORMATION

Duties of the Emergency Coordinator or Designee

- Respond to any emergencies that may arise. Use established response protocols and personal protective equipment as needed. Summon aid as necessary. Evacuate as required.
- In case of FIRE, summon the Fire Department and the Police immediately by activating the alarm system and by dialing 911. If there are injuries Emergency Management Services (EMS) can also be contacted by dialing 911.

- In the event of a spill, release or discharge, contain the flow of hazardous materials to the extent possible. Spills to the city sewer must be reported to the Utility Department. Spills must also be reported to the State Warning Point (850) 320-0519 or (800) 413-9911, and/or the National Response Center (800) 424-8802 if above the reportable quantity. Check SARA Title III.
- Clean up the waste and any contaminated materials or soil as soon as it is practical.
- If the incident i.e. fire, explosion, or other release, could threaten human health outside the facility or HOWCO has knowledge that a spill has reached surface water, notify the National Response Center Immediately at (800) 424-8802.

The following identifies the primary and alternate emergency coordinators:

Recycling Facility Primary Emergency Coordinator (Primary PIC)

Dave Roehm
Cell Phone # 727-385-1508

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

Recycling Facility Secondary Emergency Coordinator (Secondary PIC)

Lee Morris
Cell Phone # 727-543-5429

Or

Tim Hagan
Cell Phone # 727-804-4446

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

5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

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

1. Time and type of emergency
2. Location
3. Name and quantity of material(s) involvement
4. Type of service needed

5. The possible hazards to human health or the environment

The following items will be completed by the PIC:

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

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

6.0 EMERGENCY PROCEDURES

6.1 Identifying Releases and Hazards

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

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

6.2 Notifications and Reporting

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

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

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

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

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

6.3 Emergency Procedures

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

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

Emergency Communication System

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

Fire Control Systems

- Dry chemical fire extinguishers in the tank farm area

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

Site Control Systems

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

Maintenance and Testing

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

Equipment Handling Procedures

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

Removal of Oil/Water from Containment

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

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

Off-site Emergency Response Procedures - during transport

1. Driver assesses the situation.
2. Driver will contact the PIC using the telephone numbers provided in this plan.
3. If the emergency warrants an immediate response by outside agencies, the driver will contact the appropriate agency using the telephone numbers provided in this plan.

4. Driver will set up absorbent material in front of any sewer drains and/or grassy areas to prevent oil from spreading to those areas.
5. Driver will remedy the release utilizing the spill containment procedures defined in this plan.
6. Driver will document the incident as noted in this plan.

7.0 DECONTAMINATION

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

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

8.0 REPORTING

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

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

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

9.0 TANK CLOSURE PLAN

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

10.0 AMENDMENTS to CONTINGENCY PLAN

This plan will be revised, if necessary, whenever:

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

4. The PICs change; or
5. The list of emergency equipment changes.

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES

<u>Local Authority/Agency</u>	<u>Phone Number</u>	<u>Contact Period</u>
Any Emergency	911	
FL. Department of Environmental Protection		
Tallahassee (24 hour line)	800-320-0519	
Southwest District	813-632-7600	
National Response Center	800-424-8802	
CHEMTREC (Chemical Information)	800-424-9300	
Division of Emergency Response	800-635-7179	
Department of Community Affairs (DCA)	800-320-0519	
Pinellas County Emergency Management	727-464-3800	
Florida Marine Patrol	800-342-5367	
Coast Guard	727-896-6187	
St Petersburg Fire Department	727-893-7272	
Department of Transportation	813-632-6859	
FL. Highway Patrol	813-632-6859	
OSHA	813-626-1177	
Department of Environmental Management		
Division of Air Quality	727-464-4422	
Bayfront Medical Center	727-893-6714	
Bayfront Convenient Care	727-526-3627	
Edward White Hospital	727-323-1111	
Convenient Care (Company Doctor)	727-347-9719	

ATTACHMENT 7 UNIT MANAGEMENT DESCRIPTION

Drums

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

Piping

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

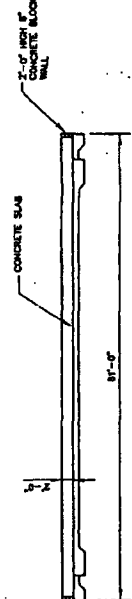
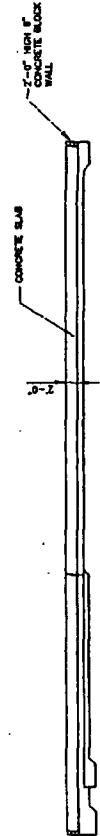
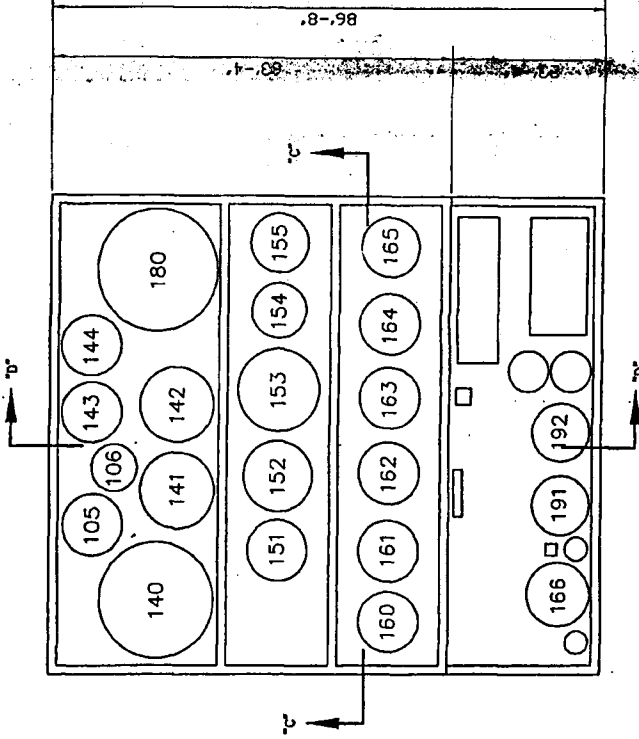
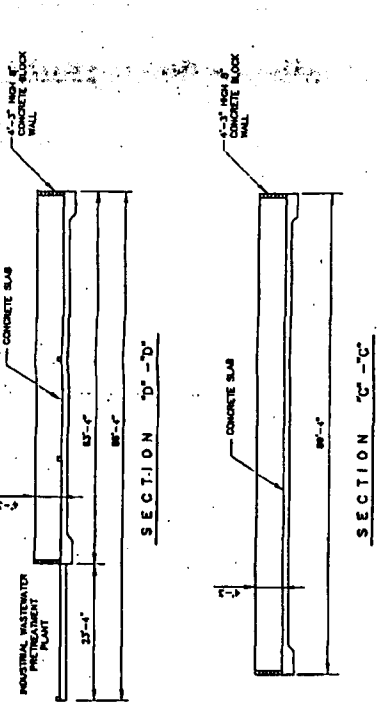
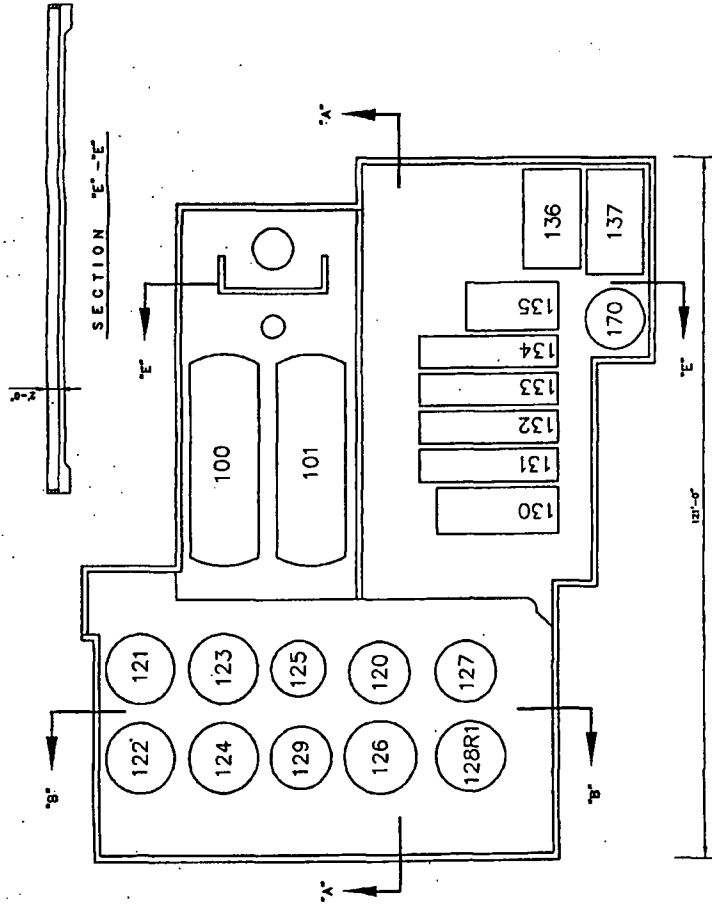
Storage Tanks

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

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

Removal of oil/water from containment

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

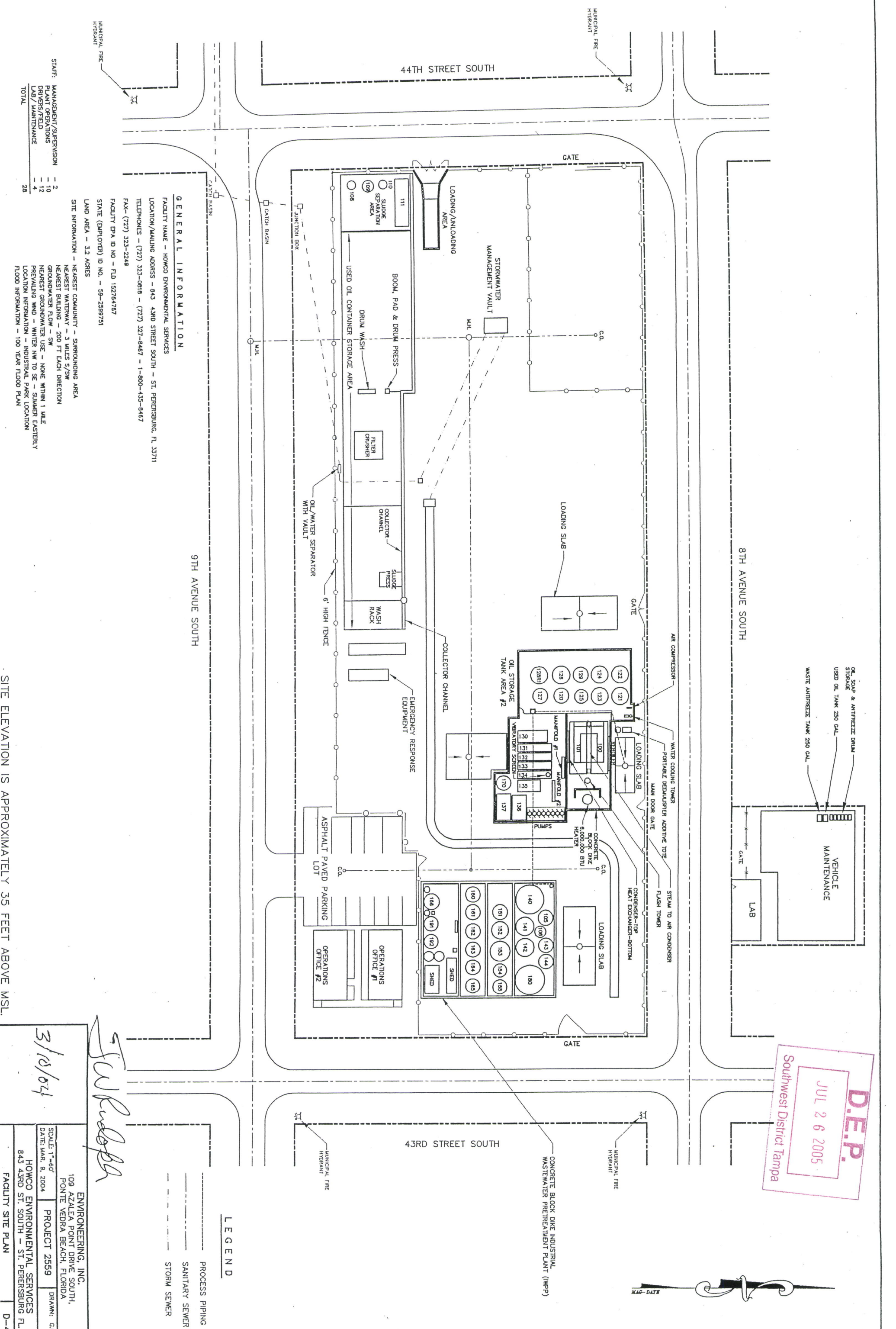


INDUSTRIAL WASTEWATER PRETREATMENT PLANT

ENGINEERING, INC.		100 N. W. 10th Ave. Suite 100, Fort Lauderdale, FL 33304	
PROJECT 2559		DATE: 03/10/04	
HOWCO ENVIRONMENTAL SERVICES		843 S.W. 1st St. - Ft. Lauderdale, FL 33304	
SHEET 1 OF 1		DATE: 03/10/04	

3/10/04

04-2



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

GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711
TELEPHONES - (727) 323-0818 - (727) 327-8467 - 1-800-435-8467
FAX - (727) 323-2248
FACILITY EPA ID NO - FLD 152764787
STATE (EMPLOYER) ID NO. - 59-2599731
LAND AREA - 3.2 ACRES

SITE INFORMATION

NEAREST COMMUNITY - SURROUNDING AREA
NEAREST WATERWAY - 3 MILES S/SW
NEAREST BUILDING - 200 FT EACH DIRECTION
GROUNDWATER FLOW - SW
NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
FLOOD INFORMATION - 100 YEAR FLOOD PLAN

SITE ELEVATION IS APPROXIMATELY 35 FEET ABOVE MSL.

Signature

3/10/04

ENVIROMEEERING, INC.	
109 AZALEA POINT DRIVE SOUTH, PONTE VEDRA BEACH, FLORIDA	
SCALE: 1"=60'	PROJECT 2559
DATE: MAR. 9, 2004	DRAWN: G.C.
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH - ST. PETERSBURG FL	
FACILITY SITE PLAN	

LEGEND

- PROCESS PIPING
- SANITARY SEWER
- STORM SEWER

D.E.P.
JUL 2 6 2005
Southwest District Tampa



REV'D 3/23/06

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

10-19-1999

PRIME

ALTERNATE

PROCESS PIPING
SANITARY SEWER
STORM SEWER

LEGEND

PRIME ROUTE FOR EVACUATION, INDUSTRIAL WASTEWATER PRETREATMENT PLANT, TANK FARM AREAS, FLASH TOWER, SHOP AND LAB.

CONCRETE BLOCK DIKE INDUSTRIAL WASTEWATER PRETREATMENT PLANT (IWPP)

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

START: MANAGEMENT/SUPERVISION - 8

CLERICAL/ACCOUNTING - 10

PLANT OPERATIONS - 12

DRIVERS/FIELD - 4

LAB/MAINTENANCE - 4

TOTAL - 42

GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES

LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711

TELEPHONES - (813) 323-0818 - (813) 327-8487 - 1-800-438-8487

FAX - (813) 323-2248

FACILITY EPA ID NO - P.D. 162764707

STATE (EMPLOYER) ID NO. - 58-2599751

LAND AREA - 3.2 ACRES

SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA

NEAREST WATERWAY - 3 MILES S/SW

NEAREST BUILDING - 200 FT EACH DIRECTION

GROUNDWATER FLOW - SW

NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE

PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY

LOCATION INFORMATION - INDUSTRIAL PARK LOCATION

FLOOD INFORMATION - 100 YEAR FLOOD PLAIN

PRIME ROUTE FOR EVACUATION, INDUSTRIAL WASTEWATER PRETREATMENT PLANT, TANK FARM AREAS, FLASH TOWER, SHOP AND LAB.

CONCRETE BLOCK DIKE INDUSTRIAL WASTEWATER PRETREATMENT PLANT (IWPP)

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

START: MANAGEMENT/SUPERVISION - 8

CLERICAL/ACCOUNTING - 10

PLANT OPERATIONS - 12

DRIVERS/FIELD - 4

LAB/MAINTENANCE - 4

TOTAL - 42

GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES

LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711

TELEPHONES - (813) 323-0818 - (813) 327-8487 - 1-800-438-8487

FAX - (813) 323-2248

FACILITY EPA ID NO - P.D. 162764707

STATE (EMPLOYER) ID NO. - 58-2599751

LAND AREA - 3.2 ACRES

SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA

NEAREST WATERWAY - 3 MILES S/SW

NEAREST BUILDING - 200 FT EACH DIRECTION

GROUNDWATER FLOW - SW

NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE

PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY

LOCATION INFORMATION - INDUSTRIAL PARK LOCATION

FLOOD INFORMATION - 100 YEAR FLOOD PLAIN

PRIME ROUTE FOR EVACUATION, INDUSTRIAL WASTEWATER PRETREATMENT PLANT, TANK FARM AREAS, FLASH TOWER, SHOP AND LAB.

CONCRETE BLOCK DIKE INDUSTRIAL WASTEWATER PRETREATMENT PLANT (IWPP)

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT

MANUAL FIRE HYDRANT



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

PERMITTEE:

HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

Attention:

Mr. Tim Hagan
President

PERMIT/CERTIFICATION:

I.D. Number: FLD 152 764 767
Permit No: 92465-H006-001
County: Pinellas
Issue Date: August 3, 2000
Expiration Date: August 3, 2005
Latitude / Longitude:
27°54'0"N / 82°38'11"W
Section / Township / Range:
10 1/2 / 31 S / 22 E
Project: **Operation of a Used
Oil and Material Processing Facility.**

This permit is issued under the provisions of Chapter 403.75 through 403.769, Florida Statutes (FS), and Rules 62-701, 62-710 and 62-4, Florida Administrative Code (FAC). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To operate a Used Oil and Material Processing Facility located at 843 43rd Street South, St. Petersburg, Pinellas County, Florida. A diagram of the site layout is included as **Attachment A**.

Used Oil Activities

The facility is authorized to process used oil, non-hazardous used antifreeze contaminated with used oil, and used oil filters under this section of the permit. The facility is also authorized to manage sludges, residues, used oil filters and by-products from filters, tank bottoms and/or storage tanks which are produced by this used oil processing facility and other oily wastes generally described in Specific Condition IV.1.b and in the Permit Application as incorporated below. Management and processing of used oil and oily wastes are covered by the permit conditions set forth in Part II.

The facility has 47 Aboveground Storage Tanks that may be used to store or process used oil, petroleum contact water, oily wastewater and other non-hazardous wastewaters. These tanks are shown in **Attachment A** of the permit. -

Material Processing Activities

To operate a materials consolidation and processing facility referred to as the HOWCO Materials Processing Facility. The facility materials processing areas are designated as the Solids Storage and Sludge Separation Areas shown in **Attachment B**.

The materials processing facility is authorized to consolidate and process non-hazardous petroleum-contaminated solid wastes and other solid wastes not constituting "used oil" subject to the permit conditions set forth in Part IV.

Other Activities

The facility also manages petroleum contact water (PCW), various virgin petroleum products and materials used in the facility's operation and process, industrial wastewater and rain water which is pretreated in their wastewater treatment process (which consists of flow equalization, gravity separation, chemical treatment, flocculation, coagulation, oxidation, filtration and air stripping) prior to discharge to the St. Petersburg sewer system (performed pursuant to a permit issued by the City of St. Petersburg) and drum recycling.

The permit application and related attachments first submitted on June 19, 1997 and all subsequent submittals and revisions thereafter were utilized in the preparation of this document and are considered a part thereof.

This permit replaces the general permit No. S052-279950

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, FS. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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), FS, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project that are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by any order from the Department.
6. The permittee shall at all times 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring 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 notify and provide the Department with the following information:
 - a. a description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact 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 that may result and may be subject to enforcement action by the Department for penalties or 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. 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. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in 62-302.500, FAC, shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This permit is transferable only upon Department approval in accordance with 62-4.120 and 62-730.300, FAC, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit is required to 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)
 - ☐ Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - ☐ Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action;
 - b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) 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 that 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 submitted or corrected promptly.
16. In the case of an underground injection control permit, the following permit conditions also shall apply:
 - a. All reports or information required by the Department shall be certified as being true, accurate and complete.
 - b. Reports of compliance or noncompliance with, or any progress reports on, requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
 - c. Notification of any noncompliance that may endanger health or the environment shall be reported verbally to the Department within 24 hours and again within 72 hours, and a final written report provided within two weeks.
 - (1) The verbal reports shall contain any monitoring or other information that indicate that any contaminant may endanger an underground source of drinking water and any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.
 - (2) The written submission shall contain a description of and a discussion of the cause of the noncompliance and, if it had not been corrected, the anticipated time the noncompliance is expected to continue, the steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance and all information required by 62-528.230(4)(b), FAC.
 - d. The Department shall be notified at least 180 days before conversion or abandonment of an injection well, unless abandonment within a lesser period of time is necessary to protect waters of the state.

17. In the case of a hazardous waste facility permit, the following permit conditions shall also apply:

a. The permittee will submit the following reports to the Department:

- (1) Manifest discrepancy report: If a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy. If not resolved within 15 days after receiving the waste, the permittee shall immediately submit a letter report including a copy of the manifest to the Department.
- (2) Unmanifested waste report: The permittee shall submit an unmanifested waste report to the Department within 15 days of receipt of unmanifested waste.
- (3) Biennial report: A biennial report covering facility activities during the previous calendar year shall be submitted to the department by March 1 of each even numbered year pursuant to 62-730, FAC.

b. Notification of any non-compliance that may endanger public drinking water supplies, or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility, shall be verbally submitted to the Department within 24 hours and a written submission provided within 5 days. The verbal submission within 24 hours shall contain the name, address, I.D. number and telephone number of the facility and owner or operator, the name and quantity of materials involved, the extent of injuries (if any), an assessment of actual or potential hazards, and the estimated quantity and disposition of recovered material. The written submission shall contain the following:

- (1) a description of any cause of non-compliance; and
- (2) 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.

c. Reports of compliance or non-compliance with, or any progress reports on, requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

d. All reports or information required to be submitted to the Department by a hazardous waste permittee shall be signed by a person authorized to sign a permit application.

SPECIFIC CONDITIONS:

PART I - STANDARD

1. General Requirements

- a. The facility shall comply with all applicable portions of 40 CFR Part 279 (§279) and Chapters 62-701 and 62-710, Florida Administrative Code (FAC).
- b. This facility shall be constructed and operated in accordance with all applicable requirements of Chapters 62-3, 62-4, 62-330, 62-520, 62-522, 62-550, 62-701, 62-713 and 62-770, FAC, and all other applicable requirements of Department Rules.
- c. By acceptance of this Permit, the Permittee certifies that he has read and understands the obligations imposed by the Specific and General Conditions contained herein, including the date of permit expiration and renewal deadlines. It is a violation of this permit to fail to comply with all conditions and deadlines.
- d. The following modifications to the General Conditions are hereby incorporated:
 - (1) Any records that the permittee is required to maintain at the facility under this permit may be maintained at the permittee's corporate office located at 3701 Central Avenue, St. Petersburg, Florida.
 - (2) Nothing contained in General Condition 10 shall be deemed to waive any right permittee has under Florida Statutes or Department rules to oppose application of any such changes to the facility if permittee is otherwise legally entitled to do so.
 - (3) General Conditions 16 and 17 do not apply to permittee's facility.
 - (4) In General Condition 7, the Department acknowledges that the permittee's management are physically located offsite at the permittee's corporate offices and that the Department will allow a "reasonable time" for the permittee's management to reach the site to facilitate Department inspection of this facility. However, nothing in this condition should be interpreted to limit the Department's lawful inspection right to inspect this facility as provided by Statute and rule.

2. Submittals

- a. Submittals in response to any conditions of this permit (except Specific Condition I.2.b) shall be submitted as follows:

(1) One copy to:

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

(2) One copy to:

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

b. All submittals in response to the permit conditions of "Part IV - Solid Waste Processing" to:

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

3. All documents submitted pursuant to the conditions of this permit shall be accompanied by a cover letter stating: the name and date of the document submitted; the number(s) of the Specific Condition(s) affected; the permit number and project name of the permit involved; and the document has been sent to each organization listed in Specific Condition I.2.a.
4. All request for permit modifications shall be certified by the owner and operator and signed, sealed, and certified by a Professional Engineer registered in the State of Florida, in accordance with 471, FS. All submittals incorporating interpretation of geological data shall be signed and sealed by a Professional Geologist registered in the State of Florida in accordance with 492, FS.
5. The Department may revoke this permit in accordance with 403.087(7), FS, or may modify this permit in accordance with 62-4.080, FAC. The filing of a request for a permit modification or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.
6. The permittee shall submit any substantial revisions in the permitted operation or design of this facility to the Department for approval prior to implementation

7. The permittee shall apply for permit renewal at least 60 days before the expiration date of this permit, in accordance with the requirements of 62-4.090, FAC.
8. The permittee shall submit a revised "Part I" of the Application Form for a Used Oil Processing Facility Permit to the Department within 30 days of any changes in the information stated in Part I.
9. The Department may modify the conditions of this permit in accordance with 62-4.080, FAC.
10. This permit is transferable only upon Department approval in accordance with 62-4.120, FAC. The permittee shall be liable for any noncompliance with the permitted activity until the transfer is approved by the Department.
11. The permittee shall annually register its used oil handling activities with the Department on DEP Form 62-701.900(13), FAC, by March 1 of each year.
12. The permittee shall maintain documentation of any shipment of used oil that is refused due to failure to meet pre-screening requirements set forth in Attachment 4 of the permit application.
13. The permittee shall use all reasonable efforts, including but not limited to correspondence, telephone calls, personal contacts, drafting and redrafting agreements, and payment of a fee, to obtain any access to real property necessary for work to be performed in the implementation of this permit. If necessary access cannot be obtained by the permittee, or if obtained, is revoked by owners or entities controlling access to the properties to which access is necessary, the permittee shall notify the Department within five business days of such refusal or revocation. The Department may at any time seek to obtain such access as is necessary to implement the terms of this permit. The permittee shall reimburse the Department for any damages, costs, or expenses, including expert and attorneys' fees, that the Department is ordered to pay, or that the Department incurs in connection with its efforts to obtain necessary access to said property. The permittee shall pay these sums to the Department, or arrange a payment schedule with the Department, within 30 days of demand by the Department.

PART II - USED OIL PROCESSING

1. The permittee may accept certain mixtures of used oil and hazardous waste if said mixture is regulated as used oil under §279.10 or applicable Florida law. The permittee shall not otherwise accept or store hazardous waste (including mixtures of used oil and hazardous waste) received from off-site generators at the facility without receiving written approval from the Department [§264].
2. The permittee shall comply with the storage capacities identified in Attachment 3 (Tables 3-1, 3-2 and 3-3) of the application.
3. The permittee shall only introduce into the processing equipment or process, used oil and other waste streams as specified in Attachment 2, pages 1 through 3, of the permit application or as described in Specific Condition IV.1.b(1)-(8); provided, however, nothing in this Specific Condition shall be deemed to prevent permittee from introducing virgin products or non-hazardous liquids containing BTU value (e.g., non-hazardous sludge, inks, greases) into the process prior to analysis pursuant to Specific Condition II.8 below.
4. The permittee shall maintain records of hazardous waste determinations from each generator for used oil waste streams [§279.57(a)(2)] and used antifreeze not destined for glycol recycling received at the facility. The determinations are to be requested from the generator each time the generator's process changes. If a non-hazardous determination is based on process knowledge, the permittee shall obtain a document from the generator that contains a brief description that clearly states the generator's process and management practices that led to the non-hazardous determination. If analytical results are used to demonstrate that the waste is non-hazardous, documentation shall be in the form of results generated by permittee's laboratory or an independent laboratory with a valid FDEP Comprehensive Quality Assurance Plan (CompQAP). The permittee shall keep this documentation on file at the facility or corporate offices.
5. The permittee shall comply with the tracking requirements specified in §279.56 and 62-710.510, FAC.
6. The permittee shall keep an operating record, in the form originally collected or obtained, at the facility or corporate offices which includes:
 - a. a copy of the permit application;
 - b. manifests and other shipping documents (for 3 years) [§279.56(c)];
 - c. training records;
 - d. the results of inspections (for 3 years);

- e. a summary report and details of incidents that require implementation of the contingency plan;
- f. the closure plan;
- g. the results of all waste analyses (for 3 years);
- h. annual used oil activity reports; and,
- i. a validated annual used oil registration form.

Unless otherwise specified above, these records must be maintained at the facility or corporate offices until the Department accepts certification of closure.

- 7. The permittee shall only ship used oil with or accept used oil from a used oil transporter who has obtained an EPA identification number and has registered with the State of Florida, except as set forth in 62-710.600(1), FAC. [62-710.500(1)(a), FAC].
- 8. Processed Used Oil Analysis Plan [§279.55]
 - a. The permittee shall obtain representative samples from its processed used oil tanks as stated in Section 4.2.1 of the application. After prior Department approval, other procedures for obtaining a representative sample based on either the sampling methods in §261, Appendix I or a method shown to be equivalent under §260.20 and §260.21 may also be used.
 - b. Unless modified by the results of the study in Specific Condition II.8.c below, the permittee shall sample and analyze every tank (i.e., batch) of used oil processed prior to shipping off-site to determine if the processed oil meets the on-specification used oil fuel criteria. The analysis shall be performed either by the permittee's laboratory or an independent laboratory with a valid FDEP CompQAP. This classification of on-specification used oil fuel must meet the requirements of the rebuttable presumption and the analytical parameters shown in Table 4-1 of the application and listed in §279.

Once the sample has been obtained, each tank of processed used oil shall be tagged-out and shall not have any additional materials (e.g. used oil, diesel fuel, etc.) added to the tank that would invalidate the analysis. The permittee shall duly note the batch number of any tank (i.e., batch) that does not meet the on-specification used oil fuel criteria and the disposition of that tank (i.e., batch) in the facility's daily operating log. If the tank (i.e., batch) is re-processed, both the initial and re-processed analytical results are to be maintained in the facility's records.

- c. At the election of the permittee, an additional study may be conducted as outlined in this permit condition to provide additional data for demonstrating process knowledge in determining on-specification used oil fuel.

The permittee will perform a sampling program that will entail sampling every tank (i.e., batch) of processed used oil prior to shipping off-site for a three (3) month period. At least 31 samples but no more than 41 samples shall be taken during this sampling period. Sampling shall be performed in accordance with Specific Condition II.8.a above. The Department shall be notified at least twenty-four (24) hours prior to each sampling event.

Each sample will be analyzed by the permittee, or an independent laboratory, for all of the constituents and properties listed in §279.11, Table 1 including PCBs. If analyzed by the permittee, at least 10% of the samples are to be "split" with one portion to be analyzed by the permittee and one portion to be analyzed by an independent laboratory with a valid FDEP CompQAP. Using SW-846 as a guideline, all appropriate quality assurance records (such as sample tracking procedure, sample holding times, chain of custody procedure, analytical methods used, method detection limits, etc.) must be retained.

The permittee shall submit to the Department the raw analytical data (including quality assurance records) from the sampling period and a statistical analysis of the data for review. Upon review of the submittal, the Department will determine the frequency of future sampling of processed used oil at the facility as follows. For each constituent/property analyzed, calculate the Student's "t" value from the data obtained for that constituent/property as described in this permit condition. Compare this "calculated t" with the tabulated "t" value from Table 9-2 of SW-846 which correspond to the applicable degrees of freedom (degrees of freedom = number of samples - 1), such that the sample mean plus the 80% confidence interval is less than the regulatory limit (except for flash point where the sample mean minus the 80% confidence interval which will be greater than the regulatory limit).

- (1) If the "calculated t" value of the constituent/property analyzed is equal to or greater than the corresponding "t" value of Table 9-2, such that the sample mean plus the 80% confidence interval is less than the regulatory limit (except for flash point where the sample mean minus the 80% confidence interval which will be greater than the regulatory limit), the permittee shall sample and analyze every tank (i.e., batch) of processed used oil for that constituent/property prior to shipping off-site. The analysis shall be performed in the manner described in Specific Condition II.8.b above.

- (2) If the "calculated t" value of the constituent/property analyzed is less than the corresponding "t" value of Table 9-2, such that the sample mean plus the 80% confidence interval is less than the regulatory limit (except for flash point where the sample mean minus the 80% confidence interval which will be greater than the regulatory limit), the permittee shall sample and analyze one tank (i.e., batch) of processed used oil once every two weeks for that constituent/property prior to shipping off-site. The analysis shall be performed in the manner described in Specific Condition II.8.b above.
- d. At the election of the permittee, the study outlined in Specific Condition II.8.c above may be repeated for any constituent/property that does not pass following the first study. Any subsequent studies must be completed within one (1) year of the end of the first study.
9. The permittee shall manage the sludges, residues, and by-products generated from the storage and processing of used oil at the facility in accordance with §279.10(e).

PART III - TANKS

"Tank system", for the purpose of Part III of this permit, is defined as the storage tank(s), appurtenant equipment and secondary containment structures comprising the permittee's used oil processing facility.

1. The permittee shall label or mark all aboveground tanks and containers used to store or process used oil, with the words "Used Oil". [§279.54(f)]
2. The permittee shall inspect all regulated tank systems in accordance with procedures presented in Unit Management (Attachment 9) of the permit application.
3. The inspection records and release detection monitoring required in 62-761.600, FAC, for aboveground process and storage tanks shall be maintained in the permittee's operating record.
4. Aboveground storage and process tanks having a capacity greater than 550 gallons shall comply with the performance standards of 62-761.500 and 62-761.510, FAC.
5. The permittee shall prevent the release of used oil or other pollutants to the environment. The secondary containment shall be sealed, free of cracks and maintained in accordance with 62-761.500(1)(e), FAC.
6. The permittee shall provide and maintain adequate secondary containment that shall be impervious to the types of pollutant stored in the tanks and contain at least 110 percent of the volume of the largest tank in accordance with 62-761.500, FAC.
7. The Department acknowledges that the used oil processing facility is not currently in compliance with 62-761, FAC, requirements for secondary containment. Consent Order #97-2190 has a schedule for achieving facility compliance with the impervious lining and volume requirements of 62-761.500, FAC. The Department acknowledges that permittee's completion of the terms of the Consent Order will satisfy the construction/design requirements for secondary containment contained in Specific Condition III.6 above.
8. Spilled or leaked waste must be removed from the secondary containment areas within three (3) days of the incident [62-761.820(1)(d), FAC]. Accumulated precipitation must be removed from the secondary containment areas within one week after a rainfall event [62-761.700(3)(a), FAC]. The above materials shall be managed in accordance with Attachment 9 of the permit application.

PART IV - SOLID WASTE PROCESSING

1. Facility Designation. In addition to the used oil activities permitted above, this facility shall be classified as a waste processing facility for the processing of non-hazardous wastes. Notwithstanding the above, nothing herein shall prohibit the permittee from handling virgin materials or products. This permit does not regulate in-feed waste streams otherwise permitted to be received or handled by the permittee pursuant to its Industrial Wastewater Pretreatment permit with the City of St. Petersburg.
 - a. Definitions. The following terms are defined as follows for the purposes of this permit:
 - (1) "Contaminated" means the presence of petroleum or petroleum products or their chemical constituents in surface water, groundwater, soil, sediment, or upon the land, in quantities or concentrations that may result in exceedances of the applicable cleanup target levels specified in 62-777, FAC, or water quality standards in 62-3, 62-302, 62-520 or 62-550, FAC, or in quantities or concentrations that may result in contaminated sediment.
 - (2) "Contaminated sediment" means sediment that is contaminated with petroleum or petroleum products or their chemical constituents to the extent that contamination may be harmful to human health or the environment as determined by the concentrations of the petroleum or petroleum products' contaminants of concern, actual circumstances of exposure, diversity studies, toxicity testing or other evidence of harmful effects, as applicable. (Refer to the Development and Evaluation of Sediment Quality Assessment Guidelines, Volumes 1-4, dated November 1994, for guidance on the evaluation of concentrations of petroleum products' contaminants of concern and sediment quality conditions.)
 - (3) "Contaminated soil" means soil that is contaminated with petroleum or petroleum products or their chemical constituents to the extent that applicable soil cleanup target levels specified in 62-777, FAC, are exceeded.
 - (4) "Contamination" refers to the definition for "contaminated."
 - (5) "Facility" means all contiguous land and structures, other appurtenances, and improvements on the land used for solid waste management.
 - (6) "Impervious surface" means a surface that has been constructed to prevent the discharge of contaminants into or onto the soil mantle. Asphalt pavement or concrete which has been sealed by a chemical resistant sealant, and which does not exhibit cracking, spalling, gouges, or other

deficiencies, may be considered "impervious" for the purposes of this permit.

- (7) "Non-hazardous wastes" are wastes that are not included in the definition of hazardous wastes pursuant to 62-730, FAC.
- (8) "Petroleum contaminated soil" as defined in 62-713.200(6), FAC.
- (9) "Petroleum contaminated water" means water which has been contaminated as defined in Specific Condition IV.1.a(1) above, exclusively by petroleum products as defined in 376.301(21), FS (1995), in quantities which may result in a violation of 62-3, FAC, water quality standards.
- (10) "Processing" means separating and consolidating the materials received based on physical characteristics (including processing of such materials through the oily solids batch treatment tank #111 and the cone-bottom tank #110), and includes bulking and consolidation of materials from small containers into larger containers, and separation of liquids and solids and may include the addition of "solidification agents" as defined below. The addition of solidification agents shall not be deemed to change the chemical characteristics of the waste stream under this permit. "Processing" does not include treatment, such as the stabilization of materials by the addition of stabilization agents, or changing the chemical character, composition or concentration of the materials.
- (11) "Site" means the area of land or water within the property boundaries where one or more waste processing, resource recovery, recycling, storage or disposal areas are located.
- (12) "Solidification Agents" include "oil-dri", vermiculite, clay absorbents, fly ash from coal-fired industrial boilers, and clean soil that are purchased specifically for solidification purposes. Other absorbent materials which may change the physical characteristics (e.g., solid/liquid state) purchased specifically for solidification purposes may be added to this list of solidification agents if written notice is provided to the Department.
- (13) "Solid Waste Processing Area" shall include the Solids Storage Area and the Sludge Separation Area shown on Drawing 10-2 in the permit application.
- (14) "Stabilization Agents" include cement kiln dust, lime, or other chemical reagents whose addition may alter the chemical characteristics of the materials.

- b. The materials, which are permitted to be accepted, processed, stored or otherwise managed at the facility under Part IV of this permit, **are limited to the non-hazardous wastes** identified below as these terms are identified in this section above:

- (1) Petroleum contaminated soil.
 - (2) Petroleum contaminated sorbent materials (e.g. pads, booms, rags, vermiculite, etc.), personal protective equipment (PPE) and petroleum contaminated debris associated with a spill such as gravel, rock, concrete, asphalt and **de minimus** quantities of other petroleum contaminated solid wastes.
 - (3) Petroleum tank bottom sludges from petroleum storage tank systems regulated pursuant to 62-761, FAC, non-regulated petroleum storage tank systems, pits, containment areas, sumps and tanks.
 - (4) Petroleum contaminated water as defined in this permit, Specific Condition IV.1.a(9).
 - (5) Petroleum contact water (PCW) as defined in 62-740.030(1), FAC.
 - (6) Petroleum contaminated sediments, sludges and liquids that originate from oil/water separators at residential car washes, rollover car washes, and tunnel car washes as defined in 62-660.803(3), FAC.
 - (7) Empty petroleum contaminated drums, pails, gas tanks, and fuel filters not otherwise constituting "used oil".
 - (8) Non-hazardous, non-liquid waste streams generated from the on-site used oil processing and industrial wastewater pretreatment facilities.
- c. Unless specifically stated otherwise in this permit, the wastes listed in Specific Condition IV.1.b. may be accepted, processed, stored and managed only if the permittee has obtained reasonable assurance that the materials are not hazardous waste as defined in Specific Condition IV.1.a(7).
- d. Wastes not specifically listed or described in Specific Condition IV.1.b. shall not be managed at the facility pursuant to Part IV of the permit.
- e. Part IV of the permit does not authorize the management of household hazardous wastes (described in §261.4), or hazardous wastes generated by conditionally exempt hazardous waste generators regulated under §261.5 (CESQG's). However, certain mixtures of used oil and hazardous waste may be accepted for used oil processing as identified in Specific Condition II.1 and the Department acknowledges that this condition does not

apply to such used oil materials that may be lawfully accepted pursuant to Part II of this permit and applicable law.

2. Prohibitions. The prohibitions of 62-701.300, FAC, shall not be violated at this site.
3. Facility Operation Requirements.
 - a. The permittee shall operate this facility in accordance with 62-701.700, FAC, the Operations Plan, other documentation supporting the permit application, and any other applicable requirements.
 - b. In the event that the processing equipment becomes inoperable, the permittee shall complete repairs, or provide reserve equipment, **within one week of discovery** of the equipment failure. In the event that sufficient reserve equipment is not available within one week of the equipment failure, and the facility has reached its permitted storage capacity, the facility shall not accept additional waste materials until sufficient equipment is operating at the site.
 - c. Incompatible materials shall not be combined during receipt, storage or processing at the facility.
 - d. Except as described in Specific Condition IV.1.a(10) above, the operations of this facility shall not alter the chemical characteristics of the solid waste materials received, processed, stored or otherwise managed by the addition of stabilization agents, or other methods, without prior Department approval. If the permittee chooses to "stabilize" solid materials or otherwise change the chemical characteristics of the materials, a permit modification shall be required.
4. Waste Acceptance.
 - a. Wastes shall be accepted in accordance with the Operations Plan, the Sampling & Analysis Plan, the conditions of this permit and the information submitted in support of this permit.
 - b. Each solid waste stream generated by the used oil processing facility shall be sampled and analyzed for the parameters listed in Table 4-3 of the permit application **at least annually**.
 - c. Wastewater treatment sludge (WWTS) generated from permittee's industrial waste pre-treatment plant sludge press and that the permittee intends to dispose off-site with no further processing at the facility (other than mixing with soil or other material for the purpose of absorbing liquid) shall be sampled and analyzed in accordance with the requirements of Specific Conditions IV.4.c(1) through (6) below. This waste

characterization process will be repeated in order to adequately re-characterize the waste each time the in-feed wastewater composition changes to the degree that invalidates the established generator knowledge for this waste stream. The solid waste generated by the on-site industrial wastewater pre-treatment shall not be managed with any other waste streams prior to sampling and analysis required by Specific Condition IV.4.c(1) through (6) below.

- (1) WWTS shall be sampled as follows: permittee shall cause a qualified professional trained in sampling techniques ("sampling professional") to take a composite sample, consisting of at least six sub-samples, of WWTS contained in the dump hopper. The sample shall be taken when the dump hopper is at least half-full and be taken directly from the hopper before the waste is commingled with any other materials or waste streams. The WWTS batch shall be uniquely identified by permittee and tracked on all chain-of-custody and other documentation concerning sampling and analysis. The sample shall be delivered to a chemical analytical laboratory for analysis. The laboratory must be a "qualified laboratory", that is, have a Department approved Comprehensive Quality Assurance Plan (CompQAP), and be approved for Toxicity Characteristic Leaching Procedure, EPA Method 1311 (TCLP), for all parameters listed in Table 1 of S261.24 ("toxic contaminants"). Within the sample holding time limit, the sample shall be analyzed by TCLP for all toxic contaminants.
- (2) The WWTS shall be sampled quarterly for two quarters and analyzed as described above and permittee shall submit to the Department a laboratory report documenting the results of the sampling and analysis performed in accordance with Specific Condition IV.4.c(1) above.
- (3) Thereafter, and not including any analyses performed in accordance with Specific Condition IV.4.c(5) below, the WWTS shall continue to be analyzed at a minimum frequency of once per year in the same manner as described above.
- (4) Although generated at two different facility process units, the waste solids generated at the cone-bottom tank (Tank No. 110) and at the oily solids batch treatment tank (Tank No. 111), are agreed by the Department and permittee to constitute the same waste stream. The oily solids batch treatment tank is generated from permittee's processing of waste sludge that typically contain recoverable petroleum constituents, but their exact composition is not precisely known because they come from many different facilities and are derived from a variety of sources and processes; including oil/water separators, storage tank clean-outs, and residential car wash holding tanks [62-660.803(3) FAC]. Wastes generated by the permittee from processing used oil are also processed in these units. This waste stream shall

be identified as oil-extracted sludge (OES). The generation of OES is agreed to occur at the time and point at which solid waste is removed from either process unit, and permittee intends to dispose of the waste off-site with no further processing at the facility, other than mixing the waste with soil or other material for the purpose of liquid absorption. OES shall be sampled at a point after it is removed from either process unit and before mixing with any other material, and shall be analyzed and managed in the same manner and within the time frames specified for WWTS in Specific Conditions IV.4.c(1) through (3) above. For the purposes of the sampling hereunder, an "OES batch" shall be defined as any amount over 55 gallons and less than the capacity of the unit removed on the same day from either process unit. The initial sample may be taken from an OES batch generated at either process unit at the permittee's discretion. Consecutive samples shall be taken alternately from the two process units.

- (5) If any of the toxic contaminant Regulatory Levels (as defined in §261.24, Table 1) are exceeded on any TCLP analysis performed in accordance with Specific Conditions IV.4.c(1) through (4), then all WWTS or OES from the batch sampled must be managed in compliance with all hazardous waste requirements per 62-730, FAC. Permittee shall segregate, uniquely identify and store each WWTS and OES batch sampled in a labeled container at the facility until the analytical results are received and reviewed to determine if the waste must be managed as hazardous waste. Following the receipt of analytical results that indicate a batch of WWTS or OES exceeds any Regulatory Levels, all WWTS or OES generated subsequently, as applicable, will be accumulated in discrete batch amounts as defined in Specific Conditions IV.4.c(1) and (5), and shall be managed in compliance with all hazardous waste requirements per 62-730, FAC, until and unless none of the Regulatory Levels are exceeded as determined by analysis of two consecutive batches of the applicable waste.
- (6) Permittee shall cause a sampling professional to sample each discrete batch of the following wastes at the point of generation prior to mixing with any other material; spent carbon and sand filtration media, and any other solid waste stream generated by the used oil and wastewater plants, other than the waste streams identified herein as WWTS, OES, tank bottom sludge and screen filter residue. Each sample shall be analyzed by a qualified laboratory using the TCLP procedure for all toxic contaminants. Permittee shall submit the laboratory results to the Department as soon as the data are available. If any of the toxic contaminant Regulatory Levels are exceeded for any waste, then that waste must be managed in compliance with all applicable hazardous waste requirements per 62-730, FAC.

- d. All waste solids generated from cleaning the vibratory screen filter in the used oil processing plant shall be placed in containers that are kept closed to the outside elements except when in use and labeled as "Screen Filter Residue". The containers shall be stored in an area provided with secondary containment until the contents are transferred for further processing into either the cone-bottom tank #110, or the oily solids batch treatment tank #111. All tank bottom sludges generated from the cleaning of storage and process tanks at the facility shall also be transferred for further processing into either the cone-bottom tank or the oily solids batch treatment tank. The "point of generation" of waste derived from either of these two materials, when managed in this manner, is the cone-bottom tank or the oily solids batch treatment tank, as applicable. If permittee chooses to manage either screen filter residue or tank bottom sludge without further processing through either the cone-bottom or oily solids batch treatment tanks, then permittee shall make a waste determination on such materials in accordance with the analysis specified in Specific Condition IV.4.c(6) above, and manage the waste in accordance with all hazardous waste requirements per 62-730, FAC, if any of the TCLP levels are exceeded.
- e. Permittee shall provide verbal notification to the Department's Southwest District Hazardous Waste Section at least three (3) days prior to performing the sampling described in Specific Conditions IV.4.c(1) through (5) above. Permittee shall allow Department representatives the opportunity to obtain a split sample at each sampling event, and allow the Department access to sample the described waste streams at any time during normal business hours. Results of all analyses performed shall be exchanged between permittee and the Department as soon as the data is available.
- f. The permittee shall maintain records of hazardous waste determinations from each generator for all solid waste streams (e.g. petroleum contaminated soils) received at the facility. The determinations are to be updated by the generator each time the generator's process is changed. Permittee will have the generator re-affirm at least annually, that the process has not changed and record this update in the record for that generator. If a non-hazardous determination is based on process knowledge, the permittee shall obtain a document from the generator that contains a brief description that clearly states the generator's process and management practices that led to the non-hazardous determination. If analytical results are used to demonstrate that the waste is non-hazardous, documentation shall be in the form of results generated by a laboratory with a valid FDEP CompQAP [Table 2, 62-160.700, FAC]. The permittee shall keep this documentation on file at the facility or corporate offices.

5. Waste Disposal.

- a. All processed materials shall be transferred, or disposed of, at an appropriately permitted disposal or treatment facility. The permittee shall not transfer any material, processed or unprocessed, for treatment or disposal, to a facility not specifically approved for the disposal or treatment of such materials.
- b. Solid wastes produced by the on-site industrial wastewater pre-treatment system or the used oil processing system which are not soil, may be disposed of at a soil treatment facility **only if** that facility is authorized by an alternate procedure issued pursuant to 62-713, FAC or 62-775, FAC, to accept and manage such wastes.
- c. The permittee shall ensure that the materials which are disposed have been adequately sampled, analyzed and characterized to meet the intended disposal facilities' acceptance criteria. The outgoing materials shall be sampled and analyzed at least **annually**, or more frequently if required by the disposal facility.
- d. Pursuant to 62-660.803(5), FAC, contaminated liquids from car (or truck) wash oil/water separators shall be disposed of at a Department permitted wastewater treatment facility or a pre-treatment facility connected to a department-permitted wastewater treatment facility (such as the permittee's on-site industrial wastewater pre-treatment facility). Processed solids from oil/water separator sludges shall be disposed of at a Class I or Class II solid waste landfill authorized by the Department unless laboratory analysis confirms alternative disposition is permitted under applicable law.

6. Storage of Materials.

- a. The maximum quantity of solid waste stored at the facility pursuant to Section IV of this permit shall be limited to **22,000 gallons**. For purposes of compliance with this permit, the following conversions shall be used:

55 gallon drum = 55 gallons
500 gallon tote = 500 gallons
15 cubic yard container = 3030 gallons
20 cubic yard container = 4040 gallons

Storage in other containers may be acceptable with Department approval.

- b. Processed solids shall be stored in covered, lined roll-off containers or covered drums on impervious surfaces.

- c. All processed and unprocessed solid wastes shall be stored within the Solids Storage and Sludge Separation Areas shown on Drawing 10-2 in the permit application.

7. Materials Processing.

- a. All materials shall be processed on impervious surfaces, or in tanks or containers.
 - b. The owner or operator shall ensure that neither liquids nor solids are discharged outside the Solids Storage and Sludge Separation Areas (Drawing 10-2 in the permit application).
 - c. Solid waste materials (liquids, sludges, solids, etc.) shall not be placed on the ground, asphalt or concrete areas at the site, but shall be managed within containers (drums, vac trucks, roll-offs, etc.) and/or processing tanks.
 - d. Containers with processed waste shall be clearly labeled "Processed Solid Waste."
 - e. The owner or operator shall ensure that the discharge pipe for the Oily Solids Batch Treatment Tank #111 discharges only into a suitable container, and does not discharge onto the ground or asphalt pavement.
 - f. Equipment that is used for mixing solidification agents with the waste materials shall be decontaminated prior to removal from the Solid Waste Processing Area. The mixing activities shall be performed such that spillage of waste outside, and damage to, the storage container is prevented.
 - g. Mixing operations shall not be conducted during inclement weather.
 - h. The owner or operator shall conduct **monthly** inspections of the Solids Storage and Sludge Separation Areas. These inspections shall be recorded on an appropriate form, and shall document the conditions of storage containers, the pavement within the Solids Storage and Sludge Separation Areas, and the processing equipment. In the event that deficiencies are discovered (e.g. leakage), the corrective actions taken shall be noted on the inspection form.
8. - Operation Plan and Operating Record. A copy of the Department approved permit, Operations Plan, construction reports and record drawings, Operations and Maintenance Manuals for the used oil processing facility and equipment, and supporting information shall be kept at the site or corporate offices at all times for reference and inspections.

9. Waste Records.

- a. The owner or operator of the waste processing facility shall maintain at the site or corporate offices, and provide to the Department upon request, the following waste records (at a minimum, the most recent three years):
 - (1) The amount of waste received, stored, processed and disposed. The amount of such waste shall include: the quantities of drums received (gallons), an estimate of the percentage of solids and liquids in each drum, the quantities of bulk liquids received (gallons), the quantities of bulk solids received (tons), and the quantities of liquids (gallons) and solids (tons) disposed of, and stored onsite.
 - (2) The Waste Profile Form and associated analytical data, for each waste stream accepted at the facility.
 - (3) The pre-burn analyses, as required by 62-713, FAC, for each shipment (batch) of petroleum contaminated soil from each separate contaminated site which is received at the facility, for those materials which will be transferred to a permitted soil thermal treatment facility.
 - (4) The pre-acceptance analyses or written waste determination required by Attachment 4, Sampling and Analysis Plan and Attachment 5, Solid Waste Handling, of the permit application.
 - (5) Copies of any analyses required by a disposal facility as a condition of acceptance of the waste and documentation indicating the actual acceptance of the material at the disposal or treatment facility for each shipment from this permitted facility.
 - (6) Monthly Waste Inspection/Corrective Action Log (see Specific Condition IV.6.h.)
 - (7) Copies of permits for the facilities that receive the processed solids from this facility.
 - (8) Incident Reports (Table 6-2) in the permit application.
- b. The following information shall be compiled monthly and a summary submitted to the Department quarterly, by January 15th, April 15th, July 15th and October 15th of each year:
 - (1) A material balance including the quantities of drums received (gallons), an estimate of the percentage of solids and liquids in each drum received, the quantities of bulk liquids received (gallons), the quantities of bulk solids received (tons), and the quantities of liquids (gallons) and

solids (tons) disposed of, and the quantity of liquids, solids and unprocessed drums stored onsite.

(2) The name and location of the disposal or treatment facility for all solid wastes removed from the facility.

10. Drainage Requirements. All areas shall be cleaned at the end of each day's operation, or as needed, to prevent nuisance conditions, hazardous conditions, odor or vector problems. Floors and impervious areas shall be free of standing liquids. Except for discharges to permitted disposal facilities by approved methods, liquids shall not be discharged outside the Solid Waste Processing Area.
11. Closure Requirements. The facility owner or operator shall notify the Department of the facility's closure, **no later than 180 days prior** to the date when the facility is expected to close, as required by 62-701.700(3)(d), FAC. The facility shall be closed in accordance with 62-701.700(3)(d) FAC, and the Closure Plan, Attachment 10, of the permit application.
12. Financial Assurance. The owner or operator shall provide financial assurance for the materials processing facility in accordance with 62-701.700(4), FAC.
 - a. All costs for closure shall be adjusted and submitted **annually, by the anniversary date of the permit issuance** each year, to: Financial Assurance Coordinator, Pinellas County Solid Waste Department, 3095 114th Ave South, St. Petersburg, FL 33716 and one (1) copy shall be sent to: Solid Waste Section Manager, Department of Environmental Protection, Southwest District, 3804 Coconut Palm Drive, Tampa, Florida 33619. The closure cost estimates shall be signed and sealed by a registered professional engineer. The closure cost estimates shall be for the time in the operation when the closing is most expensive, and shall be based on a third-party performing the work.
 - b. **Within sixty (60) days of issuance of this permit**, the owner or operator shall submit initial proof of financial assurance issued in favor of the State of Florida and/or authorized, delegated local program, on appropriate forms, in the amount of \$58,760. Thereafter, proof that the financial mechanism has been funded adequately in the amount of the cost estimates required by Specific Condition IV.12.a shall be submitted **annually** to: Financial Assurance Coordinator, Pinellas County Solid Waste Department, 3095 114th Ave South, St. Petersburg, Fl. 33716 and one (1) copy shall be sent to: Financial Assurance Coordinator, Solid Waste Section, Department of Environmental Protection, 2600 Blair Stone Road, MS#4565, Tallahassee, Fl. 32399-2400.

13. Facility Maintenance and Repair.

- a. The site shall be properly maintained including maintenance of processing equipment, tanks, storage containers, containment systems, impervious surfaces and stormwater systems.
- b. In the event of damage to any portion of the site facilities, failure of any portion of the associated systems, or any reportable "incident" or "discharge" (defined in Rules 62-761.200(2) and (40), FAC) outside of the solids waste processing area, the permittee shall **immediately (within 24 hours)** notify the Department of Environmental Protection explaining such occurrence and remedial measures to be taken and time needed for repairs or remediation. Written detailed notification shall be submitted to the Department **within seven (7) days** following the occurrence.

14. Control of Nuisance Conditions. The owner or operator shall be responsible for the control of odors and fugitive particulates arising from this operation. Such control shall minimize the creation of nuisance conditions on adjoining property. Complaints received from the general public, and confirmed by Department personnel upon site inspection, shall constitute a nuisance condition, and the permittee must take immediate corrective action to abate the nuisance. The owner or operator shall control disease vectors so as to protect the public health and welfare.

15. Stormwater System. The site shall continue to have a stormwater management system operated and maintained in accordance with 62-330, FAC, and any other applicable Department or water management district rules.

PART V - CONTINGENCY PLAN

1. The facility shall be operated and maintained to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of used oil to the air, soil, or surface water that could threaten human health or the environment.
[§279.52(a)(1)]

2. The permittee shall comply with the following conditions concerning preparedness and prevention:

- a. At a minimum, the permittee shall have the following equipment available at the facility (in addition to items described in Item 7.2 of the Preparedness and Prevention Plan in Attachment 7 of the application, which may be at the facility dependent on availability):

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

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

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

- b. The permittee shall test and maintain the equipment specified in the Preparedness and Prevention Plan as necessary to assure its proper operation in time of emergency.
3. The permittee shall inspect the facility operating, emergency and safety equipment in accordance with §279.52(a)(3).
4. All personnel involved in the management of used oil must have immediate access to an internal alarm or emergency communication device whenever used oil is being poured, mixed, spread, or otherwise handled as described in §279.52(a)(4).
5. The permittee shall maintain adequate aisle space as required by §279.52(a)(5).
6. The permittee shall post at conspicuous locations at the facility information on emergency equipment and evacuation routes as outlined in the Contingency Plan (Attachment 8) of the permit application.

7. The Contingency Plan shall be immediately amended and distributed to the appropriate agencies if any criteria of §279.52(b)(4) are met.
8. The permittee shall immediately carry out the Emergency Procedures as described within the Contingency Plan of the application whenever there is a release, fire, or explosion that threatens or could threaten human health or the environment [§279.52(b)(6)].
9. The permittee shall give proper notification to the Department if an emergency situation arises, and within 15 calendar days, must submit to the Department a written report which includes all information required in §279.52(b)(6)(ix).

The FDEP 24-hour emergency telephone number is 850-413-9911. The District FDEP Emergency Response number is 813-744-6462. During normal business hours, the District FDEP Office may be contacted at 813-744-6100.

PART VI - TRAINING

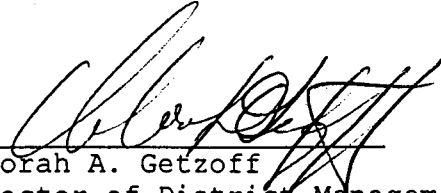
1. Facility personnel must successfully complete the approved training program identified in the Training Plan (Attachment 11) of the permit application. Personnel shall not work unsupervised until training has been completed.
2. The training plan must be reviewed by facility personnel at least annually. Verification of this training must be kept with the personnel training records and maintained on-site or at the corporate offices.
3. The permittee shall maintain an updated list of personnel handling used oil and their respective job titles at the site.

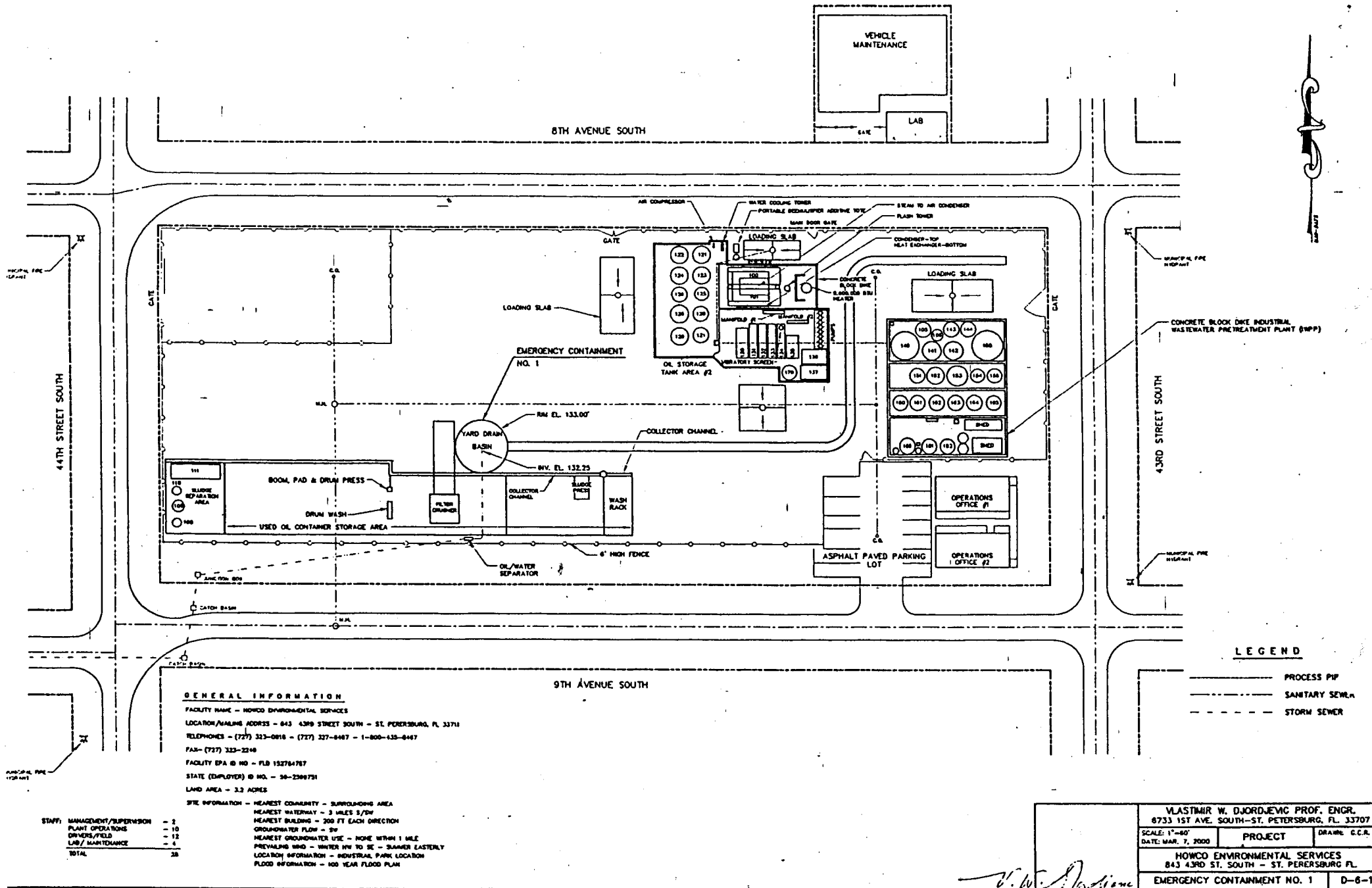
PART VII - CLOSURE

1. The permittee shall have a written closure plan as required by §279.54(h) and 62-710.800(9), FAC. The closure plan and all revisions to the plan must be kept at the facility until closure is completed, certified and accepted by the Department.
2. The permittee shall amend the closure plan in accordance with 62-710.800(9)(b), FAC, whenever necessary. The closure plan amendment shall be submitted as a permit modification and certified pursuant to Specific Condition I.4.
3. The permittee shall close the facility as described in the Closure Plan of the permit application, unless the plan is modified as described in Specific Conditions VII.2 and VII.7.
4. The permittee shall manage materials generated during closure (solid and liquid decontamination residues and contaminated soils) based upon a waste classification in accordance with §262.11.
5. The permittee shall demonstrate that the facility has met the requirements of 62-710.800(9), FAC, by showing the following:
 - a. The permittee will have demonstrated that used oil has not contaminated surface or ground water after completion of closure activities [62-710.800(9)(a)(2), FAC] when contaminant concentrations in the liquid decontamination residues (e.g., facility and equipment wash-down rinsate) do not exceed applicable groundwater cleanup target levels (GCTLs) identified in 62-777, FAC, and contaminant concentrations in soils at the site do not exceed applicable leachability values identified in 62-777, FAC.
 - b. In order for the permittee to receive a "No Further Action" (NFA) determination or a Site Rehabilitation Completion Order (SRCO) from the Department for the facility, soils must also either meet applicable soil cleanup target levels (SCTLs) identified in 62-777, FAC or otherwise demonstrate that the soil's risk to groundwater, surface water or public health have been managed specifically for this site.
6. The permittee shall analyze all samples for target parameters using appropriate methods from Test Methods for Evaluating Solid Waste (EPA SW-846), latest edition.
7. The permittee shall notify the Department at least sixty (60) days prior to the date they expect to begin closure and submit a complete revised closure plan and a request for permit modification with appropriate permit modification fee. [62-710.800(6) and (9), FAC]
8. Within thirty (30) days after completion of closure, the permittee shall certify that the facility has been closed in

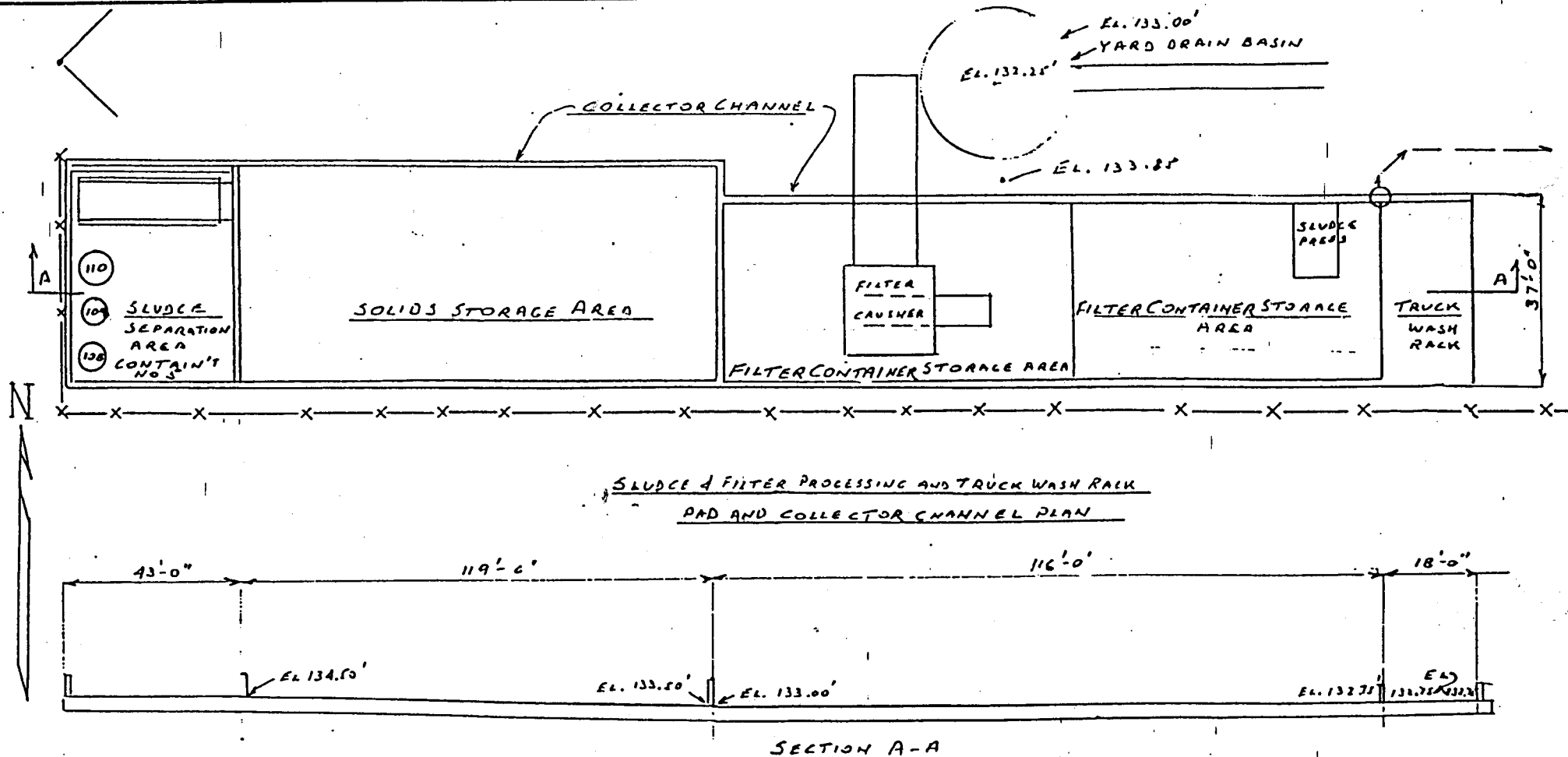
- accordance with the specifications in the closure plan of the permit application.
9. Within ninety (90) days of determining that all contaminated soils cannot be practically removed, the permittee shall submit a hazardous waste permit application to close the tank system(s) and perform post-closure care in accordance with the closure and post-closure care requirements of §265.310 that apply to hazardous waste landfills. [§279.54(h)(1)(ii)]
 10. In the event that facility closure occurs prior to State-implemented cleanup, discharges at the property of petroleum or petroleum products that have been found eligible for cleanup under the Petroleum Cleanup Participation Program, 376.3071(13), FS, shall be addressed in accordance with the terms of that program, notwithstanding any provision of this permit. As provided by 376.308(5), FS, "Effective July 1, 1996, and operating retroactively to March 29, 1995, notwithstanding any other provision of law, judgement, consent order, order, or ordinance, no person who owns or operates a facility or who otherwise could be responsible for costs as a result of contamination eligible for restoration funding from the Inland Protection Trust Fund shall be subject to administrative or judicial action, brought by or on behalf of the state or any local government or any other person, to compel rehabilitation in advance of commitment of restoration funding in accordance with a site's priority ranking pursuant to s. 376.3071(5)(a) or to pay for the costs of rehabilitation of environmental contamination resulting from a discharge of petroleum products that is eligible for restoration funding from the Inland Protection Trust Fund."

Issued this 4th day of August, 2000


Deborah A. Getzoff
Director of District Management
Southwest District



ATTACHMENT B



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

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST. AVE. SOUTH - ST. PETERSBURG, FL. 33707

SCALE: N.T.S.	APPROVED BY: PROJECT No.	DRAWN BY V.W. DJ.
DATE: 7-15-1999		REVISED

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

SOLIDS & FILTER PROCESSING AND TRUCK	DRAWING NUMBER 10-7
--------------------------------------	------------------------