



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 06/29/2018

On-Site Inspection End Date: 06/29/2018

ME ID#: 1038

EPA ID#: FLD152764767

Facility Street Address: 843 43rd St S, St Petersburg, FL 33711-1922

Contact Mailing Address: 3701 Central Ave, St Petersburg, FL 33713

County Name: Pinellas

Contact Phone: (727) 327-8467

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector

Other Participants: Elizabeth Knauss, Environmental Consultant; Richard Dillen, Quality Assurance Officer; Greg Bradley, Operations Manager; Lee Morris, Director of Operations

LATITUDE / LONGITUDE: Lat 27° 45' 40.8037" / Long 82° 41' 32.5519"

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

HOWCO Environmental Services (HOWCO) was inspected to determine its compliance with state and federal hazardous waste regulations. On January 22, 2016, the Department of Environmental Protection (Department) issued HOWCO a single permit with two permit numbers authorizing operation of a used oil processing facility (Permit #33721-HO-004) and a solid waste / materials processing facility (Permit #33721-SO-005); the dual permit expires on August 3, 2020. The Department has conducted a number of Hazardous Waste compliance inspections at this facility, most recently on March 9, 2016. The inspectors were accompanied for the walkthrough portion of the inspection by Richard Dillen, Quality Assurance Officer, and Greg Bradley, the Operations Manager. Lee Morris, Director of Operations, was present for the record review at the facility's main office on Central Avenue in St. Petersburg.

Process Description:

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor. Additionally, HOWCO accepts oily waste solids from its customers for consolidation and subsequent disposal. No solid waste treatment or solidification is performed. Used anti-freeze is shipped monthly to On-Site Antifreeze Recycling, Ft. Meyers, FL. HOWCO is also a very small quantity generator of hazardous waste (VSQG) due to the lab wastes generated during QA testing. HOWCO is permitted to have 48 aboveground storage tanks (ASTs), storing petroleum contact water (PCW), used oil, processed oil, and water/antifreeze. The facility has 23 ASTs which are regulated by the Storage Tank Program and are registered under Storage Tank Facility #8624557. The facility operated under NPDES Stormwater Permit # FLR05B511, which expires on February 4, 2021. The facility has an emergency address system (i.e., the bullhorn) in place. The fire and emergency equipment are inspected monthly and tested annually; the fire extinguishers were recertified in June 2018. The facility is on City of St. Petersburg water and sewer systems. Except as noted below, the processes at the facility have not changed since the previous inspection.

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Stormwater and wastewater are collected throughout the facility, including from the Water Plant containment sumps, the Oil Plant containment sumps, the truck wash, the drum washing area, and the yard. All collected wastewater is routed to the Water Plant via sumps and pumps. After treatment, the effluent is discharged via a Parshall flume to the sanitary sewer system under Industrial Pretreatment permit #SPFL-5622219-CIU-86-32 with the City of St. Petersburg. General facility stormwater is routed through two oil/water separators in tandem prior to being discharged to the St. Petersburg MS4. During the inspection, a large crack was observed in the concrete stormwater conveyance near the Oil Plant. The Department recommends repairing this during the planned yard re-surfacing.

The facility's on-site laboratory is located north of the main facility on 8th Street South. Processed oil is randomly sampled biweekly and tested to confirm it is on-specification. Samples are prepared and retained in the facility's on-site laboratory for thirty days. Specification analyses are done off site by PhosLab. Chemical Oxygen Demand (COD) testing is conducted in the laboratory to satisfy the requirements of the Industrial Pretreatment permit. The spent vials from the COD process are hazardous waste containing acid and chromium; the vials are accumulated in several boxes labeled "spent vials;" some of these vials are dated 2013. The laboratory also operates a Mass Spectrometer. The Mass Spectrometer produces hazardous waste in the spent vials which are 10% used oil and 90% solvent (F003). The laboratory uses mercury thermometer and maintains a mercury spill kit. No Poly Chlorinated Biphenyl (PCB) sampling is conducted in-house. As the facility is a VSQG, they are able to take their hazardous laboratory waste and spent fluorescent lamps to the Pinellas County Collection Center for disposal. Per facility staff, hazardous waste has not been taken to the Collection Center since 2016.

Two 55-gallon metal drums of used oil in secondary containment are located behind the laboratory. The drums are for the collection used oil sample waste from the laboratory (including samples past retention). The drums were covered, labeled, on containment pallets and are under a small roof; however, the containment pallet contained some stormwater. Facility staff provided photographic documentation that these containments had been emptied on July 19, 2018.

The Maintenance Shop is located next to the laboratory. The facility operates a bench style parts washer which uses non-chlorinated parts washing fluid. Spent parts washing fluid mixed in with the used oil collected the shop. In addition, the shop generates used oil filters, used oil, used antifreeze, and oily waste. At the time of this inspection, a 55-gallon drum of used antifreeze and a 55-gallon drum of drained used oil filters were located inside the shop, and two 55-gallon drums of used oil were located outside the shop. The used oil drums were equipped with secondary containment and protected from the weather; however, the containments contained a mixture of stormwater and used oil. Facility staff provided photographic documentation that these containments had been emptied on July 6, 2018.

The overall appearance of the yard was organized and maintained. A new oil burner was installed in the Oil Plant in January 2018; the old, emptied, burner was still in the yard and will be scrapped. All the containment structures appeared to be in good repair. Some of the ASTs were in need of recoating. Per facility personnel, the tanks and containments will be recoated within the next two months. In addition to these repairs, the facility was in the process of re-asphalting the yard at the time of the inspection. Non-fixed equipment and vehicles have been temporarily placed around the perimeter of the facility in preparation. Unusable equipment/vehicles will be surplus or scrapped. Water was being discharged from the water plant at the time of the inspection; according to facility personnel, this water was from the base of Tank #141 which collects stormwater from the facility.

HazMat and emergency response supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill response equipment. The required items appear to be present. There were a number of paint cans and buckets in the HazMat trailer. Some of these containers are rusting. The Department recommends that the facility inventory these products and properly dispose of any unusable materials. Three unlabeled drums were observed on the west side of the trailer. Per an email received on July 10, 2018, facility personnel confirmed that these drums contained water and the drums were emptied and removed.

The eye wash station between the HazMat trailer and the truck wash was in disrepair and did not meet ANSI specifications as the activation valve was damaged, although it could be activated. The Department recommends that this eye wash station be repaired.

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The filter crushing and drum crushing areas were clean and well maintained. The used oil filter crusher is still on site, but filters are no longer crushed. Drums of used oil filters are received and staged in the filter processing area where they are consolidated in large foundry bins. The full foundry bins of uncrushed filters are shipped to US Foundry & Manufacturing Corp., Miami, Florida. At the time of the inspection, there were three foundry bins in this area; two were empty and the third contained a few used oil filters. Approximately 22 drums of used oil filters stored in the filter processing area, along with 7 drums containing unused absorbent material. All the used oil filter drums were labeled "used oil filters".

At the time of the inspection, the Solid Waste Pad had one roll-off of spent paper filter media to be shipped to the Pinellas County Waste-to-Energy incinerator. There were also foundry five bins of used oil filters staged and awaiting shipment to US Foundry. The bins were all labeled appropriately. The lid on one of these foundry bins was damaged and did not properly close. Facility staff provided photographic documentation that the bin had been covered with a tarp on July 10, 2018. A large number of 55-gallon drums containing used absorbent material were also staged in this area prior to shipment for disposal.

Oily solid waste received or generated at the facility is not being solidified at this time. This waste is consolidated on site and sent to Waste Management, Okeechobee, Florida, which is a Class I landfill.

Oily sludges (i.e., separator sludge) from customers is processed in the Sludge Containment Area. The facility's sludge storage and settling tanks are located in a concrete containment dike next to the solid waste pad. The tanks associated with the oily sludge (i.e., not the WTU sludge) are elevated at least 10 feet. The oily sludges are pressed to remove excess oil and water. The oil and water is then processed with the rest of HOWCO's used oil. The remaining solids are sent to Clark Environmental, Inc., Mulberry, Florida, which is permitted to accept and treat such waste. HOWCO's oil-extracted sludge and Water Plant sludge are also managed by Clark Environmental. The oil extracted sludge is dewatered first on site in a filter press before getting shipped, but the Water Plant sludge is not. The sludges are analyzed annually.

Records were reviewed and found to be complete and up to date. HOWCO employees, including the designated emergency coordinators, received DOT HazMat Training and Hazardous Waste/Used Oil Management Training on January 26, 2018. The facility has a Contingency Plan (Version 6, dated May 15, 2015) and an SPCC Plan, dated June 14, 2014. Insurance is current and has been proved to the Department.

HOWCO has an electronic recordkeeping system that is used company wide. Selecting a customer's account gives access to all delivery, pick-ups, waste profiles documentation on file, including analyticals. Approximately ten accounts were randomly selected and the associated records examined, including manifests, profiles, analytical results, and certifications. Inbound and outbound paperwork was included. Currently, the only outgoing used oil is to customers, and before every load is delivered, the customer is provided with a certificate of analyses to support the claim that the material is on-specification. There are no deliveries from the St. Petersburg plant to HOWCO's other facilities (in Astor and Ft. Myers), although the plant still receives used oil from other HOWCO sites.

HOWCO requires customers to analyze all new wastes picked up, requires the generator to certify at three years that there has been no change to the process, and requires new analysis every five years. As part of its acceptance criteria, drivers use halogen meters to test all used oil for halogen content. If the instruments indicate the halogen content is >1,000-ppm, the used oil is analyzed using a Dexsil kit. If the that also shows the oil has a high halogen content, it is not picked up, unless the presumption the material is hazardous is rebutted. All used oil arriving at the plant has been accepted in accordance with this criterion, and therefore there are no "rejected loads."

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.401(6)
Explanation:	Two 55-gallon metal drums of used oil in secondary containment are located behind the laboratory. The drums were covered, labeled, on containment pallets and are under a

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small roof; however, the containment pallet contained some stormwater. Two 55-gallon drums of used oil were located outside the shop. The used oil drums were equipped with secondary containment and protected from the weather; however, the containments contained a mixture of stormwater and used oil.

Corrected: Facility staff provided photographic documentation that the maintenance shop used oil containments had been emptied on July 6, 2018. Facility staff provided photographic documentation that the laboratory used oil containments had been emptied on July 19, 2018.

Corrective Action: Stormwater must be removed from the secondary containment to ensure the containment capacity remains a 110% of the volume of the largest tank or container within the containment area.

Photo Attachments:

Laboratory used oil drums are on containment and roofed



Stormwater is present in the laboratory used oil containment



7/19/2018: Stormwater removed from the laboratory used oil containment



Maintenance shop used oil drums are on containment and roofed



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Used oil/stormwater is present in the maintenance shop used oil containment



Used oil/stormwater is present in the maintenance shop used oil containment



7/6/2018: Liquid removed from the maintenance shop used oil containment



7/6/2018: Liquid removed from the maintenance shop used oil containment



Type:	Violation
Rule:	62-710.850
Explanation:	There were also foundry five bins of used oil filters staged and awaiting shipment in the Solid Waste Pad. The lids on two of these foundry bins were damaged and did not properly close.
	Corrected: Facility staff provided photographic documentation that the bin had been covered with a tarp on July 10, 2018.
Corrective Action:	All persons storing used oil filters shall store used oil filters in above ground containers which are sealed or otherwise protected from weather and stored on an oil-impermeable surface.

Photo Attachments:

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One of the foundry bin lids was damaged/did not properly close



7/10/2018: Foundry bin covered with a tarp

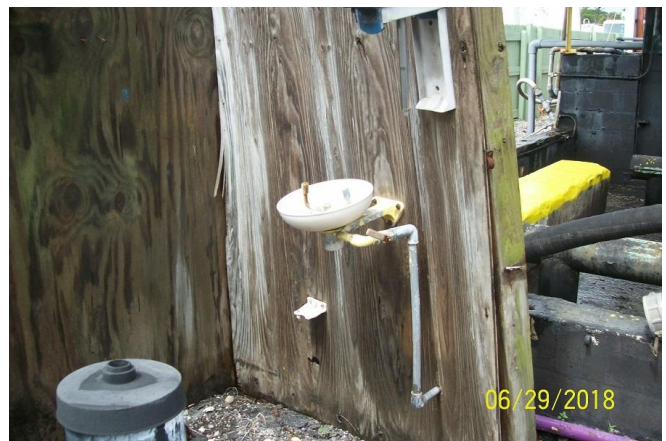


PHOTO ATTACHMENTS:

a large crack was observed in the concrete stormwater conveyance



Eye wash station near the truck wash was in disrepair



Conclusion:

Based on the observations made during this inspection, HOWCO was found to be operating out of compliance rules applicable to used oil processors. However corrective actions were taken immediately following the inspection and the facility has returned to compliance.

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1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Leslie Pedigo

Principal Inspector Name

Inspector

Principal Inspector Title**Principal Inspector Signature**

DEP

Organization

07/20/2018

Date

Elizabeith Knauss

Inspector Name

Environmental Consultant

Inspector Title

FDEP/SWD

Organization

Richard Dillen

Representative Name

Quality Assurance Officer

Representative Title

HOWCO Environmental Services

Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Greg Bradley

Representative Name

Operations Manager

Representative Title

HOWCO Environmental Services

Organization

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Lee Morris

Representative Name

Director of Operations

Representative Title

HOWCO Environmental Services

Organization

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Report Approvers:**Approver:** Shannon Kennedy**Inspection Approval Date:** 07/20/2018