



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

October 30, 2018

Richard Dillen
HOWCO Environmental Services
24133 State Road 40
Astor, FL 32102
Richarddillen@howcousa.com

Re: HOWCO Environmental Services
HW Facility ID #FLD101828689

Lake County

Dear Mr. Dillen:

Department personnel conducted a compliance inspection of the above-referenced facility on September 12, 2018. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Edward Rysak at 407-897-2906 or via e-mail at Edward.Rysak@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "David Smicherko".

David Smicherko, Environmental Manager
Central District
Florida Department of Environmental Protection

Enclosures: Inspection Report (with attachments)

cc: Edward Rysak, Edward.Rysak@dep.state.fl.us
David Smicherko, David.Smicherko@dep.state.fl.us



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 09/12/2018

On-Site Inspection End Date: 09/12/2018

ME ID#: 63050

EPA ID#: FLD101828689

Facility Street Address: 24133 State Road 40, Astor, FL 32102-3031

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

County Name: Lake

Contact Phone: (727) 327-8467

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Edward Rysak, Inspector

Other Participants: Dan Medici, Plant Manager

LATITUDE / LONGITUDE: Lat 29° 9' 46.3142" / Long 81° 32' 26.2423"

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

On 09/12/2018, Edward Rysak, Florida Department of Environmental Protection (FDEP, Department), accompanied by Daniel Medici, HOWCO Astor Plant Manager, inspected HOWCO Environmental Services in Astor, FL for compliance with state and federal used oil regulations.

HOWCO is a registered Used Oil Transporter, Transfer Facility, Processor, Marketer, Filter Transporter, Filter Transfer Facility, and Filter Processor. The company is headquartered in St. Petersburg, Florida. The St. Petersburg facility is a registered used oil transporter and processor as well as used oil filter transporter and processor.

Prior to HOWCO beginning operations at this site, North Florida Oil was operating as a used oil and used oil filter transporter and processor at this location. HOWCO took over the operations in 2000. HOWCO was issued EPA ID FLD101828689 on 09/27/2006. The facility is connected to the City of Astor sewer and water systems. The facility has three employees. Standard operating hours are 8:00 am to 5:00 pm, Monday through Friday. The facility is connected to the municipal wastewater collection and potable water systems. The property is owned by Hagan Holding Company, 3701 Central Avenue, St. Petersburg, FL 33713.

HOWCO operated under Used Oil Processing Facility permit numbers 27221-HO-004 and 27221-SO-005, issued on 07/08/2011, which expired in August 2015. These permits were renewed in December 2015 and the facility currently operates under permit numbers 27221-HO-006 and 27221-SO-007 which expire on August 25, 2020.

INSPECTION HISTORY (LAST 10 YEARS)

On August 11, 2010, HOWCO was inspected and found to be out of compliance. Violations noted included: failure to conduct monthly inspections. The corrective actions were completed and the case was closed without formal enforcement.

Inspection Date: 09/12/2018

On March 21, 2012, HOWCO was inspected and found to be out of compliance. Violations noted included: Failure to maintain a copy of the contingency plan at the facility, failure to have at least one employee on the premises or on call to respond to an emergency, failure to keep a copy of the written analysis plan at the facility, failure to keep the current year's record of each used oil shipment accepted for processing/re-refining at the facility, failure to comply with the requirements of its permit, and failure to display the validated registration form and identification number in a prominent place at the facility. Per a follow-up inspection performed on 09/04/2013 by FDEP's Central District staff, the corrective actions were completed. The case was closed with the issuance of a Final Order on 6/26/2013, OGC Case Number 12-1412, that included \$6,500 in civil penalties.

On July 16, 2015, the facility was inspected and an above-ground storage tank for oil-contaminated water was improperly labeled, specifically lacking the words "used oil." Also, it was discovered that the facility was not conducting required biweekly test sampling of outgoing processed used oil shipments per General and Standard Condition #45 (e) of permit number 27221-HO-004 and 27221-SO-005, rather it was conducting the required testing on a monthly basis. These items were corrected shortly after the inspection.

Process Description:

HOWCO transports used oil, used oil filters, non-hazardous sludges, antifreeze, absorbents and miscellaneous oily wastes to their facility in Astor from various locations throughout Florida. The Astor facility acts as a transfer location for consolidation of wastes shipped to the HOWCO facility in St. Petersburg.

When an oil tank truck returns to the facility from a pickup, a composite sample is pulled before the oil is offloaded for storage. The composite sample is screened for halogens and distilled to determine water content. Loads are bulked for shipment to HOWCO, St. Petersburg, and for shipment to burners as on-specification fuel. Two tanks are used for management of on-specification fuel oil. Oil is stored in the first tank until it is full. The tank is then locked out and sampled. Oil is then diverted to the second storage tank for accumulation while oil in the first on-specification oil tank is shipped off-site to burners. When the second tank is full it is locked out and sampled and oil is again stored in the first tank.

Inspection of the covered tanker loading/off-loading area found the area to be clean with no visible releases. Solid wastes are put into 55-gallon drums in the covered tanker trailer loading area for storage prior to disposal.

The two primary solid waste streams are solids removed from incoming used oil and spent absorbents. Solids are placed in an enclosed grate on top of a 55-gallon drum so that used oil can drain. The drained solids and spent absorbents are both placed in 55-gallon drums and stored in an enclosed trailer prior to disposal.

At the time of the inspection HOWCO had 12 above ground storage tanks (AST) located on a concrete pad surrounded by a concrete wall (tank farm). The tank farm had no visible releases at the time of the inspection. The tanks' designations and volumes were as follows:

- Tank #1 - water (8,225 gallons)
- Tank #2 - used oil (27,640 gallons)
- Tank #3 - used oil (27,640 gallons)
- Tank #4 - off-spec fuel (10,000 gallons)
- Tank #5 - used oil (27,640 gallons)
- Tank #6 - used oil (10,000 gallons)
- Tank #7 - burner fuel (8,000 gallons)
- Tank #8 - was out of service at the time of the inspection
- Tank #9 - used oil (38,000 gallons)
- Tank #10 - was out of service at the time of the inspection
- Tank #11 - used oil (heated tank - 15,000 gallons)
- Tank #12 - Screened oil (500 gallons)

Inspection Date: 09/12/2018

HOWCO's used oil processing permit allows for the contents of the tanks to change from time-to-time based on current market conditions, however, all tanks are to be provided with the appropriate marking/placarding.

Fire extinguishers and spill equipment were located next to the tank containment area. A&A Fire & Safety Inc. checks fire extinguishers on an annual basis. A direct alarm for the building security is through ADT.

Parking & Equipment Storage Area

This area is where semi-tractor trailers reside while they accumulate items to be taken to the St. Petersburg facility.

Maintenance Shop

This is the area in which minor vehicle maintenance work is performed. Used oil, used oil filters, and antifreeze generated onsite accumulates in 55-gallon drums prior to disposal offsite. Inside the maintenance shop was a small quality analysis lab used for testing parameters such as total halogen content, flashpoint, and water content of used oil samples taken from incoming and outgoing used oil shipments.

RECORDS

The following records were reviewed at the facility, pursuant to its used oil processing permit:

- Annual registration form
- Permit renewal application
- Copy of current permit application
- Contingency plan
- Monthly tank inspection forms
- Written Analysis Plan (Attachment 3 of permit application)
- Records of used oil shipments from 2018

No issues were noted with any of these documents.

The following records were reviewed after the inspection once requested from HOWCO's St. Petersburg location:

- On-specification analytical data of processed outgoing used oil shipments for the year 2018 [40 CFR 279.11] per General and Standard Condition #46 (e) of the facility's used oil processing permit number 27221-HO-006 and 27221-SO-007.
- Storage tank registration statement for fiscal year 2018-2019.

No issues were noted with any of these documents. According to Richard Dillen, Quality Assurance Officer at HOWCO's St. Petersburg location, the Astor facility does not always continuously process used oil – sometimes several weeks may pass without any processing occurring. Thusly, sampling is not always conducted every two weeks per General and Standard Condition #46 (e) of permit number 27221-HO-006 and 27221-SO-007 if no used oils have been accumulated since the most recently completed sampling event. The facility must ensure it complies with this permit condition at all times as applicable. The facility currently uses Phoslab Environmental Services to complete the required analyses.

Conclusion:

HOWCO was inspected as a non-handler of hazardous waste and a used oil processor and was in compliance at the time of inspection.

Inspection Date: 09/12/2018

5.0 - Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)	✓		
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			✓
5.16	contain the released oil? 279.22(d)(2)			✓
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✓
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✓
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)			✓
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)			✓
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		

Inspection Date: 09/12/2018

Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			✓
5.29	contain the released oil? 62-710.850(5)(b)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
	<input type="checkbox"/> Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	<input type="checkbox"/> Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
	<input type="checkbox"/> Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			✓
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓

Inspection Date: 09/12/2018

Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)	✓		
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)	✓		
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	✓		
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)	✓		
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)	✓		
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)	✓		
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)	✓		
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)	✓		
Item No.	Marketing and Processing	Yes	No	N/A
	<input type="checkbox"/> Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]			
	<input type="checkbox"/> Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

Inspection Date: 09/12/2018

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.

Edward Rysak

Principal Inspector Name

Inspector

Principal Inspector Title*E. Rysak***Principal Inspector Signature**

DEP

Organization

10/16/2018

Date

Dan Medici

Representative Name

Plant Manager

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.

Report Approvers:**Approver:**

David Smicherko

Inspection Approval Date:

10/17/2018