



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services
On-Site Inspection Start Date: 01/30/2020 **On-Site Inspection End Date:** 01/30/2020
ME ID#: 1038 **EPA ID#:** FLD152764767
Facility Street Address: 843 43rd St S, St Petersburg, Florida 33711-1922
Contact Mailing Address: 3701 Central Ave, St Petersburg, Florida 33713
County Name: Pinellas **Contact Phone:** (727) 327-8467

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: VSQG **Used Oil:** On-Spec, Used Oil, Oil Filters, Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Generator Facility
Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Marketer Facility
Routine Inspection for VSQG (<100 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Sarah M Brownlee, Inspector
Shannon Kennedy, Environmental Manager; Greg Bradley, Operations Manager; Richard
Other Participants: Dillen, Quality Assurance Officer

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

NAIC: 324110 - Petroleum Refineries

TYPE OF OWNERSHIP: Private

Introduction:

An inspection was conducted at HOWCO Environmental Services (HOWCO) on January 30, 2020 by the Florida Department of Environmental Protection (Department). The Department has conducted a number of Hazardous Waste compliance inspections at this facility, most recently on June 29, 2018. 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 inspectors were accompanied for the walkthrough portion of the inspection by Richard Dillen, Quality Assurance Officer, and Greg Bradley, the Operations Manager.

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 was actively occurring at the time of the inspection. 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 operates 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

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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 has not changed since the previous inspection which has an in depth explanation of the facility's process.

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 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 a mercury thermometer and maintains a mercury spill kit. No Poly Chlorinated Biphenyl (PCB) sampling is conducted inhouse. 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.

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 is 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, two 55-gallon drums, one of used oil and one of hydraulic oil, were located outside the shop. The two drums were equipped with secondary containment and protected from the weather. Inside the shop, the facility had a 5-gallon bucket of used oil, a step can of oily rags which are laundered by Cintas, and several used oil pans that were unlabeled. The facility labeled the oil pans during the inspection.

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 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. The Department verbally discussed the requirements related to an Episodic Event related to the potential clean-out activities.

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 five foundry bins in this area containing used oil filters. There were numerous 55-gallon drums of used oil filters stored in the filter processing area, along with 20 drums containing absorbent material. All the used oil filter drums were labeled "used oil filters."

Records were reviewed and appeared 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. The facility has a Contingency Plan and an SPCC Plan. Insurance is current and has been proved to the Department.

HOWCO has an electronic record keeping 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. Several 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 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 recertify 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

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loads."

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c)(1)
Question Number:	5.4
Question:	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"?
Explanation:	279.22(c)(1) Facility had several containers in the Maintenance Building that were not labeled "Used Oil".
Corrective Action:	Corrected: Facility labeled the containers "Used Oil" during the inspection.

Photo Attachments:

Containers labeled Used Oil (CORRECTED)



PHOTO ATTACHMENTS:

Outside of Maintenance Shop



Containers Outside of Lab



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Oil Tank Area (Receiving)



Oil Tank Area (Receiving)



Truck Wash Station



Used Oil Filter Storage



Foundry Bins

Conclusion:

At the time of the inspection, HOWCO Environmental Services was not operating in compliance with state and federal regulations for very small quantity generators of hazardous waste and used oil. The facility returned to compliance during the inspection.

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2.0: VSQG 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.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)			✓
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)			✓
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)	✓		

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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

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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)	✓		
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? 62-710.850(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?			✓

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	[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)			✓
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 checked="" 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			

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	CFR 279 Subpart H.]			
	<input checked="" 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.]			

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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

Sarah M Brownlee**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**02/21/2020**Date**Shannon Kennedy**Inspector Name**Environmental Manager**Inspector Title**DEP**Organization**Greg Bradley**Representative Name**Operations 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.

Richard Dillen**Representative Name**Quality Assurance Officer**Representative Title**Howco Environmental Services**Organization**

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Report Approvers:**Approver:**Shannon Kennedy**Inspection Approval Date:**02/24/2020