

From: [Kothur, Bheem](#)
To: [Thursby, Kim](#)
Cc: [Kothur, Bheem](#)
Subject: Fw: Permit application HOWCO-Astor - Comments
Date: Tuesday, June 30, 2020 2:17:46 PM

Hi Kim,

Please put this below chain of emails into OCLUS, under Howco Environmental Services, Inc. Renewal permit application.

Facility I.D: FLD 101 828 689

Received date: June 12, 2020

Thanks,

Bheem

From: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Sent: Tuesday, June 30, 2020 8:27 AM
To: White, John <John.White@dep.state.fl.us>; Richard Dillen <Richarddillen@howcousa.com>; Tim Hagan <thagan@howcousa.com>
Cc: Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; 'rdillen@howcousa.com' <rdillen@howcousa.com>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Subject: Re: Permit application HOWCO-Astor - Comments

Hello John and all,

Thanks for your quick review and response and appreciated.

Bheem

From: White, John <John.White@dep.state.fl.us>
Sent: Tuesday, June 30, 2020 7:53 AM
To: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Cc: Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Subject: RE: Permit application HOWCO-Astor - Comments

The response is acceptable to me. I have no further comments.

Thank you

John White
Environmental Consultant
Florida Department of Environmental Protection
John.White@floridadep.gov
(407)897-4305

From: Richard Dillen <Richarddillen@howcousa.com>
Sent: Monday, June 29, 2020 2:48 PM
To: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Cc: White, John <John.White@dep.state.fl.us>; Tim Hagan <thagan@howcousa.com>
Subject: RE: Permit application HOWCO-Astor - Comments

All,

In response to the John's 1st comment:

The designated trailer meets the definition of a "used Oil" container as per 40 CFR260.10.
HOWCO will also notify the FDEP district office in case received used oil does not meet the Total Halogen requirement and can't be successfully rebutted.

In response to the 2nd comment:

Attached are the last three of analyticals that clearly show that the waste steam is non-hazardous.

Richard Dillen

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

Watch the video to learn more about HOWCO!



From: Kothur, Bheem [<mailto:Bheem.Kothur@FloridaDEP.gov>]
Sent: Tuesday, June 23, 2020 10:19 AM
To: Richard Dillen <Richarddillen@howcousa.com>; Tim Hagan <thagan@howcousa.com>
Cc: White, John <John.White@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>;
Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Eckoff, Michael
<Michael.Eckoff@FloridaDEP.gov>; Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>
Subject: Fw: Permit application HOWCO-Astor - Comments

Hello Richard,
FYI, and review.

Just Heads Up:

Please see below review comments from John White, from our district office.
Please make sure that these comments apply for your both the (Astor and St. Petersburg),
facilities.

If you have any questions, please let me know and or you make discuss with John and let me
know..

John and Shannon are our C&E, Officers from Central and Tampa, respectively.

Thanks,

Bheem

From: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Sent: Monday, June 22, 2020 2:36 PM
To: White, John <John.White@dep.state.fl.us>
Cc: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: Fw: Permit application HOWCO-Astor - Comments

Hello John,
Thanks for your comments.
I will review your comments and Attachment-2, and make sure we address these as
appropriate.

Thanks,

Bheem

From: White, John <John.White@dep.state.fl.us>
Sent: Monday, June 22, 2020 2:23 PM
To: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: FW: Permit application HOWCO-Astor - Comments

Bheem,

I have asked Miranda and Michael to take a look at this was well. Miranda had nothing different

from my comments. Michael will be back in the office later this week. So far, my only comments are:

Attachment 2 – Detailed Process Description

Used Oil Unloading: statement made “Should an incoming shipment of used oil initially not meet acceptance criteria for total halogens, and cannot be successfully rebutted the oil is transferred to a designated trailer for temporary storage... If the analytical results do not meet the used oil specifications or cannot successfully be rebutted, the oil is shipped to a permitted facility.”

COMMENT: The trailer must meet the definition of a “container” in 40 CFR 260.10. Permit must include a requirement that the facility notify DEP of any failed halogen tests.

Removal and Disposal of Oily Solids: The solids removed during the solids removal screening are processed and disposed of through decanting and solidification. A plant technician or chemist will take the solids samples annually. Each sample will be collected in a glass jar using a scoop. The test results will be used to provide the base information for product knowledge.

COMMENT: Copies of past analytical results should be provided to ensure the Department can move forward with considering the material non-hazardous. If the analytical results document the waste exhibits a hazardous waste characteristic, then additional permit requirements will be necessary.

Thanks

John White
Environmental Consultant
Florida Department of Environmental Protection
John.White@floridadep.gov
(407)897-4305

From: Kothur, Bheem
Sent: Thursday, June 18, 2020 12:43 PM
To: White, John <John.White@dep.state.fl.us>; Ciaravella, Philip <Philip.Ciaravella@FloridaDEP.gov>
Cc: Ashwood, Janet <Janet.Ashwood@FloridaDEP.gov>; Eldredge, Susan F <Susan.Eldredge@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; Kromhout, Elizabeth <Elizabeth.Kromhout@FloridaDEP.gov>; Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>
Subject: Fw: Permit application HOWCO-Astor

Hello John and all,

Attached are the renewal permit applications (UO and SW), for Howco Environmental

Services- Astor, facility, FL.

Please review the appropriate attachments and let know you have any comments ASAP.

Thanks,

Bheem

From: Richard Dillen <Richarddillen@howcousa.com>

Sent: Thursday, June 18, 2020 12:12 PM

To: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>

Subject: FW: Permit application HOWCO-Astor

FYI.

Richard Dillen

Q.A.O.

HOWCO Env. Services

(727)-437-4059

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From: Richard Dillen

Sent: Friday, June 12, 2020 2:49 PM

To: Bheem.Kothur@FloridaDEP.gov

Cc: Tim Hagan <thagan@howcousa.com>; Greg Bradley <gregbradley@howcousa.com>

Subject: Permit application HOWCO-Astor

Mr. Kothur,

Attached are the files that were just mailed to the FDEP-Tallahassee office.

Richard Dillen

Q.A.O.

HOWCO Env. Services

(727)-437-4059

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