



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
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Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

August 26, 2020

Richard Dillen
HOWCO Environmental Services
3701 Central Ave.
St. Petersburg, FL 33713-8338
rdillen@howcousa.com

Re: HOWCO Environmental Services
HW Facility ID FLD101828689
Lake County

Dear Mr. Dillen:

Department personnel conducted an inspection of the above-referenced facility on July 14, 2020. 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 Mackenzie Black at 407-897-4184 or via e-mail at Mackenzie.Black@FloridaDEP.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Seyfert", is written over a light yellow rectangular background.

Jason Seyfert, Manager
Central District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Mackenzie Black Mackenzie.Black@floridadep.gov
Dan Medici dmedici@howcousa.com



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services
On-Site Inspection Start Date: 07/14/2020 **On-Site Inspection End Date:** 07/14/2020
ME ID#: 63050 **EPA ID#:** FLD101828689
Facility Street Address: 24133 State Road 40, Astor, Florida 32102-3031
Contact Mailing Address: 3701 Central Ave, St Petersburg, Florida 33713
County Name: Lake **Contact Phone:** (727) 327-8467

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Used Oil:** On-Spec, Oil Filters, Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Mackenzie Black, Inspector
Other Participants: Miranda Rothenberger, Inspector; Dan Medici, Plant Manager

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

NAIC: 324110 - Petroleum Refineries

TYPE OF OWNERSHIP: Private

Introduction:

On July 14, 2020, Mackenzie Black and Miranda Rothenberger, Florida Department of Environmental Protection (Department), accompanied by Daniel Medici, HOWCO Environmental Services Astor Plant Manager, inspected HOWCO Environmental Services in Astor, Florida 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 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 September 27, 2006. The facility is connected to the St. John's River Utility sewer and water systems. The facility has 5 employees and operates from 8:00AM to 5:00PM, Monday through Friday. The property is owned by Hagan Holding Company, 3701 Central Avenue, St. Petersburg, Florida 33713.

HOWCO currently operates under Used Oil Processing Facility permit numbers 27221-HO-006 and 27221-SO-007, which expire on August 25, 2020. A renewal application has been submitted.

INSPECTION HISTORY (LAST 5 YEARS):

On July 16, 2015, HOWCO was inspected and found to be out of compliance. Violations included: failure to sample outgoing used oil shipments in the correct frequency. The corrective actions were completed and the case was closed without formal enforcement.

On September 12, 2018, HOWCO was inspected and found to be in compliance.

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Process Description:

HOWCO transports used oil, used oil filters, non-hazardous sludge, antifreeze, oily solid waste, and miscellaneous oily wastes to their facility in Astor, Florida from various customers. The facility is also permitted to accept and treat petroleum contact water (PCW), but does not currently accept this waste stream. The facility acts as a transfer location for consolidation and treatment of wastes that are then shipped to the HOWCO facility in St. Petersburg, Florida.

During a pick-up, the driver will use a sniffer to test each container of waste for total halogens and indicate a "pass" or "fail" on the shipping manifest. If the material passes, it is loaded into an oil tank truck. When the truck returns to the facility, a composite sample is pulled from the combined waste prior to being offloaded for storage. The composite sample is screened for halogens and distilled to determine water content. If the composite sample from the oil tank truck passes the screening, material will be loaded into the appropriate storage tank and may be treated using a heating process to reduce the water content. Tanks #2, #8, and #9 are the primary storage tanks for refined on-specification oil. When a tank becomes full, it will be locked out and sampled prior to being sent to the St. Petersburg facility for resale or for further treatment. Oily solid wastes and spent absorbents are placed into three 55-gallon drums located in the covered tanker trailer loading area where oil will slowly drain from the solids through a screen for further use. Once fully drained, the spent solids are stored in 55-gallon drums for disposal and the reclaimed oil can be processed. During the inspection the drums were present, but did not have an accumulation of oily solids or used oil.

During the inspection, the facility had 12 above ground storage tanks (AST) located in secondary containment consisting of a concrete pad surrounded by a concrete wall with the ability to contain at least 110% of the capacity of the largest tank. The tanks and secondary containment had no visible releases at the time of the inspection and appeared to be well maintained. All tanks were provided with the appropriate labeling. The permit allows the contents of the tank to change based on current market conditions with notification to the Department.

The tank designations and capacities were as follows:

Tank #1: PCW from treatment processed (8,225 gal)

Tank #2: Used Oil (27,640 gal)

Tank #3: Used Oil (27,640 gal)

Tank #4: Used Oil (10,000 gal)

Tank #5: Used Oil (27,640 gal)

Tank #6: Used Antifreeze (10,000 gal)

Tank #7: Burner Fuel (8,000 gal)

Tank #8: Used Oil (29,000 gal)

Tank #9: Used Oil (38,000 gal)

Tank #10: Used Oil heated tank (15,000 gal)

Tank #11: Used Oil heated tank (15,000 gal)

Fire extinguishers and spill equipment were located next to the tank containment area. Fire extinguishers are inspected annually. A bullhorn is available for use for all employees for communication during an emergency.

Maintenance Shop:

Also stored on-site were a 2000-gallon double walled tank with diesel fuel used for fueling vehicles and equipment, a 500-gallon double walled tank filled with oil for vehicle oil changes, and a 55-gallon drum of antifreeze located in the shop for use in the vehicles. The facility generates waste from maintenance activities in the maintenance shop. Located under a roof near the maintenance shop were a 55-gallon drum for used oil filters and two 55-gallon drums of used absorbent pads. All containers were properly labeled and closed. Also located in the shop is a small quality analysis lab used for testing parameters such as total halogen content, flash point, and water content of used oil samples taken from incoming and outgoing used oil shipments.

Parking and Equipment Storage:

Additional vehicles and equipment were stored on the property. Five totes, three of which contained used oil from processing that were to be disposed of, were stored on a permeable surface along the North perimeter of the property without secondary containment (62-710.401(6), Florida Administrative Code [F.A.C], and permit condition Part I.27.) (See Photo 1). The Department requested that the totes be moved to an impermeable surface and placed in secondary containment. On August 17, 2020, an email received from Lee Morris indicated that the totes of thermal oil had been removed from the property (See Photo 2).

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RECORDS:

Monthly inspection logs were reviewed on-site and found to be satisfactory. In January 2020 a valve malfunction was noted during an inspection and repaired. A copy of the current permit and validated registration form and identification number were located on-site. The most updated copy of the Emergency Preparedness, Prevention & Contingency Plan (or Spill Prevention Control and Countermeasures Plan [SPCC]) was not located on site (40 CFR 279.52(b)(3)(i) and permit condition I.42.b.) The facility representative stated he would print a copy of the SPCC Plan and maintain it on-site.

All other records were requested and reviewed off-site including the SPCC Plan, the written analysis plan, the Annual Closing Cost Estimate Adjustment (DEP Form 62-710.901(7) Florida Administrative Code (F.A.C.), the annual registration and report for used oil handling activities (DEP Form 62-710.901(3), F.A.C.), random bi-weekly incoming shipment analyses, and outgoing shipment analyses results performed by NELAC certified laboratory ID No. E84925. All documents were reviewed and are satisfactory.

Additionally, local authority arrangements were made with Lake County Emergency Management and Lake County Fire and Rescue.

New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	279.52(b)(3)(i)
Explanation:	A copy of the contingency plan and all revisions to the plan must be maintained at the facility. The most recent copy of the SPCC Plan dated April 6, 2020 was not maintained at the facility.
Corrective Action:	On July 14, 2020, a facility representative stated they would print and maintain a copy of the updated SPCC Plan.

Type:	Violation
Rule:	62-710.401(6)
Question Number:	5.13
Question:	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)
Explanation:	No person may store used oil in tanks or containers unless they are clearly labeled with the words "used oil," are in good condition (no severe rusting, apparent structural defects or deterioration), and not leaking (no visible leaks). If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area. Three totes of used oil were located on a permeable surface and were not in secondary containment.
Corrective Action:	The facility shall properly store the used oil. On August 17, 2020, an email received from Lee Morris indicated that the totes of thermal oil had been removed from the property.

PHOTO ATTACHMENTS:

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Photo 1. Improperly stored used oil totes.



Photo 2. Corrective action of improperly stored used oil



totes.

Conclusion:

HOWCO was inspected as a non-handler of hazardous waste and as a used oil processor and was out of compliance at the time of the inspection. All corrective actions have been completed and the facility has returned to compliance.

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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 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 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

Mackenzie Black**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**08/24/2020**Date**Miranda Rothenberger**Inspector Name**Inspector**Inspector Title**DEP**Organization**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:** Daniel K. Hall**Inspection Approval Date:**08/24/2020