



# Florida Department of Environmental Protection

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Rick Scott  
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Jennifer Carroll  
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Herschel T. Vinyard Jr.  
Secretary

June 12, 2012

CERTIFIED MAIL

91 7199 9991 7030 9151 9870

WARNING LETTER

OWL-HW-12-011

Mr. Arthur Timothy Hagan  
HOWCO Environmental Services  
3701 Central Avenue  
St. Petersburg, Florida 33713

Lake County-HW  
HOWCO Environmental Services  
Hazardous Waste ID No.: FLD101828689  
Solid Waste (WACS) ID No.: 99089

Dear Mr. Hagan:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste, used oil, and solid waste compliance inspection was conducted at your facility located at 24133 State Road 40 on March 21, 2012. The inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations (CFR) Parts 260 – 268, adopted in Florida Administrative Code [Fla. Admin. Code] Chapter 62 – 730, 40 CFR 279, adopted in Fla. Admin. Code Chapter 62 – 710, and Fla. Admin. Code Chapter 62-701.

During the inspection, possible violations of Florida Statutes and Rules were noted. These violations are set forth in "New Potential Violations and Areas of Concern" section of the attached inspection report.

Sections 403.161 and 403.727 Florida Statutes provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately.

The Department may calculate penalties for the violations addressed above. The penalty amount will be calculated in accordance with Section 403.121, Florida Statutes, the U.S. EPA RCRA Civil Penalty Policy, dated September 2004, and the Department's Guidelines for Characterizing RCRA Violations. A copy of the documents is available upon request. The penalty amount may be discussed during the informal conference.

Please contact Danielle D. Owens, by telephone at (407) 897-4307 or by e-mail at [danielle.d.owens@dep.state.fl.us](mailto:danielle.d.owens@dep.state.fl.us) within 10 days of receipt of this Warning Letter to schedule a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

This Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The Department looks forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,



F. Thomas Lubozynski, P.E.  
Waste Program Administrator

FTL/ddo

Attachments:

1. Hazardous Waste Inspection Report
2. Solid Waste Inspection Checklist

cc: Debby Valin, Pollution Prevention Coordinator, FDEP – Central District, [debby.valin@dep.state.fl.us](mailto:debby.valin@dep.state.fl.us)  
Glen Perrigan, DEP, Hazardous Waste Regulation, [Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us)  
Charlie Cox, Lake County Department of Conservation and Compliance, [ccox@lakecountyfl.gov](mailto:ccox@lakecountyfl.gov)  
Johnny Taylor, Lake County Solid Waste, [jtaylor@lakecountyfl.gov](mailto:jtaylor@lakecountyfl.gov)



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

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**FACILITY INFORMATION:**

**Facility Name:** HOWCO Environmental Services

**On-Site Inspection Start Date:** 03/21/2012

**On-Site Inspection End Date:** 03/21/2012

**ME ID#:** 63050

**EPA ID#:** FLD101828689

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

**Contact Mailing Address:** 3701 Central Ave, Saint Petersburg, Florida 33713-8338

**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: Danielle Owens, Environmental Specialist

Other Participants: Michael Eckoff, Environmental Specialist; Dan Medici, Supervisor

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

**SIC CODE:** 2911 - Manufacturing - petroleum refining

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On March 21, 2012, Danielle Owens and Michael Eckoff, Florida Department of Environmental Protection (FDEP), conducted a routine inspection of HOWCO Environmental Services (HOWCO), located at 24133 State Road 40, Astor, Florida for compliance with used oil and used oil filter regulations. Dan Medici, HOWCO Astor Plant Manager, accompanied the inspectors.

HOWCO operates under Used Oil Processing Facility permit number 27221-HO-004, issued on 07/08/2011. The permit will expire on 08/25/2015. 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. The facility is connected to the City of Astor sewer and water systems. The facility has four employees on site.

**INSPECTION HISTORY**

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.

On October 16, 2007, HOWCO was inspected and found to be out of compliance. Violations noted included: failure to make required arrangements with local authorities; and failure to document the EPA identification number of the source of the used oil. The violations were resolved with a Short Form Consent Order, OGC number 08-0163, executed on April 10, 2008. Resolution included payment of \$3,000.00 in civil penalties.

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On August 25, 2006 HOWCO was inspected and found to be in compliance.

On February 5, 2004 HOWCO was inspected and found to be in compliance.

On November 25, 2003 HOWCO was inspected and found to be in compliance.

### Process Description:

Upon arrival at HOWCO, the inspectors noted that the main gate was closed and locked. There was a placard on the gate with emergency contact numbers. The inspectors called the local number on the gate (which appeared to be Dan Medici's cell phone) and left a message on the voicemail identifying who they were and asking for someone to return their call. After waiting for approximately 30 minutes, the inspectors departed from the facility and returned approximately two hours later to find the gate was open and workers were present. A return call was never received [40 CFR 279.52(b)(5)].

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.

Used oil filters are not off-loaded at the Astor facility. They are just transferred from one truck to a semitractor trailer and taken to the St. Petersburg facility once a week. Used oil filters are ultimately taken to U.S. Foundry in Miami. Antifreeze, consolidated at the St. Petersburg facility, is shipped to EcoFreeze in Georgia for recycling. Absorbents, i.e. kitty litter or saw dust, and grease are taken to the Okeechobee Landfill. The solid waste incinerator in Pinellas County receives the absorbent pads, booms, and paper filters.

When a truck returns to the facility, a composite sample is pulled before the oil is off-loaded for storage. The composite sample is again screened for halogens and distilled to determine water content. Loads are bulked for shipment to HOWCO, St. Petersburg. At the time of the inspection HOWCO had eleven above ground storage tanks (AST) located on a concrete pad surrounded by a concrete wall (Figure 1).

### Tank Farm

Tank #1 contained oily water, but was labeled "water", Tank #6 contained antifreeze, but was labeled "used oil." HOWCO's 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. Tank #13 is a flow through tank that is not listed on the permit's site map.

Fire extinguishers and spill equipment were located next to the containment area. West Volusia checks fire extinguishers on an annual basis. For on-site communication, each employee is equipped with a cellular telephone. A direct alarm for the building security is through ADT.

The used oil processing operation consists of the use of an emulsifying chemical, an organic acid, added to the used oil and then heating of the oil. The used oil is heated to separate the oil and water. The water is transferred to a tank and the used oil is run through a shaker screen.

Solids are collected on the screen and stored in a 55-gallon drum. After the last processing, the solids are transferred to the St. Petersburg facility for solidification.

Next to the tank farm was 6,800-gallon tanker truck filled with used oil (Figure 1). The tanker was loaded the morning of the inspection and was scheduled to go to St. Petersburg the following day.

Inspection of the tanker loading/off-loading area found the area to be clean with no visible releases. The tank farm was dry with no visible releases. Along one wall of the tank farm were seven 55-gallon drums (Figure 2). One drum contained "Oily Trash." The oily trash is debris

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generated by yard operations. The remaining drums were as follows: One drum of "New Absorbent"; One drum of "Oily Pads"; One drum of "Used Oil"; Two drums of "Used Absorbents" and one drum that contained oil collected from the oil transfer hose. The hose is allowed to drain into the drum, preventing releases to the ground.

Located on the corner of the property was a condenser that is to be installed at a later date (Figure 3). The condenser will eventually take the place of the emulsifier. Next to the condenser were three unlabeled 55-gallon drums of asphalt sealer used to seal the asphalt on the property (Figure 4). As a best management practice, the Department recommends labeling all containers on site.

#### Parking & Equipment Storage Area

The area contained a semitruck trailer with an empty drum and a drum of grease (Figure 5), several out of service tankers (Figures 6 and 7), a trailer full of used oil filters to be taken to the St. Petersburg facility (all drums appeared to be labeled) (Figure 8), and an empty pump tank (Figure 9).

#### Maintenance Shop

Minor vehicle maintenance work is done on the property. Used oil and antifreeze generated on-site accumulates in 55-gallon drums, one for used oil and one for antifreeze. Each drum is stored within an overpack container on a concrete pad (Figures 10 and 11). The drums were properly labeled and managed.

Inside the maintenance area was a small quality lab used for testing the flash point of processed oil (Figure 12).

Outside the maintenance shop was a sink used for hand washing. The sink was not connected to the public sewer and water from the sink was allowed to run onto the ground (Figures 13 and 14). The sink must be connected to the sanitary sewer or removed from service.

#### RECORD REVIEW

A copy of the permit was not available [62-710.800(2), F.A.C./Specific Conditions Part I, Number 12/403.161(1)(b), F.S.].

Records documenting the current year acceptance of used oil shipments were not available for review at the time of the inspection. The records are kept electronically and sent directly to the St. Pete office. Specific Conditions, Part II, Number 1(c), allows HOWCO to maintain shipment acceptance records at the Permittee's corporate headquarters in St. Petersburg except the current years records must be kept at the facility [40 CFR 279.56(a) and 62-710.800(2)], F.A.C./Specific Condition, Part II, Number 1(c)/ 403.161(1)(b), F.S.]

The contingency plan was not available for review at the time of the inspection [40 CFR 279.52(b)/Specific Conditions, Part I, Number 41(b)/403.161(1)(b), F.S.]. On March 29, 2012, Richard Dillen, HOWCO, provided the Department with a copy of the contingency plan (last revised April 21, 2005). It appears this is not the most current version of HOWCO's contingency plan.

Analytical results for processed oil shipped off-site to burners were not available for review at the time of the inspection. On March 29, 2012, Richard Dillen, HOWCO, provided the Department with analytical results for the last year. The analytical results were found to be in compliance with on-specification oil requirements.

On March 23, 2012, training records for 2011 were provided by Ms. Cathy Rodgers, Routing Manager for HOWCO. The training was conducted on December 3, 2011. All four employees at the Astor facility were at the training event. Specific Conditions, Part I, Number 14, allows HOWCO to maintain personnel training records at the Permittee's corporate headquarters in St. Petersburg.

Records documenting monthly inspections performed in accordance with paragraph 62-762.641(2)(e), F.A.C. were available for review at the time of the inspection.

A copy of the validated registration form was not displayed in a prominent place at the facility [62-

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710.500(4), F.A.C./62-710.800(2), F.A.C./ Specific Conditions Part I, Number 19/403.161(1)(b), F.S.].

A copy of the written analysis plan describing the procedures that will be used to comply with the analysis requirement of 40 CFR 279.53 was not available for review at the time of the inspection as required by Specific Condition, Part I, Number 45 [40 CFR 279.55].

Attachment A (Site Map) of HOWCO current Used Oil Processing Facility permit indicates there is an office building located in the front of the property. This office building is no longer a part of the facility.

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

##### Violations

Type:	Violation
Rule:	279.52(b), 279.52(b)(3), 279.52(b)(3)(i)
Explanation:	(b) Contingency plan and emergency procedures. Owners and operators of used oil processing and re-refining facilities must comply with the following requirements: (b)(3) Copies of contingency plan. A copy of the contingency plan and all revisions to the plan must be: (3)(i) Maintained at the facility. Specifically, HOWCO failed to maintain a copy of its contingency plan at the facility.
Corrective Action:	HOWCO shall maintain a copy of the contingency plan at the facility.  Provide documentation showing a contingency plan is maintained at the facility to the Department within 30 days of the date of your receipt of this report.
Type:	Violation
Rule:	279.52(b)(5)
Explanation:	Emergency coordinator. At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. Specifically, HOWCO failed to respond to a phone place to the emergency contact phone number.
Corrective Action:	HOWCO shall have at least one employee on the premises or on call to respond to an emergency.  Please provide documentation showing at least one employee has been provided to respond to an emergency to the Department within 30 days of the date of your receipt of this report.
Type:	Violation
Rule:	279.55
Explanation:	Analysis plan. Owners or operators of used oil processing and re-refining facilities must develop and follow a written analysis plan describing the procedures that will be used to comply with the analysis requirements of 279.53 and, if applicable, 279.72. The owner or operator must keep the plan at the facility. Specifically, HOWCO failed to keep the written analysis plan at the facility.

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Corrective Action: HOCWO shall keep a copy of the written analysis plan describing the procedures that will be used to comply with 40 CFR 279.53 at the facility.

Provide documentation showing the written analysis plan is kept at the facility within 30 days of the date of your receipt of this report.

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Type: Violation

Rule: 279.56(a)

Explanation: Acceptance. Used oil processors/re-refiners must keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Specifically, HOWCO failed to keep the current years records of acceptance of used oil shipments.

Corrective Action: HOWCO shall keep the current year's record of each used oil shipment accepted for processing/re-refining at the facility.

Provide documentation of the current year's used oil shipment records to the Department with 30 days of the date of your receipt of this report.

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Type: Violation

Rule: 403.161(1)(b), 62-710.800(2)

Explanation: To fail to obtain any permit required by this chapter or by rule or regulation, or to violate or fail to comply with any rule, regulation, order, permit, or certification adopted or issued by the department pursuant to its lawful authority. Specifically, HOWCO failed to keep a copy of the complete permit on-site, keep a record of accepted used oil shipments for the current year at the facility.

Corrective Action: HOWCO shall comply with the requirements of its permit.

Please provide documentation showing that these requirements are being fulfilled to the Department within 30 days of the date of your receipt of this report.

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Type: Violation

Rule: 62-710.500(4)

Explanation: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location. Specifically, HOWCO failed to display the validated registration form and identification number in a prominent place the facility.

Corrective Action: HOWCO shall display the validated registration form and identification number in a prominent place at the facility.

Please provide documentation showing the validated registration form and identification number is displayed in a prominent place at the facility

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**PHOTO ATTACHMENTS:**

Fig 1: ASTs



Fig 2: Drums Near Tank Farm



Fig 3: Condenser



Fig 4: Asphalt Sealer



Fig 5: Trailer w/Grease Drum



Fig 6: Out of Service Trailers





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Fig 7: Out of Service Trailers



Fig 8: Trailer w/Filters



Fig 9: Empty Pump Tanker



Fig 10: Used Oil Overpack



Fig 11: Used Antifreeze Overpack



Fig 12: Quality Lab



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Fig 13: Sink



Fig 14: Sink Piping



**Conclusion:**

HOWCO is a registered Used Oil Transporter, Transfer Facility, Processor, Marketer, Filter Transporter, Filter Transfer Facility and Filter Processor and was not in compliance at the time of inspection.

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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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Danielle Owens

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist

**PRINCIPAL INSPECTOR TITLE**

FDEP

**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.



Florida Department of  
Environmental Protection  
Inspection Checklist

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**FACILITY INFORMATION:**

**Facility Name:** HOWCO ENV SERVICES (UOP)

**On-Site Inspection Start Date:** 03/21/2012

**On-Site Inspection End Date:** 03/21/2012

**WACS No.:** 99089

**Facility Street Address:** 24133 State Road 40

**City:** Astor

**County Name:** LAKE

**Zip:** 32102

**INSPECTION PARTICIPANTS:**

(Include ALL Landfill and Department Personnel with Corresponding Titles)

**Principal Inspector:** Michael Eckoff, Inspector

**Other Participants:** Danielle Owens, Environmental Specialist; Dan Medici, Supervisor

**INSPECTION TYPE:**

Routine Operation Inspection for Waste Processing - Other (user defined) facility

**ATTACHMENTS TO THE INSPECTION CHECK LIST:**

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

SECTION 4.0 - WASTE PROCESSING FACILITIES

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**SECTION 4.0 - WASTE PROCESSING FACILITIES****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.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18)) Completed	Ok	Not Ok	Unk	N/A
4.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)	✓			
4.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
4.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
4.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event.) 62-701.300(2)(d)	✓			
4.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
4.5	Unauthorized open burning of solid waste prohibited, except in accordance with Department requirements? 62-701.300(3)	✓			
4.6	Are the following unauthorized wastes or special wastes properly managed? (Check any that are Not OK) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Used oil and oily wastes, except as exempted 62-701.300(11) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Liquids 62-701.300(10)	✓			

Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE Completed	Ok	Not Ok	Unk	N/A
4.7	Do the tipping, processing, sorting, storage and compaction areas that are in an enclosed building or covered area have adequate ventilation? 62-701.710(3)(a)				✓
4.8	For areas not enclosed, is litter controlled and are litter control devices maintained? 62-701.710(3)(a)				✓
4.9	Is leachate collection and removal system maintained and operated as required? 62-701.710(3)(b)				✓
4.10	Are all drains and leachate conveyances kept clean so that leachate flow is not impeded? 62-701.710(4)(b)				✓
4.11	Are the following records or plans current and available on-site? (Check any that are Not OK) <input type="checkbox"/> Operation and Maintenance Manual 62-701.710(4)(a)1 <input type="checkbox"/> Contingency Plan 62-701.710(4)(a)3 <input type="checkbox"/> Operation records 62-701.710(9)(a)				✓
4.12	Is the Operation and Maintenance Manual substantially followed? 62-701.710(4)(a)1				✓
4.13	Are putrescible wastes stored no longer than 48 hours or as otherwise allowed in the Operation and Maintenance Plan? 62-701.710(4)(b)				✓
4.14	Are areas where putrescible waste is stored or processed cleaned at least weekly to prevent odor and vector problems? 62-701.710(4)(b)				✓
4.15	Are the operating hours posted at the facility? 62-701.710(4)(c)1				✓

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Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE Completed	Ok	Not Ok	Unk	N/A
4.16	Is a trained operator on duty whenever the facility is operating? 62-701.710(4)(c)1				✓
4.17	Is at least one trained spotter on duty at all times that waste is received at the facility to inspect the incoming waste? 62-701.710(4)(c)2				✓
4.18	Are unauthorized wastes removed from the waste stream and placed into appropriate containers for disposal at a permitted facility? 62-701.710(4)(c)2				✓
4.19	Is the facility operated to control objectionable odors? 62-701.710(4)(d)				✓
4.20	Is adequate fire protection equipment available and operational? 62-701.710(4)(e)				✓
4.21	Is access to the facility controlled by fencing or other effective barriers to prevent disposal of unauthorized solid waste? 62-701.710(4)(f)				✓
4.22	If the facility is a Transfer Station and is claiming the financial assurance exemption, does it manage the waste on a first-in, first-out basis and store waste for no greater than 7 days? 62-701.710(10)(a)				✓
4.23	Is stormwater effectively controlled? 62-701.710(8)				✓
4.24	Are all additional specific conditions (not otherwise addressed above) in the permit, Department order, or certification, if any, being followed? 62-701.320(1), 403.161, F.S.				✓

Item No.	WASTE PROCESSING FACILITY CLOSURE Completed	Ok	Not Ok	Unk	N/A
4.25	Has the solid waste or residue been properly disposed of within 30 days after receiving the final solid waste shipment? 62-701.710(6)(c)				✓
4.26	Has closure been completed within 180 days after receiving the final solid waste shipment? 62-701.710(6)(d)				✓

**COMMENTS:**

03/22/2012

Permit No. 27221-SO-005 expires August 25, 2015

No solid waste was being stored on-site at the time of the inspection.



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**Signed:**Michael Eckoff**PRINCIPAL INSPECTOR NAME**Inspector**PRINCIPAL INSPECTOR TITLE**NO SIGNATURE**PRINCIPAL INSPECTOR SIGNATURE**Danielle Ownes**INSPECTOR NAME**Environmental Specialist**INSPECTOR TITLE**NO SIGNATURE**INSPECTOR SIGNATURE**FDEP - Central District**ORGANIZATION**Dan Medici**REPRESENTATIVE NAME**Supervisor**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**Howco Environmental Services**ORGANIZATION****Supervisor:** Gloria DePradine

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 "Not Ok" or areas of concern.