Howco

① 10/16/96 Inspection.

State of Florida
Department of Environmental Protection

Media Insert

Dep Box Number: DWM-SWD-HW 156

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PreIndex ID Number: 1589337

	→	Slides
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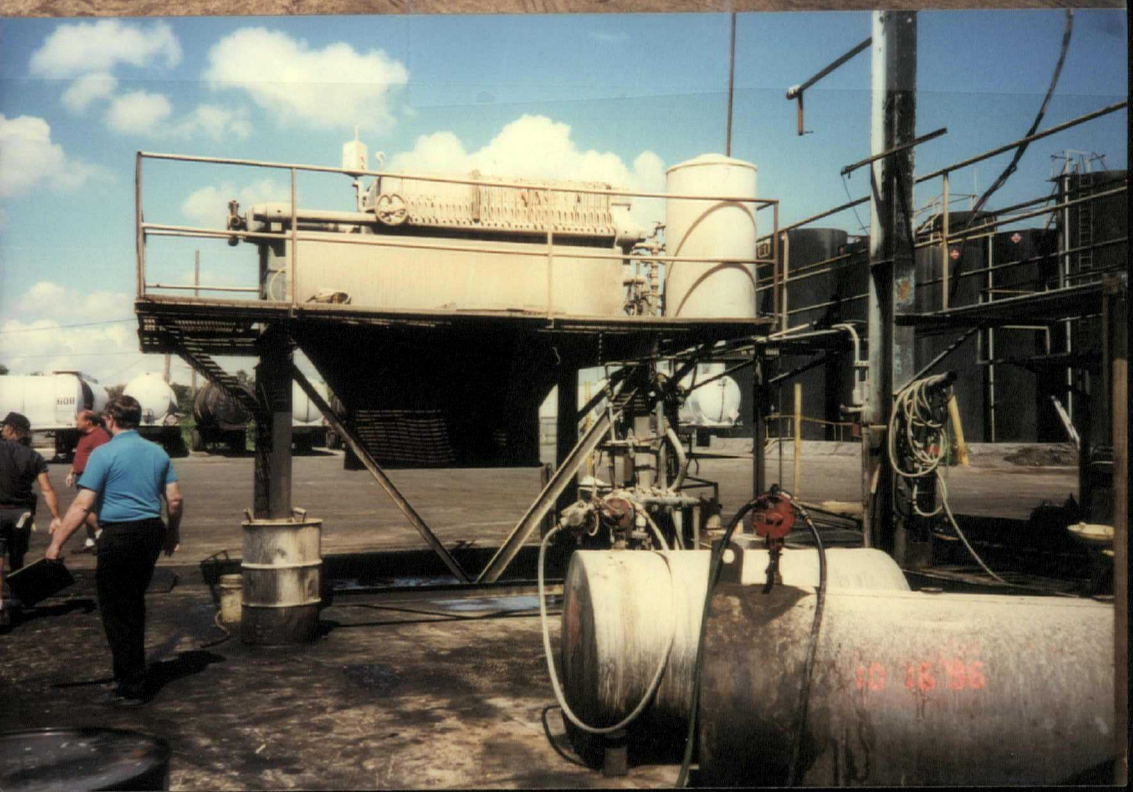
1	→	Floppy Disk
	→	Negatives
	→	

Notes: HOWCO CONSENT ORDER


"BUILDING A SAFE ENVIRONMENT"
ENVIRONMENTA
904-236-1823
SILVER SPRINGS
30
1863
10 16 '96


UILDING A SAFE ENVIRONMENT"
1863
10 16 '96


10 16 '96




10 16 96


149
USED OIL
USED OIL
USED OIL
10 16 96


1-800-435-8467
SERVICES
TEAM
48
FORD
10 16 96


TIM'S OIL
10 16 96


USED OIL
USED OIL
TIM'S OIL RECOVERY
10 16 96

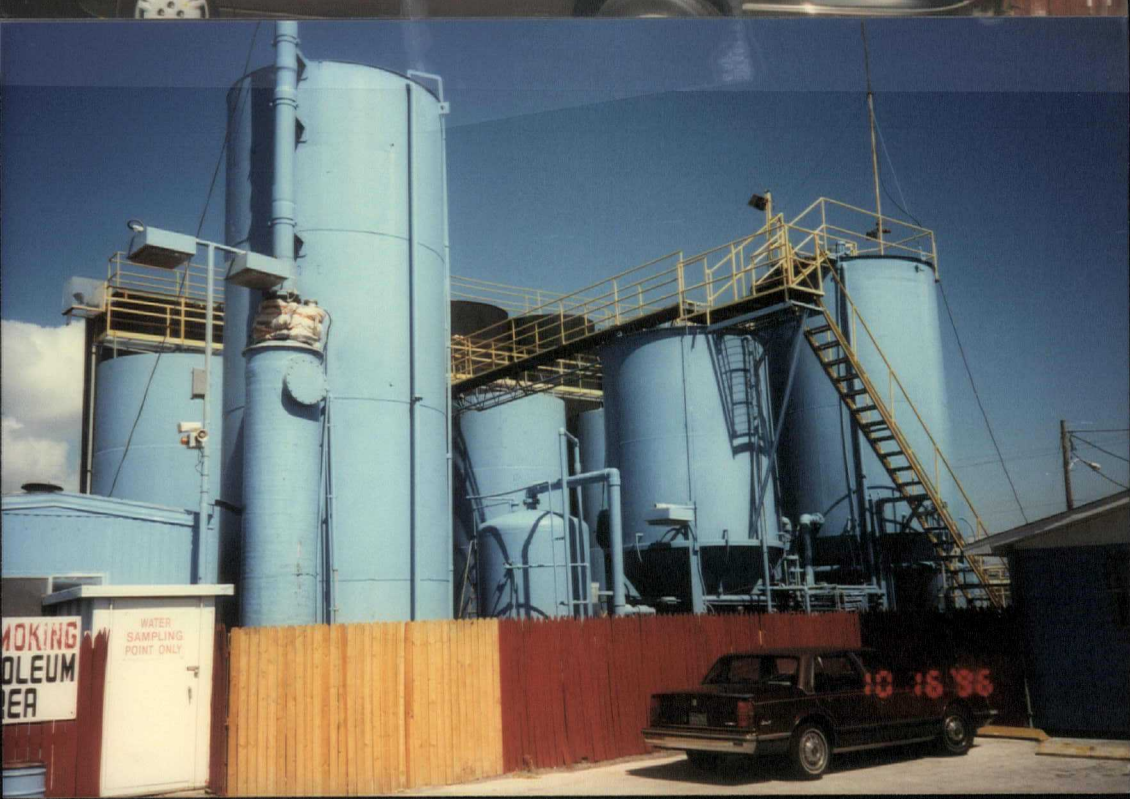

10 16 96


149
Danger!
10 16 96


10 16 96


USED
24
USED
OIL


USED OIL RECOVERY

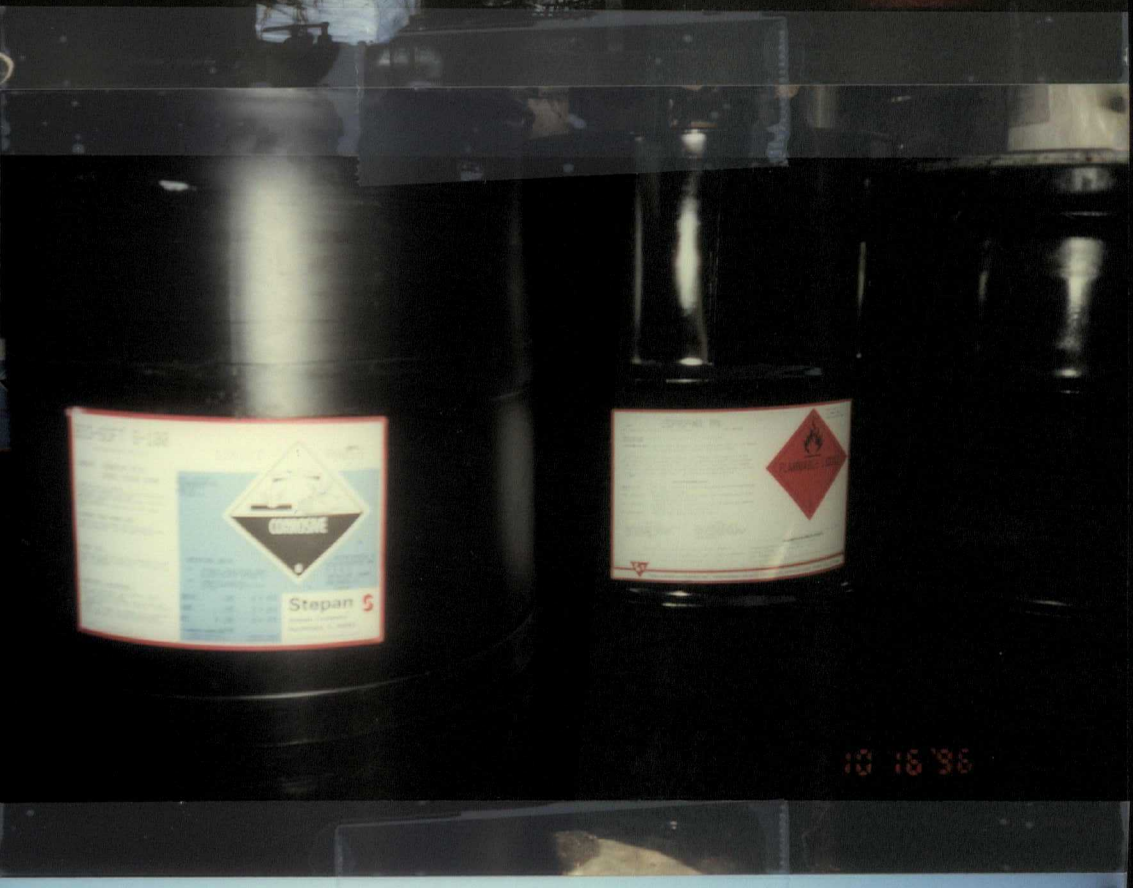

WATER
SAMPLING
POINT ONLY


10 16 96


10 16 96


10 16 96


10 16 96


CORROSIVE
Stepan
10 16 96


46
10 16 96

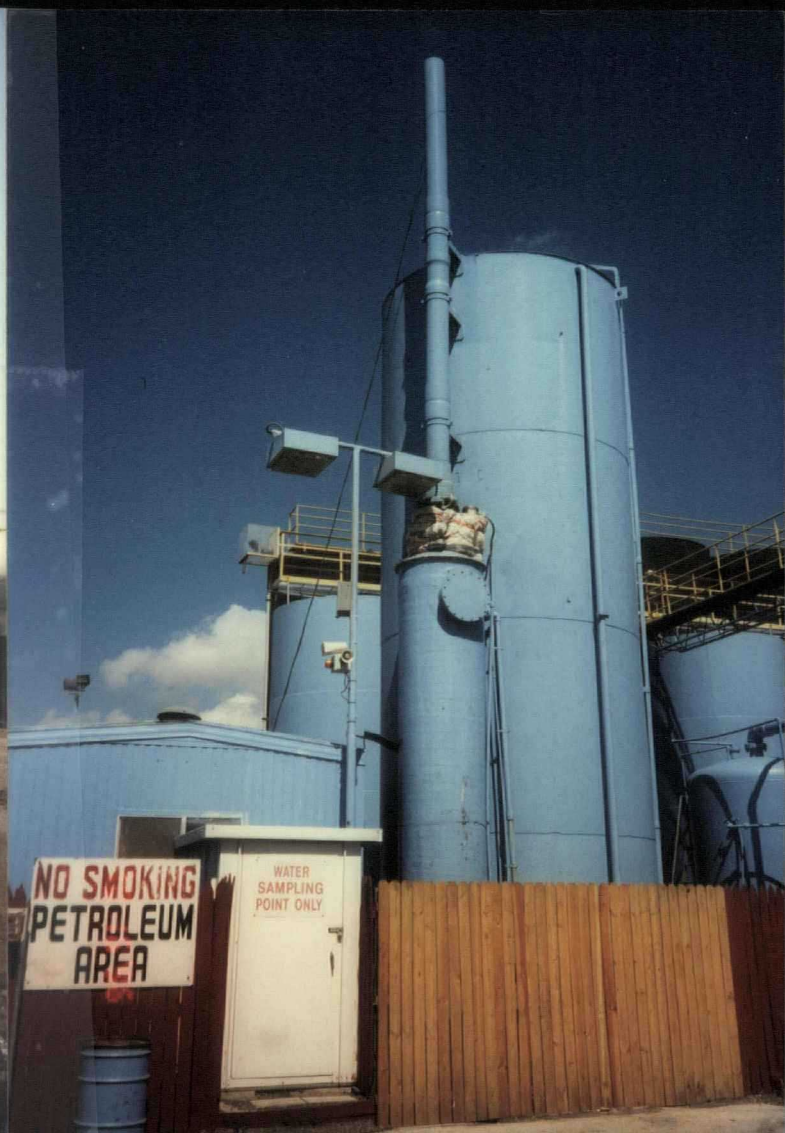

HOWCO KLEAN
Parts Cleaning Fluid
NON HAZARDOUS
An Environmentally Friendly Alternative
DO NOT MIX WITH
800-435-8467
10 18 96


Budget
10 18 96


TIM'S OIL RECOVERY
TIM'S OIL RECOVERY
10 16 96


JAN'S OIL
10 16 96


OBERG
SHEAR/BALER


NO SMOKING
PETROLEUM
AREA
WATER
SAMPLING
POINT ONLY


Budget

See File
2

Chemical Analysis Report

SW-DIST-2000-05-10-01

Florida Department of Environmental Protection
Central Laboratory
2600 Blair Stone Road
Tallahassee, FL 32399-2400
CompQAP# 870688G

Event Description: **Howco Environmental Services**
Request ID: **RQ-2000-05-08-25**
Customer: **SW-DIST**
Project ID: **OTHER-WSM**

Job: TLH-2000-05-10-36	Group: Pesticides
Job: TLH-2000-05-10-36	Group: Priority Organic Pollutants
Job: TLH-2000-05-10-39	Group: Metals
Job: TLH-2000-05-10-41	Group: Metals
Job: TLH-2000-05-10-42	Group: Priority Organic Pollutants

Send Reports to
FL Dept. of Environmental Protection
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619
Attn: Maria de la Cantera

For additional information please contact
Timothy W. Fitzpatrick
Yuh-Hsu Pan, Ph.D.
Liang-Tsair Lin, Ph.D.
Christopher A. Morgan, Ph.D.
Suncom 277-2571 Phone (850) 487-2571

Certified by: [signature] Date: 6/26/00

Report Printed Date: Jun 23, 2000

Abbreviations and data remark codes

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.
V - Analyte was detected in both sample and method blank.
Y - The laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate
Z - Colonies were too numerous to count (TNTC).

Results for NELAP accredited tests contained in this report meet the requirements specified for the National Environmental Laboratory Accreditation Program.

Reporting units note:
Analytical values for tissue and waste matrices are reported on a wet weight basis.

Sample Location: FP-1

Field ID: 25938

Collection Date/Time: 5/9/2000 9:50 AM

Matrix: WAS-SOLID

Lab ID: 454842	Storet Code	Component	Result	Code	Units
Test: TCLP for Semi-volatile organic pollutants by GC/MS. (EPA 625/ 8270 mod.)					
Comments: Please refer to QC Report for parameters exceeding limits. Bad recoveries for some compounds from matrix spike due to matrix interference. MDL and PQL elevated due to required sample dilution. Insufficient sample available to extract a duplicate matrix spike.					
	39340	gamma-BHC	15	U	ug/L
	77151	m,p-Cresols	62	I	ug/L
	77152	o-Cresol	27	I	ug/L
	34571	1,4-Dichlorobenzene	10	U	ug/L
	34611	2,4-Dinitrotoluene	10	U	ug/L
	39390	Endrin	15	U	ug/L
	39700	Hexachlorobenzene	10	U	ug/L
	34391	Hexachlorobutadiene	30	U	ug/L
	34396	Hexachloroethane	30	U	ug/L
	34447	Nitrobenzene	20	U	ug/L
	39032	Pentachlorophenol	30	U	ug/L
	77687	2,4,5-Trichlorophenol	10	U	ug/L
	34621	2,4,6-Trichlorophenol	10	U	ug/L
		Pyridine	40	U	ug/L

Lab ID: 454852	Storet Code	Component	Result	Code	Units
Test: Mercury in TCLP samples using cold vapor AA spectroscopy. (EPA 245.1)					
		Mercury	0.0010	U	mg/L

Lab ID: 454858	Storet Code	Component	Result	Code	Units
Test: Metals, total recoverable, in TCLP samples using ICP emission spectroscopy. (EPA 6010 mod.)					
Comments: The Ba PQL was adjusted.					
		Barium	0.63	I	mg/L
Test: Metals, total recoverable, in TCLP samples using ICP mass spectroscopy. (EPA 6020 mod.)					
		Arsenic	0.047	I	mg/L
		Cadmium	0.00040	U	mg/L
		Chromium	0.073	I	mg/L
		Lead	0.020		mg/L
		Selenium	0.012	U	mg/L
		Silver	0.00030	U	mg/L

Lab ID: 454860	Storet Code	Component	Result	Code	Units
Test: Volatile organic pollutants in TCLP samples by GC/MS. (EPA 8260)					

Comments:
Please refer to QC table for parameters exceeding limits. The MDLs are elevated due to required dilution of the sample matrix. The QC statistics for the compound tetrachloroethene are out of routine statistical limits due to the presence of the compound in the sample matrix.

Benzene	140		ug/L
Bromoform	5.0	U	ug/L
Carbon tetrachloride	2.0	U	ug/L
Chlorobenzene	2.0	U	ug/L
Chloroform	2.0	U	ug/L
Dibromochloromethane	2.0	U	ug/L
1,2-Dichlorobenzene	2.0	U	ug/L
1,3-Dichlorobenzene	2.0	U	ug/L
1,4-Dichlorobenzene	2.0	U	ug/L
1,1-Dichloroethane	2.0	U	ug/L
1,2-Dichloroethane	2.0	U	ug/L
1,1-Dichloroethene	2.0	U	ug/L
1,2-Dichloropropane	2.0	U	ug/L
Ethylbenzene	130		ug/L
Methylene chloride	6.6	I	ug/L
1,1,2,2-Tetrachloroethane	2.0	U	ug/L
Tetrachloroethene	28		ug/L
Toluene	950		ug/L
1,1,1-Trichloroethane	2.0	U	ug/L
1,1,2-Trichloroethane	2.0	U	ug/L
Trichloroethene	38		ug/L
Vinyl chloride	5.0	U	ug/L
Xylenes (total)	730		ug/L
Acetone	100	U	ug/L
Carbon disulfide	5.0	U	ug/L
2-Butanone	100	U	ug/L
Trichlorofluoromethane	2.0	U	ug/L
4-Methyl-2-Pentanone	100	U	ug/L

Sample Location: CS-1

Field ID: 25939

Collection Date/Time: 5/9/2000 10:05 AM

Matrix: WAS-SOLID

Lab ID: 454843	Storet Code	Component	Result	Code	Units
Test: TCLP for Semi-volatile organic pollutants by GC/MS. (EPA 625/ 8270 mod.)					

Comments:
Please refer to QC Report for parameters exceeding limits. Bad recoveries for some compounds from matrix spike due to matrix interference. MDL and PQL elevated due to required sample dilution. Insufficient sample available to extract a duplicate matrix spike.

39340	gamma-BHC	15	U	ug/L
77151	m,p-Cresols	96		ug/L
77152	o-Cresol	22	I	ug/L
34571	1,4-Dichlorobenzene	10	U	ug/L

34611	2,4-Dinitrotoluene	10	U	ug/L
39390	Endrin	15	U	ug/L
39700	Hexachlorobenzene	10	U	ug/L
34391	Hexachlorobutadiene	30	U	ug/L
34396	Hexachloroethane	30	U	ug/L
34447	Nitrobenzene	20	U	ug/L
39032	Pentachlorophenol	30	U	ug/L
77687	2,4,5-Trichlorophenol	10	U	ug/L
34621	2,4,6-Trichlorophenol	10	U	ug/L
	Pyridine	40	U	ug/L

Lab ID: 454853	Storet Code	Component	Result	Code	Units
Test: Mercury in TCLP samples using cold vapor AA spectroscopy. (EPA 245.1)					
		Mercury	0.0010	U	mg/L

Lab ID: 454859	Storet Code	Component	Result	Code	Units
Test: Metals, total recoverable, in TCLP samples using ICP emission spectroscopy. (EPA 6010 mod.)					

Comments:
The Ba PQL was adjusted.

	Barium	0.48	I	mg/L

Test: Metals, total recoverable, in TCLP samples using ICP mass spectroscopy. (EPA 6020 mod.)

Comments:
The Cd MDL was adjusted.

Arsenic	0.020	I	mg/L
Cadmium	0.0010	U	mg/L
Chromium	0.030	U	mg/L
Lead	0.047	A	mg/L
Selenium	0.012	U	mg/L
Silver	0.00030	U	mg/L

Lab ID: 454861	Storet Code	Component	Result	Code	Units
Test: Volatile organic pollutants in TCLP samples by GC/MS. (EPA 8260)					

Comments:
Please refer to QC table for parameters exceeding limits. The MDLs are elevated due to required dilution of the sample matrix.

Benzene	170		ug/L
Bromoform	5.0	U	ug/L
Carbon tetrachloride	2.0	U	ug/L
Chlorobenzene	2.0	U	ug/L
Chloroform	2.0	U	ug/L
Dibromochloromethane	2.0	U	ug/L
1,2-Dichlorobenzene	2.0	U	ug/L
1,3-Dichlorobenzene	2.0	U	ug/L
1,4-Dichlorobenzene	2.0	U	ug/L
1,1-Dichloroethane	4.9	I	ug/L

1,2-Dichloroethane	2.0	U	ug/L
1,1-Dichloroethene	2.0	U	ug/L
1,2-Dichloropropane	2.0	U	ug/L
Ethylbenzene	130		ug/L
Methylene chloride	14	I	ug/L
1,1,2,2-Tetrachloroethane	2.0	U	ug/L
Tetrachloroethene	31		ug/L
Toluene	1000		ug/L
1,1,1-Trichloroethane	2.0	U	ug/L
1,1,2-Trichloroethane	2.0	U	ug/L
Trichloroethene	14		ug/L
Vinyl chloride	12	I	ug/L
Xylenes (total)	700		ug/L
Acetone	700		ug/L
Carbon disulfide	5.0	U	ug/L
2-Butanone	100	U	ug/L
Trichlorofluoromethane	2.0	U	ug/L
4-Methyl-2-Pentanone	1500		ug/L

Quality Control Report

TLH-2000-05-10-36

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-BNA					
	1,4-Dichlorobenzene	59.4 63.8	84.1	7.27	
	2,4,5-Trichlorophenol	110 93.2	106	16.2	
	2,4,6-Trichlorophenol	89.2 99.8	63.9	11.3	
	2,4-Dinitrotoluene	97.7 92.2	0.0*	5.81	
	Hexachlorobenzene	92.0 95.0	88.8	3.27	
	Hexachlorobutadiene	66.0 71.3	97.2	7.72	
	Hexachloroethane	57.4 62.5	24.7*	8.58	
	Nitrobenzene	84.7 87.8	6.20*	3.57	
	Pentachlorophenol	113 101	243*	10.4	
	Pyridine	40.1 52.3	70.6	26.5	
	m,p-Cresols	67.8 71.4	115	5.20	
	o-Cresol	76.4 79.0	64.9	3.34	

TLH-2000-05-10-39

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-HG-H					
	Mercury	86.3	88.4 87.7	0.795	

TLH-2000-05-10-41

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-ICP					
	Barium	102	97.2 105	7.98	
TCLP-ICPMS					
	Arsenic	101	106 109	2.98	
	Cadmium	99.2	99.8 102	2.12	
	Chromium	102	102 105	2.68	
	Lead	102	103 105	0.0544	
	Selenium	100	102 107	4.56	
	Silver	103	103 103	0.179	

TLH-2000-05-10-42

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-VOC					
	1,1,1-Trichloroethane	103 98.3	110 109	5.07	1.32
	1,1,1-Trichloroethane	96.8 100	107 112	3.53	3.69
	1,1,2,2-Tetrachloroethane	82.3 74.9	118 114	9.44	3.60
	1,1,2,2-Tetrachloroethane	89.7 84.2	110 116	6.28	5.81
	1,1,2-Trichloroethane	96.1 95.7	97.4 98.7	0.334	1.35
	1,1-Dichloroethane	105 102	111 109	2.85	1.59
	1,1-Dichloroethane	101 102	107 111	0.768	3.52
	1,1-Dichloroethene	107 99.6	111 109	6.73	1.95
	1,1-Dichloroethene	115 100	107 113	13.1	5.29
	1,2-Dichlorobenzene	85.9 87.2	94.6 94.7	1.57	0.106
	1,2-Dichlorobenzene	92.9 93.4	95.0 96.8	0.558	1.86
	1,2-Dichloroethane	98.4 94.8	98.9 100	3.79	1.29

* – Item failed QC

(LFB - Laboratory Fortified Blank; MS - Matrix Spike; RPD - Relative Percent Difference; RSD - Relative Standard Deviation)

1,2-Dichloroethane	95.8	96.2	95.1	99.5	0.354	4.50
1,2-Dichloropropane	94.3	88.0	95.8	95.6	6.87	0.230
1,2-Dichloropropane	91.5	91.7	93.9	92.3	0.240	1.70
1,3-Dichlorobenzene	86.0	87.7	97.0	95.8	1.98	1.18
1,3-Dichlorobenzene	91.9	95.8	97.6	99.2	4.16	1.65
1,4-Dichlorobenzene	80.1	80.9	90.8	87.9	0.919	3.25
1,4-Dichlorobenzene	88.7	90.8	91.4	92.0	2.32	0.655
Benzene	96.2	92.0	97.8	96.1	4.51	1.75
Benzene	91.6	91.1	95.9	101	0.569	5.10
Bromoform	93.4	89.1	90.1	91.3	4.65	1.32
Bromoform	90.0	88.5	87.8	91.0	1.64	3.51
Carbon tetrachloride	103	97.3	109	107	6.00	1.99
Carbon tetrachloride	93.2	97.2	107	108	4.29	1.30
Chlorobenzene	99.8	96.3	106	106	3.55	0.604
Chlorobenzene	99.6	98.5	103	105	1.13	2.67
Chloroform	102	98.5	104	102	3.98	1.19
Chloroform	96.2	96.1	101	104	0.146	3.63
Dibromochloromethane	97.9	93.6	98.8	97.1	4.49	1.78
Dibromochloromethane	94.0	92.2	95.9	96.5	1.91	0.582
Ethylbenzene	106	101	113	113	4.73	0.0
Ethylbenzene	105	104	110	113	0.440	3.03
Methylene chloride	112	108	113	114	4.23	1.18
Methylene chloride	86.6	112	115	121	25.5*	4.88
Tetrachloroethene	102	95.2	85.4	121	6.54	34.3*
Tetrachloroethene	96.7	98.0	106	106	1.31	0.378
Toluene	102	96.9	104	105	4.62	0.537
Toluene	98.3	99.7	103	106	1.37	2.75
Trichloroethene	107	101	98.1	97.2	5.42	0.922
Trichloroethene	102	104	98.0	97.4	1.79	0.553
Trichlorofluoromethane	106	102	122	122	4.00	0.524
Trichlorofluoromethane	114	109	121	120	4.63	1.16
Xylenes (total)	101	101	105	104	0.792	0.281

* – Item failed QC

(LFB - Laboratory Fortified Blank; MS - Matrix Spike; RPD - Relative Percent Difference; RSD - Relative Standard Deviation)

Cooler ' king Worksheet For Request: RQ-200' -08-25
Howco Environmental Services
Ship Cooler On: 25-APR-2000 Requester: Maria A Cantera

Customer/Project: SW-DIST/OTHER-WSM Priority 3

813-744-6100 SC 512-1042
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Attn: Maria de la Cantera

Comments:

Requested Analyses:

Group: A **# of Sites: 2**

Container ID: GJ-1L **Qty: 2** **Preservation: ICE** , Lot # 349569
Description: Glass Jar 1L

Analysis	Description
TCLP-BNA	TCLP for Semi-volatile organic pollutants by GC/MS.
TCLP-HG-H	Mercury in TCLP samples using cold vapor AA spectroscopy.
TCLP-TR	Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy.

Container ID: GJ-SEP-250 **Qty: 4** **Preservation: ICE** , Lot # 300021
Description: 250 ml glass jar with a septa lid.

Analysis	Description
TCLP-VOC	Volatile organic pollutants in TCLP samples by GC/MS.

'Cooler Packed By:' MD & AS Date: 4/27/00
DEP Cooler ID #(s): 290

Kit must also include:
- ✓ Field Sheets
- ✓ Temperature Control Bottle (1 per cooler)
- ✓ FedEx Bills, if applicable (1 per cooler)
- ✓ Plastic Bags

If Preservation Included:
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____

Cooler received intact? (Circle one) Yes No Received By/Date: _____

PLEASE RETURN ALL COOLERS FOR REQUEST RQ-2000-05-08-25

Florida Department of Environmental Protection
Central Laboratory Sample Submittal Form

Request Number: RQ-2000-05-08-25

Tlowco Environmental Services

Customer: SW-DIST

Project ID: OTHER-WSM

PMAS:

Event ID *

Requester: Maria A Cantera

Collected By: JAMES DREGNE

Field Parameters Measured By:

Field Report Prepared By:

Send Final Report To: JAMES DREGNE

Lab ID *

Location: FP-1

Field ID: 25938

Matrix (Include type e.g. Salt, Fresh, etc)

Temp (C)

pH

Latitude ° ' " .

Longitude ° ' " .

☐ Comp ☒ Grab

Collection (begin) Date 5/9/00 Time 0952 Eastern Central

Collection (end) Date Time Eastern Central

Bottle Group(s) ** A

Tot Res Chlorine (mg/L)

Diss Oxygen (mg/L)

Storet Station Number

Sample Depth ☐ m ☐ ft

☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)

NPDES Number

Comments TCLP-VOC/TCLP-BNA/TCLP-TR/TCLP-HG-H

Lab ID *

Location: CS-1

Field ID: 25939

Matrix (Include type e.g. Salt, Fresh, etc)

Temp (C)

pH

Latitude ° ' " .

Longitude ° ' " .

☐ Comp ☒ Grab

Collection (begin) Date 5/9/00 Time 1005 Eastern Central

Collection (end) Date Time Eastern Central

Bottle Group(s) ** A

Tot Res Chlorine (mg/L)

Diss Oxygen (mg/L)

Storet Station Number

Sample Depth ☐ m ☐ ft

☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)

NPDES Number

Comments TCLP-VOC/TCLP-BNA/TCLP-TR/TCLP-HG-H

Lab ID *

Location

Field ID

Matrix (Include type e.g. Salt, Fresh, etc)

Temp (C)

pH

Latitude ° ' " .

Longitude ° ' " .

☐ Comp ☐ Grab

Collection (begin) Date Time Eastern Central

Collection (end) Date Time Eastern Central

Bottle Group(s) **

Tot Res Chlorine (mg/L)

Diss Oxygen (mg/L)

Storet Station Number

Sample Depth ☐ m ☐ ft

☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)

NPDES Number

Comments

Lab ID *

Location

Field ID

Matrix (Include type e.g. Salt, Fresh, etc)

Temp (C)

pH

Latitude ° ' " .

Longitude ° ' " .

☐ Comp ☐ Grab

Collection (begin) Date Time Eastern Central

Collection (end) Date Time Eastern Central

Bottle Group(s) **

Tot Res Chlorine (mg/L)

Diss Oxygen (mg/L)

Storet Station Number

Sample Depth ☐ m ☐ ft

☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)

NPDES Number

Comments

Relinquished By:	Date/Time	Received By:	Date/Time	Relinquished By:	Date/Time	Received By:	Date/Time
J. M. Dregne	5/9/00 1300	[illegible]	11:08 05-10-00				

* Shaded Areas for Lab use only.

** Please see reverse side for Bottle Group information.

TATE OF FLORIDA
EPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD

Page 1 of 1

PROJECT NAME	SUBMITTING AGENCY NAME	SUBMITTING AGENCY CODE
Howco Environmental	FDEP Southwest District	8040

AMPLER SIGNATURE(S): James Dregne

Q # -2000-05-08-25 | MODULE # 3070

STATION/ LOCATION/ NUMBER	DATE M/D/Y	TIME #####	COMP/ GRAB	# OF CONTAINERS	PARAMETERS: TCLP-VOC	TCLP-BNA	TCLP-TR	TCLP-HG-H	Field ID #
FP-1	5/9/00	0950	GRAB	3	✓	✓	✓	✓	25938
CS-1	5/9/00	1005	GRAB	3	✓	✓	✓	✓	25939

	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Sealed and Relinquished by: James Dregne	5/9/00 1300	FEDEX	HWalker	05-10-00 11:08
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time

EMARKS:

Metals, Volatiles, Acid B/N Extr., Pesticides, PCB's, Nutrients, Wet Chem., Toxicity, Algal Assay, Chlorophyll, etc.

Howco Environmental Services

ject: OTHER-WSM
quest ID: RQ-2000-05-08-25

Job ID:	TLH-2000-05-10-36	Job Status: V	
mple	St	Field ID	Sampling Location
1842	V	25938	FP-1
P-BNA			
1843	V	25939	CS-1
P-BNA			

Job ID:	TLH-2000-05-10-39	Job Status: V	
mple	St	Field ID	Sampling Location
1852	V	25938	FP-1
P-HG-H			
1853	V	25939	CS-1
P-HG-H			

Job ID:	TLH-2000-05-10-41	Job Status: V	
mple	St	Field ID	Sampling Location
1858	V	25938	FP-1
P-TR			
1859	V	25939	CS-1
P-TR			

Job ID:	TLH-2000-05-10-42	Job Status: V	
mple	St	Field ID	Sampling Location
1860	V	25938	FP-1
P-VOC			
1861	V	25939	CS-1
P-VOC			

Legal Case Tracking System 12-SEP-2001_15:22:56
Case Record (Part 1)

OGC Number: 01-1496-C-52-HW District: 6 SOUTHWEST County: 52 PINELLAS
Status: O OPEN Mode: E ENFORCEMENT Desc:

Style of Case: HOWCO_ENVIRONMENTAL_SERVICES;_DEP_VS.
Alias Name:
Site Name:

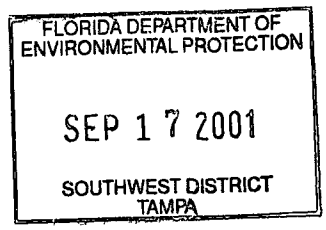
Lead Attorney: ACD ANGELA C DEMPSEY Supervisor Initials: LRM
2nd Attorney: Supervisor Initials:

Primary Program Area	Date	OGC Case Activity
HW HAZARDOUS_WASTE	12-SEP-2001 CCO	CIVIL_CASE_OPENED_IN_OGC

Secondary Program Areas

Case Origin: OGC Case in Litigation ? N

Count: *1 <Replace>



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

For Routing To Other Than The Addressee
To: _____ Location: _____
To: _____ Location: _____
To: _____ Location: _____
From: _____ Date: _____

LEGAL CASE TRACKING SYSTEM
ENFORCEMENT CASE ENTRY FORM

TO: Larry Morgan M.S. 35
Office of General Counsel

FROM: William Kutash

DATE: APR 11 1997

This form accompanied by: X Penalty Authorization
_____ Draft Consent Order _____ Draft N.O.V. _____ Case Report

The following information may be used for entry in the Legal Case Tracking System.

Case Name: Hewco Environmental Services, Inc.

Case Alias: _____

Responsible Office: Southwest District County Pinellas

District Contact: Randy Strauss

Program Area: Haz Waste 2nd Program Area Solid Waste Used Oil

Date Compliance/Enforcement Case Opened by District October 16, 1996

Permit/Application Number: _____

Facility ID Number: EPA ID No: FLD 152 764 767

Comments: _____

----------FOR OGC USE ONLY----------

OGC NUMBER: _____ Date Case Opened: _____

OGC ATTORNEY ASSIGNED: _____

Send Copies To:

____ Originator
____ Wetland Resource Management
____ Local Govt Wastewater Financial Assistance
____ Air Quality Planning & Regulation
____ Waste Planning Regulation
____ Leigh O'Shields State Lands Management
____ Mr. Ron Silver, U.S. Army Corps
____ Surface Water Management
____ Groundwater Protection
____ Water Facilities Planning & Regulation
____ Waste Cleanup
____ _____ (Other)
____ _____ (Other)

Revised August 1988

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Civil Penalty Authorization
Southwest District

1. Type of Alleged Violations: Solid & Hazardous Waste and Used Oil

2. Investigator: Randall Strauss

3. Violator: Howco Environmental Services

4. Location: 843 43rd St. S., St. Petersburg, Pinellas County

5. Date Submitted: April 3, 1997

6. Nature of Alleged Violations:

This facility does used oil processing and marketing, used oil filter recycling, industrial wastewater treatment and other non-hazardous solid waste treatment and disposal. Howco is a state registered used oil and filter transporter, processor and marketer; but is not a permitted hazardous waste treatment, storage or disposal facility, and is not authorized to accept hazardous waste. Most of the violations are of used oil and used oil filter processing management standards located at 40 CFR 279, which is adopted in Chapter 62-710, F.A.C., which also establishes additional used oil and filter management standards that were cited. There are also hazardous waste violations cited for failing to properly make hazardous waste determinations on solid wastes generated at the Howco facility, and for transporting hazardous waste from customers to the facility where it was treated and disposed.

The most serious used oil violations are for managing used oil and filters on open pads, as well as in trenches, sumps and storage and process tanks that are not provided with impervious secondary containment, as required. The hazardous waste determination citation was due to Howco's disposal of their facility process wastes at Florida landfills and soil thermal treatment facilities that are not permitted to accept hazardous waste. The hazardous waste transportation, treatment and disposal citations were due to Howco transporting hazardous waste anti-freeze to the facility and treating it in their wastewater plant which discharges to the City of St. Petersburg sewer system. A solid waste violation was cited for unauthorized disposal of sludge from their wastewater plant at a soil thermal treatment facility, which is not allowed to accept this type of waste whether or not it is hazardous. Further details of the violations are included in the inspection report attached as Exhibit I.

7. Penalty Rationale:

Howco has been previously cited for the same hazardous waste determination violations due to engaging in the same activities that have continued since their last inspection. Although no penalty settlement has ever been completed in the previous case, negotiations had reached a point of Howco agreeing to do analytical waste determinations, but the details have been in dispute and the determinations have not been done. With regards to the citations for accepting hazardous waste for treatment and disposal, Howco actually performed the analyses for the customers that showed the waste to be hazardous, and therefore was fully aware that they should not have accepted this waste.

The used oil citations are for violations of standards designed to prevent contamination of soil and groundwater. Although a considerable amount of soil and groundwater contamination has already been identified at the facility, most of these areas have been determined to be eligible for state reimbursement of clean-up costs through the Abandoned Tank Restoration Program. The current management of used oil on open pads, trenches, sumps and tanks that are not provided with impervious secondary containment as required, creates a significant potential that continuing soil and groundwater contamination with used oil could be occuring. Further continuing contamination, if occuring, would be difficult or impossible to differentiate from the existing contamination that the Department has apparently determined was due to abandoned tanks removed from the site long ago. The secondary containment standards have been in effect at the Federal level since September 1992 and were adopted by the State in June 1995. Howco is one of the largest used oil processors in the state and expended considerable time, resources and effort to obtain eligibility for state clean-up reimbursement. The facility should be expected to have spent at least the same effort to determine and comply with the standards designed to prevent further contamination of this site.

8. Penalty Recommendations:

I recommend that $48,932.00 in civil penalties be sought against Howco Environmental Services, Inc., as calculated on the attached Penalty Computation Worksheet.

Randall Strauss
Environmental Specialist II

Elizabeth Knauss
Environmental Manager

4/4/97
William Kutash
Environmental Administrator

Richard Garrity
Director of District Management

4/10/97
Date

Virginia B Wetherell
Secretary
for Perry Odom

4/17/97
Date

cc: Larry Morgan, OGC
Satish Kastury, BWP&R

Penalty Computation Worksheet

	Violator's Name:	Howco Environmental Services							
	Facility:	843 43rd St. S., St. Petersburg							
	Department Staff:	Randall H. Strauss							
	Date Determined:	3-Apr-97							
	Violation Type	Potential for Harm	Extent of Deviation	RCRA Matrix Range	Penalty Selected	Multi-Day	Econ. Ben.	Adj	Total
1	40CFR262.11	Moderate	Major	$8000-$10,999	Pending				Pending
2	40CFR263.20 & 403.727(3)(b)5	Moderate	Moderate	$5000-$7999	$6,500				$6,500
3	403.727(3)(b)1 & (3)(b)2	Moderate	Major	$8000-$10,999	$9,500		$1,482		$10,982
				Non-RCRA Matrix Range					
4	40CFR279.52(a)(1)	Minor	Major	$600-$1199	$900		Pending		$900
5	40CFR279.52(b)(2)(iii)&(iv)	Minor	Moderate	$200-$599	$400				$400
6	40CFR279.52(b)(3)(ii)	Minor	Minor	$100-$199	$150				$150
7	40CFR279.54(a) & 62-710.850(6)(a)	Major	Major	$8000-$10,000	$9,000		Pending		$9,000
8	40CFR279.54(c)	Major	Major	$8000-$10,000	$9,000		Pending		$9,000
9	40CFR279.54(d)	Major	Major	$8000-$10,000	$9,000		Pending		$9,000
10	403.413(4)(c)	Moderate	Moderate	$2000-$3199	$3,000				$3,000
11									
12									
13									
14									
15									
16									
	Total Penalty				$47,450		$1,482		$48,932

Howco Environmental Services, Inc.

Penalty Justification for Items #1 through #3 Based Upon: "Guidelines for Characterizing RCRA Violations" — April 18, 1995, which uses the RCRA Penalty Matrix amounts.

1. Regulation: 40 CFR 262.11 — **Hazardous Waste Determination**

   Violation: Howco disposed of industrial wastewater treatment sludge, filter solids from oil processing and wastewater treatment and other solid wastes without making a hazardous waste determination at the point of generation.

   Characterization of Violation: **(3.1)** - guideline reference number

   Potential for Harm — Moderate

   Based on "Ranking System for Potential for Harm"(Exhibit II)

   Extent of Deviation — Major

   Howco disposed of the wastes at state landfill and soil thermal treatment facilities. The guidelines characterize shipping waste for disposal without making a determination as a major extent of deviation.

   Penalty Pending: The Hazardous Waste program does not normally include the calculated amount for this violation in the initial assessment, unless the waste in question is known for a fact to be hazardous, such as a listed waste. In this case, the waste must be analysed to make the determination and if it is determined to be hazardous, then a penalty assessed at the middle of the moderate/major range, $9,500.00, would be added to the amount listed above.

2. Regulation: 40 CFR 263.20 & 403.727(3)(b)5 — **Transporting Hazardous Waste without a Manifest**

   Violation: Howco failed to use a hazardous waste manifest to transport hazardous waste anti-freeze to their facility. These violations were combined because they are essentially equivalent Federal and State requirements.

   Characterization of Violation: **(5.1)**

   Potential for Harm — Moderate

   Based on "Ranking System for Potential for Harm"(Exhibit III)

   Extent of Deviation — Moderate

The hazardous waste anti-freeze was shipped using Howco's normal shipping papers. The guidelines characterize this violation as a moderate extent of deviation if other shipping papers are available.

3. Regulation: 403.727(3)(b)1. & 403.727(3)(b)2. — **Transportation, Treatment & Disposal of Hazardous Waste to/at an Unpermitted Facility**

   Violation: Howco transported hazardous waste anti-freeze to their own facility for treatment and disposal. These violations were combined for the purpose of assessing a penalty because they were considered to result from a continuous single act. Howco's primary normal business activity is picking-up waste for direct transport and treatment at their own facility.

   Characterization of Violation: **(17.2)**

   Potential for Harm — Moderate

   Based on "Ranking System for Potential for Harm"(Exhibit III).

   Extent of Deviation — Major

   The guideline of "Operating without a permit"(17.2) was used for these violations. This guideline calls for determining the potential for harm by using the ranking system and characterizes the extent of deviation as major.

   Adjustment: An economic benefit adjustment of $1482.00 was added to the penalty for this violation due to the avoided cost of disposing of the anti-freeze to a permitted hazardous waste facility. The penalty was determined as indicated on the "Economic Benefit Calculation" attached as Exhibit IV.

Penalty Justification for Items #4 through #9 Based Upon: "Guidelines for Characterizing Used Oil Violations" — August 1996, which uses the Non-RCRA Penalty Matrix amounts.

4. Regulation: 40 CFR 279.52(a)(1) — **Operate and Maintain Facility to Prevent Releases**

   Violation: During the inspection used oil was observed seeping through the mortar joints of the concrete block wall adjoining the used oil filter pad.

   Characterization of Violation: **(28.6)**

   Potential for Harm — Minor

   At the time of inspection, the amount of oil that had seeped through the mortar joints appeared to be minimal. The guidelines characterize a release of less than 275 gallons as a minor potential for harm.

   Extent of Deviation — Major

The guidelines characterize this violation as always a major extent of deviation.

5. Regulation: 40 CFR 279.52(b)(2)(iii) &(iv) — **Contingency Plan**

   Violation: Howco failed to describe arrangements with local authorities and locations of all emergency equipment in the Contingency Plan.

   Characterization of Violation: **(28.8)**

   Potential for Harm — Minor

   The guidelines characterize an incomplete plan as a minor potential for harm.

   Extent of Deviation — Moderate

   The guidelines characterize an incomplete plan as a moderate extent of deviation.

6. Regulation: 40 CFR 279.52(b)(3)(ii) — **Contingency Plan Submittal**

   Violation: Howco failed to submit copies of the Contingency Plan to all local police departments, fire departments, hospitals and state and local emergency response teams.

   Characterization of Violation: **(11.3 in RCRA Guidelines)**

   Potential for Harm — Minor

   The guidelines characterize this as a minor potential for harm when committed by a hazardous waste facility.

   Extent of Deviation — Minor

   The guidelines characterize this as a minor extent of deviation when committed by a hazardous waste facility.

   This violation is not specifically addressed in the Used Oil Guidelines, but was judged to be essentially the same or less than for the characterization for a hazardous waste facility, which is already minor/minor. The non-RCRA matrix is still used for this violation.

7. Regulation: 40 CFR 279.54(a) & 62-710.850(6)(a) — **Storage of Used Oil & Filters**

   Violation: Howco managed used oil and filters on an uncovered outdoor pad and in open trenches and sumps that were not sealed or otherwise protected from the elements. One penalty was assessed for these violations because they were judged to be the result of the single act of draining used oil filters on an open, outdoor pad which routed the oil to the open trench and sump.

Characterization of Violation: **(26.2)**

Potential for Harm — Major

The guidelines characterize greater than 5000 filters not properly stored as a major potential for harm. The large pile of filters stored on the pad at the time of inspection plus the fact that Howco had shipped approximately 140,000 pounds of crushed filters that had been managed in this manner in the two weeks prior to the inspection, establish that well over this amount was involved.

Extent of Deviation — Major

The guidelines characterize this violation as a major extent of deviation when committed by a processor.

8. Regulation: 40 CFR 279.54(c) - **Secondary Containment for Containers**

Violation: Howco failed to provide secondary containment for trailers, temporary tanks and drums stored on the outdoor pad.

Characterization of Violation: **(28.2)**

Potential for Harm — Major

The guidelines characterize greater than 1400 gallons as a major potential for harm. The containers involved include several 8000 gallon tankers, frac tanks and the continuous acitvity of drums-in/drums-out on the pad. At the time of inspection, approximately twenty 55-gallon drums were stored on the pad.

Extent of Deviation — Major

The guidelines characterize this violation as a major extent of deviation.

9. Regulation: 40 CFR 279.54(d) - **Secondary Containment for Aboveground Tanks**

Violation: Howco failed to provide impervious secondary containment for any of the facility's used oil storage and processing tanks.

Characterization of Violation: **(28.2)**

Potential for Harm — Major

The total capacity of used oil storage and process tanks is well over 400,000 gallons. The guidelines characterize lack of containment of greater than 1400 gallons as a major potential for harm.

Extent of Deviation — Major

The guidelines characterize this violation as a major extent of deviation.

Penalty Justification for Item #10 Based Upon: "Guidelines for Characterizing Solid Waste Violations" — November 19, 1990 which uses the Non-RCRA Penalty Matrix amounts.

10. Regulation: 403.413(4)(c) - **Unauthorized Disposal of Solid Waste**

Violation: Howco disposed of industrial wastwater treatment sludge at a soil thermal treatment facility which is not authorized to acccept this waste.

Characterization of Violation: **(I.A.)**

Potential for Harm — Moderate

The waste disposed is estimated to be at least one-half dump truck load, which is approximately 15,000 pounds. The guidelines characterize disposal of over 500 pounds as a moderate potential for harm.

Extent of Deviation — Moderate

The guidelines characterize disposal of between 5 and 10 tons as a moderate extent of deviation.

In addition to the above-described penalties, Economic Benefit adjustments may be assessed for the violations described in Items 4, 7, 8 & 9 above, which relate to required upgrades of the facility. These adjustments would be based on the economic benefit derived from the delayed costs of not having upgraded the facility at the time it was first required. There are two main reasons why these adjustments can not be calculated at this time: 1) there are many different possible ways to correct these violations and the costs can not be pre-determined, and 2) the corrective action required to upgrade the facility's storage tank secondary containment areas can not be done in a reasonably short time, unless the facility is required to be shut down until completed. The corrective actions will most likely be done in accordance with a compliance schedule negotiated and incorporated into a Consent Order. Only after reliable estimates are obtained can these amounts be calculated. Therefore, this submittal is also requesting authorization to assess an economic benefit adjustment for these violations that would be calculated as soon as the "delayed costs" are determined. The calculations will be done in accordance with the "Economic Benefit Calculation Worksheet."

State of Florida
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Interoffice Memorandum

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: _X_ Richard Garrity, DDM
___ William Kutash, ENV. ADM.
___ OGC, ATTN: _____

FROM/THROUGH: William Kutash, ENVIRONMENTAL ADMINISTRATOR
Elizabeth Knauss, ENVIRONMENTAL MANAGER
Randy Strauss, ENVIRONMENTAL SPECIALIST II

DATE: April 1, 1997
FILE NAME: Howco Environmental Services COMET No. 100547
PROGRAM: Hazardous Waste COUNTY: Pinellas

TYPE OF DOCUMENT:

WARNING LETTER _X_ FINAL ORDER _____ CASE REPORT _____
DRAFT _____ OR FINAL _____ NOV _____ CONSENT ORDER _____
PENALTY AUTHORIZATION _____ OTHER _____

DESCRIPTION OF VIOLATION: Failure to make HW determinations, properly manage used oil & filters, provide secondary containment, unauthorized transportation, treatment and disposal of hazardous and solid waste.

SUMMARY OF CORRECTIVE ACTIONS: Do TCLP analyses of solid wastes at point of generation, upgrade secondary containment for tanks and containers, complete HW determinations before accepting waste

PENALTY SUMMARY: Class I haz. waste & used oil citations

EXTENT OF DEVIATION: Major POTENTIAL FOR HARM: Major

Issuing WL prior to approval of penalty authorization - last paragraph of WL modified.

PENALTY AMOUNT: $48,482.00 COST AND EXPENSES: $100.00

TOTAL PENALTY AMOUNT: $48,582.00 APPROVED BY SECRETARY: Pending

Department of Environmental Protection

Exhibit I

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ___ COMPLAINT _X_ ROUTINE ___ FOLLOW-UP ___ PERMITTING

FACILITY NAME: Howco Environmental Services DEP/EPA ID FLD 152 764 767

STREET ADDRESS: 843 43rd Street South, St. Petersburg, FL

MAILING ADDRESS: 3701 Central Ave., St. Petersburg, FL 33713

COUNTY: Pinellas PHONE: (813)327-8467 DATE: October 16-17, 1996 TIME: 9:00

NOTIFIED AS:	**CURRENT STATUS:**	
___ Non Handler	___ Non Handler	___ Non-Notifier
___ CESQG (<100 kg/mo.)	___ CESQG (<100 kg/mo.)	
___ SQG (100-1000 kg/mo.)	___ SQG (100-1000 kg/mo.)	
___ Generator (>1000 kg/mo.)	___ Generator (>1000 kg/mo.)	
___ Transporter	___ Transporter	
___ Transfer Facility	___ Transfer Facility	
___ Interim Status TSD Facility	___ Interim Status TSD Facility	
___ TSD Facility	___ TSD Facility	
Unit Type(s):	Unit Type(s):	
___ Exempt Treatment Facility	___ Exempt Treatment Facility	
_X_ Used Oil	_X_ Used Oil	

2. Applicable Regulations:

_X_ 40 CFR 261.5 _X_ 40 CFR 262 ___ 40 CFR 263 _X_ 40 CFR 264 ___ 40 CFR 265
___ 40 CFR 266 ___ 40 CFR 268 ___ 40 CFR 273 _X_ 40 CFR 279
_X_ 62-710 F.A.C. _X_ 62-730 F.A.C. ___ 62-737 F.A.C. ___ 62-740 F.A.C.

3. Responsible Official:

Tim Hagan, owner

4. Survey Participants and Principal Inspector:

Bill Crawford, Roger Evans, Randy Strauss—FDEP; Ernest Roggelin—Pinellas Co. HRS Storage Tank Program; Jose Rodriquez—Pinellas Co. DEM Air Program; Roy Williams—St. Petersburg Fire & Rescue/Prevention Division; Tim Hagan—Howco Environmental Services

5. Facility Latitude: 27°54'00" Longitude: 82°38'11"

6. SIC Code: 4953, 5172

7. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

8. Permit No.: N/A Date Issued: _____ Exp. Date: _____

9. Pre-Arranged Inspection: Yes _____ No _X_

10. Facility Description:

This facility was last inspected by the Department's hazardous waste section in March 1994. The major processes and activities are the same as reported in previous inspections, i.e. used oil collection, processing and marketing; wastewater, sludge and soil treatment and disposal; used oil filter processing; hazardous waste brokering; emergency response waste recovery and disposal; and laboratory analytical services. The facility currently employs about 45 people at the oil processing/wastewater plant and the main office located at the mailing address identified above.

The handling of used oil filters has changed since the previous inspection in 1994, when filters were transported to the facility in 55-gallon drums, then emptied into a roll-off container prior to crushing. Howco now collects and transports filters in dedicated trucks in-bulk. The trucks dump the filters on a pad located at the southwest corner of the facility. Oil drains from the filters across the pad into an open trench. This trench extends approximately 300 feet along the edge of a concrete pad and collects used oil and contaminated stormwater run-off from—in addition to the filters—a soil/sludge waste pile, a cone-type sludge separator, spillage from filter crushing and waste drum handling, and the operation of a waste sludge filter press. The trench drains to a collection sump for a truck wash rack, which is then pumped through an underground pipe to tanks used for oil/water separation located in the wastewater treatment area. The details of construction of the pad in the bulk soil and oil filter drainage areas could not be determined due to being coated with a layer of oil/soil mixture. There was visible oil seepage through the mortar cracks of the concrete block wall enclosing the drainage area. After draining and crushing, the filters are transported as scrap in roll-offs to U.S. Foundry & Manufacturing, 8351 NW 93rd St., Medley, FL. Approximately 140,000 pounds of scrap filters were transported to U.S. Foundry during a two-week period prior to the inspection.

The management of the filters on the open pad constitutes a violation of Section 62-710.850(6), Florida Administrative Code (F.A.C.), which requires filters to be stored in labeled containers, protected from the weather on an oil-impermeable surface. The used oil drainage on the pad and in the trench constitute violations of similar requirements for used oil management by processors spelled-out at 40 CFR 279.54. These standards specify that used oil can only be stored in tanks, containers, or units regulated under hazardous waste-permitted facility requirements, and the units must be provided with secondary containment.

Located on the pad adjacent to the filters, a bulk soil/waste pile is used as an oil absorbent and media for mixture of various solid wastes managed at the facility. Wastes that are added to this pile include solids cleaned from the trench drain system described above, solids removed from a cone-type liquid/solid separator, solids from a vibratory filter used in the oil processing plant, filter press solids, spent absorbents and any other miscellaneous sludges or solid-phase wastes. The miscellaneous wastes include anything that can not be processed through the used oil or wastewater plants, and can be mixed homogeneously into the bulk pile.

The cone separator is used for liquid/solids separation from tanker loads of oily wastes such as tank bottom, oil/water separator, sump and stormwater drain clean-outs. The liquids are processed through the oil and/or wastewater plants and the solids are added to the bulk pile. A pile of clean soil is located nearby and added as needed to the waste pile, which is periodically mixed and allowed to dry and drain to the trench. This waste had been disposed to Chambers Landfill up until April 1996, but the most recent disposal prior to this inspection was in September 1996, and went to Geologic Recovery Systems, Mulberry, FL, a soil thermal treatment facility. Treated soil from Geologic is the source of the clean soil described above that is used for mixing. Disposal of the bulk waste pile to Geologic constitutes a repeat violation of Section 403.413(4)(c), F.S., which Howco was previously cited for in conjunction with a February 19, 1993, Department inspection. The practice had apparently been discontinued after that citation until the most recent September 1996 disposal.

Prior to disposal, the bulk waste pile is mixed and a grab sample is taken for analysis for the parameters required by the disposal facility—either Chambers or Geologic. The method of waste determination for materials added to the pile received from off-site range from generator knowledge to full TCLP analysis, but include the customer's certification that the waste is non-hazardous. Several waste streams generated by Howco are also added to the bulk pile. The filter press sludge generated by Howco has been analysed at least three times in the past for TCLP constituents and was determined to be non-hazardous at those times. The cone separator solids, shaker filter solids and sand/carbon wastewater filter media have never been analysed at the point of generation, i.e. upon removal from the units. Due to the variety of sources contributing to these waste streams, a schedule should be implemented to analyse these solid wastes at the point of generation. The analyses should include all TCLP parameters likely to be present to ensure only non-hazardous wastes are added to the bulk pile before being mixed and diluted with clean soil.

Oil that contains between 6% and 20% water is distilled at 250°F to remove the water. At the time of inspection, modifications in the plant were underway to replace the distillation condenser. The former condenser utilized cooling water from a closed-loop water tower which was being replaced with a totally air-cooled unit. In addition to water, the condensate also contains enriched concentrations of halogenated compounds and "light ends" that distill over at this temperature. The condensate is routed to a storage tank where physical separation occurs between the aqueous and organic phases. The aqueous phase is routed for treatment in the wastewater plant and the "light ends" organic phase is mixed with processed oil and burned to provide heat for the distillation. Uncondensed vapor emissions from the condensate storage tank are routed through an approximate 30-gallon drum containing activated carbon. A waste determination consisting of TCLP analysis for organics must be performed on the spent carbon prior to disposal.

Since the organic phase of the condensate is derived from used oil and burned for energy recovery, it is regulated as "used oil" per 40 CFR 279.10(e)(2). In addition, even though the light ends can exceed 4000 ppm of halogens and thus be defined as "off-specification," Howco is

exempt from 40 CFR 279 Subpart G, standards for off-specification used oil burners, per 40 CFR 279.50(b)(3)(ii). Howco's air permit may specify other possible regulatory requirements pertaining to the burning of this material, which is to be determined by the Pinellas County DEM Air Program.

The used oil storage and processing tanks are located within two adjacent secondary containment areas. The western section contains 10 vertical tanks ranging from 20,000 to 30,000-gallon capacity which are used to store processed oil prior to shipment. The containment for these tanks consists of a concrete slab base sorrounded by an asphalt-covered earthen berm. The eastern section contains tanks used for storage of incoming oil and processing tanks and equipment. The containment for this area consists of a concrete floor with concrete block walls. The Pinellas County Storage Tank Program has determined that these containment areas do not meet the standards for secondary containment specified at 62-762.500(6), F.A.C.; specifically, that the containments are not impervious to used oil for a number of reasons. These include cracks, holes and deterioration in the concrete base and walls, incomplete sealing of joints, and the asphalt berm does not meet the permeability rate standard of $1X10^{-7}$ cm/sec or less. Due to these deficiencies, the containments also do not meet the requirement located at 40 CFR 279.54(d)(2). The containments should be upgraded to meet all the 62-762.500, F.A.C., standards by June 23, 1997, when the facility's new Used Oil Processing Facility Permit application is due.

Tanks that are used for oil/water separation, burner fuel storage and untreated and treated wastewater storage and processing are located in a containment area generally referred to as the Wastewater Treatment Plant. This area is subdivided into four sections separated by concrete block containment walls. Several tanks in this area are subject to regulation as used oil tanks including: Tank #105 (15,000 gal) which is used for burner fuel storage; Tanks #140 and #141 (30,000 & 20,000 gals) which receive used oil collected in the trench and truck wash sump described above; and five tanks (18,000-20,000 gals) which are used for oil/water separation. Used oil separated in the latter tanks is pumped back into the oil plant for processing. Due to the storage and processing of various used oils and materials derived from used oil in these tanks, this secondary containment area is also subject to the requirements of 40 CFR 279 and Chapter 62-762, F.A.C. For the same reasons stated in the above paragraph, the containment for this area must be upgraded to meet the 62-762.500, F.A.C., standards by June 23, 1997.

The separated oil layers from tanks in the wastewater plant are discharged into the containment area. The oil is then pumped from sumps within the containment into the oil processing plant. The intentional use of the containment to handle used oil precludes its potential function as an emergency secondary containment. If the area is to be used in this manner, then the containment itself must be provided with secondary containment. The alternative is to manage the separated oil only in tanks that are provided with secondary containment.

Subsequent to the inspection, Howco pressure tested six 3" underground pipes used to convey oily wastes, wastewater and sludges between the two plants, from the truck wash sump to the separator holding tanks and

from the wastewater plant to the sludge holding tank for the filter press. Two of the six lines failed, including a line between the two plants, Line #1, and the line from the wastewater plant to the sludge holding tank, Line #6. Due to failing the pressure tests, Howco submitted a Discharge Reporting Form to the Pinellas County Storage Tank Program on January 10, 1997, and subsequently reported that Line #2 was to be abandoned in place and that Line #6 was repaired. Documentation of a "passed" pressure test after the repairs on Line #6 should be submitted to the Department.

In addition to the permanent tanks that are identified on facility drawings and have been registered with the Department's storage tank program, Howco keeps approximately ten to fifteen tanker trailers on-site and leases portable tanks that are used for temporary storage of various wastes. Some of the tanker trailers are in-use for waste hauling, however several of them are not licensed for over the road use and are reportedly used for temporary overflow storage capacity. These tanks must also be provided with secondary containment if they are used for the storage of used oil for greater than 24 hours.

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Currently, all or almost all of the processed oil is marketed as "on-specification" used oil fuel and a sequential number is assigned to each "batch" of fuel. Exactly what constitutes a "batch" of used oil fuel was not completely determined from the inspection, but appears to be associated with each time one of the ten 20,000 to 30,000-gallon storage tanks is filled. With oil being continually added and withdrawn from the tanks, exactly what constitutes a discrete batch and how the analyses correlate to each batch number is not clear. This procedure needs to be clarified in Howco's analysis plan, which simply states that a monthly composite sample is sent to an outside lab for verification of their product knowledge.

Each delivery of fuel to an oil burner is accompanied by a "Certificate of Analysis" that includes the batch number and results for arsenic , cadmium, chromium, lead, flash point and total halogen concentrations. The total halogens are run in Howco's lab by x-ray fluorescence. A review of total halogen results for 29 batches indicate that a unique determination was made for this parameter on each batch, because the result for each batch was different and varied by a considerable amount. The average total halogen concentration for the 29 batches was 608.5 ppm, with a low of 237 ppm and a high of 937 ppm.

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monthly confirmatory analysis that is performed by an outside lab. The sample sent for outside analysis is a composite of all the samples taken by Howco during the month for total halogen analysis. The breakdown of lead results for the 29 batches reviewed as reported on the "Certificates of Analysis" is as follows: (20)56 ppm, (6)51 ppm, (2)56.5 ppm, and (1)39.8 ppm. Arsenic and cadmium are listed as <1 ppm on all analyses and chromium is listed as either 1 or 2 ppm. Since the lead results reported for the individual batches are not the result of a discrete analysis of each specific batch, they should not be reported as an actual analytical result on the "Certificate of Analysis." If Howco does not wish to analyse a representative sample of each batch, then they should propose a sampling plan with statistical data to support reporting the lead concentration as <X ppm, with a specified percentage certainty.

A review of records for a variety of incoming wastes revealed that Howco has received anti-freeze wastes that were determined to be hazardous due to exceeding TCLP limits. During the inspection, a record was observed for the receipt of anti-freeze from Tampa Volvo on 1/18/95 that analysed at 10 ppm lead by TCLP. Subsequent to the inspection, records were obtained in conjunction with an inspection of Ken Marks Ford, Clearwater, that showed Howco picked-up 260 gallons of anti-freeze on January 31, 1996, that was analysed in Howco's lab as containing 2.2 ppm tetrachloroethylene. Since these anti-freeze wastes were transported by Howco for treatment in their wastewater system, they were subject to regulation as solid wastes, and as hazardous wastes due to exceeding the TCLP limits of 5 ppm for lead and 0.7 ppm for tetrachloroethylene, respectively.

A business sideline Howco is attempting to develop is the sale of their own brand of parts cleaner called Howco Klean, which the MSDS states contains 90% aliphatic and 10% aromatic petroleum distillates, 2% 1,2,4-trimethylbenzene and has a flash point of 143°F (TCC). Howco plans to pick-up the used solvent for processing in their oil treatment plant if an initial analysis from each customer determines the spent solvent to be non-hazardous. Testing of the spent solvent should include all the metal and organic TCLP constituents, except pesticides, and the flash point should be determined using one of the methods specified at § 261.21—not the method reported on the MSDS, Tagliabue Closed Cup (TCC).

Other miscellaneous activities include brokering of hazardous waste disposal which is usually arranged through Perma-Fix. A copy of all hazardous waste manifests is maintained in Howco's office. Flourescent bulb disposal is brokered using Perma-Fix as transporter and Quicksilver, Tampa, as the recycling facility. Laboratory analytical services are performed on a job basis, as well as for wastes picked-up by Howco.

A review of additional required records indicated that training records were complete and up-to-date. The Used Oil Annual Reports for '93, '94 and '95 were reviewed and revealed discrepancies that have not been explained as of the date of this report. All the used oil is reported on the '94 and '95 reports as being "Marketed for an industrial process." No oil is reported to have been "Marketed as an on-spec fuel," even though this is the stated disposition of all of Howco's used oil in 1995, and almost all of it in 1994. The 1993 report states

that 1,851,395 gallons was marketed as fuel or used in an on-site burner, and 1,015,803 gallons was marketed to the phosphate industry for use in flotation. The '94 report states that 13,688 gallons of used oil was used for phosphate flotation. Howco's Annual Reports need to be corrected to indicate the amounts of used oil marketed as on-spec fuel, if this is in fact the disposition of the oil.

The facility maintains an SPCC and Contingency Plan that was most recently updated in January 1996. Although the plan states that the local police and fire departments have been familiarized with the facility, there is no description of any arrangements with these agencies in the plan, as specified at § 279.52(b)(2)(iii), nor is there documentation of submittal of the plan to these authorities. The plan identifies the location of portable fire extinguishers on a drawing, but describes the location of spill control and other emergency equipment as being in the "HazMat trailer." It's not clear whether this refers to the same equipment Howco uses for off-site emergency response, which would therefore not always be available at the facility. The plan needs to be clarified to show the exact location of this trailer if it is permanent, and all locations of spill control materials and safety equipment other than just the fire extinguishers. All other records reviewed which included safety inspections, tank inspections, incoming waste profiles and analyses (except those violations noted above), and bulk waste analyses were in order. The following violations were identified as a result of the inspection and subsequent follow-up investigation.

11. Summary of Alleged Violations:

40 CFR 262.11	Failure to determine if solid wastes added to the bulk pile meet the definition of hazardous waste at the point of generation.
40 CFR 263.20 & 403.727(3)(b)5., F.S.	Failure to use a manifest in the transportation of hazardous waste anti-freeze.
40 CFR 279.52(a)(1)	Failure to maintain and operate the facility to minimize the possibility of a release of used oil to the soil.
40 CFR 279.52(b)(2)(iii)&(iv)	Failure to describe arrangements with local authorities and locations of all emergency equipment in the contingency plan.
40 CFR 279.52(b)(3)(ii)	Failure to submit copies of contingency plan to local police, fire, hospital and emergency response teams.
40 CFR 279.54(a)	Failure to store used oil in tanks, containers or other regulated units.
40 CFR 279.54(c)	Failure to provide impervious secondary containment for containers of used oil.
40 CFR 279.54(d)	Failure to provide impervious secondary containment for existing aboveground tanks.

62-710.850(6)(a), F.A.C.	Failure to store used oil filters in sealed, labeled containers on an oil-impermeable surface.
403.413(4)(c), F.S.	Disposal of wastewater treatment sludge at a soil thermal treatment facility in violation of Department rules.
403.727(3)(b)1., F.S.	Transportation of hazardous waste to an unpermitted facility.
403.727(3)(b)2., F.S.	Storage, treatment and disposal of hazardous waste at an unpermitted facility.

12. Recommendations:

a) Revise the analysis plan to include a detailed description of the processed oil sampling procedures and a statistical method of determining the maximum lead content of the processed oil batches.

b) Do not report results from monthly composite sample lead analyses as actual analytical results on the "Certificate of Analysis."

c) Provide results of pressure test on repaired Line #6.

d) Provide information regarding current practices for the disposition of the "light ends."

e) Provide clarification regarding the disposition of used oil marketed in 1994 and 1995.

Inspected: _____
Randall H. Strauss
Environmental Specialist II

Approved: _____ Date: 4/2/97
Elizabeth B. Knauss
Environmental Manager

Exhibit H

RANKING SYSTEM FOR POTENTIAL FOR HARM

Facility Name: Howco Environmental Services

Rule(s) Violated: 262.11 - failure to make HW detrminations at the point of generation on filter press sludge, shaker filter solids and other solid wastes added to the bulk waste pile

Nature of Waste: 4

Category A = 8

Category B = 4

Volume of Waste: 8

>26 drums = 8
6-25 drums = 5
<1-5 drums = 2

Receptors: (Potential = 4) + (10-100 people = 2) = 6

Discharge/
(Potential = 4)
(No Potential = 1)

(>1000 people = 4)
(100-1000 people = 3)
(10-100 people = 2)
(<10 people = 1)

TOTAL SCORE: 18

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: 8-12

ASSIGNED BY: Randall H. Strauss DATE: April 1, 1997

Exhibit III

RANKING SYSTEM FOR POTENTIAL FOR HARM

Facility Name: Howco Environmental Services

Rule(s) Violated: 263.20, 403.727(3)(b)1., 403.727(3)(b)2., 403.727(3)(b)5. - transportation of hazardous waste without a manifest; transportation, treatment and disposal of hazardous waste anti-freeze at an unpermitted facility

Nature of Waste: 4

Category A = 8

Category B = 4

Volume of Waste: 5

>26 drums = 8
6-25 drums = 5
<1-5 drums = 2

Receptors: (Potential = 4) **+** (10-100 people = 2) **= 6**

Discharge/
(Potential = 4)
(No Potential = 1)

(>1000 people = 4)
(100-1000 people = 3)
(10-100 people = 2)
(<10 people = 1)

TOTAL SCORE: 15

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: 8-12

ASSIGNED BY: Randall H. Strauss DATE: April 2, 1997

Exhibit IV

ECONOMIC BENEFIT CALCULATION

General
EB = AC(1-T) + DC(I)

where
EB = economic benefit
AC = avoided costs (*i.e.*, expenditures nullified by violator's failure to comply)
T = corporate tax rate (given T = 38%)
DC = delayed costs (*i.e.*, expenditured deferred by violator's failure to comply)
I = interest rate charged by IRS for deliquent accounts (given I = 10%)

Specific
Location : Howco Environmental Services
843 43rd St. S.
St. Petersburg

Violation	**Avoided Cost**
403.727(3)(b)1. & 2.–transportation, treatment and disposal of HW anti-freeze	$247/drum X 6 drums=$1482.00

per quote from City Environmental Services, Tampa 4/1/97

AC = $1482.00

In this case the economic benefit was estimated to equal the avoided cost. No adjustment for tax factors was made because any reduction was estimated to be offset by the potential earnings on the avoided cost.

Date: 3/19/97 4:41:31 PM
From: Joan Flint TAL
Subject: Re: Howco - St. Petersburg
To: Randy Strauss TPA

Could you please FAX (813 744-6125) a copy of Howco/St. Pete's 1996 Annual Report.

FYI - almost all (if not all) of Howco's processed oil is marketed as on-spec fuel. The 94 and 95 reports state that it all is marketed for an industrial process. I'm trying to find out from Howco if this is just due to misunderstanding the categories, or what. Are there written directions that come with the packages that are clear on this?

I have not as yet received Howco's annual report for 1996!

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

APR 11 1997

Mr. Tim Hagan
Howco Environmental Services
3701 Central Ave.
St. Petersburg, FL 33713

RE: WARNING LETTER #100547
Howco Environmental Services
843 43rd St. S.
St. Petersburg, FL
EPA ID NO.: FLD 152 764 767

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 program field inspection conducted on October 16 & 17, 1997, indicates that violations of Florida Statutes and Rules may exist at the Howco Environmental Services facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 11 of the report lists a summary of alleged violations of Department Rules.

Section 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 other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should be ceased.

You are requested to contact Randall Strauss at (813)744-6100, ext. 387, within fifteen (15) days of receipt of this Warning Letter to arrange 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.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. If after further investigation, the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the Department's Settlement Guidelines for Civil Penalties and the RCRA Civil Penalty

APR 11 1997

Policy of 1990, a civil penalty has been calculated and is pending review. Costs and expenses in this case will be a minimum of $100.00. If this matter cannot be resolved within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/rhs

Enclosure

cc: Panduranga Ojili, HWR
Jewell Grubbs, USEPA, Region IV
Charlie Ryburn, Pinellas Co. DEM
Compliance File

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

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Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ___ COMPLAINT _X_ ROUTINE ___ FOLLOW-UP ___ PERMITTING

FACILITY NAME: Howco Environmental Services DEP/EPA ID FLD 152 764 767

STREET ADDRESS: 843 43rd Street South, St. Petersburg, FL

MAILING ADDRESS: 3701 Central Ave., St. Petersburg, FL 33713

COUNTY: Pinellas PHONE: (813)327-8467 DATE: October 16-17, 1996 TIME: 9:00

NOTIFIED AS:	**CURRENT STATUS:**	
___ Non Handler	___ Non Handler	___ Non-Notifier
___ CESQG (<100 kg/mo.)	___ CESQG (<100 kg/mo.)	
___ SQG (100-1000 kg/mo.)	___ SQG (100-1000 kg/mo.)	
___ Generator (>1000 kg/mo.)	___ Generator (>1000 kg/mo.)	
___ Transporter	___ Transporter	
___ Transfer Facility	___ Transfer Facility	
___ Interim Status TSD Facility	___ Interim Status TSD Facility	
___ TSD Facility	___ TSD Facility	
Unit Type(s):	Unit Type(s):	
___ Exempt Treatment Facility	___ Exempt Treatment Facility	
_X_ Used Oil	_X_ Used Oil	

2. Applicable Regulations:

_X_ 40 CFR 261.5 _X_ 40 CFR 262 ___ 40 CFR 263 _X_ 40 CFR 264 ___ 40 CFR 265
___ 40 CFR 266 ___ 40 CFR 268 ___ 40 CFR 273 _X_ 40 CFR 279
_X_ 62-710 F.A.C. _X_ 62-730 F.A.C. ___ 62-737 F.A.C. ___ 62-740 F.A.C.

3. Responsible Official:

Tim Hagan, owner

4. Survey Participants and Principal Inspector:

Bill Crawford, Roger Evans, Randy Strauss—FDEP; Ernest Roggelin—Pinellas Co. HRS Storage Tank Program; Jose Rodriquez—Pinellas Co. DEM Air Program; Roy Williams—St. Petersburg Fire & Rescue/Prevention Division; Tim Hagan—Howco Environmental Services

5. Facility Latitude: 27°54'00" Longitude: 82°38'11"

6. SIC Code: 4953, 5172

7. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

8. Permit No.: N/A Date Issued: _____ Exp. Date: _____

9. Pre-Arranged Inspection: Yes _____ No _X_

10. Facility Description:

This facility was last inspected by the Department's hazardous waste section in March 1994. The major processes and activities are the same as reported in previous inspections, i.e. used oil collection, processing and marketing; wastewater, sludge and soil treatment and disposal; used oil filter processing; hazardous waste brokering; emergency response waste recovery and disposal; and laboratory analytical services. The facility currently employs about 45 people at the oil processing/wastewater plant and the main office located at the mailing address identified above.

The handling of used oil filters has changed since the previous inspection in 1994, when filters were transported to the facility in 55-gallon drums, then emptied into a roll-off container prior to crushing. Howco now collects and transports filters in dedicated trucks in-bulk. The trucks dump the filters on a pad located at the southwest corner of the facility. Oil drains from the filters across the pad into an open trench. This trench extends approximately 300 feet along the edge of a concrete pad and collects used oil and contaminated stormwater run-off from—in addition to the filters—a soil/sludge waste pile, a cone-type sludge separator, spillage from filter crushing and waste drum handling, and the operation of a waste sludge filter press. The trench drains to a collection sump for a truck wash rack, which is then pumped through an underground pipe to tanks used for oil/water separation located in the wastewater treatment area. The details of construction of the pad in the bulk soil and oil filter drainage areas could not be determined due to being coated with a layer of oil/soil mixture. There was visible oil seepage through the mortar cracks of the concrete block wall enclosing the drainage area. After draining and crushing, the filters are transported as scrap in roll-offs to U.S. Foundry & Manufacturing, 8351 NW 93rd St., Medley, FL. Approximately 140,000 pounds of scrap filters were transported to U.S. Foundry during a two-week period prior to the inspection.

The management of the filters on the open pad constitutes a violation of Section 62-710.850(6), Florida Administrative Code (F.A.C.), which requires filters to be stored in labeled containers, protected from the weather on an oil-impermeable surface. The used oil drainage on the pad and in the trench constitute violations of similar requirements for used oil management by processors spelled-out at 40 CFR 279.54. These standards specify that used oil can only be stored in tanks, containers, or units regulated under hazardous waste-permitted facility requirements, and the units must be provided with secondary containment.

Located on the pad adjacent to the filters, a bulk soil/waste pile is used as an oil absorbent and media for mixture of various solid wastes managed at the facility. Wastes that are added to this pile include solids cleaned from the trench drain system described above, solids removed from a cone-type liquid/solid separator, solids from a vibratory filter used in the oil processing plant, filter press solids, spent absorbents and any other miscellaneous sludges or solid-phase wastes. The miscellaneous wastes include anything that can not be processed through the used oil or wastewater plants, and can be mixed homogeneously into the bulk pile.

The cone separator is used for liquid/solids separation from tanker loads of oily wastes such as tank bottom, oil/water separator, sump and stormwater drain clean-outs. The liquids are processed through the oil and/or wastewater plants and the solids are added to the bulk pile. A pile of clean soil is located nearby and added as needed to the waste pile, which is periodically mixed and allowed to dry and drain to the trench. This waste had been disposed to Chambers Landfill up until April 1996, but the most recent disposal prior to this inspection was in September 1996, and went to Geologic Recovery Systems, Mulberry, FL, a soil thermal treatment facility. Treated soil from Geologic is the source of the clean soil described above that is used for mixing. Disposal of the bulk waste pile to Geologic constitutes a repeat violation of Section 403.413(4)(c), F.S., which Howco was previously cited for in conjunction with a February 19, 1993, Department inspection. The practice had apparently been discontinued after that citation until the most recent September 1996 disposal.

Prior to disposal, the bulk waste pile is mixed and a grab sample is taken for analysis for the parameters required by the disposal facility—either Chambers or Geologic. The method of waste determination for materials added to the pile received from off-site range from generator knowledge to full TCLP analysis, but include the customer's certification that the waste is non-hazardous. Several waste streams generated by Howco are also added to the bulk pile. The filter press sludge generated by Howco has been analysed at least three times in the past for TCLP constituents and was determined to be non-hazardous at those times. The cone separator solids, shaker filter solids and sand/carbon wastewater filter media have never been analysed at the point of generation, i.e. upon removal from the units. Due to the variety of sources contributing to these waste streams, a schedule should be implemented to analyse these solid wastes at the point of generation. The analyses should include all TCLP parameters likely to be present to ensure only non-hazardous wastes are added to the bulk pile before being mixed and diluted with clean soil.

Oil that contains between 6% and 20% water is distilled at 250°F to remove the water. At the time of inspection, modifications in the plant were underway to replace the distillation condenser. The former condenser utilized cooling water from a closed-loop water tower which was being replaced with a totally air-cooled unit. In addition to water, the condensate also contains enriched concentrations of halogenated compounds and "light ends" that distill over at this temperature. The condensate is routed to a storage tank where physical separation occurs between the aqueous and organic phases. The aqueous phase is routed for treatment in the wastewater plant and the "light ends" organic phase is mixed with processed oil and burned to provide heat for the distillation. Uncondensed vapor emissions from the condensate storage tank are routed through an approximate 30-gallon drum containing activated carbon. A waste determination consisting of TCLP analysis for organics must be performed on the spent carbon prior to disposal.

Since the organic phase of the condensate is derived from used oil and burned for energy recovery, it is regulated as "used oil" per 40 CFR 279.10(e)(2). In addition, even though the light ends can exceed 4000 ppm of halogens and thus be defined as "off-specification," Howco is

exempt from 40 CFR 279 Subpart G, standards for off-specification used oil burners, per 40 CFR 279.50(b)(3)(ii). Howco's air permit may specify other possible regulatory requirements pertaining to the burning of this material, which is to be determined by the Pinellas County DEM Air Program.

The used oil storage and processing tanks are located within two adjacent secondary containment areas. The western section contains 10 vertical tanks ranging from 20,000 to 30,000-gallon capacity which are used to store processed oil prior to shipment. The containment for these tanks consists of a concrete slab base sorrounded by an asphalt-covered earthen berm. The eastern section contains tanks used for storage of incoming oil and processing tanks and equipment. The containment for this area consists of a concrete floor with concrete block walls. The Pinellas County Storage Tank Program has determined that these containment areas do not meet the standards for secondary containment specified at 62-762.500(6), F.A.C.; specifically, that the containments are not impervious to used oil for a number of reasons. These include cracks, holes and deterioration in the concrete base and walls, incomplete sealing of joints, and the asphalt berm does not meet the permeability rate standard of $1X10^{-7}$ cm/sec or less. Due to these deficiencies, the containments also do not meet the requirement located at 40 CFR 279.54(d)(2). The containments should be upgraded to meet all the 62-762.500, F.A.C., standards by June 23, 1997, when the facility's new Used Oil Processing Facility Permit application is due.

Tanks that are used for oil/water separation, burner fuel storage and untreated and treated wastewater storage and processing are located in a containment area generally referred to as the Wastewater Treatment Plant. This area is subdivided into four sections separated by concrete block containment walls. Several tanks in this area are subject to regulation as used oil tanks including: Tank #105 (15,000 gal) which is used for burner fuel storage; Tanks #140 and #141 (30,000 & 20,000 gals) which receive used oil collected in the trench and truck wash sump described above; and five tanks (18,000-20,000 gals) which are used for oil/water separation. Used oil separated in the latter tanks is pumped back into the oil plant for processing. Due to the storage and processing of various used oils and materials derived from used oil in these tanks, this secondary containment area is also subject to the requirements of 40 CFR 279 and Chapter 62-762, F.A.C. For the same reasons stated in the above paragraph, the containment for this area must be upgraded to meet the 62-762.500, F.A.C., standards by June 23, 1997.

The separated oil layers from tanks in the wastewater plant are discharged into the containment area. The oil is then pumped from sumps within the containment into the oil processing plant. The intentional use of the containment to handle used oil precludes its potential function as an emergency secondary containment. If the area is to be used in this manner, then the containment itself must be provided with secondary containment. The alternative is to manage the separated oil only in tanks that are provided with secondary containment.

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All the flash point results are reported as >140F, which is based on generator knowledge that all past analyses have been significantly higher than 140F. The results for metals appear to be based on a

monthly confirmatory analysis that is performed by an outside lab. The sample sent for outside analysis is a composite of all the samples taken by Howco during the month for total halogen analysis. The breakdown of lead results for the 29 batches reviewed as reported on the "Certificates of Analysis" is as follows: (20)56 ppm, (6)51 ppm, (2)56.5 ppm, and (1)39.8 ppm. Arsenic and cadmium are listed as <1 ppm on all analyses and chromium is listed as either 1 or 2 ppm. Since the lead results reported for the individual batches are not the result of a discrete analysis of each specific batch, they should not be reported as an actual analytical result on the "Certificate of Analysis." If Howco does not wish to analyse a representative sample of each batch, then they should propose a sampling plan with statistical data to support reporting the lead concentration as <X ppm, with a specified percentage certainty.

A review of records for a variety of incoming wastes revealed that Howco has received anti-freeze wastes that were determined to be hazardous due to exceeding TCLP limits. During the inspection, a record was observed for the receipt of anti-freeze from Tampa Volvo on 1/18/95 that analysed at 10 ppm lead by TCLP. Subsequent to the inspection, records were obtained in conjunction with an inspection of Ken Marks Ford, Clearwater, that showed Howco picked-up 260 gallons of anti-freeze on January 31, 1996, that was analysed in Howco's lab as containing 2.2 ppm tetrachloroethylene. Since these anti-freeze wastes were transported by Howco for treatment in their wastewater system, they were subject to regulation as solid wastes and as hazardous wastes due to exceeding the TCLP limits of 5 ppm for lead and 0.7 ppm for tetrachloroethylene, respectively.

A business sideline Howco is attempting to develop is the sale of their own brand of parts cleaner called Howco Klean, which the MSDS states contains 90% aliphatic and 10% aromatic petroleum distillates, 2% 1,2,4-trimethylbenzene and has a flash point of 143°F (TCC). Howco plans to pick-up the used solvent for processing in their oil treatment plant if an initial analysis from each customer determines the spent solvent to be non-hazardous. Testing of the spent solvent should include all the metal and organic TCLP constituents, except pesticides, and the flash point should be determined using one of the methods specified at § 261.21—not the method reported on the MSDS, Tagliabue Closed Cup (TCC).

Other miscellaneous activities include brokering of hazardous waste disposal which is usually arranged through Perma-Fix. A copy of all hazardous waste manifests is maintained in Howco's office. Flourescent bulb disposal is brokered using Perma-Fix as transporter and Quicksilver, Tampa, as the recycling facility. Laboratory analytical services are performed on a job basis as well as for wastes picked-up by Howco.

A review of additional required records indicated that training records were complete and up-to-date. The Used Oil Annual Reports for '93, '94 and '95 were reviewed and revealed discrepancies that have not been explained as of the date of this report. All the used oil is reported on the '94 and '95 reports as being "Marketed for an industrial process." No oil is reported to have been "Marketed as an on-spec fuel," even though this is the stated disposition of all of Howco's used oil in 1995, and almost all of it in 1994. The 1993 report states

that 1,851,395 gallons was marketed as fuel or used in an on-site burner, and 1,015,803 gallons was marketed to the phosphate industry for use in flotation. The '94 report states that 13,688 gallons of used oil was used for phosphate flotation. Howco's Annual Reports need to be corrected to indicate the amounts of used oil marketed as on-spec fuel, if this is in fact the disposition of the oil.

The facility maintains an SPCC and Contingency Plan that was most recently updated in January 1996. Although the plan states that the local police and fire departments have been familiarized with the facility, there is no description of any arrangements with these agencies in the plan, as specified at § 279.52(b)(2)(iii), nor is there documentation of submittal of the plan to these authorities. The plan identifies the location of portable fire extinguishers on a drawing, but describes the location of spill control and other emergency equipment as being in the "HazMat trailer." It's not clear whether this refers to the same equipment Howco uses for off-site emergency response, which would therefore not always be available at the facility. The plan needs to be clarified to show the exact location of this trailer if it is permanent, and all locations of spill control materials and safety equipment other than just the fire extinguishers. All other records reviewed which included safety inspections, tank inspections, incoming waste profiles and analyses (except those violations noted above), and bulk waste analyses were in order. The following violations were identified as a result of the inspection and subsequent follow-up investigation.

11. Summary of Alleged Violations:

40 CFR 262.11	Failure to determine if solid wastes added to the bulk pile meet the definition of hazardous waste at the point of generation.
40 CFR 263.20 & 403.727(3)(b)5., F.S.	Failure to use a manifest in the transportation of hazardous waste anti-freeze.
40 CFR 279.52(a)(1)	Failure to maintain and operate the facility to minimize the possibility of a release of used oil to the soil.
40 CFR 279.52(b)(2)(iii)&(iv)	Failure to describe arrangements with local authorities and locations of all emergency equipment in the contingency plan.
40 CFR 279.52(b)(3)(ii)	Failure to submit copies of contingency plan to local police, fire, hospital and emergency response teams.
40 CFR 279.54(a)	Failure to store used oil in tanks, containers or other regulated units.
40 CFR 279.54(c)	Failure to provide impervious secondary containment for containers of used oil.
40 CFR 279.54(d)	Failure to provide impervious secondary containment for existing aboveground tanks.

62-710.850(6)(a), F.A.C.	Failure to store used oil filters in sealed, labeled containers on an oil-impermeable surface.
403.413(4)(c), F.S.	Disposal of wastewater treatment sludge at a soil thermal treatment facility in violation of Department rules.
403.727(3)(b)1., F.S.	Transportation of hazardous waste to an unpermitted facility.
403.727(3)(b)2., F.S.	Storage, treatment and disposal of hazardous waste at an unpermitted facility.

12. Recommendations:

a) Revise the analysis plan to include a detailed description of the processed oil sampling procedures and a statistical method of determining the maximum lead content of the processed oil batches.

b) Do not report results from monthly composite sample lead analyses as actual analytical results on the "Certificate of Analysis."

c) Provide results of pressure test on repaired Line #6.

d) Provide information regarding current practices for the disposition of the "light ends."

e) Provide clarification regarding the disposition of used oil marketed in 1994 and 1995.

Inspected: Randall H. Strauss
Randall H. Strauss
Environmental Specialist II

Approved: Elizabeth B. Knauss Date: 4/2/97
Elizabeth B. Knauss
Environmental Manager

USED OIL PROCESSOR CHECKLIST

Facility Name: HOWCO Date: 10/17/96.

Facility Representative: Tim Hagan Facility ID : ↑

Inspector: R. Strauss. Registration # FLD 152764767

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y____ N__✓__

   Transporter or burner processing incidental to normal course of operations? Y____ N____

   Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.

2. Does the processor have an EPA ID Number? (279.51(a)) Y__✓__ N____

3. Is the processor Registered? (62-710.500(1)(b)) Y__✓__ N____

4. Does the processor have a general permit? 62-710.800(1)) Y__✓__ N____

5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was " the notification for renewal submitted 30 days prior to expiration of the general permit?(62-710.800(2)) Y____ N____ N/A

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y__✓__ N____

   Is the facility a registered used oil filter processor? (62-710.850) Y__✓__ N____

2. Are the filters stored in above ground containers which are: (62-710.850(6))

   In good condition? Y____ N__✓__

   Closed or otherwise protected from weather? Y____ N__✓__

   Labeled "Used Oil Filters"? Y____ N__✓__

   Stored on an oil impervious surface? Y____ N____ Unknown.

3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))

   Destination or end use of the processed filters? Y__✓__ N____

   Name and street address of each destination or end user? Y__✓__ N____

   Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y__✓__ N____

4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y__✓__ N____

Facility Name: ± USO Environmental
Date: 10/17/96.

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y ✓ N____
   * also drained on pad & routed to plant through trench & sump.
2. If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C. rules? Y ✓ N____
   (Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

   Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs ? Applies to all ASTs regardless of size per 279.54(d & e) Y____ N ✓

3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y ✓ N____
4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y ✓ N____

   Is the containment system impervious to oil so as to prevent migration? Y____ N ✓ Unknown - ? about evidence of oil permeating concrete block wall.
5. Are ASTs, UST tank fill lines and containers labeled "used oil? (279.54(f)) Y ✓ N____
6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y ✓ N____

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y ✓ N ✓
   Oil seeping through outer concrete block wall.
2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel?(279.52(a)) Y ✓ N____
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y ✓ N____

   Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4)) Y ✓ N____
4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y ✓ N____
5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y ✓ N____
6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y____ N____ N/A
7. Is the emergency equipment inspected and tested periodically? Y ✓ N____
   Frequency? Weekly / Daily

Facility Name: Veco Environmental
Date: 10/17/96

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5i)) Y ✓ N

9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))
   Fire Department: St. Petersburg Y ✓ N
   Police: St. Petersburg Y ✓ N
   Hospital: Unknown. Y N ✓
   Emergency Response Contractor: Laidlaw Y ✓ N

10. If not, has the facility attempted to do so and is the refusal documented? Y N

Contingency Plans and Emergency Response -- 279.52(b)

1. Does the facility have a contingency plan? Y ✓ N
2. Is it at the facility and easily available? Y ✓ N
3. Does the plan include:
   Fire Response Procedure: (compare to 279.52(b)(6)) N/A Y ✓ N
   Spill Response Procedures: " N/A Y ✓ N
   Explosion Response Procedures: " N/A Y ✓ N
   Instructions for handling contaminated materials & residues Y ✓ N
   A description of arrangements with local authorities: N/A Y N ✓
   Emergency Coordinators: (Name) Lynn LeMaster, Tim Hagan. Y ✓ N
   Addresses and telephone numbers of Emergency Coordinators: Y ✓ N
   Emergency equipment list: Y ✓ N
   Specifications and capabilities of emergency equipment: Y N
   Locations of emergency equipment: Y N ✓
   An evacuation plan and routes: Y ✓ N
   Evacuation/alarm signals: Y ✓ N
   External reporting procedures: Y ✓ N
   Internal recordkeeping requirements: Y ✓ N
4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y ✓ N
5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (279.52(b)(3)) Y N ✓ *
   * no proof.
6. Is the emergency coordinator authorized to commit funds for incident response? Y ✓ N
7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y ✓ N
9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y ✓ N

Facility Name: H & H Environmental
Date: 10/17/96

Rebuttable Presumption and Analysis Plan -- 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y ✓ N

2. Is the 1,000 ppm halogen determination made by testing? Y ✓ N

   If so, does the analysis plan cover: (279.55(a)(2))

   Sampling methods? Y ✓ N

   Frequency of sampling? Y ✓ N

   Analytical Methods? Y ✓ N

   Is the 1,000 ppm halogen determination made by process knowledge? Y ✓ N

   If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y ✓ N

3. Have any analyses showed exceedances of the 1,000 ppm level? Y N ✓

   If so, was the oil managed as hazardous waste? Y N

   If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A ✓ Y N

4. Is the used oil fuel specification determination made by testing?

   If so, does the analysis plan cover: (279.55(b)(2))

   Sampling methods? Y ✓ N

   Whether the oil will be tested before or after processing? Y ✓ N

   Frequency of sampling? Y ✓ N

   Analytical Methods? Y ✓ N

   Is the used oil fuel specification determination made by process knowledge? Y * N

   * partial analysis / partial process knowledge

   If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y ✓ N

5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59). N/A Y N ✓

   Some residues disposed in bulk pile.

   If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A Y N ✓

   filters, sludges, etc.

6. Are test records or copies of records providing basis for determinations kept for 3 years? (279.57(a)(2)(i)) Y ✓ N

   Where tests have been performed — primarily for waste accepted from off-site, but not waste generated on-site.

Facility Name: A. Co. Environmental
Date: 10/17/96

Recordkeeping and Reporting -- 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y ✓ N
EPA ID # of oil provider (if applicable)?	Y N ✓
Name & Address of the transporter delivering the oil to the facility?	Y ✓ N
EPA ID # of the transporter delivering the oil	Y ✓ N
Quantity of oil shipped?	Y ✓ N
Type of oil received (62-710.510(1)(c))	Y ✓ N
Date of shipment?	Y ✓ N

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y ✓ N
EPA ID # of receiving facility?	Y N ✓
Name & Address of transporter delivering the oil?	Y ✓ N
EPA ID # of transporter?	Y ✓ N
Quantity of oil delivered?	Y ✓ N
End Use of the oil? (62-710.510(1)(e))	Y ✓ N
Date of delivery?	Y ✓ N

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1)) Y ✓ N

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520) Y ✓ N

   If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)? Y N ✓

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2)) Y ✓ N

Closure -- 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a)) Y ✓ N

2. Does the plan include procedures for removing containers of oil and residues? Y ✓ N

   Cleaning and decontaminating tanks and ancillary equipment? Y ✓ N

   Removing contaminated soils? Y ✓ N

   Eliminating the need for further maintenance? Y N ✓

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

USED OIL MARKETER CHECKLIST

Facility Name: Howco. Date: 10/16/96.

Facility Representative: Tim Hogan. Facility ID #: FLD 152 764 767

Inspector: R. Strauss Registration #_____

40 CFR 279 Subpart H -- Marketer Standards

1. Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally) Y_____ N ✓

   Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y ✓ N_____

2. Check other Subparts the marketer complys with. (Must comply with at least one and have EPA ID #)

   ____C - Generator ✓ E - Transporter ✓ F - Processor ____G - Burner

3. Is the facility registered? (62-710.500(1)(c))) _____N/A (Utility) Y ✓ N_____

4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) N/A ✓ Y_____ N_____

   And approved Industrial Furnaces or Boilers(279.71(b)) Y_____ N_____

5. Does the marketer claim the used oil meets the specification by analysis? Y ✓ N_____

   Or by obtaining copies of generator performed analyses? (279.72(a)) Y_____ N_____

6. Does the marketer have copies of written and signed certifications from all off specification oil burners to which he has directed shipments stating that the burner: (279.75) N/A_____

   Has notified EPA of its used oil management activities? from > 3 years ago. Y ✓ N_____

   Will only burn off spec oil in an approved device? Y ✓ N_____

7. Do Off specification oil delivery records include: (279.74(a)) N/A ✓

   did not review in detail - none shipped > 3 years.

Name & Address of transporter delivering oil?	Y_____	N_____
EPA ID # of transporter?	Y_____	N_____
Name & Address of receiving burner?	Y_____	N_____
EPA ID # of receiving burner?	Y_____	N_____
Quantity of oil shipped?	Y_____	N_____
Date of shipment?	Y_____	N_____

8. Do on specification oil delivery records include: (279.74(b)) N/A_____

Name & Address of receiving facility?	Y ✓	N_____
Cross reference to analysis or other information used to determine that the oil meets the specification?	Y ✓	N_____
Quantity of oil shipped?	Y ✓	N_____
Date of shipment?	Y ✓	N_____

9. Does the marketer keep copies of records for three years? (279.72(b)) Y ✓ N_____

10. Does the facility maintiain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y ✓ N ✓

11. Does the facility submit annual reports by March 1? Y ✓ N_____

USED OIL TRANSPORTER CHECKLIST

Facility Name: Howco Date: 10/16/96.

Facility Representative: Tim Hagan. Facility ID #: FLD152764767.

Inspector: R. Strauss Registration #_____

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? (279.40(a)) Y_____ N ✓

   On site transport?

   Generator transporting < 55 g /time to a collection center?

   Transporter of < 55 g /time from generator to aggregation point owned by same generator ?

2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous) N/A Y_____ N_____

3. Does the transporter process used oil incidental to transport? (279.41) Y_____ N ✓

   Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? N/A ✓ Y_____ N_____

   If not, has the transporter conducted a hazardous waste determination? (279.10(e)) N/A ✓ Y_____ N_____

4. Has the facility notified of used oil activities? Check EPA form 8700-12 Y ✓ N_____

5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? (279.43(a)) Y ✓ N_____

6. Does the transporter comply with DOT requirements? (279.43(b)) Y ✓ N_____

7. If any oil is discharged during transport, does the transporter: (279.43(c)) N/A_____

   Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable? Coast Guard not included in general not. list. Y_____ N ✓

   Report to DOT in writing per 49 CFR 171.16? Y_____ N_____

   Clean up any discharges until the discharge poses no threat? Y ✓ N_____

8. Does the facility also transport used oil filters? Y_____ N_____

   If so, are the filters stored in above ground containers which are: (62-710.850(6))

   In good condition? Y ✓ N_____

   Closed or otherwise protected from weather? Y ✓ N_____

   Labeled "Used Oil Filters"? Y ✓ N_____

   Stored on an oil impervious surface? Y_____ N 1 Unknown.

Facility Name: ( ) Howco
Date: 10/10/96.

Transporter Recordkeeping - 279.46

1. Do used oil acceptance records include: (279.46(a))
   - Name & Address of facility providing the oil for transport? Y ✓ N
   - EPA ID # of oil provider (if applicable)? Y N ✓
   - Quantity of oil shipped? Y ✓ N
   - Date of shipment? Y ✓ N
   - Signature of oil provider, dated upon receipt? Y ✓ N

2. Do used oil delivery records include: (279.46(b))
   - Name & Address of receiving facility or transporter? Y ✓ N
   - EPA ID # of receiving facility or transporter? Y ✓ N
   - Quantity of oil delivere? Y ✓ N
   - Date of delivery? Y ✓ N
   - Signature of oil receiver, dated upon receipt? Y N ✓

3. Do the above records also include state required information on the type of oil and destination or end use? (62-710.510(1)(c & e)) Y ✓ N

4. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1)) Y ✓ N

5. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520) Y ✓ N

   If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)? Y N

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2)) Y ✓ N

Transporter Certification (62-710 F.A.C.)

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600) N/A Y ✓ N
2. Does the facility maintain training records? (62-710.600(2)(c)) Y ✓ N
3. Does the facility maintain insurance or financial assurance of $100,000 combined single limit? (62-710.600(2)(d)) Y ✓ N
4. Is the facility registration form and ID number displayed? (62-710.500) Y ✓ N

Facility Name: WRO
Date: FZD 150 764 767.

Transfer Facility Standards - 279.45

1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F N/A___ Y___ N✓

Is the transfer facility registered per 62-710.500(1)(a) F. A. C.? Y___ N___

2. Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm? Y___ N___

Is this done by testing? Y___ N___

Is this done by process knowledge? Describe basis in narrative. Y___ N___

Are test records or copies of records providing basis for determination kept for 3 years? Y___ N___

3. Have any analyses showed exceedances of the 1,000 ppm level? Y___ N___

If so, was the oil managed as hazardous waste? Y___ N___

If not, was the oil exempt? Describe in narrative. N/A___ Y___ N___

4. Is used oil stored only in tanks or containers? (Circle applicable units) Y___ N___

5. If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C rules? Y___ N___
(Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Is secondary containment provided and adequate? Y___ N___

6. Are containers, and tank trailers in good condition and not leaking? Y___ N___

7. Are containers provided with secondary containment consisting of walls and floor at a minimum? Y___ N___

Is the containment system impervious to oil so as to prevent migration? Y___ N___

8. Are ASTs, UST tank fill lines and containers labeled "used oil"? Y___ N___

9. Are used oil filters stored more than 10 days?

If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A___ Y___ N___

10. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? Y___ N___

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR QUALITY DIVISION

Pinellas County Government
300 South Gardan Avenue
Clearwater, Florida 34616

FAX: (813) 464-4420

PHONE: (813) 464-4422

SUNCOM: 570-4422

DATE: 26 March 1997

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(Including fax Cover)

TO: Randy Stevens **FAX #:** 744-6125

SUBJECT:

Attached are the Notice Warning Letter and Inspection Report, pursuant to our conversation on 3/25/97. If you need more information, you can reach me at 464-4703.

Person Sending Fax: Joe O. Rodriguez-Fuga

WPDOCS\aqadm.fax.cov
Rev. 01/97

PINELLAS COUNTY
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR QUALITY DIVISION
300 SOUTH GARDEN AVENUE
CLEARWATER, FLORIDA 34616

COMMISSIONERS
ROBERT B. STEWART - CHAIRMAN
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SALLIE PARKS

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SUNCOMFAX:570-4420

December 6, 1996

Mr. Tim Hagan, President
HOWCO Environmental Services
843 43rd Street South
St. Petersburg, Florida 33711

CERTIFIED MAIL: P 144 334 260

Re: First Warning Letter: - Air Pollution Permit No. 1030153-002-AO

Mr. Hagan,

Pursuant to Chapter 403 of the Florida Statutes, and the rules promulgated therein, which authorizes and empowers the Pinellas County Department of Environmental Management to control, abate and prohibit pollution of the air in Pinellas County, Florida, you are hereby notified of findings which indicate that a violation may have taken place of the Pinellas County Code as follows:

Pinellas County Code, Section 58-103(b).

1) Specific Condition No. 4. - This oil heater is permitted to burn only the following fuels:
A. virgin No.2 Fuel Oil with a maximum sulfur content of 0.5% by weight; and
B. on specification used No. 5 fuel oil with a maximum sulfur content of 0.75%...

Specifically, according to HOWCO usage logs, a fuel known as light ends was burned from 20 December 1995 to 16 October 1996.

2) Specific Condition No. 5. - This source is permitted to burn on specification used No. 5 oil. On specification used oil is defined as used oil that meets the 40CFR PART 279 (Standards For The Management of Used Oil) specifications listed below. Used oil that does not meet any of the following specifications is considered off specification oil and shall not be burned.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
... Total Halogens	4,000 ppm maximum ...

Specifically, according to HOWCO logs and Certificates of Analysis, 'light ends fuel containing Halogen levels above 5,000 ppm's was burned from 20 December 1995 to 16 October 1996.

3) Specific Condition No. 5. - This source is permitted to burn on specification used No. 5 oil. On specification used oil is defined as used oil that meets the 40CFR PART 279 (Standards For The Management of Used Oil) specifications listed below. Used oil that does not meet any of the following specifications is considered off specification oil and shall not be burned.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
... Flash Point	100° F minimum ...

Specifically, according to HOWCO logs and Certificates of Analysis, 'light ends fuel with flash points below 87, 79, 75 and 60 degrees F was burned from 20 December 1995 to 16 October 1996.

4) Specific Condition No. 6. - The fuel oil firing rate for this oil heater shall not exceed 34.5 gallons per hour ...

Specifically, on 6/20/96 and 7/11/96 HOWCO burned 39.67 and 35.5 gallons per hour (total of light ends and on specification used No. 5 fuels) .

5) General Condition No. 2. This permit is valid only for the processes and operations applied for and indicated in the approved drawings or exhibits. Any unathorized deviation from the approved drawings or exhibits, specifications or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

A) Specifically, HOWCO appears to emit isopropyl alcohol (IPA) into the air during its oil recycling process (3.15 tons from 5/31/96 to 10/16/96). The use of IPA was not indicated in the original permit application and is not authorized by this air permit.

B) Specifically, HOWCO emitted approximately 0.7 tons of volatile organic compounds (VOCs) in connection with an outside spraying area used for the coating of 55 gallon metal drums (0.6 tons VOC as mineral spirits, 0.1 tons VOC in black paint). The outside spray area was not indicated in the original permit application and is not authorized by this air permit.

C) Specifically, HOWCO appears to have reconfigured the oil recycling process as compared to the process flow submitted with the construction permit application.

6) Specific Condition No. 14 In order to demonstrate compliance with the maximum sulfur content and on specification used oil requirements of Specific Condition Nos. 4 and 5, the permittee shall collect a sample from each batch....delivered for firing in the oil heater. This sample shall be analyzed for sulfur content and the parameters listed in Specific Condision No. 5 using appropriate EPA or ASTM test methods....Records of the ... analysis shall be retained for a two year period and made available upon request.

(7) Specifically, HOWCO has not sampled and analyzed Light Ends for the months of December 1995, January, February, March, August, September, and October 1996. Also, HOWCO did not make available upon request Certificates of Analysis for the Light Ends burned in the months of December 1995, January, February, March, August, September, and October 1996. (7)

On the basis of inspections performed on 16,17,21 and 25 October, 1996, by Pinellas County staff at HOWCO Environmental Services, this serves as a First Warning Letter for operating an emission unit in possible violation of a Pinellas County Code.

Call upon receipt of this letter to schedule a meeting at this office, to discuss financial settlement and resolutions for any potential violations for which HOWCO Environmental Services may be responsible. Come to the meeting prepared to explain the circumstances which led to the alleged violations. If the warning letter cites a documentation/ recordkeeping violation, bring to the meeting evidence which either demonstrates a violation did not take place, or a proposed remedy to bring the source back into compliance.

In addition to scheduling a meeting, provide a written response within ten (10) calendar days of receiving this warning letter. Indicate in the letter the precise cause of each violation cited above. Include a time table of actions that have been or will be taken to prevent future occurrences of the violations cited.

Note that operation of a source in violation of Pinellas County Code, Chapter 58, may result in liability for damages and restoration, and the judicial imposition of civil penalties up to $10,000 per violation, per day, pursuant to Chapter 403 of the Florida Statutes. Continuation of activities which are in violation of existing regulations can result in fines being levied for each and every day a violation takes place. Violations may be resolved through entry into a Consent Order or progressive enforcement action as allowed by Florida Statutes.

Please be advised that failure to respond to this notice, or comply within the specified time frames, may result in commencement of civil action for injunctive relief and the assessment of civil and/or criminal penalties as provided by Chapter 58, Pinellas County Code and the Florida Statutes. The Florida Department of Environmental Protection reserves the right to take enforcement actions related to the potential violations cited above.

To schedule a meeting, or if you have any questions regarding this letter, contact Wayne Martin at (813) 464-4422.

Sincerely,

Peter A. Hessling
Air Quality Division Administrator

cc: PF-1030153 003. RF
Thomas Ellison, SW-FDEP

AQSSS\0153003.ENF

INSPECTION REPORT FORM
AIR POLLUTANT EMISSION SOURCES

SOURCE: Howco Environmental Services		*DISTRICT:* Southwest	*COUNTY:* Pinellas
ADDRESS: 843 43rd Street South St. Petersburg, Fl. 33711		*CONTACT:* Mr. Tim Hagan (813) 323 - 0818	
ARMS No.: 1030153 003	*PERMIT NO.:* 1030153 - 002 - AO	*EXPIRATION DATE:* 6/24/2001	
EMISSION UNIT DESCRIPTION: For the Operation of 1 Oil Heater, 2 Heated Oil Tanks, a Condensing Unit and a Flash Tower For Oil Recycling *(EMISSION UNIT TYPE* - Class - B)			
INSPECTION DATE: October 16,17,21,25, 1996	*AUDIT TYPE:* 3	*COMPLIANCE STATUS:* B - Non Compliance	

Inspection Comments/Recommendations:

This emission unit was inspected as a result of an anonymous citizen complaint that it was burning off-spec no. 5 waste oil with halogen levels above 4,000 ppm. This was a multimedia inspection with the following agencies represented : Roy Williams, City of St. Petersburg Fire Department; Roger Evans, Randy Strauss and William Crawford, FDEP Hazardous Waste Program, Ernest Roggelin, Pinellas County Public Health Unit Pollutant Storage Tank Program and Jose Rodriguez, Pinellas County Department of Environmental Management, Air Quality Division. HOWCO was represented by Messrs. Tim Hagan, President; Bob Lamaster, Production Manager and Richard Dellim, QA Manager.

The inspection indicated that HOWCO was in possible violation of the Pinellas County Code and Permit Conditions as follows:

- Specific Condition Nos. 4 and 5 authorizes HOWCO to burn only virgin No. 2 oil and "on specification" used No. 5 fuel oil, and defines "on specification" used No. 5 oil as one that meets the 40 CFR Part 279 (Standards for the Management of Used Oil).

  1. HOWCO burned a fuel other than virgin No. 2 and other than "on specification" used No.5 fuel oil and identifled by HOWCO as "light ends" fuel from 20 December, 1995 to 16 October, 1996.

  2. Used Oil is defined as having a maximum total halogen level of 4,000 ppm's. Certificates of Analysis and Usage/Burn Logs for the months of April and May revealed that HOWCO burned "Light Ends" fuel with Total Halogen Levels Above 4,000 ppm for approximately 32 days.

  3. Used Oil is defined as having a minimum flash point of 100 degrees F. Certificates of Analysis and Usage/Burn Logs for the months of April, May, June and July revealed that HOWCO burned "Light Ends" fuel with flash points below 100 Degrees F for approximately 68 days.

- Specific Condition No. 6 authorizes an oil heater firing rate not to exceed 34.5 gallons per hour. On 6/20/96 and 7/11/96 HOWCO burned 39.67 and 35.5 gallons per hour.

- Specific Condition No. 14 requires HOWCO to analyze a sample from each batch of fuel, delivered for firing in the oil heater, for sulfur content and the parameters listed in Specific Condition No. 5 using appropriate EPA or ASTM test methods. It also requires HOWCO to retain records of the analysis for a two year period and make it available upon request.

  1. HOWCO had not sampled and analyzed "Light Ends" for the months of December 1995, January, February, March, August, September and October 1996.

  2. HOWCO did not "make available upon request" Certificates of Analysis for the "Light Ends" burned in the months of December 1995, January, February, March, August, September and October 1996.

- General Condition No. 2 authorizes HOWCO to perform the specific processes and operations applied for and indicated in the approved drawings or exhibits and states that any unauthorized deviation from the approved drawings, exhibits, specifications or conditions of the permit may constitute grounds for revocation and enforcement action by the department.

  1. HOWCO used 3.15 tons of Isopropyl Alcohol (IPA), as part of a process to remove water from the oil, from 5/31/96 to 10/16/96 in its oil recycling process. This process was not submitted as part of the application, and is not authorized by the Air Operating Permit.

  2. HOWCO used 0.57 tons of mineral spirits and 55 gallons of Fast Black Drum Enamel to spray paint 2 to 3 pallets of drums, once or twice per week in the open yard.

  3. The process flow diagram, submitted with the construction application, does not appear to agree with the current configuration of oil recycling process. No process changes have been submitted by HOWCO.

Mr. Tim Hagan was made aware of these possible violations and was informed that HOWCO would be receiving a warning letter.

HOWCO was maintaining daily logs of its operations which complied with the requirements of Specific Condition Nos. 15, 16 and 17.

HOWCO had complied with the testing requirements of Specific Condition Nos. 9,10,11,12, and 13. Likewise, HOWCO had complied with Specific Condition No.18 with the submittal of FDEP Form 62-213.900(5) " Annual Operating Report for Air Pollutant Emitting Facilities"

The operating hours for this sourc_ .re not restricted.

This Emission Unit is deemed to be in non-compliance with emissions and procedures.

INSPECTOR (S): Jose A. Rodriguez-Lugo, Pinellas County Air Quality Division	
SIGNATURE (S): Jose A. Rodriguez-Lugo	*DATE:* November 26, 1996

Contact Log? _yes___, 1st CY Insp'n? _yes___, CY Reinsp'n? _yes___, ARMS? _11/13/96__,

Src Complete for CY? __no__, Enforce Tracking? ____, Audit Samples? _na___

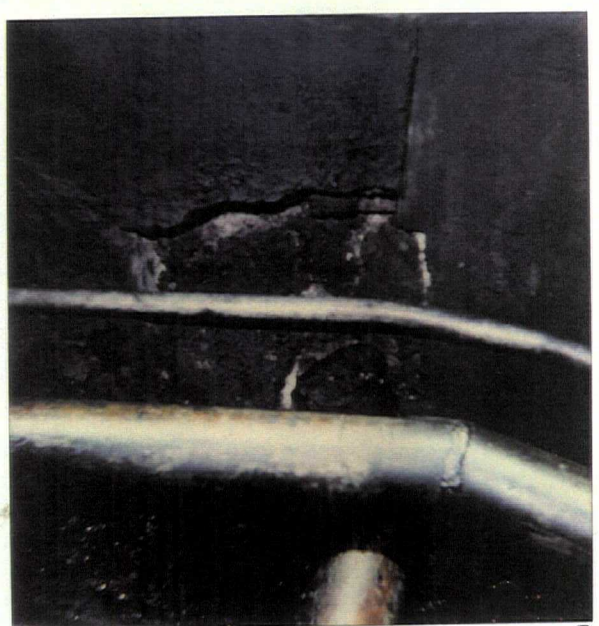
AQSSS\01530397.ENF

5286245557 5-15-96 EMR
NORTH LOADING AREA
DAMAGED & HOLLOW BLOCK WALL
NEAR NE CORNER TANK #100

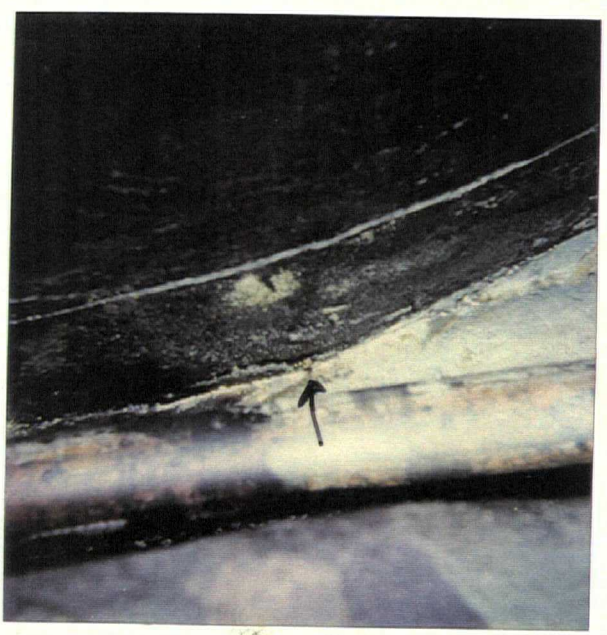
PHOTO #3

HOWCO 5-15-96 5286245557
NORTH LOADING AREA
NEAR NW CORNER TANK #100
STEP CRACK & NO MORTAR EMR

PHOTO #4

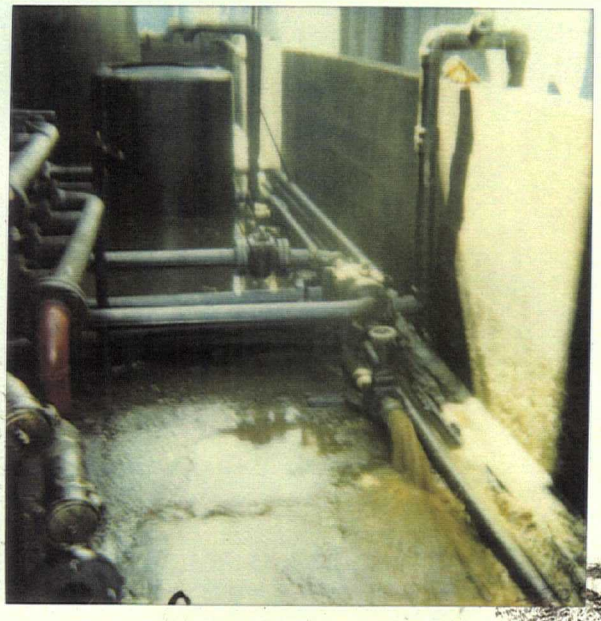


HOWCO 5-15-96 5286245557
WEST FARM WALL EMR
BTWN #173 & #129
INTEGRITY



HOWCO 5-15-96 EMR
SOUTH LOADING RACK, #173
HOLE AT TANK BASE @ 7:30 position
5286245557

PHOTO #6



5286 24557
HOWCO 2-20-97

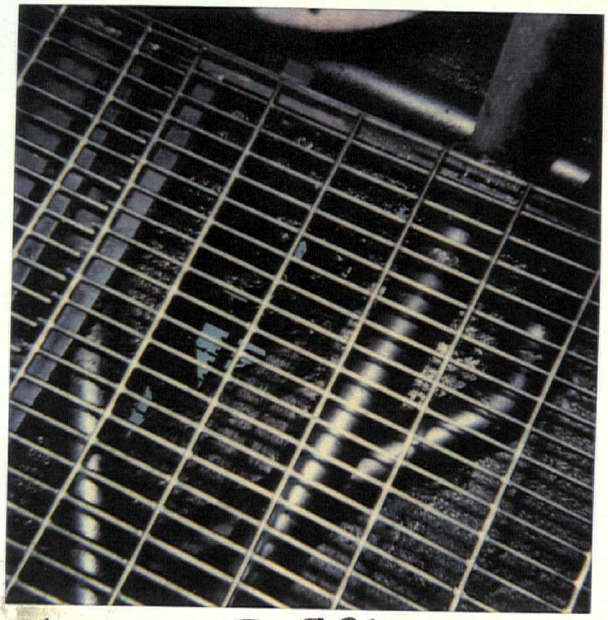
5286 24557
HOWCO 2-20-97

Tank #142 5286 24557
HOWCO 2-20-97

HOWCO (from #142)
5286 24557
HOWCO 2-20-97

HOWCO 5-15-96 EMR
TYPICAL FLOOR 528624557
CRACK, EAST & WEST FARMS

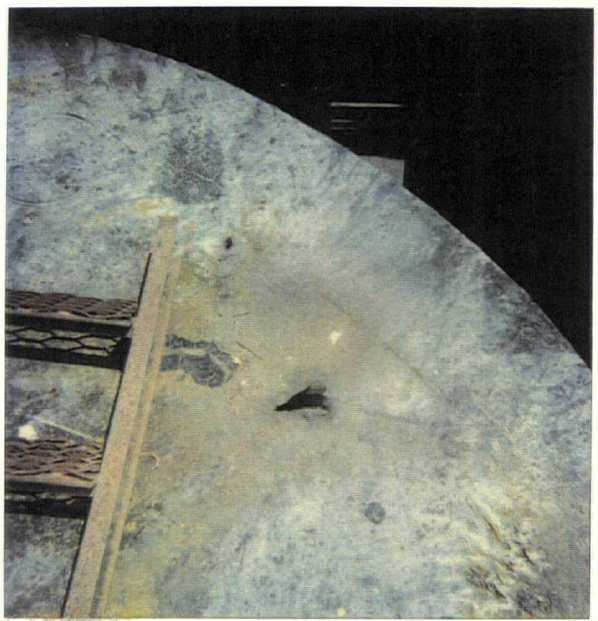
PHOTO # 7



HOWCO 5-15-96 EMR
~~WEST~~ FARM 528624557
FORMER FLOOR PUMP AREA
PIT COLLECTS OIL

HOWCO 5-15-96 EMR
~~EAST~~ FARM 528624557
TANK #30 WEST MIDDLE
SADDLE CRACKING

PHOTO # 2

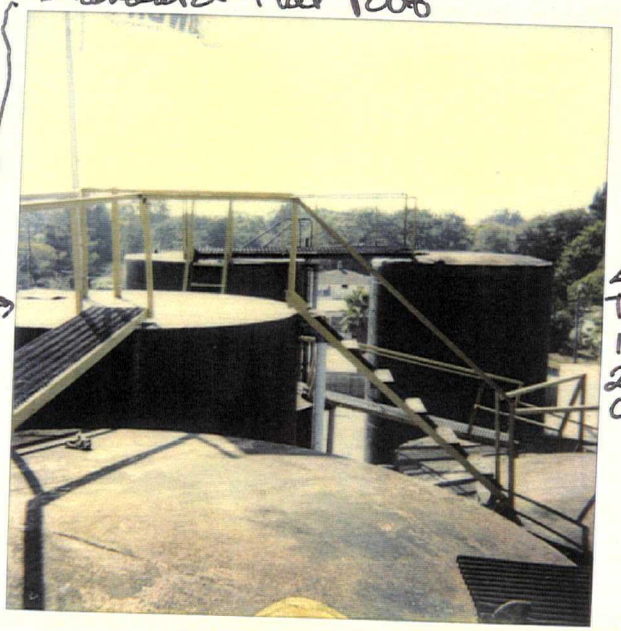


HOWCO 5-15-96 EMR
EAST FARM #142
ROOF HOLE 528624557

PHOTO # 1

52 8624557 1-17-96
T 120 deformed bottom ER/IS

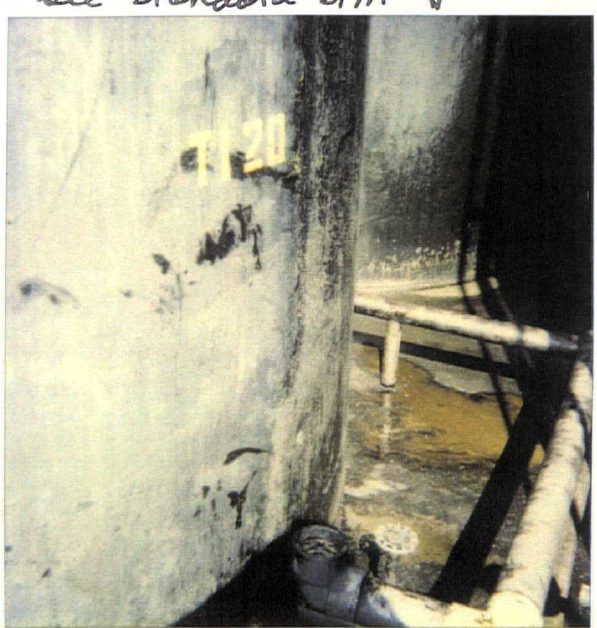
standard flat roof



T 120 deformed roof ER/IS
1-17-96
52862455 7

T 120 52862455 7
1-17-96 ER/IS

see standard btm ↓*



T 120 52862455 7
1-17-96 ER/IS fill line

Date: 3/17/97 2:43:18 PM
From: Ernest Roggelin CLW
Subject: HOWCO
To: Randy Strauss TPA
CC: Pedro Vargas-Prada CLW

Randy: This message contains comments re: your March 13, 1997 emails concerning HOWCO.

Your description of the construction of the facility is too general, and needs further expansion/re-definition. Please refer to either your CAR diagrams, or better yet, the HOWCO blueprint (rev. 9-96).

The western tank farm has two major sections. The far-western portion contains tanks 121-129 and consists of a concrete base, with an asphalt covered berm.

The remaining portion of the western tank farm, contains tanks 100-101, 130-137, 170-173. This area contains both storage tank program 62-762 regulated tanks, as well as "process" tanks that are exempt under 62-762. This area consists of an uneven concrete floor, with concrete block walls. Portions of the wall may have a solid fill.

The eastern tank farm is subdivided into 4 sections, oriented north to south; and it has a concrete base with concrete block walls. These walls may have portions that are solid-filled. The northernmost section contains tanks that are regular=ted under 62-762, and as one moves southward less of the tanks are so regulated.

In accordance with FAC 62-762.510(2) storage tanks containing other pollutants have until December 31, 1999 to comply with 62-762.00(3)(d-f), (4), & (6).

However, 62-762.700 requires "components of a storage tank system discovered to have discharged or contributed to the discharge of a pollutant...shall be isolated...& not used until repaired or replaced..." I tried this tack to get HOWCO to initiate repairs, but was unsuccessful. HOWCO= quoted the 1999 deadline. We would probably have to go through enforcement to get this work accomplished.

I will be sending you copies of inspections, our correspondence, HOWCO's responses & some photos dating back to May 1996 regarding the condition of the containment. You should read the papers on the "controlled overflow" events, circa 1994, that have & continue to occur at the facility. Check out the

2-20-97 photo.

If you need any additional info, let me know. Probably Paul Stanek will drop the papers off tomorrow afternoon. Ernest

528624557

State of Florida, Department of Environmental Protection (DEP)
Po t Storage Tank Inspection Program, implemc by the:
Pinellas County Public Health Unit (PCPHU), Engineering Division
4175 East Bay Dr. Clearwater, FL 34624-6966
Inspection Report-Cover Page

528624557 HOWCO ENVIRONMENTAL SERVI FACILITY STATUS: OPEN
843 43RD ST S LAT/LONG: 27:45:47 / 82:41:32
SAINT PETERSBURG FL 33711-1922 FACILITY TYPE: C / Fuel User/Non-Retail
(813)327-8467 DATE ENTERED: 29-APR-86 OPER: TIM HAGAN

ACCOUNT OWNER : HOWCO ENVIRONMENTAL SERVI 843 43RD ST S SAINT PETERSBUR FL 33711-1922
(813)327-8467 CONTACT: TIM HAGAN
TANK OWNER : HOWCO ENVIRONMENTAL SERVI 843 43RD ST S SAINT PETERSBUR FL 33711-1922
(813)327-8467 CONTACT: TIM HAGAN

Tank #	Product	Size	Status	Status Date	Install Date	Position	Fee Y/N	CONSTRUCTION Tank	Monitor	Pipe
1	Leaded Gas	2000	B	30-JUN-86		A	N	D	I	C
100	Waste Oil	29500	U		07/1980	A	Y	ACK	M	BI
101	Waste Oil	28500	U		07/1980	A	Y	ACK	M	BI
105	Vehicular Diesel	14000	U		07/1980	A	Y	CKM	M	BI
106	Waste Oil	9870	U		07/1980	A	Y	CKM	M	BI
120	Waste Oil	21775	U		07/1980	A	Y	ACKS	M	BI
121	Waste Oil	27989	U		07/1980	A	Y	ACKS	M	BI
122	Waste Oil	27989	U		07/1980	A	Y	ACKS	M	BI
123	Waste Oil	27989	U		07/1980	A	Y	ACKS	M	BI
124	Waste Oil	27989	U		07/1980	A	Y	ACKS	M	BI
125	Waste Oil	18040	U		07/1980	A	Y	ACKS	M	BI

Inspection Type: REPAIR & DISCHARGE REINSPECTION AST

Inspector Name & #: Ernest Roggelin (813) 538-7277 ext. 136 Contact Name (Print) Joy Wolf

Inspector's Signature & Date: 2-20-97

Contact's Signature & Date: 2/20/97

State of Florida, Department of Environmental Protection (DEP)
Po t Storage Tank Inspection Program, implem by the:
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SAINT PETERSBURG FL 33711-1922 FACILITY TYPE: C / Fuel User/Non-Retail
(813)327-8467 DATE ENTERED: 29-APR-86
OPER: TIM HAGAN

Tank #	Product	Size	Status	Status Date	Install Date	Position	Fee Y/N	CONSTRUCTION Tank	Monitor	Pipe
126	Waste Oil	18565	U		07/1980	A	Y	ACKS	M	BI
127	Waste Oil	18565	U		07/1980	A	Y	ACKS	M	BI
128	Waste Oil	23792	U		07/1980	A	Y	ACKS	M	BI
129	Waste Oil	21775	U		07/1980	A	Y	ACKS	M	BI
140	Waste Oil	26041	U		07/1980	A	Y	ACK	M	CKM
141	Waste Oil	17432	U		07/1980	A	Y	ACK	M	CKM
142	Waste Oil	17432	U		07/1980	A	Y	ACK	M	CKM
143	Waste Oil	17013	U		07/1980	A	Y	ACK	M	CKM
144	Waste Oil	18886	U		07/1980	A	Y	ACK	M	CKM
150	Waste Oil	15000	U		07/1980	A	Y	ACK	M	CKM
151	Waste Oil	15000	U		07/1980	A	Y	ACK	M	CKM
152	Waste Oil	28130	U		07/1980	A	Y	ACK	M	CKM
153	Waste Oil	20531	U		07/1980	A	Y	ACK	M	CKM
154	Waste Oil	18172	U		07/1980	A	Y	ACK	M	CKM
155	Waste Oil	20139	U		07/1980	A	Y	ACK	M	CKM
160	Waste Oil	14792	U		07/1980	A	Y	ACK	M	CKM
161	Waste Oil	14792	U		07/1980	A	Y	CKM	M	BI

REPAIR TANK.

State of Florida, Department of Environmental Protection (DEP)
Po t Storage Tank Inspection Program, implem by the:
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Inspection Report-Cover Page

528624557 HOWCO ENVIRONMENTAL SERVI FACILITY STATUS: OPEN
843 43RD ST S LAT/LONG: 27:45:47 / 82:41:32
SAINT PETERSBURG FL 33711-1922 FACILITY TYPE: C / Fuel User/Non-Retail
(813)327-8467 DATE ENTERED: 29-APR-86
OPER: TIM HAGAN

Tank #	Product	Size	Status	Status Date	Install Date	Position	Fee Y/N	CONSTRUCTION Tank	Monitor	Pipe
162	Waste Oil	14792	U		07/1980	A	Y	C K M	M	B I
163	Waste Oil	14792	U		07/1980	A	Y	A C K	M	C K M
164	Waste Oil	18832	U		07/1980	A	Y	A C K	M	C K M
165	Waste Oil	18618	U		07/1980	A	Y	A C K	M	C K M
166	Waste Oil	15000	U		07/1980	A	Y	A C K	M	C K M
170	Waste Oil	11000	U		07/1980	A	Y	A C K	M	A C K
171	Waste Oil	9607	U		07/1980	A	Y	A C K	M	A C K
172	Waste Oil	9703	U		07/1980	A	Y	A C K	M	A C K
173	Waste Oil	5500	U		07/1980	A	Y	A C K	M	A C K
174	Vehicular Diesel	2898	A	01-JAN-90	07/1980	A	N	A C K	M	A C K
180	Waste Oil	56796	U		07/1980	A	Y	A C K	M	C K M
2	Vehicular Diesel	4000	B	30-JUN-86		A	N	D	I	C
3	Vehicular Diesel	3000	T	01-DEC-94	07/1987	A	Y	A E K	B C E	D

(A) OBSERVED EXTENT OF REPAIRS TO TANK # 142; ULTRASONIC DATA RCVD.

(B) CHANGE OWNER ADDRESS VIA S.I.R.F. TO DEP Tallahassee.

(C) OBSERVED REPAIR TO LINE #6; & OBSERVED EXCAVATION NEAR FAULTY FITTING - NO VISUAL CONTAMINATION

State of Florida, Department of Environmental Protection (DEP)
Po t Storage Tank Inspection Program, implem by the:
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SAINT PETERSBURG FL 33711-1922 FACILITY TYPE: C / Fuel User/Non-Retail
(813)327-8467 DATE ENTERED: 29-APR-86

(D) PROVIDE FINAL PASSING LINE TEST DATA UPON COMPLETION OF NORRIS & SAMON WORK.

(E) SUBMIT WRITTEN "PLAN" TO PERMANENTLY CLOSE LINE 2

(F) DESCRIBE WHY PRODUCT OVERFLOWS FROM TANKS OCCUR.

Name: HANCO ENV. SVCS
Facility I.D.#: 528624557
Date: 2-20-97

ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
I.	REGISTRATION/NOTIFICATION: Comments: USE "STORAGE TANK REGISTRATION FORM" TO CHANGE OWNER ADDRESS.					
	1. Facility has registered all applicable tanks on site; 62-762.400	1.			X	
	2. Current registration placard is properly displayed; 62-762.410 (6)	2.	X			
	Proper notification has been made for the following; 62-762.450:					
	3. Abandonment and closure (30 days prior); (1) (a)	3.				X
	4. Change of ownership (30 days after); (1) (b)	4.				X
	5. Retrofitting, replacement or upgrading; (10 days prior); (1) (c)	5.				X
	6. Change of tank status (in service/out of service); (1) (d)	6.				X
	7. Change of facility status (e.g. substances stored); (1) (e)	7.				X
	8. Change of method of financial responsibility (within 30 days); (2)	8.				X
	9. The facility owner/operator notified D.E.R. of internal tank inspection 24 hrs prior to the test; (3)	9.				X
	10. Loss of greater that 100 gallons on an impervious surface or 500 gallons inside secondary containment within one working day; .450 (4)	10.				X
II.	RECORDS KEEPING: Comments: See Notes on 10-16-96 inspection					
	11. All records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	11.	SP	X		
	12. Some, but not all records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	12.	X			
III.	REPORTING/DISCHARGE RESPONSE/ REPAIRS: Comments: Received 1-14-97. Line Test (Failures Line 2 & Line 6 - Red in NESource Report)					
	Proper reporting requirements met for the following; 62-762.460:					
	13. Integral piping tightness test failure within 10 days; (1) Discovery 1-10-97	13.	X			
	14. Pollutant discharge exceeding 25 gallons on a pervious surface; (2)	14.				X
	15. Positive response of a release detection device with one working day; (3)	15.				X
	The owner or the operator of the system which has discharged has:					
	16. Taken it out-of-service; 62-762.700 (1), had it repaired or replaced; .700, or properly closed it; .800 Both OOS - Line 6 Repaired - Line 2 to close	16.	X			
	17. Removed any regulated substances from the system; 62-762.820 (1) FROM LINES	17.	X			
	18. Tightness tested all repaired components before placing them back in service; 62-762.700 (5) & (6) TO BE SCHEDULED ON LINE #6	18.				X
	19. Begun initial corrective actions for a release; 62-762.820 (2)	19.			X	SP
IV.	INVENTORY REQUIREMENTS FOR TANKS IN CONTACT WITH THE SOIL: Comments:					
	20. All inventory requirements maintained in accordance with 62-762.720 (1)	20.				X
	21. Some, but not all inventory requirements maintained in accordance with 62-762.720 (1)	21.				X

→ LINE #6 → LOOSE PIPE FITTING → NO VISUAL EVIDENCE OF USED OIL CONTAMINATION
LINE #2 → MAY BE WITHIN CONTAMINATION PLUME EXISTING

Name: Howard Env. Svcs
Facility I.D.#: 528624557
Date: 2-20-97

ABOVEGROUND STORAGE TANK
COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
V.	PERFORMANCE STANDARDS/CATHODIC PROTECTION: Comments: #28 → ROOF HOLES REPAIRED & ULTRASONIC TESTS RESULTS RCVD.; #6 LINE REPAIRS TO SCH 80 PIPE. #24 - See Previous Inspections.					
	Storage tank criteria; 62-762.500					
	22. Meets construction upgrading schedule; .510 and .520 1999	22.				X
	23. Meets applicable storage tank standards; (1), (2) & (3) NOTE: SOME ASTs WERE USED	23.	X			
	24. Tank has secondary containment system; .500 (6) CUSTOMER	24.	X			
	25. Tank equipped with overfill protection; (3) (f) 1-4, (g)	25.				X
	Piping criteria					
	26. Meets new piping standards with secondary containment; .500 (4) & .600 (4)	26.				X
	27. Meets construction upgrading schedule; 62-762.510 (3) , & .520 (2)	27.				X
	Repairs to storage tank systems; 62-762.700					
	28. Failed storage tank system component properly required; (1)-(4)	(28)	X			
	29. Tightness testing of the required component prior to being brought back into service; (5)	29.				X
	Cathodic Protection; 62-762.730					
	30. Cathodic protection system for tank and piping provides continuous protection; (1)-(4)	30.				X
	Secondary containment; 62-762.500					
	31. Does containment are have sufficient volume; .500 (6) (a) (2)	31.	X			
	32. Is the containment area made out of impervious material in accordance with Chapter 62-762, F.A.C., requirements; (6) (a) (1) See Previous Inspections	32.		X		
	33. Is the containment area equipped with drainage system or protected from accumulation of rain; (6) (a) (3)	33.	X			
	34. Hydrant pits equipped with spill prevention equipment; (5)	34.				X

VI.	RELEASE DETECTION/MONITOR WELLS: Comments: TANK VISUAL / LINE PRESSURE CHECKS					
	35. Facility has an approved released-detection system; 62-762.600 & 62-762.860	35.	X			
	36. Monitoring wells properly designed, constructed and installed; 62-762.640 or 62-762.600 (6)	36.				X
	37. Interstitial monitoring adequate to detect a release from integral piping; 62-762.600 (4) & (5)	37.				X

VII.	OUT-OF SERVICE STATUS: Comments:					
	38. Are the corrosive protection devices properly maintained; 62-762.800 (1) (a)	38.				X
	39. Is the vent line and other ancillary equipment properly secured and maintained; (1) (b)	39.				X
	40. Test performed to insure the integrity of out-of-service system prior to being returned to service; (1) (c)	40.				X

VIII.	VARIANCE: Comments:					
	41. Has the facility for an Alternate Procedure; 62-762.850 (1)	41.				X

IX.	OTHERS: Comments: PRODUCT OVERFLOWING WASTE OIL TANK IN EAST CONTAINMENT AREA. (INSUFFICIENT STORAGE VOLUME)					
	42. Any other violation noted during inspection (Explain in comments)	42.	X			

FLORIDA DEPARTMENT OF HEALTH

Lawton Chiles
Governor

James T. Howell, M.D., M.P.H.
Secretary

February 24, 1997

FILE

Lewis Cornman
Dept. of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: **528624557**
HOWCO Environmental Services
843 43rd Street South
St. Petersburg
PINELLAS

Dear Mr. Cornman:

Please find enclosed the compliance checklist package for the referenced facility's DRF of **January 10, 1997.** As part of the October 17, 1996 compliance inspection, HOWCO was required to perform annual line pressure testing. Norris & Samon Pump Service Inc. conducted testing on January 10, 1997; at which time two lines identified as "Line #2 & Line #6" failed.

Line #6 has been observed to connect the wastewater treatment plant to the oil filter crushing area. This open area collects waste oil products as well as being subject to other indeterminate surface contaminants. This line is not considered part of the regulated system. HOWCO excavated portions of the line, severed it, air tested portions, until it was determined that a loose elbow-fitting near the western end of the line was loose. HOWCO representatives informed this agency that no visible waste oil contamination was present around this fitting.

Line #2 appears to connect the tanks in the non-regulated "processing area" to the eastern tank farm. The eastern tank farm contains both regulated and non-regulated tanks; the latter containing oil-water separator liquids. It is unclear at this time, if line #2 solely transported regulated products. HOWCO has indicated that line #2 will be abandoned-in-place.

Your attention is directed to the attached soil and groundwater contamination charts. It is further recommended that you discuss this facility with Rafael Perez, relative to ATRP and HOWCO's predecessor A & E Road Oiling.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

Pinellas County Health Department • Environmental Engineering
4175 East Bay Drive, Suite 300
Clearwater, FL 34624-6977
Tel: (813) 538-7277 • Fax: 538-7293 • Suncom: 558-7277

FLORIDA DEPARTMENT OF HEALTH

Lawton Chiles
Governor

James T. Howell, M.D., M.P.H.
Secretary

February 24, 1997

Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

Re: 528624557
HOWCO Environmental Services
843 43rd Street South
St. Petersburg
PINELLAS

Dear Mr. Hagan:

On February 20, 1997 this agency performed a combination discharge investigation and compliance reinspection visit. The discharge investigation was in response to the January 10, 1997 discovery of two underground lines failing their respective line pressure tests. The lines identified in the Norris & Samon Pump Service report were designated as #2 and #6. The compliance reinspection was to verify the repairs made to the roof shell of tank #142. Please find enclosed a copy of the inspection report.

Upon filing the DRF, HOWCO initiated a limited excavation process to locate the source of the line #6 failure. A loose elbow was eventually located and repaired, and upon the examination of the excavation there appears to be no waste oil staining. Please be advised that since this line connects the wastewater plant with the "open" oil filter recycling area, this line has been deemed non-regulated.

Similarly, line #2 appears to connect the processing area tanks with the eastern tank farm. The eastern farm does contain both regulated and non-regulated tanks. At this time, this agency does not possess a piping/valving schematic diagram for your facility. It is HOWCO's stated intention to permanently abandon line #2 in-place.

You will also find enclosed a copy of the FPLRIP Compliance Checklist document, that has been forwarded to DEP Tallahassee.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

Pinellas County Health Department • Environmental Engineering
4175 East Bay Drive, Suite 300
Clearwater, FL 34624-6977
Tel: (813) 538-7277 • Fax: 538-7293 • Suncom: 558-7277

FLORIDA PETROLEUM LIABILITY RESTORATION AND INSURANCE PROGRAM COMPLIANCE CHECKLIST

☐ FPLRIP ☐ ATRP ☐ CPP ☒ OTHER DAT. DISCHARGE: 1-10-97

Date: 2-24-97 DEP Facility Number: 528624557

Facility Name: HOWCO ENVIRONMENTAL SERVICES

Facility Address: 843-43RD. STREET SOUTH
ST. PETERSBURG, FL

Contact Person: TIM HAGAN Telephone: (813) 323-0818

Latitude: 27°45'41" Longitude: 82°41'32"

For the items below that may indicate non-compliance or gross negligence or unknown, please explain in detail, attach additional pages if necessary; also, provide supporting documentation and a vicinity sketch:

YES NO **COMPLIANCE WITH CHAPTER 376.3072 F.S., AS REVISED.**

☒ ☐ 1a. Was any contamination reported (discovered) prior to the current discharge?
SEE FIRE/PCT DATABASE.

1b. If yes, was an approved method of release detection installed by January 1, 1997?
FAC. PERFORMS VISUAL INSPECTION OF ASTs
What method? & ANNUAL BULK LINE PRESSURE TEST

☒ ☐ 2. Has proper demonstration of financial responsibility been made in accordance with Rule 62-761.480 or 62-762.480, F.A.C.?

☒ ☐ 3. Has a Storage Tank Program inspection ever been performed for this facility in accordance with Chapter 62-761, or 62-762, F.A.C.? If yes, give the date of the most recent inspection and supply a copy.
☒ Compliance: 2-20-97 Have all previously identified violations (Mod/Mod) been corrected? YES
ALSO, SEE 10-17-96
☐ Closure: _____ ☐ Installation: _____

☐ ☒ 4. Has the owner or operator intentionally caused or concealed a discharge or disabled leak detection equipment?

☐ ☒ 5. Has the owner or operator failed to report a suspected release within 1 working day after discovery? TIGHTNESS TEST RESULTS.
RCVD 1-14-97

☐ ☒ 6. Has the owner or operator, within 3 days of discovery of an actual new discharge, failed to take steps to test or empty the storage tank system and complete such activity within 7 days?
LINE #6 NOT PART OF REGULATED SYSTEM.
LINE #2 - UNKNOWN IMPACT OF FAILED TEST.

☐ ☒ 7. Has the owner or operator, after testing or emptying the storage tank system, failed to proceed within 24 hours thereafter to abate the known source of the discharge or to begin free product removal relating to an actual new discharge and failed to complete abatement within 72 hours, although free product recovery may be ongoing.
UPON FAILED RESULTS, FACILITY BLANKED OFF 2 LINES

DEP Facility Number: 7606-[illegible]
Facility Name: HOWCO ENV SVCS
Date: 2-24-97

YES NO — INFORMATION MUST BE COMPLETED BY INSPECTOR (SITE SCORING AND RANKING).

☐ ☒ 8. Is there evidence of a contamination problem in accordance with Chapter 376.3071, F.S.? If yes, explain in comment section.

If yes to 8, check those that apply:

☐ A. _____ monitoring well(s)/borehole(s) show(s) >2" free product.

☐ B. _____ monitoring well(s)/borehole(s) show(s) <2" free product or petroleum sheen.

☐ C. _____ monitoring well(s)/borehole(s) are contaminated but contain no free product (vapors only).

☐ D. Soil contamination and/or recent product loss.

Check those that apply:

9. Contamination product type (Chapter 62-771, F.A.C):

☐ A. Light petroleum: (kerosene, gasoline, aviation fuel, etc.)

☐ B. Heavy petroleum: (fuel oil, diesel, etc.)

☒ C. Other: MIXED "OIL" PRODUCTS

☐ D. Unknown: _____

10. Potable water (Chapter 62-771, F.A.C):

☐ A. Within ½ mile: Large wells >100,000 gpd.
1. Indicate direction: _____
2. Estimate distance: _____

☐ B. Within ¼ mile: small wells <100,000 gpd.
1. Indicate direction: _____
2. Estimate distance: _____

☐ C. Surface water body used as a public water system.

11. Indicate below, proximity to population centers: (restaurants, shopping centers, residences, etc.):

☒ A. <500 feet:
1. Indicate direction: SOUTH
2. Estimate distance: ~200 FEET

☐ B. >500 feet:
1. Indicate direction: _____
2. Estimate distance: _____

Comments:
LINE #6 TRANSPORTS A VARIETY OF CO-MINGLED WASTE OIL PRODUCTS TO "WASTE WATER PLANT" FROM OIL FILTER CRUSHING/DRUM STORAGE AREAS. LINE #2 CONNECTS "PROCESS AREA" TO EASTERN FARM. (See letter)

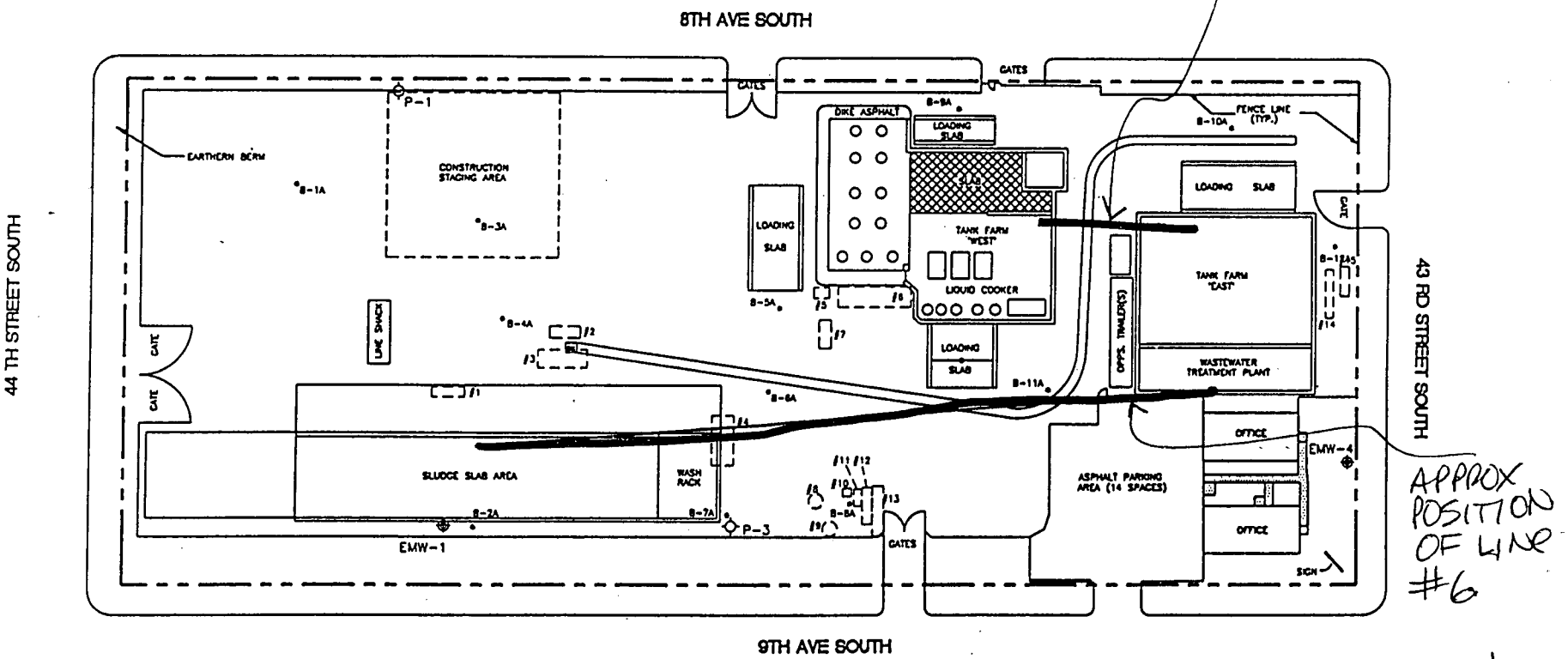
[signature] — Compliance Inspector

2-24-97 — Inspection Date

DEP District: _____ (or) Local Program: Pinellas Cnty-Engineering

FIGURE 3A
SOIL BORING LOCATION MAP (OCTOBER 10, 1994)
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA

APPROX. POSITION OF LINE #2



APPROX POSITION OF LINE #6

TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 5,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

LEGEND

- EXISTING MONITORING WELL INSTALLED BY OTHERS
- PIEZOMETER LOCATION
- CONCRETE DRAINAGE SWALE AND DRAIN
- SOIL BORING LOCATION
- PROPERTY BOUNDARY LINE
- FORMER STORAGE TANK LOCATION

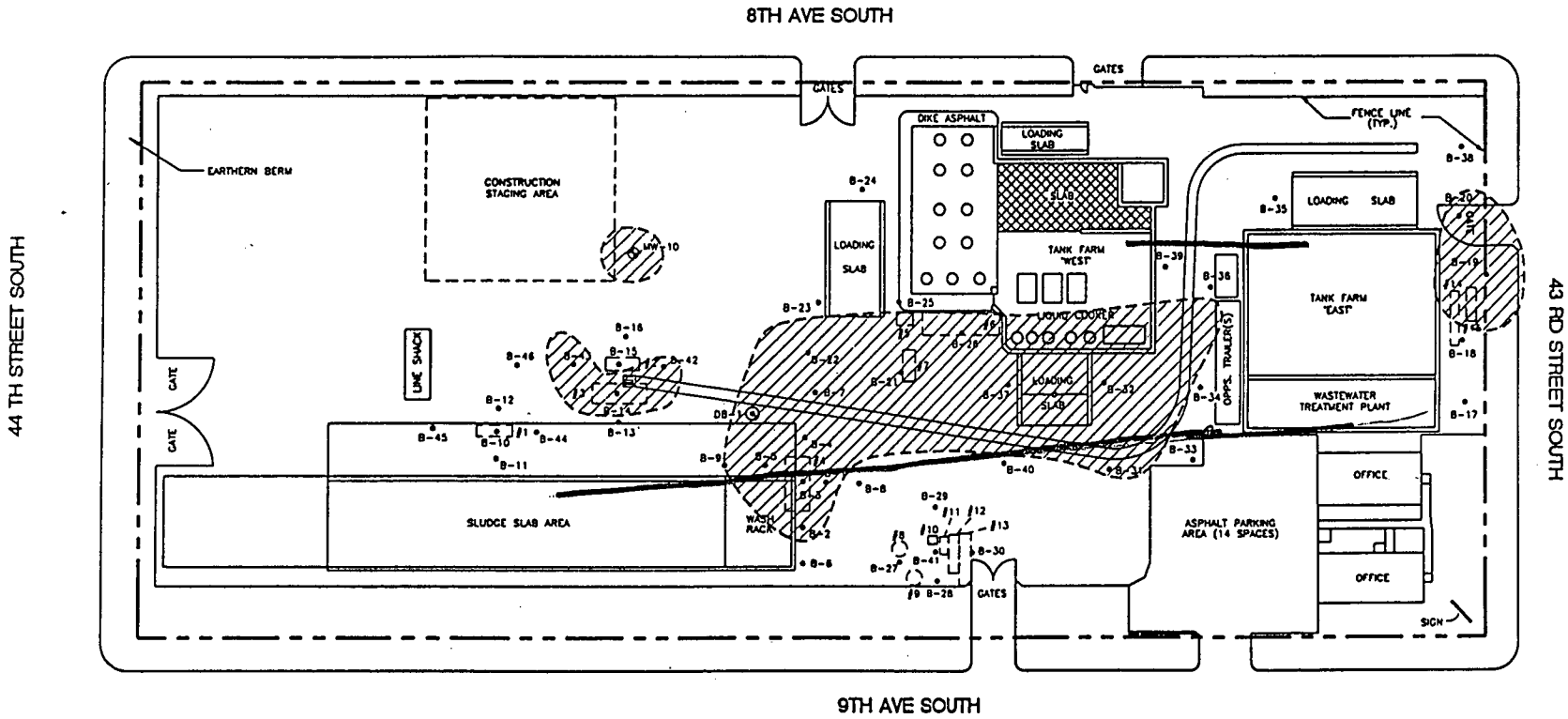
NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE.

APPROXIMATE Scale: 1"=80'

G94-216.82\SBMAP2 03-28-96 DS

INC.

FIGURE 8
APPROXIMATE EXTENT OF EXCESSIVELY CONTAMINATED SOIL
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA



TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 5,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

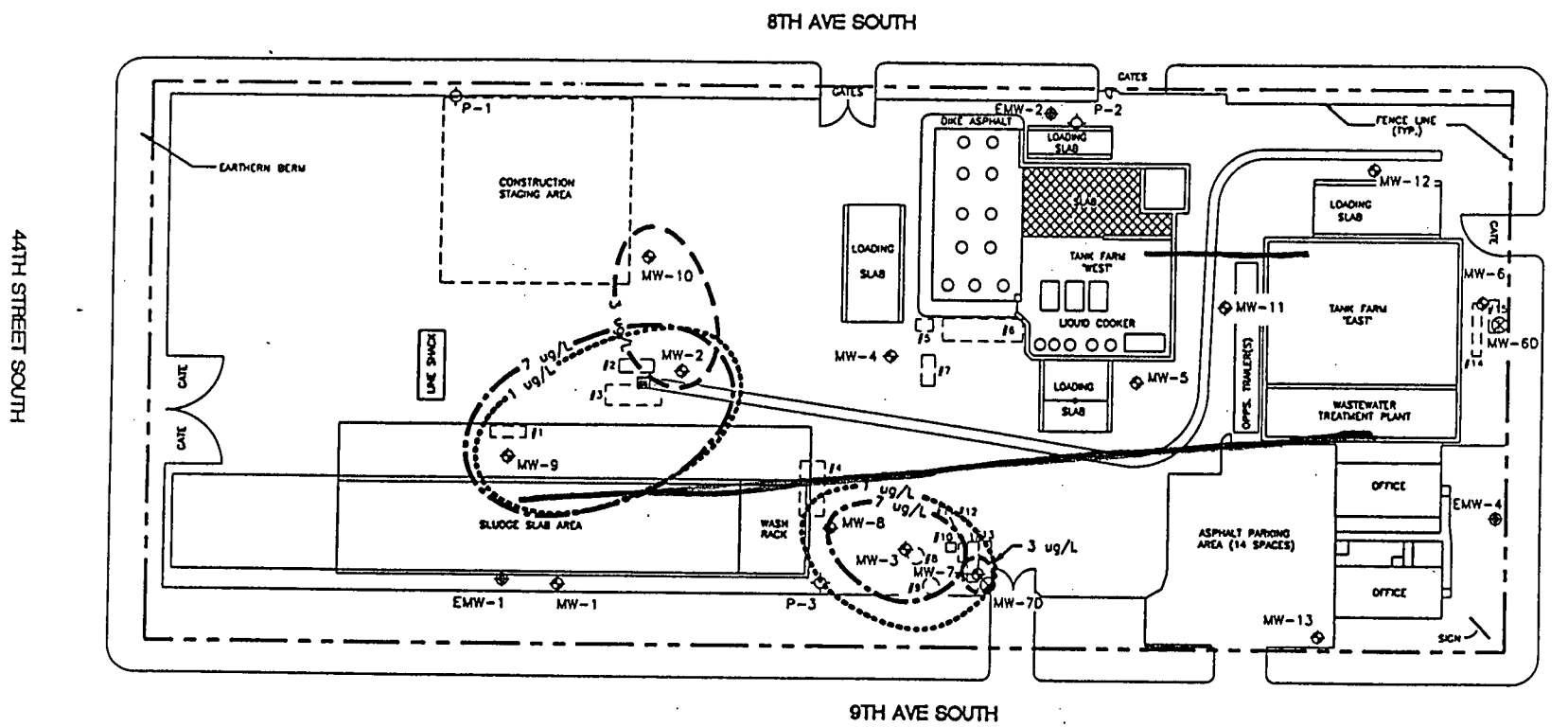
LEGEND

- PROPERTY BOUNDARY LINE
- SOIL BORING LOCATION
- DEEP SOIL BORING LOCATION
- APPROXIMATE EXTENT OF EXCESSIVELY CONTAMINATED SOIL (>50 ppm MIXED PRODUCT)
- MONITORING WELL LOCATION
- FORMER STORAGE TANK LOCATION
- NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE
- CONCRETE DRAINAGE SWALE AND DRAIN

APPROXIMATE Scale: 1" = 80'

G[illegible]16.82\CONTAM 04-19-96 DS

FIGURE 9A
GROUNDWATER QUALITY SUMMARY MAP (PCE, 1,1-DCE, and VINYL CHLORIDE)
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA



TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 3,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

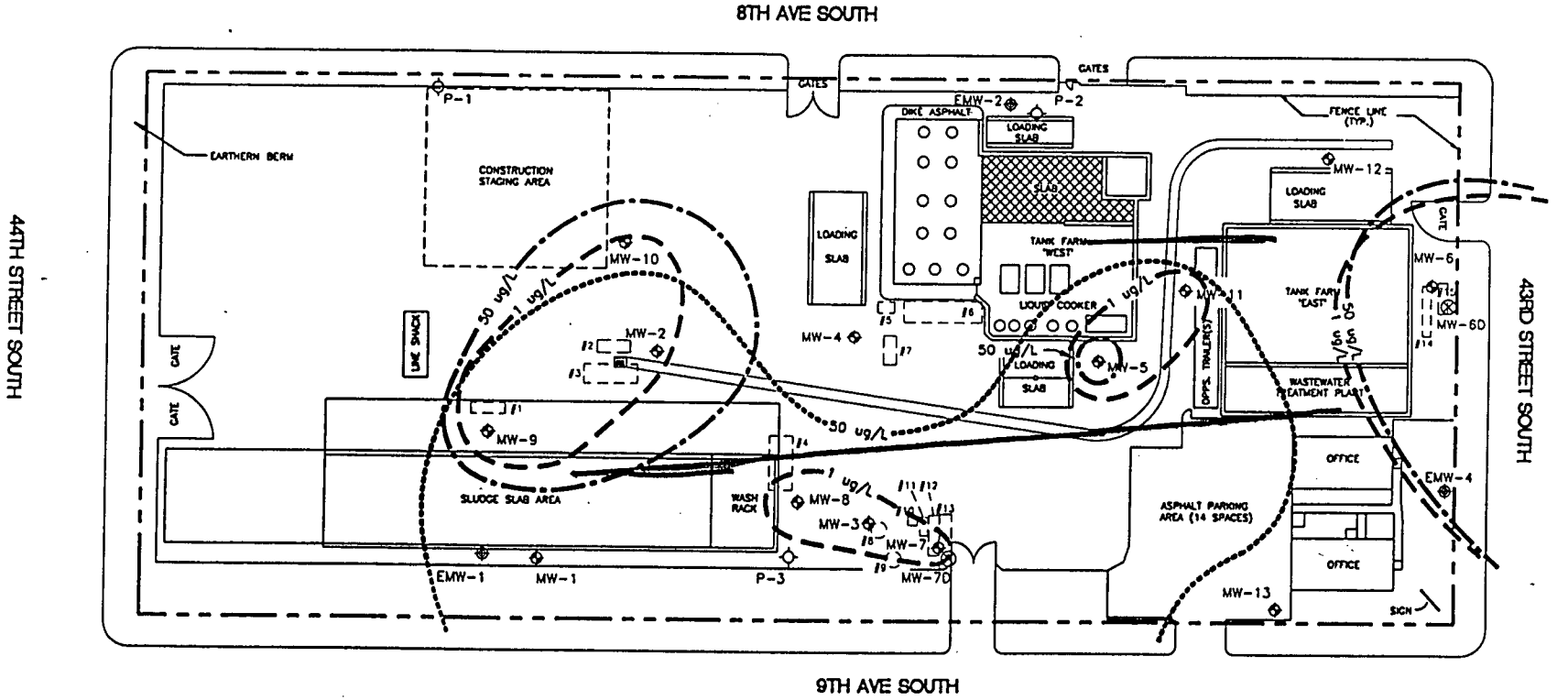
LEGEND

- EXISTING MONITORING WELL INSTALLED BY OTHERS
- MONITORING WELL INSTALLED BY FGS, INC.
- PIEZOMETER LOCATION
- DEEP WELL LOCATION
- CONCRETE DRAINAGE SWALE AND DRAIN
- PROPERTY BOUNDARY LINE
- FORMER STORAGE TANK LOCATION
- PCE
- 1,1-DCE
- VINYL CHLORIDE

APPROXIMATE Scale: 1"=80'

NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE.

FIGURE 9B
GROUNDWATER QUALITY SUMMARY MAP (BENZENE, TOTAL VOA's, and MTBE)
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA



TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 5,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

LEGEND

- EXISTING MONITORING WELL INSTALLED BY OTHERS
- MONITORING WELL INSTALLED BY FGS, INC.
- PIEZOMETER LOCATION
- DEEP WELL LOCATION
- CONCRETE DRAINAGE SWALE AND DRAIN
- PROPERTY BOUNDARY LINE
- FORMER STORAGE TANK LOCATION
- BENZENE
- TOTAL VOA's
- MTBE

NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE.

APPROXIMATE Scale: 1" = 80'

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

January 20, 1997

FILE

Mr. Ernest M. Roggelin
Pinellas County Public Health Unit
Engineering - Suite 300
4176 East Bay Drive
Clearwater, FL 34624-6966

Dear Mr. Roggelin:

In response to your letters dated October 21, 1996 and November 27, 1996, enclosed please fine a letter from Norris & Samon, a discharge report, pictures of repairs, transducer certification and the ultrasound readings for tank 142.

On January 10, 1997, Norris & Samon Pump Service performed pressure tests on the underground line at the HOWCO facility. The test results are included in their letter. HOWCO has discontinued using the line noted "not good." An investigation will follow. Repairs have been made and photographs taken of tank 142. A rust reformer was applied prior to making repairs. A cement was applied to ensure tightness. Also enclosed is a copy of the transducer certification along with the ultrasound readings of the tank.

Should you have any questions or require any additional information, please do not hesitate to contact me at (813) 327-8467, extension 226.

Sincerely,

Tim Hagan

Tim Hagan
President/CEO

Enclosures

TH/jh

3701 Central Avenue • St. Petersburg, FL 33713 • (813) 327-8467 • 1-800-435-8467 • Fax 1-813-323-2249

MORRIS & SAMON
PUMP SERVICE
323 - 4422

2620 - 20TH AVENUE NORTH
ST. PETERSBURG, FL 33713
FLA WATS 1 - 800 - 323 - 4423

January 10, 1997

Howco Environmental
3701 Central Avenue
St. Petersburg, Florida 33713

Attn: Mr. Tim Hagan

Re: Underground Waste Oil Line Test For:
Howco Environmental
843 43rd Street South
St. Petersburg, Florida

#1 Line: Oil & water supply from north valving station in oil plant tank farm to tanks 140/150 in holding tank farm (3" sch 40 steel). Petro-tite hydrostatic 65psi - 1-hour.

#2 Line: Oil & water from north valving station in oil plant tank farm to tanks 150 in holding tank farm (3" sch 40 steel). "Not Good"

#3 Line: Oil & water from south valving station in oil plant tank farm to tanks 160 in holding tank farm (3" sch 40 steel). Petro-tite hydrostatic 65psi - 1-hour.

#4 Line: Oil, water & sludge from oil plant tank farm to tanks 140/150 in holding tank farm (3" SCH 40 steel). Petro-tite hydrostatic 65psi - 1-hour.

#5 Line: Oil, water & sludge sump supply from wash rack to tanks 140/141 in holding tank farm (3" sch 80 PVC). Petro-tite hydrostatic 65psi - 1-hour, line is approximately 350 ft. underground

#6 Line: Oil & water supply from water treatment tanks 192 to sludge tank 108 next to filter crusher west of wash rack (3" sch 80 PVC). "Not Good" line is approximately 400 ft. underground

Sincerely,

Joe F. Samon
Construction Superintendent

FILE

HRS PINELLAS COUNTY
PUBLIC HEALTH
JAN 14 1997
ENVIRONMENTAL
ENGINEERING

DER Form # 17-761.900(1)
Form Title Discharge Reporting Form
Effective Date December 10, 1990
DER Application No.
(Filled in by DER)

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Discharge Reporting Form

Use this form to notify the Department of Environmental Regulation of:

1. Results of tank tightness testing that exceed allowable tolerances within ten days of receipt of test result.
2. Petroleum discharges exceeding 25 gallons on pervious surfaces as described in Section 17-761.460 F.A.C. within one working day of discovery.
3. Hazardous substance (CERCLA regulated), discharges exceeding applicable reportable quantities established in 17-761.460(2) F.A.C., within one working day of the discovery.
4. Within one working day of discovery of suspected releases confirmed by: (a) released regulated substances or pollutants discovered in the surrounding area, (b) unusual and unexplained storage system operating conditions, (c) monitoring results from a leak detection method or from a tank closure assessment that indicate a release may have occurred, or (d) manual tank gauging results for tanks of 550 gallons or less, exceeding ten gallons per weekly test or five gallons averaged over four consecutive weekly tests.

Mail to the DER District Office in your area listed on the reverse side of this form

PLEASE PRINT OR TYPE
Complete all applicable blanks

1. DER Facility ID Number: 52/8624557 2. Tank Number: -- 3. Date: 01/10/97
4. Facility Name: Howco Environmental
   Facility Owner or Operator: Tim Hagan
   Facility Address: 843 43rd Street South St. Petersburg,Fl.
   Telephone Number: (813) 327-8467 County: Pinellas
   Mailing Address: 3701 Central Avenue St. Petersburg, Florida 33713
5. Date of receipt of test results or discovery: 01/10/97 month/day/year
6. Method of initial discovery. (circle one only)
   A. Liquid detector (automatic or manual)
   B. Vapor detector (automatic or manual)
   C. Tightness test (underground tanks only)
   D. Emptying and Inspection.
   E. Inventory control.
   F. Vapor or visible signs of a discharge in the vicinity.
   G. Closure: _____ (explain)
   (H. Other:) Line Test
7. Estimated number of gallons discharged: Unknown
8. What part of storage system has leaked? (circle all that apply) A. Dispenser (B. Pipe) C. Fitting D. Tank E. Unknown
9. Type of regulated substance discharged. (circle one)
   A. leaded gasoline
   B. unleaded gasoline
   C. gasohol
   D. vehicular diesel
   F. aviation gas
   G. jet fuel
   L. used/waste oil
   M. diesel
   O. new/lube oil
   V. hazardous substance includes pesticides, ammonia, chlorine and derivatives (write in name or Chemical Abstract Service CAS number) _____
   (Z. other) (write in name) Petroleum Contaminated Water
10. Cause of leak. (circle all that apply)
    (A. Unknown) B. Split C. Loose connection D. Corrosion E. Puncture F. Installation failure G. Spill _____ H. Overfill I. Other (specify) _____
11. Type of financial responsibility. (circle one)
    A. Third party insurance provided by the state insurance contractor
    B. Self-insurance pursuant to Chapter 17-769.500 F.A.C.
    C. Not applicable
    D. None
12. **To the best of my knowledge and belief all information submitted on this form is true, accurate, and complete.**

Tim Hagan (Owner)
Printed Name of Owner, Operator or Authorized Representative

Tim Hagan
Signature of Owner, Operator or Authorized Representative

Northwest District Northeast District Central District Southwest District South District Southeast District

P.1

1-14-1997 3:15PM FROM 3281939

P O Box 350 • Lewistown, PA 17044 • (717) 242-0327

Krautkramer Branson

6 MONTH TRANSDUCER WARRANTY Krautkramer Branson

Transducer Certificate of Certification

Transducer Information

Model : FH2E-D Serial Number : 003N5C

The above listed Ultrasonic Transducer has been performance tested and meets or exceeds all manufacturer specifications and performs as designed and specified on the applicable style of Krautkramer instrumentation.

The equipment used in performing the Transducer Certification is traceable to the National Institute of Standards and Technology. The calibration system procedures utilized at this facility conform to the requirements set forth in MIL-STD-45662A.

Date Certified : 9-20-96 Certified by : SR

This facility's Quality System is registered to ISO 9001, 1994.

TODD Lilly
4332 9TH AVE N
ST PETERSBURG
PH # 445-0414

1/16/97

RECEIVED FROM HOWCO ENVIRONMENTAL.
50.00 FOR TANK READINGS ON
TANK #142

CHECK # 022753

Todd Lilly

TESTED WITH:

ULTRASONIC TRANSDUCER
MODEL FH2E-D
DATE CERTIFIED 9/20/96

1/16/97

HOWCO ENVIRONMENTAL.
843 43 ST S
ST PETE. FL 33711.

RE: ULTRASOUND READINGS TANK # 142.
WATER PLANT DYKE. 8Φ VERTICLE
READINGS WEST SIDE OF TANK READINGS
BOTTOM TO TOP EVERY 4" RESPECTIVELY.

0.141	1) 0.141"	19) 0.141	37) 0.140	55) 0.141	73) 0.14
	2) 0.143"	20) 0.140	38) 0.142	56) 0.140	74) 0.13
	3) 0.141	21) 0.141	39) 0.141	57) 0.139	75) 0.13
	4) 0.141	22) 0.141	40) 0.139	58) 0.139	76) 0.14
	5) 0.139	23) 0.142	41) 0.140	59) 0.139	77) 0.15
	6) 0.141	24) 0.141	42) 0.140	60) 0.141	78) 0.14
	7) 0.142	25) 0.141	43) 0.140	61) 0.141	79) 0.14
	8) 0.141	26) 0.139	44) 0.139	62) 0.140	80) 0.14
	9) 0.141	27) 0.141	45) 0.140	63) 0.141	
	10) 0.141	28) 0.141	46) 0.139	64) 0.141	
	11) 0.139	29) 0.140	47) 0.141	65) 0.140	
	12) 0.140	30) 0.140	48) 0.141	66) 0.141	
	13) 0.141	31) 0.139	49) 0.141	67) 0.141	
	14) 0.141	32) 0.142	50) 0.140	68) 0.140	
	15) 0.140	33) 0.142	51) 0.140	69) 0.139	
	16) 0.141	34) 0.141	52) 0.139	70) 0.142	
	17) 0.139	35) 0.141	53) 0.141	71) 0.141	
	18) 0.141	36) 0.141	54) 0.141	72) 0.141	

TESTED BY. [signature] WITNESSED BY [signature]

FAX To Tammy & Norrie & Sammy
1-14 @ 2:2 .m. Tammy will fax to HRS

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # 17-761.900(1)
Form Title Discharge Reporting Form
Effective Date December 10, 1990
DER Application No. _____ (Filled in by DER)

Discharge Reporting Form

Use this form to notify the Department of Environmental Regulation of:

1. Results of tank tightness testing that exceed allowable tolerances within ten days of receipt of test result.
2. Petroleum discharges exceeding 25 gallons on pervious surfaces as described in Section 17-761.460 F.A.C. within one working day of discovery.
3. Hazardous substance (CERCLA regulated), discharges exceeding applicable reportable quantities established in 17-761.460(2) F.A.C., within one working day of the discovery.
4. Within one working day of discovery of suspected releases confirmed by: (a) released regulated substances or pollutants discovered in the surrounding area, (b) unusual and unexplained storage system operating conditions, (c) monitoring results from a leak detection method or from a tank closure assessment that indicate a release may have occurred, or (d) manual tank gauging results for tanks of 550 gallons or less, exceeding ten gallons per weekly test or five gallons averaged over four consecutive weekly tests.

Mail to the DER District Office in your area listed on the reverse side of this form

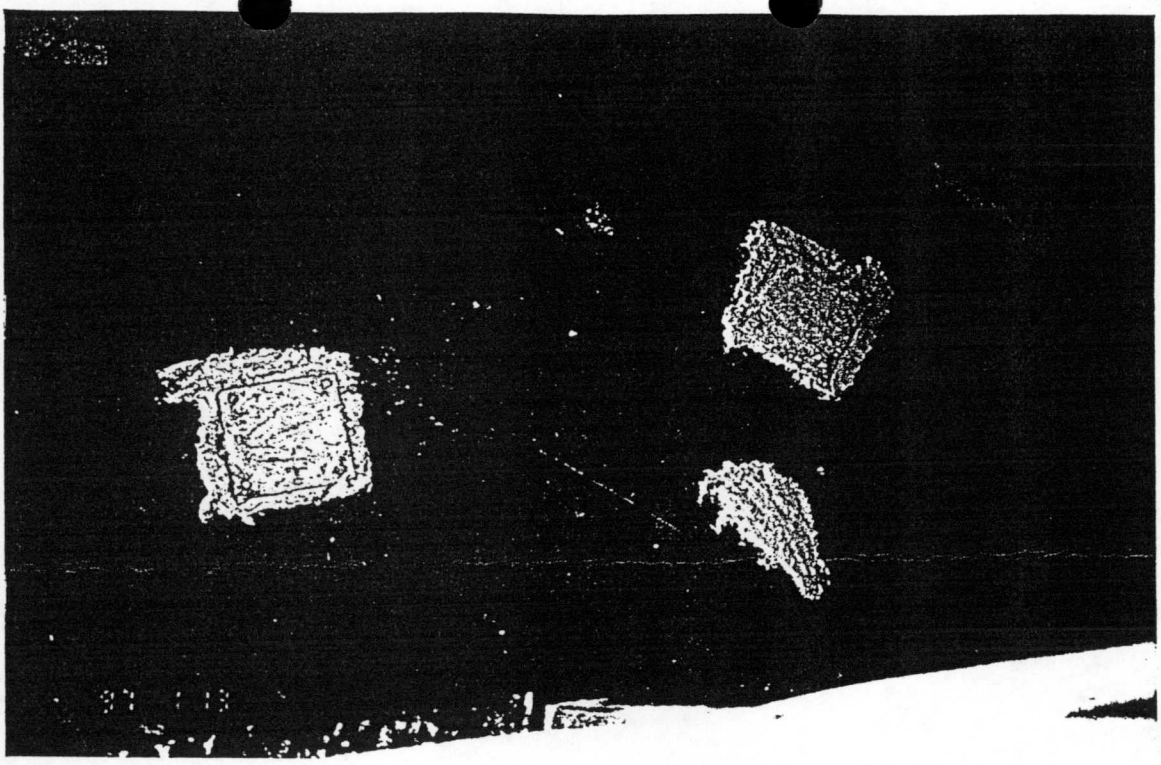
PLEASE PRINT OR TYPE
Complete all applicable blanks

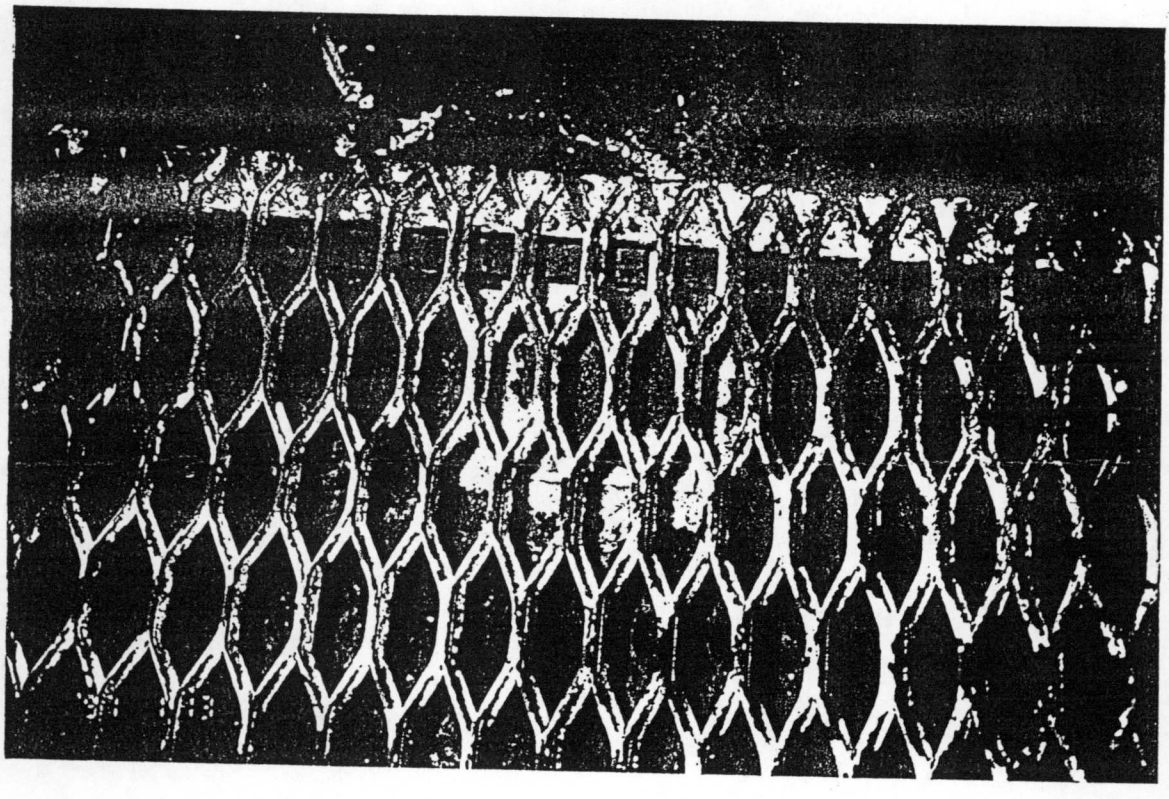
1. DER Facility ID Number: 52/8624557 2. Tank Number: _____ 3. Date: 01/10/97
4. Facility Name: Howco Environmental
   Facility Owner or Operator: Tim Hagan
   Facility Address: 843 43rd Street South St. Petersburg,Fl.
   Telephone Number: (813) 327-8467 County: Pinellas
   Mailing Address: 3701 Central Avenue St. Petersburg, Florida 33713
5. Date of receipt of test results or discovery: 01/10/97 month/day/year
6. Method of initial discovery. (circle one **only**)
   A. Liquid detector (automatic or manual) D. Emptying and Inspection. F. Vapor or visible signs of a discharge in the vicinity.
   B. Vapor detector (automatic or manual) E. Inventory control. G. Closure: _____ (explain)
   C Tightness test (underground tanks only). (H. Other:) Line Test
7. Estimated number of gallons discharged Unknown
8. What part of storage system has leaked? (circle all that apply) A. Dispenser (B. Pipe) C. Fitting D. Tank E. Unknown
9. Type of regulated substance discharged. (circle one)
   A. leaded gasoline D. vehicular diesel L. used/waste oil V. hazardous substance includes pesticides, ammonia, chlorine and derivatives (write in name or Chemical Abstract Service CAS number) _____
   B. unleaded gasoline F. aviation gas M. diesel
   C. gasohol G. jet fuel O. new/lube oil (Z. other) (write in name) Petroleum Contaminated Water
10. Cause of leak. (circle all that apply)
    (A. Unknown) C. Loose connection E. Puncture G. Spill _____ I. Other (specify) _____
    B. Split D. Corrosion F. Installation failure H. Overfill
11. Type of financial responsibility. (circle one)
    A. Third party insurance provided by the state insurance contractor C. Not applicable
    B. Self-insurance pursuant to Chapter 17-769.500 F.A.C. D. None
12. **To the best of my knowledge and belief all information submitted on this form is true, accurate, and complete.**

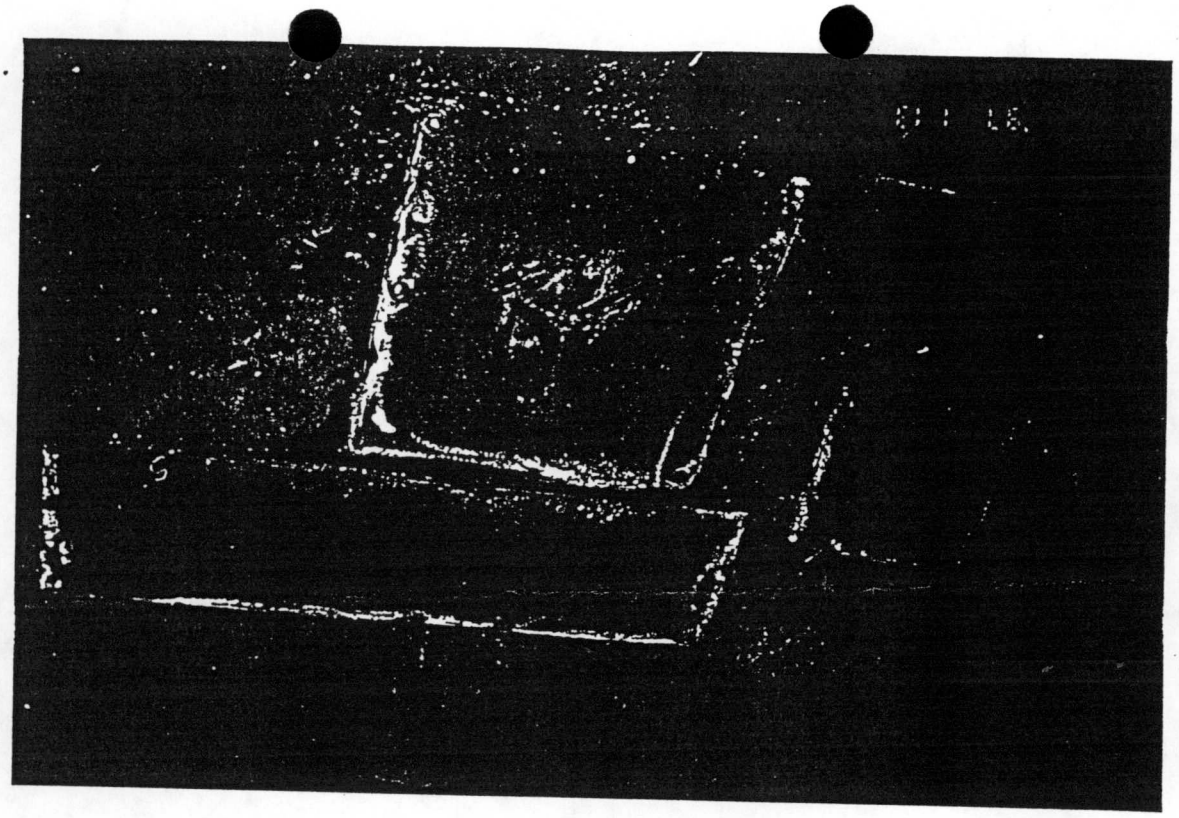
Tim Hagan (Owner)
Printed Name of Owner, Operator or Authorized Representative

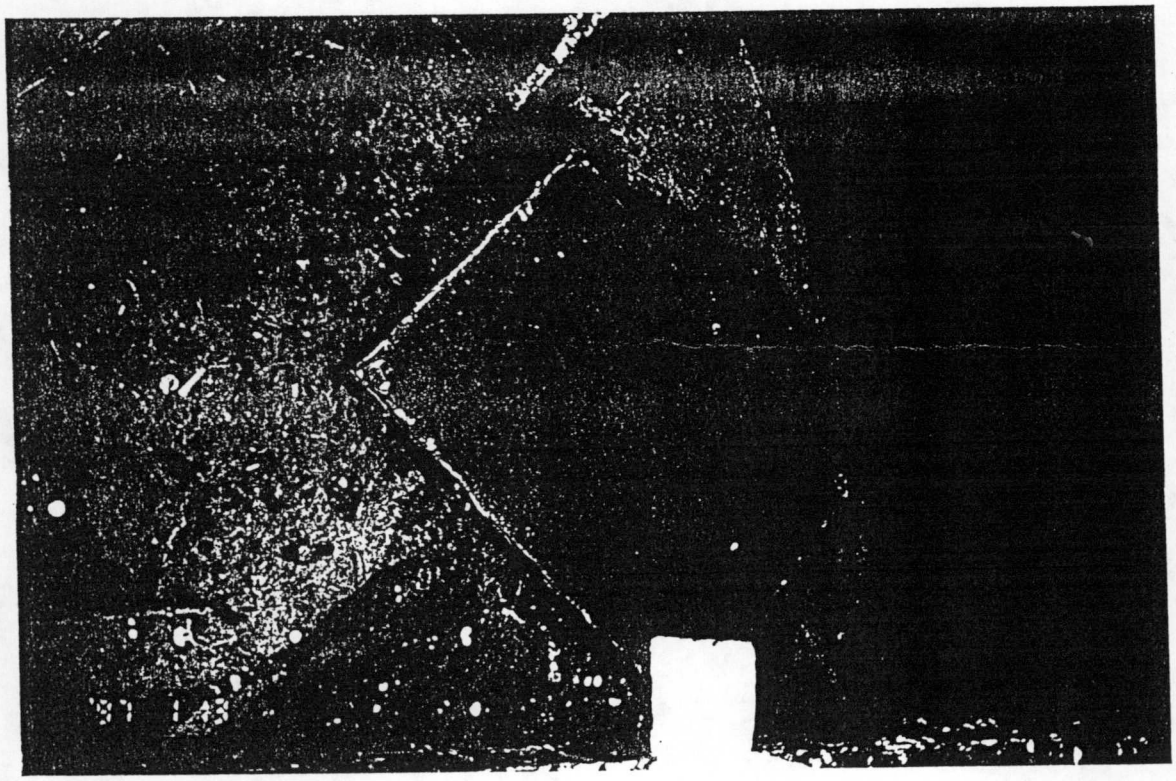
Tim Hagan
Signature of Owner, Operator or Authorized Representative

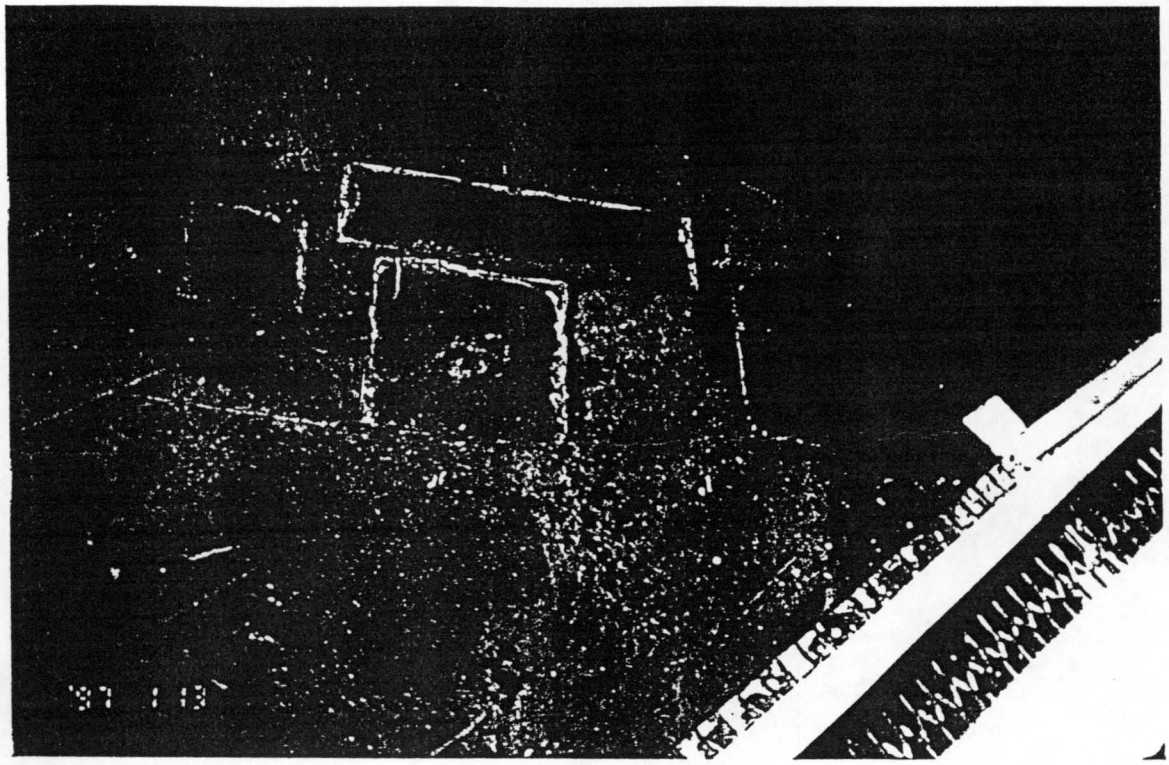
Northwest District: 160 Governmental Center | Northeast District | Central District | Southwest District | South District | Southeast District

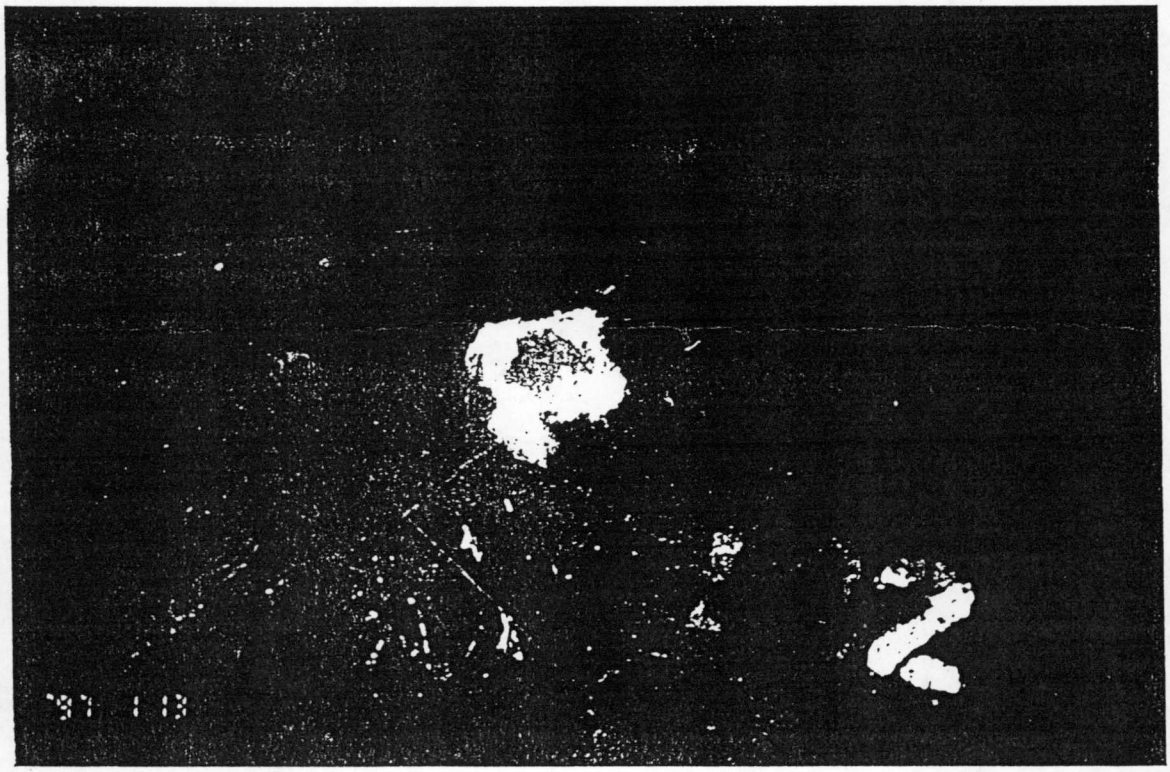












HOWCO ON-SPEC OIL BATCH GENERATION.

Begin date:	1/11/96		No. of Days between dates:			267
End Date:	10/4/96		No. of months between dates:			8.782895
			Total generation for period:			2440000
			Avg. monthly generation:			277812.7

Batch #683 dated 1/11/96 shipment to Batch #804 dated 10/4/96 shipment. Estimated 122 batches @ 20,000 gal/each. generated during this period.

This equals. 277,812.7 gal/mo. average.

= 3,333,752.4 gals/yr.

Page 1

HRS Pinellas County Public Health Unit

November 27, 1996

Tim Hagan
HOWCO Environmental Services, Inc.
843 43rd Street South
St. Petersburg, FL 33711-1922

Re: **528624557**
HOWCO Environmental Services Inc.
St. Petersburg
PINELLAS

Dear Mr. Hagan:

On October 21, 1996 this agency issued a non-compliance letter, to your attention, reflecting issues revealed during the multi-agency inspection of October 16-17, 1996. On November 5, 1996 this agency received your September 9, 1996 letter addressing non-compliance issues from a May 15, 1996 compliance inspection. The issues raised during May 1996 remain, for the most part, unaddressed as of the October 1996 visit.

Please provide a timely response to the following:

- During the October 1996 visit you indicated that "line pressure testing" would be performed within 30 days of October 17, 1996. Please submit the test data at this time.

- Provide a repair invoice for the hole in the roof of tank 142; this item was first noted during the May 15, 1996 inspection. It has been previously requested that a non-destructive evaluation of the tank shell be conducted; please advise this agency if this test has been performed by HOWCO.

Based on your September 9, 1996 letter, item #2 response, it is this agency's interpretation that you have **confirmed** that your tank farm facilities **do not have impervious secondary containment.** You are correct in noting that aboveground tanks specifically regulated under Florida Administrative Code Chapter 62-762.510(4) containing "other pollutants" have until December 31, 1999 to meet the designated code requirements.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4175 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624-6966
TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

5286285 7

HRS PINELLAS COUNTY PUBLIC HEALTH
NOV 05 1996
ENVIRONMENTAL ENGINEERING

September 9, 1996

Mr. Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program
Pinellas County Public Health Unit
Engineering - Suite 300
4176 East Bay Drive
Clearwater, FL 34624-6966

Dear Mr. Roggelin:

This is in response to your letter dated June 11, 1996 and addresses the issues related to your compliance inspection on May 15, 1996. The items are listed to correspond with the item numbers referred to in your letter.

Item 1 - HOWCO has decided to use the "pipe pressure test" for our release detection system for the underground transfer piping connection on the west and east tank farm. This test will be performed within the next thirty (30) days and the results will be forwarded to your attention.

Item 2 - On or about November 15, 1995, a routine inspection was made. At this time Pedro Gonsallas explained to me that we have until 1999 to retrofit the secondary containment wall around the west tank farm. Based on this information HOWCO is planning to replace the asphalt burned dike to concrete dike walls. We also plan to add a new concrete bottom slab to this area at the same time we are installing the concrete walls. This is a major undertaking and will require a lengthy planning period. We do expect to have it completed within the required time frame of 1999.

Item 4 - The required submission of the storage tank registration farm has been completed and mailed to the DEP in Tallahassee along with a copy to your agency.

Item 5 - HOWCO has chosen to use the "pipe pressure test" method. The release detection and results are outlined in Item 1.

Item 6 - HOWCO has changed the format of the monthly release detection form that we are using to include a more detailed reporting of the conditions of the tanks and containment units at the facility.

Item 7 - After an investigation into tank number 141, it was discovered that it may have experienced

an overfilled condition. After reviewing the inventory, there was a small amount of product missing from this tank. If the tank was overfilled, it was a very small amount and has been cleaned up. We will keep closer tabs on that tank to ensure that it does not happen again.

Also enclosed are the two copies of the plant layout that you requested. Should you have any further questions, please contact me at (813) 327-8467, extension 226.

Sincerely,

Tim Hagan

Tim Hagan
President/CEO

Enclosure

TH/jh

October 21, 1996

Tim Hagan
HOWCO Environmental Services, Inc.
843 43rd Street South
St. Petersburg, FL 33711-1922

Re: **528624557**
HOWCO Environmental Services Inc.
St. Petersburg
PINELLAS

Dear Mr. Hagan:

On October 16-17, 1996 a reinspection was performed at the referenced facility, to determine the level of compliance with issues initially addressed in this agency's June 11, 1996 non-compliance letter. The present inspection was a multi-agency effort, with the following representatives: Roy Williams, City of St. Petersburg Fire Department; Jose Rodriguez-Lugo, Pinellas County Environmental Management; and the DEP Hazardous Waste Program, with Roger Evans, Randy Strauss, and William Crawford. A copy of my report is enclosed for your file.

It is acknowledged that you have provided this agency with a current site plan, sealed by your engineer as of September 13, 1996. As we have previously discussed you need to provide this agency with a written statement regarding your efforts to meet the compliance issues addressed in the June 1996 letter. During the recent visit, you made available a draft version of your reply; please forward that document to this agency.

With respect to the present reinspection, the following issues require your attention and a timely response:

- No release detection records exist for the underground piping connecting the East and West tank farms. You indicated that you will be having a Pollutant Contractor perform line tightness testing within the 30 days of October 17, 1996. Please forward the test results upon completion of the test.

- Initiate repair to the roof of tank #142, which has visible holes. It is recommended that a non-destructive evaluation of the tank integrity be performed in conjunction with the repair. This repair issue was initially noted on the May 15, 1996 compliance inspection.

- On the May 15, 1996 inspection it was noted that the western concrete saddle of tank #130 was damaged. Since that time, it has become apparent that this tank is part of the flow-through process area. Therefore, it becomes a recommendation that this structural defect be repaired.

PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
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TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

- The May 15, 1996 inspection and subsequent letter addressed structural defects associated with the walls and floors of the western and eastern containment units. Please advise this agency as to the steps you have taken to repair these areas, and to provide an impervious structure.

- Provide a copy of the Storage Tank Registration Form (STRF) documenting your notification of DEP Tallahassee of the closed status of tank #120.

Upon completion of the repairs to Tank #142 a reinspection will be performed by this agency.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

DEPARTMENT OF ENVIRONMENTAL PROTECTION

POLLUTANT STORAGE TANK SYSTEM
INSPECTION REPORT FORM - COVERAGE

PRINTED: 10/14/96

FACILITY ID #: 528624557 COUNTY: PINELLAS
FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC
FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG
FACILITY CONTACT: TIM HAGAN PHONE: (813) 327-8467
OWNER: HOWCO ENVIRONMENTAL SERVICES INC PHONE: (813) 327-8467
OWNER ADDRESS: 843 43RD ST S, SAINT PETERSBURG, FL, 33711-1922
OWNER CONTACT: TIM HAGAN OWNER CHANGE DATE: 06/16/93
LATITUDE:27-45-47 LONGITUDE:82-41-32 FAC TYPE: NON-RETAIL BUSINESS
LAST UST COMPLIANCE DATE:00/00/00 LAST AST COMPLIANCE DATE:11/02/94
CONTAMINATION DATA AVAILABLE: OTHER ATRP

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
1	2000	A	XX/XX	A	D	C	I	B
100	29500	L	XX/80	A	ACK	BI	M	U
101	28500	L	XX/80	A	ACK	BI	M	U
105	14000	L	XX/80	A	CKM	BI	M	U
106	9870	L	XX/80	A	CKM	BI	M	U
120	21775	L	XX/80	A	ACK	BI	M	U
121	27989	L	XX/80	A	ACK	BI	M	U
122	27989	L	XX/80	A	ACK	BI	M	U
123	27989	L	XX/80	A	ACK	BI	M	U
124	27989	L	XX/80	A	ACK	BI	M	U
125	18040	L	XX/80	A	ACK	BI	M	U
126	18565	L	XX/80	A	ACK	BI	M	U
127	18565	L	XX/80	A	ACK	BI	M	U
128	23792	L	XX/80	A	ACK	BI	M	U
129	21775	L	XX/80	A	ACK	BI	M	U
140	26041	L	XX/80	A	ACK	CKM	M	U
141	17432	L	XX/80	A	ACK	CKM	M	U
142	17432	L	XX/80	A	ACK	CKM	M	U
143	17013	L	XX/80	A	ACK	CKM	M	U
144	18886	L	XX/80	A	ACK	CKM	M	U
150	15000	L	XX/80	A	ACK	CKM	M	U
151	15000	L	XX/80	A	ACK	CKM	M	U
152	28130	L	XX/80	A	ACK	CKM	M	U
153	20531	L	XX/80	A	ACK	CKM	M	U
154	18172	L	XX/80	A	ACK	CKM	M	U
155	20139	L	XX/80	A	ACK	CKM	M	U
160	14792	L	XX/80	A	ACK	CKM	M	U

MORE TANKS LISTED NEXT PAGE

INSPECTION TYPE (ALL THAT APPLY)
__ ROUTINE
__ INSTALL
__ ABANDONED
__ DISCHARGE
__ CLOSURE
X REINSPECT

SITE INFORMATION (ALL THAT APPLY)
__ NEAR PUB WELL
X CONTAMINATED
__ COMPLAINT
__ ACID TANKS
__ REPAIRED
__ UPGRADED
__ UST & (AST)
__ HAZARD MAT

DEP DISTRICT OR LOCAL PROGRAM: PINELLAS CNTY-ENGINEERING

INSPECTOR NAME (PRINT) E M ROGGELIN CONTACT NAME (PRINT) Tim Hagan

E M Roggelin 10-16-96
INSPECTOR'S SIGNATURE & DATE

Tim Hagan 10-17-96
CONTACT'S SIGNATURE & DATE

10-17-96

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
161	14792	L	XX/80	A	CKM	BI	M	U
162	14792	L	XX/80	A	CKM	BI	M	U
163	14792	L	XX/80	A	ACK	CKM	M	U
164	18832	L	XX/80	A	ACK	CKM	M	U
165	18618	L	XX/80	A	ACK	CKM	M	U
166	15000	L	XX/80	A	ACK	CKM	M	U
170	11000	L	XX/80	A	ACK	ACK	M	U
171	9607	L	XX/80	A	ACK	ACK	M	U
172	9703	L	XX/80	A	ACK	ACK	M	U
173	5500	L	XX/80	A	ACK	ACK	M	U
174	2898	L	XX/80	A	ACK	ACK	M	U
180	56796	L	XX/80	A	ACK	CKM	M	U
2	4000	D	XX/XX	A	D	C	I	B
3	3000	D	XX/87	A	AEK	D	BC	U

MULTI-AGENCY INSPECTION:

JOSÉ RODRIGUEZ-LUGO (PINELLAS COUNTY ENV. MGMT.)
ROGER EVANS
RANDY STRAUSS } DEP SOUTHWEST
WILLIAM C. CRAWFORD } HAZARDOUS WASTE PROGRAM
ROY WILLIAMS CITY ST. PETERSBURG FIRE DEPT

DEPARTMENT OF ENVIRONMENTAL PROTECTION
POLLUTANT STORAGE TANK SYSTEM
INSPECTION REPORT FORM - COVERAGE

PRINTED: 10/14/96

FACILITY ID #: 528624557 COUNTY: PINELLAS
FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC
FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG
FACILITY CONTACT: TIM HAGAN PHONE: (813) 327-8467

COMMENTS: (A) REVIEWED HOWCO'S DRAFT RESPONSE LETTER TO MAY 15, 1996 LETTER. (B) RCVD SITE PLAN.

ITEM #11: NO RELEASE DETECTION RECORDS FOR UNDERGROUND PIPE CONNECTING WEST & EAST FARMS SINCE MAY 1996.

ITEM #23: FORMER USTs NOW SERVING AS ASTs MUST MEET 62-762 FAC REFERENCED STANDARDS BY DECEMBER 1999.

ITEM #28: REPAIR #142 TANK WITH VISIBLE HOLES IN TANK ROOF. PROVIDE NON-DESTRUCTIVE EVALUATION OF TANK INTEGRITY. (NOTE: TANK #130 SADDLE DAMAGED)

ITEM #32: REFER TO MAY 15, 1996 INSPECTION REGARDING COMMENTS ON CONDITION OF CONTAINMENT WALLS & FLOORS; CONTINUE REPAIR PROCESS.

ITEM #35: FACILITY HAS CHOSEN PRESSURE-TEST OF BULK PIPING (UNDERGROUND); TO BE PERFORMED WITHIN 30 DAYS AS INDICATED VERBAL

- VISUAL CHECKLIST OF TANKS & CONTAINMENT.
- SEND COPY of STRF for Tank #120 (ITEM #1)
- VISUAL INSPECTION DOCUMENTATION ADEQUATE SINCE MAY 1996
- PHOTOS TAKEN OF FACILITY.
- ADDITIONAL CORRESPONDENCE CONCERNING TANK #120 CLOSURE; WILL BE FORTHCOMING FROM AGENCY.

Name: HRWCD
Facility I.D.#: 528624557
Date: 10-16-97

ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
I.	REGISTRATION/NOTIFICATION: Comments:					
	1. Facility has registered all applicable tanks on site; 62-762.400	1.			X	
	2. Current registration placard is properly displayed; 62-762.410 (6) 1996-1997	2.	X			
	Proper notification has been made for the following; 62-762.450:					
	3. Abandonment and closure (30 days prior); (1) (a)	3.				X
	4. Change of ownership (30 days after); (1) (b)	4.				X
	5. Retrofitting, replacement or upgrading; (10 days prior); (1) (c)	5.				X
	6. Change of tank status (in service/out of service); (1) (d)	6.				X
	7. Change of facility status (e.g. substances stored); (1) (e)	7.				X
	8. Change of method of financial responsibility (within 30 days); (2)	8.				X
	9. The facility owner/operator notified D.E.R. of internal tank inspection 24 hrs prior to the test; (3)	9.				X
	10. Loss of greater that 100 gallons on an impervious surface or 500 gallons inside secondary containment within one working day; .450 (4)	10.				X
II.	RECORDS KEEPING: Comments:					
	11. All records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	11.		X		
	12. Some, but not all records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	12.	X			
III.	REPORTING/DISCHARGE RESPONSE/ REPAIRS: Comments:					
	Proper reporting requirements met for the following; 62-762.460:					
	13. Integral piping tightness test failure within 10 days; (1)	13.				X
	14. Pollutant discharge exceeding 25 gallons on a pervious surface; (2)	14.				X
	15. Positive response of a release detection device with one working day; (3)	15.				X
	The owner or the operator of the system which has discharged has:					
	16. Taken it out-of-service; 62-762.700 (1), had it repaired or replaced; .700, or properly closed it; .800	16.				X
	17. Removed any regulated substances from the system; 62-762.820 (1)	17.				X
	18. Tightness tested all repaired components before placing them back in service; 62-762.700 (5) & (6)	18.				X
	19. Begun initial corrective actions for a release; 62-762.820 (2)	19.				X
IV.	INVENTORY REQUIREMENTS FOR TANKS IN CONTACT WITH THE SOIL: Comments: OTHER POLLUTANTS					
	20. All inventory requirements maintained in accordance with 62-762.720 (1)	20.				X
	21. Some, but not all inventory requirements maintained in accordance with 62-762.720 (1)	21.				X

Name: Hess
Facility I.D.#: 320624557
Date: 10-16-96

ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
V.	PERFORMANCE STANDARDS/CATHODIC PROTECTION: Comments:					
	Storage tank criteria; 62-762.500					
	22. Meets construction upgrading schedule; .510 and .520 1999	22.				X
	23. Meets applicable storage tank standards; (1), (2) & (3) USTs (former) as ASTs.	23.			X	
	24. Tank has secondary containment system; .500 (6) addition	24.	X			
	25. Tank equipped with overfill protection; (3) (f) 1-4, (g)	25.				X
	Piping criteria					
	26. Meets new piping standards with secondary containment; .500 (4) & .600 (4)	26.				X
	27. Meets construction upgrading schedule; 62-762.510 (3) , & .520 (2)	27.				X
	Repairs to storage tank systems; 62-762.700					
	28. Failed storage tank system component properly required; (1)-(4) tank # 142	28.		X		
	29. Tightness testing of the required component prior to being brought back into service; (5)	29.				X
	Cathodic Protection; 62-762.730					
	30. Cathodic protection system for tank and piping provides continuous protection; (1)-(4)	30.				X
	Secondary containment; 62-762.500					
	31. Does containment are have sufficient volume; .500 (6) (a) (2)	31.	X			
	32. Is the containment area made out of impervious material in accordance with Chapter 62-762, F.A.C., requirements; (6) (a) (1) hollow block, concrete walls/floor.	32.		X		
	33. Is the containment area equipped with drainage system or protected from accumulation of rain; (6) (a) (3)	33.	X			
	34. Hydrant pits equipped with spill prevention equipment; (5)	34.				X

VI.	RELEASE DETECTION/MONITOR WELLS: Comments: underground line					
	35. Facility has an approved released-detection system; 62-762.600 & 62-762.860	35.		X		
	36. Monitoring wells properly designed, constructed and installed; 62-762.640 or 62-762.600 (6)	36.				X
	37. Interstitial monitoring adequate to detect a release from integral piping; 62-762.600 (4) & (5)	37.				X

VII.	OUT-OF SERVICE STATUS: Comments:					
	38. Are the corrosive protection devices properly maintained; 62-762.800 (1) (a)	38.				X
	39. Is the vent line and other ancillary equipment properly secured and maintained; (1) (b)	39.				X
	40. Test performed to insure the integrity of out-of-service system prior to being returned to service; (1) (c)	40.				X

VIII.	VARIANCE: Comments:					
	41. Has the facility for an Alternate Procedure; 62-762.850 (1)	41.				X

IX.	OTHERS: Comments:					
	42. Any other violation noted during inspection (Explain in comments)	42.				X

HRS Pinellas County Public Health Unit

June 11, 1996

Tim Hagan
HOWCO Environmental Services, Inc.
843 43rd Street South
St. Petersburg, FL 33711-1922

Re: **528624557**
HOWCO Environmental Services Inc.
St. Petersburg
PINELLAS

Dear Mr. Hagan:

On May 15, 1996 the annual Florida Administrative Code, Chapter 62-762 compliance inspection was performed at your facility. Representatives of this agency, the Department of Environmental Protection, the City of St. Petersburg Fire Department, and your company were in attendance. You have been previously supplied with a copy of the inspection document, although a copy is enclosed for your use.

This letter addresses the issues revealed during that visit, and your comments are requested:

1. It is unknown, at this time, whether the facility has an approved release detection system for the underground transfer piping connecting the West and East tank farms. Please note the following pertinent FAC Chapter 62-762 references: 762.200(3), 762.200(19), 762.600(5), 762.600(7). The aforementioned sections define both integral and bulk piping, as well as describe release detection requirements for those applications. A December 1, 1993 letter between the DEP and the Florida Petroleum Council discusses proposed rule changes allowing the inclusion of 3-inch diameter and larger piping into the bulk category; and an administrative decision to allow the down-sizing prior to the rule change.

An initial question, then, would be on what diameter pipe connects the two tank farms? If you choose to select the inclusion of the piping, in the bulk piping category; please be prepared to demonstrate the diameter of the pipe at both tank farms.

Florida Groundwater Service, Inc. on behalf of your company, attempted to satisfy the integral piping release detection requirement. Their January 5, 1996 letter to this agency, regarding monitor well #11 did not provide enough information. Please have your consultant provide a detailed response, describing how the well meets the requirements of FAC Chapter 62-761.640(1)(a-d). Your company needs to decide whether release detection will be by the "pipe pressure test" or "ground water monitoring well".

2. In accordance with FAC Chapter 62-762.700(2) repairs shall be made to storage tank systems in a manner to prevent any discharge due to structural failure or corrosion. FAC Chapter 62-762.200(37) defines the storage tank

PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4175 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624-6966
TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

system to include the aboveground tank, integral piping, and the release detection components. FAC Chapter 62-762.200(32) defines release detection to include secondary containment, and FAC Chapter 62-762.200(34) includes an "impervious containment area" in its definition of secondary containment.

- Tank #142 exhibited a hole in its roof. Please repair and describe the process used to verify the structural integrity of the tank shell [Photo #1].

- The western saddle for tank #130 exhibited damage to its concrete structure [Photo #2]. Please repair.

- The eastern tank farm, black tank section, exhibits cracking of the containment floor. Investigate the extent of the penetration, sealing where necessary to provide an impervious construction condition for the unit.

- The western tank farm exhibits a more widespread deterioration of the containment floor, and concrete block walls. See the accompanying site diagram and photographs highlighting existing conditions.

[Photo #3 - hole in block wall appears to demonstrate hollow core nature of wall unit. While the hollow core may not be a universal construction feature, the area indicated requires repair.]

[Photo #4 - "step" cracks following the mortared edges both inside and outside the block wall have apparently compromised the impervious integrity of this corner of the containment unit. Please repair.]

[Photo #5 - South loading area wall in the vicinity of tanks #170-173 exhibit extensive "step" cracking, as well as deterioration of the mortar between blocks. This damage has affected several courses of block. Please repair.]

[Photo #6 - Tank #173 appears to be experiencing a deterioration of the concrete base support. There is a hole at the 7:30 position (Bob Boyett is aware of this item).]

[Photo #7 - presents a typical example of cracking of the floor of the portion of the containment unit where tanks #120-128 are located. Investigate the extent of the penetration, sealing where necessary to provide an impervious construction condition for the unit.]

3. Your attention is directed to FAC Chapter 62-762.800(2) describes the

requirements for the closure of aboveground storage tank systems. Subsection (d) provides additional exemptions for sites with documented contamination, or that were initially installed with secondary containment. Your attention is again directed to FAC Chapter 62-762.200(34) which defines secondary containment, and to (16) which defines impervious.

Herein lies the next series of issues. The asphalt berm surrounding the western portion of the West Farm appears to be faintly depicted in the March 1979 aerial photo, although it is more clearly depicted in the November 1984 aerial. Based on the March 1994 aerial photo, tank #120, does appear to be present.

Based on several discussions it is this agency's initial opinion that asphalt is not a recognized impervious secondary containment barrier to oil products. Toward the resolution of this issue, this agency will accept a sealed opinion from a Professional Engineer, on the degree to which your asphalt berm and concrete pad can provide impervious secondary containment.

I have had the opportunity to examine the Contamination Assessment Report dated April 1996 as prepared by your consultant for the Department of Environmental Protection. This document appears to indicate that neither soil nor ground water sampling occurred within the confines of the western portion of the West tank farm.

Therefore, you are advised to have the condition of the containment assessed, and if not impervious perform a closure assessment of the tank #120 portion in accordance with Department of Environmental Protection regulations and guidelines.

4. FAC Chapter 62-762.450(1)(a) required the submission of a Storage Tank Registration Form notifying the DEP of the planned closure of a storage tank system. This document was apparently not submitted when tank #120 was removed by your staff. Please sign the enclosed document, forwarding the original to the DEP Registration Section, 2600 Blair Stone Road, Tallahassee 32399-2400; copying our agency.

5. FAC Chapter 62-762.710(2) requires the retention of records associated with the results of the examination of monitoring wells. In accordance with Chapter 62-762.600(5) the release detection system shall be monitored at least once a month. The January 5, 1996 FGS Inc. letter informed this agency that monitor well #11 would provide leak detection for the underground transfer line. It appears that up to the date of the inspection, no records have been maintained for this well.

6. In accordance with FAC Chapter 62-762.600(2) the monthly release detection process requires the thorough inspection of the exterior of each tank and the secondary containment system, noting: wetting, discoloration, blistering, corrosion, cracks, or other signs of structural damage or leakage. At the time of the inspection, the HOWCO monthly inspection forms did not note individual tank defects, nor deterioration of the secondary containment structures. Mr. Boyett and I discussed how this oversight might be remedied. Besides the aforementioned containment structure defects, several tanks exhibit peeling paint, corrosion, and/or saddle damage. Further, both east and west containment units exhibit puddling of oil products which while not impacting the 110% capability of the units, do not mesh with the noted "clean-dry" status of monthly reports. You are advised to implement a more accurate reporting of the condition of the tanks and containment units at your facility. Similarly, tanks with deformities should be noted on this monthly report (tank #173).

7. In accordance with FAC Chapter 62-762.450(4) notification requirements, please investigate the apparent overfill situation that occurred with tank #141. When Mr. Boyett and I climbed to the top of this tank and #142, it appeared that #141 had recently experienced an overfill condition. The tank top was wet, and adjacent tanks exhibited splash marks. Please determine the amount of product released into the containment unit.

Please be advised that this agency may have additional questions concerning the registration date(s) of the present tank farm units based on information in both the Contamination Assessment Report, and from the aerial photographs.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO[illegible]TANT STORAGE TANK SYSTEM
INSPE[illegible]ION REPORT FORM - COVER PA[illegible]E

PRINTED: 05/14/96

FACILITY ID #: 528624557 COUNTY: PINELLAS
FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC
FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG
FACILITY CONTACT: TIM HAGAN PHONE: (813) 327-8467
OWNER: HOWCO ENVIRONMENTAL SERVICES INC PHONE: (813) 327-8467
OWNER ADDRESS: 843 43RD ST S, SAINT PETERSBURG, FL, 33711-1922
OWNER CONTACT: TIM HAGAN OWNER CHANGE DATE: 06/16/93
LATITUDE:27-45-47 LONGITUDE:82-41-32 FAC TYPE: NON-RETAIL BUSINESS
LAST UST COMPLIANCE DATE:00/00/00 LAST AST COMPLIANCE DATE:11/02/94
CONTAMINATION DATA AVAILABLE: OTHER ATRP

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
1	2000	A	XX/XX	A	D	C	I	B
100	29500	L	XX/80	A	ACK	BI	M	U
101	28500	L	XX/80	A	ACK	BI	M	U
105	14000	L	XX/80	A	CKM	BI	M	U
106	9870	L	XX/80	A	CKM	BI	M	U
120	21775	L	XX/80	A	ACK	BI	M	U
121	27989	L	XX/80	A	ACK	BI	M	U
122	27989	L	XX/80	A	ACK	BI	M	U
123	27989	L	XX/80	A	ACK	BI	M	U
124	27989	L	XX/80	A	ACK	BI	M	U
125	18040	L	XX/80	A	ACK	BI	M	U
126	18565	L	XX/80	A	ACK	BI	M	U
127	18565	L	XX/80	A	ACK	BI	M	U
128	23792	L	XX/80	A	ACK	BI	M	U
129	21775	L	XX/80	A	ACK	BI	M	U
140	26041	L	XX/80	A	ACK	CKM	M	U
141 wst.	17432	L	XX/80	A	ACK	CKM	M	U
142 use.	17432	L	XX/80	A	ACK	CKM	M	U
143	17013	L	XX/80	A	ACK	CKM	M	U
144	18886	L	XX/80	A	ACK	CKM	M	U
150	15000	L	XX/80	A	ACK	CKM	M	U
151	15000	L	XX/80	A	ACK	CKM	M	U
152	28130	L	XX/80	A	ACK	CKM	M	U
153	20531	L	XX/80	A	ACK	CKM	M	U
154	18172	L	XX/80	A	ACK	CKM	M	U
155	20139	L	XX/80	A	ACK	CKM	M	U
160	14792	L	XX/80	A	ACK	CKM	M	U

MORE TANKS LISTED NEXT PAGE

AST

INSPECTION TYPE (ALL THAT APPLY)
- [X] ROUTINE
- [ ] INSTALL
- [ ] ABANDONED
- [ ] DISCHARGE
- [ ] CLOSURE
- [ ] REINSPECT

SITE INFORMATION (ALL THAT APPLY)
- [ ] NEAR PUB WELL
- [ ] CONTAMINATED
- [ ] COMPLAINT
- [ ] ACID TANKS
- [ ] REPAIRED
- [ ] UPGRADED
- [ ] UST & AST
- [ ] HAZARD MAT

DEP DISTRICT OR LOCAL PROGRAM: Pinellas CPHU-ENGINEERING

INSPECTOR NAME (PRINT) E.M. Roggelin CONTACT NAME (PRINT) BOB BOYETT

E.M. Roggelin 5-15-96 Bob Boyett 5/15/96

INSPECTOR'S SIGNATURE & DATE CONTACT'S SIGNATURE & DATE

W/ J.A. Sowers

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
POLLUTANT STORAGE TANK SYSTEM
INSPECTION REPORT FORM - COVER PAGE

PRINTED: 05/14/96

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
161	14792	L	XX/80	A	CKM	BI	M	U
162	14792	L	XX/80	A	CKM	BI	M	U
163	14792	L	XX/80	A	ACK	CKM	M	U
164	18832	L	XX/80	A	ACK	CKM	M	U
165	18618	L	XX/80	A	ACK	CKM	M	U
166	15000	L	XX/80	A	ACK	CKM	M	U
170	11000	L	XX/80	A	ACK	ACK	M	U
171	9607	L	XX/80	A	ACK	ACK	M	U
172	9703	L	XX/80	A	ACK	ACK	M	U
173	5500	L	XX/80	A	ACK	ACK	M	U
174	2898	L	XX/80	A	ACK	ACK	M	U
180	56796	L	XX/80	A	ACK	CKM	M	U
2	4000	D	XX/XX	A	D	C	I	B
3	3000	D	XX/87	A	AEK	D	BC	U

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
PETROLEUM STORAGE TANK SYSTEM
INSPECTION REPORT FORM - COVER PAGE

PRINTED: 05/14/96

FACILITY ID #: 528624557 COUNTY: PINELLAS
FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC
FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG
FACILITY CONTACT: TIM HAGAN PHONE: (813) 327-8467

COMMENTS: DISCUSS CLOSURE WITH PEDRO VARGAS-PRADA 538-7277 ext 137 Re EXISTENCE OF 2° CONTAINMENT.
- PROVIDE NARRATIVE OF TANK #120 REMOVAL, RECEIPTS.
- HAVE EGS PROVIDE GWTR FLOW DIRECTION & HYDRAULIC CONDUCTIVITY DATA FOR MW#11.
- SUBMIT STRF FOR REMOVAL OF TANK #120.
- BEGIN MONTHLY SAMPLING & RECORD FOR MW#11
- TANK #142 - REPAIR ROOF HOLE.
- EXPLAIN APPARENT OVERFLOW SITUATION TANK #141 (AMOUNT SPILLED)
- MAJOR RETROFIT DATE 12-31-99

NOTE: CRACKS IN WALLS/FLOORS OF WEST & EAST TANK FARMS; PROBLEMS WITH MORTAR SEVERAL AREAS.

NOTE: PEELING PAINT/CORROSION ON TANKS - RECORD AS NOTED.

TANK #130 HORIZONTAL. SADDLE DAMAGED

NOTE: TANKS WITH DEFORMITIES.

FORMER PUMP LOCATION IN FLOOR - COLLECTS OIL.

Name: HOWCO
Facility I.D.#: 528624557
Date: 5-15-96

ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
I.	REGISTRATION/NOTIFICATION: Comments:					
	1. Facility has registered all applicable tanks on site; 62-762.400	1.	X			
	2. Current registration placard is properly displayed; 62-762.410 (6)	2.	X			
	Proper notification has been made for the following; 62-762.450:					
	3. Abandonment and closure (30 days prior); (1) (a) Tank #120	3.		X		
	4. Change of ownership (30 days after); (1) (b)	4.				X
	5. Retrofitting, replacement or upgrading; (10 days prior); (1) (c)	5.				X
	6. Change of tank status (in service/out of service); (1) (d)	6.				X
	7. Change of facility status (e.g. substances stored); (1) (e)	7.				X
	8. Change of method of financial responsibility (within 30 days); (2)	8.				X
	9. The facility owner/operator notified D.E.R. of internal tank inspection 24 hrs prior to the test; (3)	9.				X
	10. Loss of greater that 100 gallons on an impervious surface or 500 gallons inside secondary containment within one working day; .450 (4)	10.				X
II.	RECORDS KEEPING: Comments: #11 - MONITOR WELL MONTHLY DATA					
	11. All records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	11.		X		
	12. Some, but not all records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	12.	X			
III.	REPORTING/DISCHARGE RESPONSE/ REPAIRS: Comments:					
	Proper reporting requirements met for the following; 62-762.460:					
	13. Integral piping tightness test failure within 10 days; (1)	13.				X
	14. Pollutant discharge exceeding 25 gallons on a pervious surface; (2)	14.	X			
	15. Positive response of a release detection device with one working day; (3)	15.				X
	The owner or the operator of the system which has discharged has:					
	16. Taken it out-of-service; 62-762.700 (1); had it repaired or replaced; .700, or properly closed it; .800 tank has been removed.	16.	X			
	17. Removed any regulated substances from the system; 62-762.820 (1)	17.				X
	18. Tightness tested all repaired components before placing them back in service; 62-762.700 (5) & (6)	18.				X
	19. Begun initial corrective actions for a release; 62-762.820 (2)	19.				X
IV.	INVENTORY REQUIREMENTS FOR TANKS IN CONTACT WITH THE SOIL: Comments:					
	20. All inventory requirements maintained in accordance with 62-762.720 (1)	20.				X
	21. Some, but not all inventory requirements maintained in accordance with 62-762.720 (1)	21.				X

Name: HOWCO
Facility I.D.#: 528624557
Date: 6-15-96

ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
V.	PERFORMANCE STANDARDS/CATHODIC PROTECTION: Comments:					
	Storage tank criteria; 62-762.500					
	22. Meets construction upgrading schedule; .510 and .520	22.				X
	23. Meets applicable storage tank standards; (1), (2) & (3)	23.	X			
	24. Tank has secondary containment system; .500 (6) concrete, block, asphalt wall	24.	X			
	25. Tank equipped with overfill protection; (3) (f) 1-4, (g)	25.				X
	Piping criteria					
	26. Meets new piping standards with secondary containment; .500 (4) & .600 (4)	26.				X
	27. Meets construction upgrading schedule; 62-762.510 (3) , & .520 (2)	27.				X
	Repairs to storage tank systems; 62-762.700					
	28. Failed storage tank system component properly required; (1)-(4) #142.	28.			X	
	29. Tightness testing of the required component prior to being brought back into service; (5)	29.				X
	Cathodic Protection; 62-762.730					
	30. Cathodic protection system for tank and piping provides continuous protection; (1)-(4)	30.				X
	Secondary containment; 62-762.500					
	31. Does containment are have sufficient volume; .500 (6) (a) (2)	31.	X			
	32. Is the containment area made out of impervious material in accordance with Chapter 62-762, F.A.C., requirements; (6) (a) (1) hollow block, cracking walls/floor	32.			X	
	33. Is the containment area equipped with drainage system or protected from accumulation of rain; (6) (a) (3)	33.	X			
	34. Hydrant pits equipped with spill prevention equipment; (5)	34.				X

#35 - RECORD DETAILS AS NOTED ON PLANT TOUR.

VI.	RELEASE DETECTION/MONITOR WELLS: Comments: #36 PROVIDE GWTR FLOW DIRECTION; HYDRAULIC CONDUCTIVITY DATA. #35 SAME.					
	35. Facility has an approved released-detection system; 62-762.600 & 62-762.860	35.			X	
	36. Monitoring wells properly designed, constructed and installed; 62-762.640 or 62-762.600 (6)	36.			X	
	37. Interstitial monitoring adequate to detect a release from integral piping; 62-762.600 (4) & (5)	37.				X

VII.	OUT-OF SERVICE STATUS: Comments:					
	38. Are the corrosive protection devices properly maintained; 62-762.800 (1) (a)	38.				X
	39. Is the vent line and other ancillary equipment properly secured and maintained; (1) (b)	39.				X
	40. Test performed to insure the integrity of out-of-service system prior to being returned to service; (1) (c)	40.				X

VIII.	VARIANCE: Comments:					
	41. Has the facility for an Alternate Procedure; 62-762.850 (1)	41.				X

IX.	OTHERS: Comments:					
	42. Any other violation noted during inspection (Explain in comments)	42.				X

HOWCO
ENVIRONMENTAL SERVICES INC.
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

24557

HRS PINELLAS COUNTY PUBLIC HEALTH UNIT
FEB 24 1994
ENGINEERING

February 21, 1994

Mr. Earnest M. Roggelin, Environmental Specialist III
Pollutant Storage Tank Program
Pinellas County Public Health Unit
4175 East Bay Drive
Clearwater, Fl 34624-6966

Dear Mr. Roggelin:

We are in receipt of your letter dated February 15, 1994 wherein you discussed the controlled overflow/discharge event that took place at our facility recently.

In response to your request for information, the following is provided:

A. The approximate one inch of oil sludge which appears on the bottom of the containment once the liquid has been removed is a product of two factors:

1. The oil that rides up and down on the water that is in the various tanks that are being overflowed has an emulsified layer.

2. The oil that constantly sits in the containment sump is a sufficient quantity even though not in excess of five hundred gallons to generate an emulsified layer of semi-solids once the containment has been pumped out.

It is our contention that at no time was there more than five hundred gallons of petroleum product in the containment area. The sludge as you call it was a product of the emulsification of the oil that was present plus the water and the fact that as we pulled the water out the oil further emulsifies some portion of the water on its way down to the concrete floor.

Please understand that it is our intent that at any time we have a discharge of petroleum products into a containment area which is in excess of five hundred gallons, we will make the necessary reports immediately and infact file a discharge report to your office for review. It is rare but not impossible for this containment to have product in it again. These are most generally due to excessively quick and heavy rainfalls and on very rare occasions, this being one, there can be a mechanical failure which produced excess product in the containment area. As you are aware, we initially had the fire department inspect the premises thoroughly after the report was

made by the City St. Petersburg Officials. Their inspection revealed that there is a film of oil on the top of the water in the containment area and this film could not have been five hundred gallons of petroleum. Also, immediately upon our discovering the containment had product in it, we initiated a clean-up procedure which began with the removal of the liquids. Upon your arrival, we had just finished removing the liquids and were in the process of cleaning the bottom manually. This cleaning process takes an extensive amount of time and man power and would not be an immediate removal. This therefore is why you found approximately one inch of emulsive semi-solids on the containment floor.

Your concern for the registration for our skid tank in the facility yard is understandable. We are not unwilling to register this tank if the determination by your office is that is does not qualify as a portable or mobile tank by virtue of the Florida Statues. Please advise if it is your decision that it must be registered. In that event we will provide the necessary submission to Tallahassee for registration.

Your decision to allow our registration of all tanks to be named used oil is appreciated. We felt that this was the only rational way to register our tanks considering that the potential for used oil is always there and rather than have misleading association of name for any possible emergency it would be logical and more protective to maintain the used oil status.

I hope this explanation will satisfactory for the purposes for your inspection and we look forward to your eventual annual visit for compliance inspection later this year.

Sincerely,

Richard J. King

RK/ts

February 15, 1994

R. J. King
Tim's Oil Recovery, Inc.
843 43rd Street South
St. Petersburg, FL 33711-1922

Re: 528624557
Tim's Oil Recovery, Inc.
843 43rd Street South
St Petersburg
PINELLAS

Subject: Controlled Overflow/Discharge Event

Dear Mr. King:

On February 10, 1994 Joseph Sowers and I met with you briefly to investigate a complaint that this agency received from the City of St. Petersburg via the Department of Environmental Protection. The subject event occurred on February 7, 1993. The following items require a response:

a. You indicated to this agency that approximately "5000 gallons of water with 1/4 inch of product" was determined to constitute the "controlled overflow" event. Upon consideration, the containment area when viewed held approximately one inch of waste oil sludge which appears to be denser than water. If so, how will this amount of product factor into the controlled overflow amount discharged? As was discussed, a release of 500 gallons or more must be reported to the Department of Environmental Protection as a discharge.

b. During your overview of the event, you indicated that the eastern containment area contains oil/water separators and processed water tanks. The separators receive a broad spectrum of water/oil from the yard drains, and therefore appear not to be regulated under Florida Administrative Code Chapter 17-762. Please read the accompanying memorandum dated May 30, 1991. If this interpretation holds true, then the PCPHU would be concerned only with the western containment area, and the "skid tank" for compliance activities.

Relative to our discussion on the identification of the facility's tanks as waste/used oil, "L", this agency will continue to accept that determination at this time. While your company collects a broad spectrum of "waste" products including: gasoline, vehicle

PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4175 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624-6966
TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

LAWTON CHILES, GOVERNOR

diesel, home heating oil, used lube oil, etc. the blending both on the truck and on-site in the large volume tanks probably reduces the non-lube constituents to a de minimus quantity.

Late this year during your routine compliance inspection this agency will need to assemble a flow chart of the western containment area tanks, along with all associated piping. If I may be of further assistance, please contact me at 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

cc: Randy Strauss, DEP Tampa
John Parnell, City of St. Petersburg

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee
Location:
Location:
To: Location:
From: Date:

Interoffice Memorandum

HRS PINELLAS COUNTY
PUBLIC HEALTH UNIT

ENGINEERING
D. E. R.
JUN - 5 1991
SOUTHWEST DISTRICT
TAMPA

TO: Deputy Assistant Secretaries
Waste Program Administrators
Tanks Section Supervisors

FROM: John Ruddell, Acting Director
Division of Waste Management

DATE: May 30, 1991

SUBJECT: Oil Water/Separators

The 1990 legislature amended the definition of petroleum storage systems in Section 376.301, Florida Statutes. This amendment states,

> Petroleum storage systems may also include oil/water separators,... (underline added for emphasis)

The intent of this amendment was to allow Early Detection Incentive (EDI) and Petroleum Liability Insurance Program (PLIRP) eligibility consideration for leaks from oil/water separators. The primary consideration was for oil/water separators connected by integral piping to above ground bulk terminal facilities.

On January 17 staff from the Bureau of Waste Cleanup, Bureau of Waste Planning and Regulation, Bureau of Water Facilities Planning and Regulation, Petroleum Insurance and the Office of General Counsel met to formalize the Department's position on oil/water separators. The following is the result of that meeting:

- Many structures are called oil/water separators but certain criteria must be met for such a structure to be considered a petroleum storage system. These criteria include:

  1. the oil/water separator has piping connections to and services a petroleum product tank

  2. the oil/water separator only receives and holds petroleum products and water

3. the oil/water separator is constructed to contain, without discharge, all petroleum products and water

4. the oil/water separator system is closed to the environment

- The following types of oil water separators are <u>not</u> considered petroleum storage systems:

1. those receiving broad spectrum waste materials such as from stormwater runoff, car washes or service bays

2. those constructed with drainfields, soakage pits, grease traps, septic tanks, surface water or soil discharges

- To be eligible for EDI or PLIRP a contamination problem from an oil/water separator that meets the criteria for petroleum storage system must be related to a leak, not disposal. Disposal of contaminants such as the discharge of tank drawdown waters is not eligible for funds under the various cleanup programs.

If you have any questions, please contact Pat Dugan at SC 277-3299.

JR/lfk

cc: Janet Bowman
Phil Coram
Kirste Johnson
Doug Jones
Beth Lowry
Bill Truman
Mary Jean Yon

Need from Howco:

① Monthly certified lab oil shipment verification analyses. don't have any

② ~~Chain~~ Paperwork trail between outgoing oil batch analyses & Certificate provided with shipment, i.e. lab records of A.A. analyses w/ regard to Pb level, specifically.

③ My 40 CFR? Log book

④ Make/model of sniffer.
~~③~~ Purchase from Grainger Snap-ON.

① → Monthly composite metals/PCB's

Telecon w/ Richard Dillas 10/29/96 —
① will send year-to-date of outside
Mo. 9/96.
lab analyses. for ON-SPEC oil shipments.
Said they are a composite of all.
~~[illegible]~~3. the batches shipped during the month.
③ will send make & model of sniffer
② Said he has lab log of all ON-SPEC oil analyses.
and they can be matched up to the Certificates.

Howco

10/16/96

Time: 10:00 AM

Incoming Waste

Generator	Tel #	Contact	Type of waste	Invoice	Halogen detector	Dexsil test
Mikes Auto 2120 Central Ave St. Pete, 33712	895-5424	Mike Walker	Used oil 200 gal	176769	Pass	N/A
Mitchell Transport 9516 E. MLK Blvd Tampa, 33610	621-0099		140	176869	"	"
Mills Compressor Service 5602 Causeway Blvd Tampa, 33619	623-3513		25	173675	"	"
Montgomery Ward #1446 2252 University Sq Mall Tampa, 33612	975-7561	Scott Factor	Used antifreeze 120	176208	"	"
Metal Processors, Inc. 200 S. Falkenburg Rd Tampa, 33619	654-0050	Bill Winnett	used oil 125	170774	"	"
Mike's Texaco 2736 9th Ave N. St. Pete, 33713	323-0180		200	176735	"	"
Morrow Crane Co. 7603 Industrial Lane Tampa, 33637	988-1054		275	170680	"	"
Middleton's Best Value 2740 9th Street N St. Pete, 33704	822-5820	Dan Middleton	200	170487	"	"
Ed's Auto Repair 14723 N. Florida Ave Tampa, 34689	961-6133		120	176345	"	"

June '96 ≈ 16,200 gals incoming used oil (no charge receipts)

September '96 ≈ 12,025 gals (no charge)

Time: 10:00 AM.
10/16/96

Howco/St. Petersburg Inspection - October 16, 1996

Participants:

Bill Crawford, Roger Evans, Randy Strauss - FDEP; Jose Rodriquez - Pinellas Co. DEM Air Program; Ernest Roggelin - HRS Pinellas Co. Storage Tank Program; Roy Williams - City of St. Petersburg Fire & Rescue/Prevention Div.

Purpose:

Multi-media compliance inspection of air program, used oil, solid waste, PCW, storage tank and fire and public safety requirements. Verify sources and waste determination procedures for used oil, PCW, exempt and other solid wastes accepted from off-site, and determine characterization and disposition of resulting products and wastes generated on-site. Review processing plant operations and verify process descriptions, flow diagrams, and records as pertinent to fire prevention/public safety, air pollution control and waste management requirements.

Applicable Regulations and Permits:

40 CFR 279 & 62-710 F.A.C. - Used Oil Management Standards

General Permit - Used Oil Recycling Facility

40 CFR 262.11 - Hazardous Waste Determination Requirement

62-740 F.A.C. - Petroleum Contact Water (PCW) Management Standards

62- 762 F.A.C. - Aboveground Storage Tank Regulations

Air Permit - 62-204 through 62-297 F.A.C. as applicable

Industrial Wastewater Discharge Permit - City of St. Petersburg POTW

National and City of St. Petersburg Fire & Public Safety Codes/Standards

Records Required

- Used oil pick-ups - past year
- PCW pick-ups/Waste profiles - past year
- Processed oil shipments/analyses - past year
- Burner fuel analyses
- Other solid wastes received (bulk/soil wastes, drummed wastes) - past year
- Off-site disposal locations/waste analyses for other wastes - past year
- Any analyses available for on-site generated waste (filter press sludge, process plant solids, wastewater treatment carbon/sand filter waste)
- Tank/secondary containment inspections, underground piping MW leak detection records
- Training records

Background Information/General Questions:

1. Are there process flow schematic diagrams w/ sampling port locations of the used oil and/or wastewater plants?

   No piping diagrams, but there is a process flow diagram

2. Is there an inventory of solid wastes on-site other than those stored or in-process within the oil and wastewater plants, i. e. tanker contents, solid waste drums, solid waste pile. Is there a liquid/solid separation operation - solids to solid waste pile, liquids to oil/wastewater plant?

   Petroleum contaminated soils => Geologic Recovery (dirt burner) in Polk Co.

3. What wastes other than automotive used oil are transported and processed in the processing plant, i.e. anti-freeze, CESQG waste solvent, parts washer solvent (mineral spirits, citrus-based, high flash non-listed solvents), industrial machine oils and cutting/cooling fluids, waste gasoline? Are these mixed in the trucks or segregated from automotive used oils?

   - automotive used oil
   - water + antifreeze → treated thru wastewater plant
   - waste gasoline (from marinas, etc.)
   - jet fuels

4. What is the make and model of "sniffer" used? Is it specific for halogens/chlorine - or a general OVA? How many Chlor-D-Tect Kits are purchased/used per month?

   (in field) Basic sniffer set at approx. 800 - 900 ppm just an audible alarm

   (at plant) Dexel Titration Kit
   X-ray fluorescent test

5. General discussion of '94 and '95 Used Oil Annual Reports. Do quantities include PCW? Why is there no amount listed for "marketed as on-spec or off-spec fuel?" What are the "industrial processes" oil is used for - facilities? What is the amount of used oil fuel burned on-site?

   PPW - petroleum products & water (is another source but not regared as PCW)

   Phosphate industry

[redacted]

Only 1 Heater on-site

2 Tanks (136 & 137) horizontal tanks used to store product for burner

6. Is new parts washer solvent supplied and spent solvent picked-up for processing/recycling?

   Howco Clean - high flash solvent petroleum based (manufactured by Ashland)

   Spent solvent will be burned for energy recovery

7. What and where are "YBOR #1-#3" tanks (185-187) and "BARGE-TAMPA" (196) listed on "Tank Data Sheet?"

   Rented tanks from Ybor City - Radian Oil

   Rented barge - International Ship

   Rented for excess storage in one of their busy seasons

   gasoline components

8. Is average analysis available for "light ends" - storage location/amounts/disposition - DEP WM permit says goes to wastewater treatment?

   Light ends is a by-product of the distillation process

   2 ways of treating oil:
   - Cooking it & let water drop out (never get 100% water removal)
   - Distillation tower to get away from emulisifer

   Blended-in of used oils with light ends for shipments

   Distillation tower - water / light ends / oil (same as flash tower)

9. Disposal location/transport method of scrap filters?

10. Update status of underground piping from wash rack sump to process plant.

11. What is minimum amount for no-charge pick-up - presuming no water/used oil?

    200-gals min. (4 to 5 drums)

12. Names and titles of plant Emergency Coordinators

2 - 20,000 oil wate. tankers

1 - 55 gal drum labeled Haz Waste by filter press. (Manifest # 175775)
appears to be full, no accum date, no info.

1 - 55 gal of misc sludge, not closed,

Filter press is for the wastewater treatment only

Oil shaker solids is mixed with fill

Total Chlorine (inorganic & organic) using X-ray machine (> 1000 ppm)
up to 4000 ppm
Robut presumption by doing a GC-Test

X-ray test — Richard Dillen - Lab Chemist
PPM Cl
% Sulphur

Howco ~~Hazardous~~ brokers ~~of~~ HW thru Permafix

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

February 8, 1996

HOWCO NUMBER: 1791

Ken Marks Ford
24825 US 19 North
Clearwater, FL 34623

MATRIX: Antifreeze

DATE RECEIVED: February 1, 1996 DATE COMPLETED: February 7, 1996

CERTIFICATE OF ANALYSIS

TCLP METALS

ANALYSIS	METHOD	RESULTS	DETECTABLE LIMIT
Lead	7420	0.2 mg/ℓ	0.10 mg/ℓ

EPA METHOD 8020

VOLATILE AROMATICS	RESULTS	DETECTABLE LIMIT
Benzene	BDL	25 μg/ℓ
Chlorobenzene	BDL	25 μg/ℓ
1,4-Dichlorobenzene	BDL	25 μg/ℓ
Ethylbenzene	BDL	25 μg/ℓ
Methyl Ethyl Ketone	BDL	25 μg/ℓ
Methyl Tert Butyl Ether	BDL	25 μg/ℓ
Toluene	BDL	25 μg/ℓ
m-Xylene & p-Xylene	66 μg/ℓ	25 μg/ℓ
o-Xylene	183μg/ℓ	25 μg/ℓ

SURROGATE	% RECOV	LIMITS
Bromofluorobenzene	96	16 - 167

BDL = Below Detection Limit
All analyses were performed in accordance with E.P.A., A.S.T.M., Standard Methods or other F.D.E.R. approved procedures.

CERTIFICATE OF ANALYSIS

EPA METHOD 8010

VOLATILE HALOCARBONS	RESULTS	DETECTABLE LIMIT
Carbon Tetrachloride	BDL	25 µg/ℓ
Chlorobenzene	BDL	25 µg/ℓ
Chloroform	BDL	25 µg/ℓ
1,4-Dichlorobenzene	BDL	25 µg/ℓ
1,2-Dichloroethane	BDL	25 µg/ℓ
1,1-Dichloroethylene	BDL	25 µg/ℓ
1,1,1-Trichloroethane	BDL	25 µg/ℓ
Tetrachloroethylene	2,200 µg/ℓ	25 µg/ℓ
Trichloroethylene	BDL	25 µg/ℓ
Vinyl Chloride	BDL	25 µg/ℓ

SURROGATE	% RECOV	LIMITS
Bromofluorobenzene	93	22 - 154

BDL = Below Detection Limit
All analyses were performed in accordance with E.P.A., A.S.T.M., Standard Methods or other F.D.E.R. approved procedures.

Respectfully submitted,

Richard Dillen
Laboratory Chemist

cc: Accounting.
Customer Service

HOWCO
ENVIRONMENTAL SERVICES
843 43rd Street South
St. Petersburg, Florida 33711

EPA I.D. FLD 152-764-767

EMERGENCY CONTACT: 1-800-435-8467

U.A.U.O.S.

162394

F7FC-1 RTE:4WK STP:6 FRQ:7

CERTIFIED MANIFEST/INVOICE

No. 162394

BILL TO:	GENERATOR/CUSTOMER:
KEN MARKS FORD - CLEARWATER 24825 US 19 NORTH CLEARWATER, FL 34623-3999 (813) 797-2277	KEN MARKS FORD - CLEARWATER 24825 US 19 NORTH CLEARWATER, FL 34623-3999 (813) 797-2277

HM	PROPER SHIPPING NAME/DESCRIPTION	HAZARD CLASS	I.D. Number	Pkg. Grp.	Unit	Estimated Quantity	Actual Quantity	Unit Price	Total Price
X	Fuel Oil (*No. 1, 2, 4, 5, or 6*) Flammable Liquid	3	NA1993	III	Gls.				
X	Flammable Liquids, n.o.s. (*Used Antifreeze*)	3	UN1993	I			260		
X	Combustible Liquid, n.o.s. (*Used Oil*)	COMBUSTIBLE LIQUID	NA1993	III			650		
X	Combustible Liquid, n.o.s. (*Water Soluble Oil*)	COMBUSTIBLE LIQUID	NA1993	III					
X	Combustible Liquid, n.o.s. (*Petroleum Contact Water*)	COMBUSTIBLE LIQUID	NA1993	III					
X	Combustible Liquid, n.o.s. (*Used Oil & Water Mix*)	COMBUSTIBLE LIQUID	NA1993	III					
	Used Oil Filters								
	Empty Drums								
	Contaminated Absorbent								
	Clean Absorbent								
	Sludge								
	TOTAL								

ARRIVAL TIME	DEPART TIME	CASH	CHARGE	CHECK NO.	C.O.D.	P.O. REQ'D	CUSTOMER P.O.#
1025	1055		✓		OPEN	NO	

TRANSPORTER/RECYCLER/CERTIFICATION

THIS IS TO CERTIFY THE ABOVE DESCRIBED MATERIALS HAVE BEEN PICKED UP AND WILL BE TRANSPORTED, TREATED, REPROCESSED AND/OR DISPOSED OF IN A MANNER PURSUANT TO ALL FEDERAL, STATE AND LOCAL LAWS AND GUIDELINES.

[signature] 470 1/31/96 32

DRIVERS SIGNATURE DATE TRUCK/TRAILER #

THIS IS TO CERTIFY THAT THE ABOVE-NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

PER ______

OIL FILTER DRUMS TO BE SERVICED ______ COMMENTS: ______

HOWCO FACILITY SIGNATURE (FOR PCW) ______ RECEIVING DATE ______

BY MY SIGNATURE BELOW I ACKNOWLEDGE AND AGREE WITH THE ABOVE AND FURTHER ACKNOWLEDGE THAT I HAVE READ AND AGREE TO THE PROVISIONS AND TERMS SET FORTH ON THE REVERSE SIDE OF THIS MANIFEST.

Jim Simmons 1/31/96

CUSTOMER SIGNATURE TITLE DATE

CUSTOMER COPY

NATIONAL OIL RECYCLERS NORA

HRS Pinellas County Public Health Unit

November 27, 1996

D.E.P.
DEC 03 1996
SOUTHWEST DISTRICT
TAMPA

Tim Hagan
HOWCO Environmental Services, ~~Inc.~~ ER
843 43rd Street South
St. Petersburg, FL 33711-1922

Re: **528624557**
HOWCO Environmental Services ~~Inc.~~ ER
St. Petersburg
PINELLAS

Dear Mr. Hagan:

On October 21, 1996 this agency issued a non-compliance letter, to your attention, reflecting issues revealed during the multi-agency inspection of October 16-17, 1996. On November 5, 1996 this agency received your September 9, 1996 letter addressing non-compliance issues from a May 15, 1996 compliance inspection. The issues raised during May 1996 remain, for the most part, unaddressed as of the October 1996 visit.

Please provide a timely response to the following:

- During the October 1996 visit you indicated that "line pressure testing" would be performed within 30 days of October 17, 1996. Please submit the test data at this time.

- Provide a repair invoice for the hole in the roof of tank 142; this item was first noted during the May 15, 1996 inspection. It has been previously requested that a non-destructive evaluation of the tank shell be conducted; please advise this agency if this test has been performed by HOWCO.

Based on your September 9, 1996 letter, item #2 response, it is this agency's interpretation that you have **confirmed** that your tank farm facilities **do not have impervious secondary containment.** You are correct in noting that aboveground tanks specifically regulated under Florida Administrative Code Chapter 62-762.510(4) containing "other pollutants" have until December 31, 1999 to meet the designated code requirements.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4175 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624-6966
TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

LAWTON CHILES, GOVERNOR

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

5286295 7

HRS PINELLAS COUNTY PUBLIC HEALTH
NOV 05 1996
ENVIRONMENTAL ENGINEERING

September 9, 1996

Mr. Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program
Pinellas County Public Health Unit
Engineering - Suite 300
4176 East Bay Drive
Clearwater, FL 34624-6966

Dear Mr. Roggelin:

This is in response to your letter dated June 11, 1996 and addresses the issues related to your compliance inspection on May 15, 1996. The items are listed to correspond with the item numbers referred to in your letter.

Item 1 - HOWCO has decided to use the "pipe pressure test" for our release detection system for the underground transfer piping connection on the west and east tank farm. This test will be performed within the next thirty (30) days and the results will be forwarded to your attention.

Item 2 - On or about November 15, 1995, a routine inspection was made. At this time Pedro Gonsallas explained to me that we have until 1999 to retrofit the secondary containment wall around the west tank farm. Based on this information HOWCO is planning to replace the asphalt burned dike to concrete dike walls. We also plan to add a new concrete bottom slab to this area at the same time we are installing the concrete walls. This is a major undertaking and will require a lengthy planning period. We do expect to have it completed within the required time frame of 1999.

Item 4 - The required submission of the storage tank registration farm has been completed and mailed to the DEP in Tallahassee along with a copy to your agency.

Item 5 - HOWCO has chosen to use the "pipe pressure test" method. The release detection and results are outlined in Item 1.

Item 6 - HOWCO has changed the format of the monthly release detection form that we are using to include a more detailed reporting of the conditions of the tanks and containment units at the facility.

Item 7 - After an investigation into tank number 141, it was discovered that it may have experienced

843 43rd Street So. • St. Petersburg, FL 33711 • (813) 323-0818 • 1-800-334-6926 • Fax 1-813-323-2249

an overfilled condition. After reviewing the inventory, there was a small amount of product missing from this tank. If the tank was overfilled, it was a very small amount and has been cleaned up. We will keep closer tabs on that tank to ensure that it does not happen again.

Also enclosed are the two copies of the plant layout that you requested. Should you have any further questions, please contact me at (813) 327-8467, extension 226.

Sincerely,

Tim Hagan

Tim Hagan
President/CEO

Enclosure

TH/jh

COMPLAINT FORM
FDEP Southwest District

COMPLAINT # _____ **DATE:** 03/04/96

TYPE OF COMPLAINT: **AIR** **D&F** **GW** **SW** **IW** **DW**
PW **TANKS** **ODOR** **NOISE** **HW(RCRA)** X

COMPLAINANT: Anonymous former employee **PHONE:** (813)

ADDRESS:

CITY: **ZIP:** **COUNTY:** Pinellas

COMPLAINT RECEIVED BY: Randy Strauss **VIA:** Phone.

NATURE OF COMPLAINT: Tim's Oil Recovery/Howco, St. Petersburg
Extension on permit -expired one week ago
Hazardous material: gasoline w/ halogens 11,000
stored in tanks 125 and 135 light ends coming off of cooking process then blended back into processed oil
Sludge press very high in metals - will try to get analyticals
Antifreeze is processed through the plant as "high COD" water - not IDed as antifreeze - Tank 171, 172 stores the antifreeze separated from truck loads - sometimes ship off-site, but sometimes treat in WWT plant
Drums received are not catalogued or tested - liquids just dumped into process system, solids added to "soil pile"
Main yard drain soaked with oil and sludge
Oil/water separator serviced ? maybe once/6months - specified frequency in permit?

LOCATION OF COMPLAINT & DIRECTIONS TO COMPLAINT AREA:

INVESTIGATION PROCEDURE & FINDINGS:

(Continued on page 2)

COMPLAINT FORM – page 2

COMPLAINT # _____

INVESTIGATION PROCEDURE & FINDINGS(CONT.):

CONCLUSION/ACTION:

INVESTIGATION DATES:

TIME SPENT: FIELD: OFFICE: TOTAL HOURS:

INVESTIGATED BY:

INVESTIGATION CLOSED DATE:

INFORMATION REFERRED TO: DATE:

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

November 1, 1996

Mr. Randy Strauss
Florida D.E.P.
3804 Coconut Palm Dr.
Tampa, FL 33619

Dear Mr. Strauss:

Please find enclosed the information, you requested during our telephone conversation on Tuesday, October 29, 1996.

If you have any questions, please do not hestitate to call me at 328-7403 ext. 347.

Sincerely,

Richard Dillen
Laboratory Chemist

cc: Tim Hagan, President, HOWCO Environmental Services

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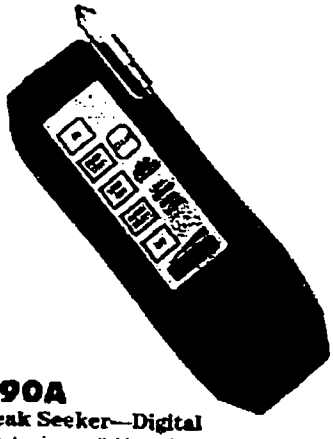


AC790A
A/C Leak Seeker—Digital

• The most unique, reliable, and versatile leak detector ever produced • The state-of-the-art microprocessor based leak-seeker will quickly and easily locate leaks of virtually any size of any refrigerant • The AC790A features the patented SPS ion-pump self-ventilating sensor mounted on a 18" flexible wrap-around probe • A digital sensitivity selector enables the selection of ten different sensitivity levels for locating all types of refrigerant leaks including HFC-134a • An alarm select key enables the selection of the audible alarm, the moving ten segment bar graph display, or a combination of both alarms • For extremely noisy environments an earphone is provided

AC780A
A/C Leak Seeker

• The unique detection circuit design of the AC780A Leak Seeker® combines with the most advanced and sensitive corona discharge sensor ever developed, resulting in an instrument capable of extreme sensitivity and stability, vital to effectively detect small HFC-134a leaks, as well as all CFC and HCFC refrigerants • The AC780A is a professional service tool that is accurate, reliable, simple to operate, and economically priced • A rugged, three position slide switch is used to turn the instrument ON and select either LO or HI sensitivity ranges • The advanced analog circuitry allows detection of 1/10 ounce per year of HFC-134a in the HI sensitivity range • Since the instrument requires no calibration, the user simply selects the desired sensitivity and begins searching for leaks • The wide range audible alarm makes it easy to distinguish small variations in the concentration of the refrigerant gas • An earphone jack is provided for convenience of operation in noisy industrial environments • Visual indication of the leak size is provided by a blinking high-brightness LED • The blinking rate is proportional to the leak size • The visual LED also indicates a low battery condition by turning off when batteries need to be replaced

AC34970
R12/R134 Air Vac

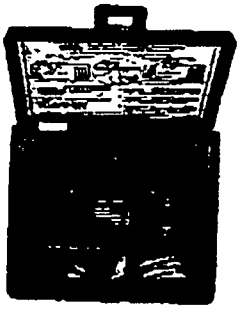
• The ever-so-popular air vac now comes with a dual inlet so you can use the same unit for both R12 and R134 • The rugged Lexan® case is both oil and scratch resistance and incorporates a convenient handle • This air vac is driven by compressed air—there is no oil or moving parts to be replaced

Specifications:

Drive	Air
Free Air Displacement	1 cfm
Number of Stages	Venturi
Input Pressure	75 psi
Vacuum Rating	29.7 in/Hg
Intake Fitting	1/4" MFL and 1/2" acme
Dimensions	4-1/2" h x 4" w x 7-1/2" d
Weight	2 lbs

AC755
A/C Manifo

• Silicone clamp glycerin type • and anodized g manifolds • Sh by using high q connects are th exclusive colo multi-purpose reinforced nyl sanoprene out specifications: pressure of 80 • Quick disco manifold gaug



AC4000A
Electronic Sight Glass With Led

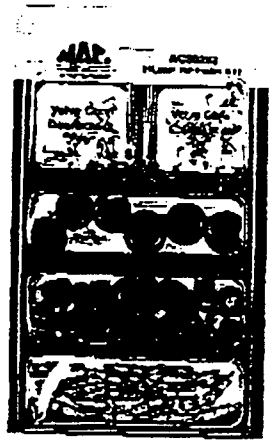
• Eliminates need for optical sight glass • Optimizes refrigerant charge for maximum cooling • Detects starved evaporators • Checks for refrigerant floodback • Maximizes evaporator capacity • Aids in adjusting thermostatic expansion valves • Diagnoses problems in the system • Operates on any metal tubing • Useful on expansion valve and capillary tube systems • Will not penetrate or deform tubing • Operates through use of ultrasonics • Cordless operation • Transducer clamps fit tubing from 1/8" - 1-1/4" in diameter • Two second continuous audible alarm • Handy service hook for easy set-up • Low battery indicator • Made in the U.S.A.

Specifications:

Transducer Cord Length	42" (1066.8mm)
Response Time	4 sec. initially
Temp. Range	32°F-105°F
Power Supply	9v Battery
Battery Life	30 Hrs.
Dimensions	8" x 3" x 1.8" (203.2mm x 76.2mm x 45.7mm)
Weight	14 oz.

AC5650
Multi-Gas Leak Detector

• Specifically designed with enhanced electronic circuitry to meet both current and future leak detection needs • Can be used to detect all class I and class II substances (as defined by the Clean Air Act), HFC refrigerants (R134, R125), halon gases (1211, 1301, etc.), SF-6, ethylene, perchlorethylene, trichlorethylene and most other compounds containing halogens (i.e. chlorine, flourine and bromine) • Visual led leak size indicators • Constant power indication • No dangerous or poisonous gases generated • Rugged probe with 36" (914.4mm) coiled cord • Durable carrying case • Made in the U.S.A.



AC30292
Hose Repair Kit for A/C Hoses

• Consists of the following components:

(12)	1/4" valve core depressors
(12)	3/16" valve core depressors
(12)	hose gaskets, 1/4"
(12)	hose gaskets, 3/16"
(12)	valve core, standard
(6)	valve core deeper
(6)	quick seal o-rings, (red)
(3)	quick seal caps, 1/4" (blue)
(3)	quick seal caps, 3/16" (red)

AC10
A/C Man

• Large 3-1/ dampened elimination operation • block of al • Optical si refrigerant smooth op gauge • Co 72" (1.8m) hoses

SPECIALTY TOOLS

PETROTECH SOUTHEAST, INC.

2681 NE 4TH AVE.
POMPANO BEACH, FL 33064
(954) 943-1549

Mr. Mark Schafer
Howco Environmental Services, Inc.
843 43rd St. South
St. Petersburg, FL 33711

Jan. 25, 1996
Lab #HES51257
Collected by: Client

Site Location/Project
843 43rd St. South St.Petersburg, FL 33711
OB-118

Collected: 01/22/96
Received: 01/22/96

PARAMETER	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
Lead	56.5	mg/kg	3050/7420	1.0	01/24/96	DS
Cadmium	0.55	mg/kg	3050/7130	0.3	01/24/96	DS
Chromium	0.48	mg/kg	3050/7190	2.0	01/24/96	DS
Arsenic	0.26	mg/kg	7061	0.2	01/23/96	DS
Sulfur	0.07	%	D129	0.02	01/23/96	RP
Flashpoint	176'	deg F	1010	60'	01/23/96	RP
API Gravity	27.8/60'	'F	D287		01/23/96	SF
Specific Gravity	0.8895		D1298		01/23/96	SF
Heat of Combustion	132,000 18,710	BTU/Gal BTU/lb	D240		01/23/96	RP
% Water	0.88	%	ASTM	0.1	01/23/96	SF
Total Halogens	488	mg/kg	5050/9252	5.0	01/23/96	RP
Viscosity	285/100'	ssu/'F	D445		01/23/96	RP
Sediment	0.02	%		0.05	01/23/96	SF
Pounds per Gallon	7.0522	lb/gal		0.7000	01/23/96	SF
PCB COMPOUNDS						
PCB 1016	*BDL	mg/kg	8080	0.28	01/24/96	DS
PCB 1221	*BDL	mg/kg	8080	0.62	01/24/96	DS
PCB 1232	*BDL	mg/kg	8080	0.53	01/24/96	DS
PCB 1242	*BDL	mg/kg	8080	1.57	01/24/96	DS
PCB 1248	*BDL	mg/kg	8080	0.32	01/24/96	DS
PCB 1254	*BDL	mg/kg	8080	0.52	01/24/96	DS
PCB 1260	*BDL	mg/kg	8080	2.10	01/24/96	DS

FDEP CompQAP #95-0244
HRS Certification #E86188

BDL: Indicates Analyte is Below Detection Limit
Unless otherwise noted, mg/kg indicates wet weight

John R. Feagle
Operations Manager

PETROTECH SOUTHEAST, INC.

2681 NE 4TH AVE.
POMPANO BEACH, FL 33064
(954) 943-1549

Mr. Mark Schafer
Howco Environmental Services, Inc.
843 43rd St. South
St. Petersburg, FL 33711

Feb. 21, 1996
Lab #HES51281b
Collected by: Client

Site Location/Project
843 43rd St. South St.Petersburg, FL 33711
TK#127

Collected: 02/6/96
Received: 02/8/96

PARAMETER	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
Lead	26.5	mg/kg	3050/7420	1.0	02/13/96	DS
Cadmium	0.41	mg/kg	3050/7130	0.3	02/13/96	DS
Chromium	0.56	mg/kg	3050/7190	1.0	02/13/96	DS
Arsenic	0.33	mg/kg	7061	0.2	02/14/96	DS
Sulfur	0.05	%	D129	0.02	02/14/96	RP
Flashpoint	188'	deg F	1010	60'	02/14/96	RP
API Gravity	27.7/60'	'F	D287		02/14/96	SF
Specific Gravity	0.8895		D1298		02/14/96	SF
Heat of Combustion	135,000 18,100	BTU/Gal BTU/lb	D240		02/14/96	RP
% Water	0.88	%	ASTM	0.1	02/15/96	SF
Total Halogens	488	mg/kg	5050/9252	5.0	02/14/96	RP
Viscosity	265/100'	ssu/'F	D445		02/15/96	RP
Sediment	0.22	%	D4007	0.05	02/15/96	SF
Pounds per Gallon	7.4522	lb/gal	D1250	0.7000	02/15/96	SF

PCB COMPOUNDS						
PCB 1016	*BDL	mg/kg	8080	0.28	02/13/96	DS
PCB 1221	*BDL	mg/kg	8080	0.62	02/13/96	DS
PCB 1232	*BDL	mg/kg	8080	0.53	02/13/96	DS
PCB 1242	*BDL	mg/kg	8080	1.57	02/13/96	DS
PCB 1248	*BDL	mg/kg	8080	0.32	02/13/96	DS
PCB 1254	*BDL	mg/kg	8080	0.52	02/13/96	DS
PCB 1260	*BDL	mg/kg	8080	2.10	02/13/96	DS

FDECompQAP #95-0244
HRS Certification #E86188, E86312

BDL: Indicates Analyte is Below Detection Limit
Unless otherwise noted, mg/kg indicates wet weight

John R. Feagle
Operations Manager

PETROTECH SOUTHEAST, INC.

2681 NE 4TH AVE.
POMPANO BEACH, FL 33064
(954) 943-1549

Mr. Richard Dillen
Howco Environmental Services, Inc.
843 43rd St. South
St. Petersburg, FL 33711

April 15, 1996
Lab #HES51337a
Collected by: Client

Site Location/Project
843 43rd St. South St.Petersburg, FL 33711
Composite Monthly MO0319

Collected: 03/19/96
Received: 03/20/96

PARAMETER	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
Lead	56.0	mg/kg	3050/7420	1.0	3/26/96	rkp
Cadmium	1.02	mg/kg	3050/7130	0.3	3/26/96	rkp
Chromium	1.36	mg/kg	3050/7190	2.0	3/26/96	rkp
Arsenic	0.22	mg/kg	7061	0.2	3/27/96	rkp
Sulfur	0.15	%	D129	0.02	4/06/96	ds
Flashpoint	>160'	deg F	1010	60'	4/05/96	sf
API Gravity	28.0/60'	'F	D287		4/05/96	sf
Specific Gravity	0.8913		D1298		4/05/96	sf
Heat of Combustion	136,000 16,000	BTU/Gal BTU/lb	D240		4/06/96	ds
% Water	1.35	%	D4006	0.1	4/05/96	sf
Total Halogens	545	mg/kg	5050/9252	5.0	4/06/96	ds
Viscosity	280/100'	ssu/'F	D445		4/05/96	sf
Sediment	0.22	%	D96	0.05	4/05/96	ds
Pounds per Gallon	8.5025	lb/gal	D1250	0.7000	4/05/96	sf
PCB COMPOUNDS						
PCB 1016	*BDL	mg/kg	8080	0.28	4/08/96	env
PCB 1221	*BDL	mg/kg	8080	0.62	4/08/96	env
PCB 1232	*BDL	mg/kg	8080	0.53	4/08/96	env
PCB 1242	*BDL	mg/kg	8080	1.57	4/08/96	env
PCB 1248	*BDL	mg/kg	8080	0.32	4/08/96	env
PCB 1254	*BDL	mg/kg	8080	0.52	4/08/96	env
PCB 1260	*BDL	mg/kg	8080	2.10	4/08/96	env

PETROTECH SOUTHEAST, INC.

2681 NE 4TH AVE.
POMPANO BEACH, FL 33064
(954) 943-1549

Mr. Richard Dillen
Howco Environmental Services, Inc.
843 43rd St. South
St. Petersburg, FL 33711

May 9, 1996
Lab #HES51372
Collected by: Client

Site Location/Project
843 43rd St. South St.Petersburg, FL 33711
MO-0502

Collected: 05/2/96
Received: 05/3/96

PARAMETER	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
Lead	51	mg/kg	3051/6010A	10	05/3/96	MEC
Cadmium	*BDL	mg/kg	3051/6010A	1.0	05/3/96	MEC
Chromium	2	mg/kg	3051/6010A	1.0	05/3/96	MEC
Arsenic	*BDL	mg/kg	3051/7060A	1.0	05/3/96	MEC

PCB COMPOUNDS	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
PCB 1016	*BDL	ug/kg	8080	10.0	5/03/96	JGC
PCB 1221	*BDL	ug/kg	8080	10.0	5/03/96	JGC
PCB 1232	*BDL	ug/kg	8080	10.0	5/03/96	JGC
PCB 1242	*BDL	ug/kg	8080	10.0	5/03/96	JGC
PCB 1248	*BDL	ug/kg	8080	10.0	5/03/96	JGC
PCB 1254	*BDL	ug/kg	8080	10.0	5/03/96	JGC
PCB 1260	*BDL	ug/kg	8080	10.0	5/03/96	JGC

FDECompQAP #95-0244
HRS Certification #E86240, 86356

BDL: Indicates Analyte is Below Detection Limit
Unless otherwise noted, mg/kg indicates wet weight

John R. Feagle
Operations Manager

PETROTECH SOUTHEAST, INC.

2681 NE 4TH AVE.
POMPANO BEACH, FL 33064
(954) 943-1549

Mr. Richard Dillen
Howco Environmental Services, Inc.
843 43rd St. South
St. Petersburg, FL 33711

June 13, 1996
Lab #HES51415A
Collected by: Client

Site Location/Project
843 43rd St. South St.Petersburg, FL 33711

Collected: 06/4/96
Received: 06/4/96

#MO604 Oil

PARAMETER	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
Lead	56	mg/kg	3051/6010A	10	6/07/96	MEC
Cadmium	*BDL	mg/kg	3051/6010A	1.0	6/07/96	MEC
Chromium	2	mg/kg	3051/6010A	1.0	6/07/96	MEC
Arsenic	*BDL	mg/kg	3051/7060	1.0	6/11/96	MEC

MO-604 Oil

PCB COMPOUNDS	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
PCB 1016	*BDL	mg/kg	8080	10.0	06/11/96	JGC
PCB 1221	*BDL	mg/kg	8080	10.0	06/11/96	JGC
PCB 1232	*BDL	mg/kg	8080	10.0	06/11/96	JGC
PCB 1242	*BDL	mg/kg	8080	10.0	06/11/96	JGC
PCB 1248	*BDL	mg/kg	8080	10.0	06/11/96	JGC
PCB 1254	*BDL	mg/kg	8080	10.0	06/11/96	JGC
PCB 1260	*BDL	mg/kg	8080	10.0	06/11/96	JGC

FDEP CompQAP #95-0244
HRS Certification #E86240,86356

BDL: Indicates Analyte is Below Detection Limit
Unless otherwise noted, mg/kg indicates wet weight

John R. Feagle
Operations Manager

PETROTECH SOUTHEAST, INC.

2681 NE 4TH AVE.
POMPANO BEACH, FL 33064
(954) 943-1549

Attn: Mr. Richard Dillen
Howco Environmental Services
843 43rd St. South
St. Petersburg, FL 33371

August 19, 1996
Lab #HEC51471

Site Location/Project

Collected: 8/06/96
Received: 8/07/96

MO628

PARAMETER	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
Lead	44.0	mg/l	200.7	0.1	8/12/96	MEC
Cadmium	*BDL	mg/l	200.7	1.0	8/12/96	MEC
Chromium	2.0	mg/l	200.7	1.0	8/12/96	MEC
Arsenic	*BDL	mg/l	206.2	1.0	8/10/96	MEC

PCB COMPOUNDS	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
PCB 1016	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1221	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1232	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1242	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1248	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1254	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1260	*BDL	ug/l	8080	0.5	8/10/96	JGC

FDEP CompQAP #95-0244
HRS Certification # E86240.86356

BDL: Indicates Analyte is Below Detection Limit
0***Unless otherwise noted, mg/kg indicates wet weight***

John R. Feagle
Operations Manager

PETROTECH SOUTHEAST, INC.

2681 NE 4TH AVE.
POMPANO BEACH, FL 33064
(954) 943-1549

Attn: Mr. Richard Dillen
Howco Environmental Services
843 43rd St. South
St. Petersburg, FL 33371

August 19, 1996
Lab #HEC51472

Site Location/Project

Collected: 8/06/96
Received: 8/07/96

MO731

PARAMETER	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
Lead	54.0	mg/l	200.7	0.1	8/12/96	MEC
Cadmium	*BDL	mg/l	200.7	1.0	8/12/96	MEC
Chromium	2.0	mg/l	200.7	1.0	8/12/96	MEC
Arsenic	*BDL	mg/l	206.2	1.0	8/10/96	MEC

PCB COMPOUNDS	RESULT	UNITS	METHOD	DET LIMIT	DATE	ANALYST
PCB 1016	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1221	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1232	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1242	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1248	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1254	*BDL	ug/l	8080	0.5	8/10/96	JGC
PCB 1260	*BDL	ug/l	8080	0.5	8/10/96	JGC

FDEP CompQAP #95-0244
HRS Certification # E86240,86356

BDL: Indicates Analyte is Below Detection Limit
0***Unless otherwise noted, mg/kg indicates wet weight***

John R. Feagle
Operations Manager

Environmental Conservation Laboratories
10207 General Drive
Orlando, Florida 32824
407 / 826-5314
Fax 407 / 850-6945

ENCO Laboratories
DHRS Certification No. E83182

CLIENT : Howco Envir. Services Inc.
ADDRESS: 3701 Central Ave North
St. Petersburg, FL 33713

REPORT # : OR5471.2
DATE SUBMITTED: October 17, 1996
DATE REPORTED : October 24, 1996

ATTENTION: Richard Dillen

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

PROJECT #: PO#13362

Weekly Water

10/16/96 08:00

#1 - MO-996

LABORATORY MANAGER

David J. Vesey

ENCO LABORATORIES
REPORT # : OR5471.2
DATE REPORTED: October 24, 1996
REFERENCE : PO#13362
PROJECT NAME : Weekly Water

RESULTS OF ANALYSIS

EPA METHOD 8080 - PCBS/AROCLORS BY GC/ECD	MO-996	LAB BLANK	Units
Aroclor-1016/1242	5 U D2	5 U	mg/Kg
Aroclor-1221	5 U D2	5 U	mg/Kg
Aroclor-1232	5 U D2	5 U	mg/Kg
Aroclor-1248	5 U D2	5 U	mg/Kg
Aroclor-1254	5 U D2	5 U	mg/Kg
Aroclor-1260	5 U D2	5 U	mg/Kg
Surrogate:	**% RECOV**	**% RECOV**	**LIMITS**
2,4,5,6-TCMX	90	60	30-150
DBC	106	120	29-171
Date Extracted	10/17/96	10/17/96	
Date Analyzed	10/22/96	10/22/96	

TOTAL METALS	METHOD	MO-996	LAB BLANK	Units
Arsenic	7060	0.40 U	0.40 U	mg/Kg
Date Analyzed		10/20/96	10/20/96	
Cadmium	7130	**1.0**	0.80 U	mg/Kg
Date Analyzed		10/19/96	10/19/96	
Chromium	7190	4.0 U	4.0 U	mg/Kg
Date Analyzed		10/20/96	10/20/96	
Lead	7420	**53.2**	4.0 U	mg/Kg
Date Analyzed		10/17/96	10/17/96	

D2 = Analyte value determined from a 1:5 dilution.
U = Compound was analyzed for but not detected.

ENCO LABORATORIES
REPORT # : OR5471.2
DATE REPORTED: October 24, 1996
REFERENCE : PO#13362
PROJECT NAME : Weekly Water

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
EPA Method 8080				
PCB-1260	66/ 65/136	25-174	2	26
Total Metals				
Arsenic, 7060	90/ 84/101	50-135	8	15
Cadmium, 7130	96/ 97/ 98	80-110	1	10
Chromium, 7190	102/106/101	80-115	4	10
Lead, 7420	109/105/106	80-110	4	10

Environmental Conservation Laboratories Comprehensive QA Plan #960038

NA = Not applicable
< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

DATE RECEIVED	SAMPLE #	SAMPLE ORIGIN	ANALYSIS REQUESTED	IN-HOUSE	OUTSIDE LAB	DATE COMPLETED
1-12-96	IMC 215 611 P/O	Howco	LBS/GAL	V		1-12-96
	HARPER #3	Howco	LBS/GAL	V		1-12-96
1-16-96	HARPER #4 (1-15-96)	Howco	LBS/GAL	✓		1-16-96
1-17-96	2357	VAL WARD CADILLAC INC.	8010/8020 TCLP-METALS	✓	PETROTECH	1-30-96 REJECTED
1-19-96	OB-118	Howco oil BATCH TK#137	As, Cd, Cr, Pb, S, TOX, PCB's, FLASH		PETROZUM	1-30-96
	SW-119	Howco SLUDGE PLANT	8-METALS TOTALS TOX, TRPH, PCB's 8010/8020		PETROTECH	1-30-96
1-22-96	A/F ALLEN	Howco	FREEZING POINT	V +2°F		1-22-96
	0122-01	LB SMITH	8010/8020		ENCO	2-1-96
	0122-02	Howco KLEEN	8010/8020		/	2-1-96
1-24-96	AJAX II (1-18-96)	Howco P/O 177	FLASH, BS&W, HAL. BTU, VISC	✓		1-24-96
1-25-96	GRAYCO ENV.	GRAYCO ENV.	BTEX			1-25-96
	1783	BOB WILSON DODGE A/F	TCLP-LEAD	V		FREEZ. PT. -22°F
			BENLENE, TETRA- & TRI CL. ETHYLENE	V ✓		2-6-96

DATE RECEIVED	SAMPLE #	SAMPLE ORIGIN	ANALYSIS REQUESTED	IN-HOUSE	OUTSIDE LAB	DATE COMPLETED
~~1-9-96~~ 2-6-96	1792	SATELITE ARCHERY	8010/8020	✓ RUSH		~~2-8-96~~ REJECTED
	TK#127	HOWCO	BTEX	✓		2-6-96
			MONTHLY OIC		PETROTECH	
	1793	US POST	TOTAL HALOGENS	✓		2-23-96
	2-13-96	OFFICE - TAMPA	FLASHPOINT	✓		
			As, Cd, Cr, Pb		PETROTECH	
			PCB's			
	WW206	HOWCO	WEEKLY WATER		PETROTECH	
	1794	US POST	TCLP - LEAD	✓		2-21-96
		OFFICE - TAMPA	8010/8020	✓		
2-13-96	2461	AIRCRAFT SERV.	TCLP - METALS		PETROTECH	2-23-96
			8010/8020	✓		
	1797	ACCENT AUTO	TCLP - LEAD	✓		2-21-96
			8010/8020	✓		
	1671	TAMPA HONDA	TCLP - LEAD	✓		2-21-96
			8010/8020	✓		
	WW213	HOWCO	MONTHLY WATER		PETROTECH	2-23-96
2-15-96	1796	TYTON CORP.	PREBURN:			~~2-27-96~~
			8010/8020	✓		2-27-96
			TOX, TRPH			
			8-RCRA METALS			
2-16-96	2358	HIGHLAND COUNTY	TCLP - LEAD	✓		2-21-96
			8010/8020	✓		
	2462	KELLY EQUIP. CO	601/602	✓		2-23-96
2-14-96	2340					

DATE RECEIVED	SAMPLE #	SAMPLE ORIGIN	ANALYSIS REQUESTED	IN-HOUSE	OUTSIDE LAB	DATE COMPLETED
3-14-'96	1811	BATES R.V. SOUTH	TCLP-LEAD 8010/8020	FP-38°F ✓ ✓		3-19-'96
	1813	CRAMER TOYOTA VENICE	TCLP-LEAD 8010/8020	✓ ✓		3-19-'96
3-15-'96	2500 NISSAN-BRANDON	ATLANTA TESTING PARTS CLEANER	8010 PCB's 8010/802	✓	ENCO	REJECTED 3-15-'96
3-19-'96	WWW 319 OB 319	HOVCO "	BOD, COD MONTHLY OIL		PETROTECH PETROTECH	
3-25-'96	1812	FL WASTE ENV.	COD NO CERTIFICATE	✓		3-25-'96
	2363	BOB WILSON DODGE	A/F-TEST	✓		REJECTED 4-2-'96
	1810	ENGINE SERV. CENTER	8010/8020 TCLP-METALS	✓	ENCO ENCO	
3-27-'96 HOVCO-KLEEN	2501 2511	~~KORI~~ FLORIDA LIFT SYSTEM	~~RCRA-8~~ TCLP-METALS		ENCO	4-8-'96
	CITRUS OIL		FLASHPOINT 155°F	✓		3-27-'96
3-28-'96	SW328	HOVCO YARD	RCRA-8 METALS 8010/8020 TRPH		ENCO	4-8-'96
3-29-'96	WWW329	WEEKLY WATER	BOD, COD		PETROTECH	4-4-'96
4-1-'96 HOVCO-KLEEN	2464 2364	HONDA CARS VENICE LINC-MERC	601 TCLP-METALS	✓	PETROTECH	4-2-'96 4-16-'96
4-9-'96	2512	PETERSON COMP.	TCLP-METALS		PETROTECH	4-17-'96
4-12-'96	2502	FREELAND	TCLP-LEAD	✓		4-26-'96

		CHEVROLET	8010 / 8020	✓		
4-18-96	WW0418	HOWCO Qtrly Water	pH, BOD, COD, OG, Phc 602, 610, As, Cd Cr, Pb, Ni, Ag, Zn 601 / 602		Petrotech	4-30-96
	960418-OS-EF				Petrotech	
	960418-OS-Int					
	960418-NS-EF					
	960418-NS-Int	↓	↓		↓	
4	2518	FL. WASTE ENV.	H_2O; HALOGEN	✓		4-19-96
4-22-96	2521	TROPICAL	TCLP-LEAD	✓		4-26-96
		PONTIAC-CAD.	8010/8020	✓		
	2339	TAMPA	TCLP-LEAD	✓		4-26-96
		VOLVO-SAAD	8010/8020	✓		
4-24-96	WW424	HOWCO WEEKLY WATER	BOD, COD		PETROTECH	
4-26-96	2507	POLK COUNTY SCHOOL	TCLP-METALS 8010/8020	✓		5-7-96
	2520	TOM EDWARDS CHRYSLER	TCLP-LEAD 8010/8020	✓ ✓		4-26-96
5-2-96	WWW0502	HOWCO WEEKLY WATER	BOD, COD		PETROTECH	5-9-96
	MO-0502	HOWCO	MONTHLY OIL		PETROTECH	5-9-96
~~5-3-96~~	WW2523	PETERSON Comp	8010/8020		PETROTECH	5-6-96
5-7-96	WWM507	HOWCO MONTHLY WATER	pH, BOD, COD Cu, Pb, Ni, Zn O&G, PHENOLS 602		PETROTECH	5-17-96

Date Received	Sample #	Sample Origin	Analysis Requested	In-House	Outside Lab	Date Completed
6-4-96	MD-604	Howco	As, Cd, Cr, Pb PCB's		Petrotech	6-13-96
6-7-96	1815	Blount Chevrolet	TCLP-Lead	✓		REJECTED 6-10-96
			8010/8020	✓		
6-10-96	2526	Manatee County School Board	TCLP-metals 8010/8020	✓	Petrotech	6-24-96 REJECTED
6-13-96	WWM613	Howco Monthly water	BOD, COD, O&G Phenols, Cu, Pb, Ni, Zn, 602, pH		Petrotech	6-24-96
6-14-96	1772	Am. Oil Express	RCRA-8 8010/8020		Progress 1	6-19-96
6-17-96	2529	Hall of Fame Golf Course-TPA	TCLP-metals 8010/8020	✓	Progress	6-20-96
6-19-96	WWW619	Howco Weekly water	BOD, COD		Petrotech	6-26-96
6-24-96	2531	Ewell Ind. Inc.	TCLP-metals 8010/8020	✓	Progress	6-27-96
6-26-96	WWW626	Howco Weekly water	BOD, COD		Petrotech	7-2-96
7-2-96	WWQ702	Howco Quarterly water	pH, BOD, COD, O&G Metals, Phenols 602, 625		Petrotech	7-15-96
	NS-INF NS-EFF	Howco Air	Benzene, Toluene Ethylbenzene, Xylene			7-3-96

Date Received	Sample #	Sample Origin	Analysis Requested	In-House	Outside Lab	Date Completed
6-4-96	MD-604	Howco	As, Cd, Cr, Pb PCB's		Petrotech	6-13-96
6-7-96	1815	Blount Chevrolet	TCLP-Lead 8010/8020	✓ ✓		REJECTED 6-24-96
6-10-96	2526	Manatee County School Board	TCLP-metals 8010/8020	✓	Petrotech	6-24-96 REJECTED
6-13-96	WWM613	Howco Monthly water	BOD, COD, O&G Phenols, Cu, Pb, Ni, Zn, 602, pH		Petrotech	6-24-96
6-14-96	1772	Am. Oil Express	RCRA-8 8010/8020		Progress 1	6-19-96
6-17-96	2529	Hall of Fame Golf Course-TPA	TCLP-metals 8010/8020	✓	Progress	6-20-96
6-19-96	WWW619	Howco Weekly water	BOD, COD		Petrotech	6-26-96
6-24-96	2531	Ewell Ind. Inc	TCLP-metals 8010/8020	✓	Progress	6-27-96
6-26-96	WWW626	Howco Weekly water	BOD, COD		Petrotech	7-2-96
6-28-96	MD-628	Monthly Oil	As, Cd, Cr, Pb, PCB's		Petrotech	8-19-96
7-2-96	WW2702	Howco Qualterly water	pH, BOD, COD, O&G Metals, Phenols 602, 625		Petrotech	7-15-96
	NS-INF	Howco	Benzene, Toluene			

DATE RECEIVED	SAMPLE #	SAMPLE ORIGIN	ANALYSIS REQUESTED	IN-HOUSE	OUTSIDE LAB	DATE COMPLETED
8-6-96	WWM806	HOWCO MONTHLY WATER	pH. BOD. COD. Oil & Grease. Phenols. 602 Cu. Pb. Ni. Zn		PETROTECH	8-14-96
	MO-731	HOWCO MONTHLY OIL COMP.	As. Cd. Cr. Pb PCB's		PETROTECH	8-14-96
8-7-96	1894	SEE 7-31-96	TCLP - LEAD		PROGRESS	8-9-96
8-8-96	TK-150	HOWCO TREATED WATER	601/602	✓		8-8-96
	TK-151		601/602	✓		
	TK-152		601/602	✓		
	TK-150-II		601/602	✓		
8-9-96	TK-153	HOWCO TREATED WATER	601/602	✓		8-9-96
	TK-152		601/602	✓		
	TK-166		601/602	✓		
8-12-96	TK-150	HOWCO TREATED WATER	601/602	✓		8-12-96
	TK-151		601/602	✓		8-13-96
8-13-96	TK-166	HOWCO TREATED WATER	601/602	✓		
	TK-150		601/602	✓		

		LIGHT ENDS				
9-18-96	WWW918	HOWCO - ISCO	BOD, COD		ENCO	9-26-96
9-19-96	1824	U.S. POST. ST. PETE	8010/8020 TCLP - METALS	✓	PROGRESS	9-26-96
9-25-96	WWW925	HOWCO - ISCO	BOD, COD		ENCO	10-4-96
9-30-96	PWS 927 GRAY LINE PARTS WASHER	GRAY LINE TRUCKING	8010/8020 TCLP - METALS	✓	PROGRESS	10-3-96
	1778	DIMMITT CHEVROLET	TCLP - LEAD 8010/8020	✓ ✓		10-2-96
	PWS 930 PARTS WASHER	CITY OF BRADENTON	8010/8020 TCLP - METALS		PROGRESS	10-3-96
10-2-96	WWQ1002	HOWCO QUARTERLY WATER	BOD, COD, pH METALS, 0&G, 610 TOT. PENOLS, 602		ENCO	10-15-96
	OS-INF	HOWCO INF#1	601/602	✓		
	OS-EFF	HOWCO EFF#1				
	NS-INF	HOWCO INF#2				
	NS-EFF	HOWCO EFF#2		✓		
10-4-96	PWS 1004 PARTS WASHER	T.I. TEXACO	8010/8020 TCLP - METALS	NOT	ENOUGH SAMPLE	
10-9-96	WWW1009	HOWCO WEEKLY WATER	BOD, COD		ENCO	10-17-96
10-16-96	WWW1016	HOWCO WEEKLY WATER	BOD, COD		ENCO	10-24-96
	MO-996	HOWCO MONTHLY DIC	PCB's, As, Cd, Cr, Pb H, O, TX, FLASHPOINT API, BTU, S, SEDIM	✓ ✓	ENCO	10-24-96

10/28/96 FICTITIOUS NAME DOCUMENT SCREEN 16:07:26

SUMMARY FOR FILING: G96131000190 FILED: 05/10/1996
STATUS: ACTIVE EXPIRES: 12/31/2001
Current Owners: 0001 County : PINELLAS
Pages in all forms/attachments: 0001 Events filed: 0000
Name GRAYCO ENVIRONMENTAL SERVICES

Addr 843 43RD STREET SOUTH

ST PETERSBURG, FL 33711
1) OWNER HAGAN HOLDING COMPANY
343 43RD STREET SOUTH Charter #: H92075
ST PETERSBURG, FL 33711 Fei #: 59-2613500

5)Name list 6)Next name/addr 7)Prev name/addr 9)Summary

----- THIS IS NOT OFFICIAL RECORD; SEE DOCUMENTS IF QUESTION OR CONFLICT ----
** NO HISTORY **
ENTER SELECTION AND <CR>:

another subsidiary operates Marion Co - east of I 75

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Report # 17-710900(3)
Annual Report by
Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No. _____ If used in DER

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1992 through December 31, 1992

SECTION A
(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: HOWCO ENVIRONMENTAL SERVICES
Mailing Address: 843 43RD ST. SOUTH
ST. PETERSBURG, FL 33711
☐ Check if changed since last registration

2 Telephone No. (813) 323-0818

3. Used Oil Registration No.: 50119 -UO

4. Name of person preparing report (please print)
CATHY CLEMSON
Affiliation with business: CONTROLLER
Phone No., if different than 2 (___)

5 Type of operation (check as many as apply)
☒ Collection Facility
☒ Transporter
☒ Recycling Facility

SECTION B
(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			-0-*

*REPORTED UNDER TIM'S OIL RECOVERY 50010-UO

DER Form # 17-710.900(3)
Form Title Annual Report by Used Oil Facilities and Transporters
Effective Date January 17, 1990
DLR Application No. (Filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			
10. AG – Agricultural			
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			
12. MI – Military (all except ships and port facilities)			
13. PC – Public Used Oil Collection Centers			
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			
16. OF – Sources Outside Florida			
17. SH – Ships, Port Facilities, Marinas			
18. OT – Other Sources (specify)			
19. BI – Beginning Inventory			
20. TR or RE – Used Oil Transporter or Recycling Facility			
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			
23. MBI – Marketed as a Fuel In-State or On-Site Burner			
24. MBO – Marketed as a Fuel Out-of-State			
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process)			
26. MINO – Marketed for an Industrial Process Out-of-State (specify process)			
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☐ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify)			
28. EI – Total Inventory on Hand (end of year)			
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other)			

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Tim Hagan 6-9-93
Name of Authorized Person (Please print or type)

Tim Hagan 6-9-93
Signature of Authorized Person Date

DER Form # 17-710.900(3)
Annual Report by
Form Title Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No _____
(Filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			
10. AG – Agricultural			
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			
12. MI – Military (all except ships and port facilities)			
13. PC – Public Used Oil Collection Centers			
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			
16. OF – Sources Outside Florida			
17. SH – Ships, Port Facilities, Marinas			
18. OT – Other Sources (specify)			
19. BI – Beginning Inventory			
20. TR or RE – Used Oil Transporter or Recycling Facility			
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			
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24. MBO – Marketed as a Fuel Out-of-State			
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____			
26. MINO – Marketed for an Industrial Process Out-of-State (specify process) _____			
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☐ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify) _____			
28. EI – Total Inventory on Hand (end of year)			
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) _____			

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Tim HAGAN
Name of Authorized Person (Please print or type)

Tim Hagan 3-3-94
Signature of Authorized Person Date

403.760 Public used oil collection centers.—

(1) The department shall encourage the voluntary establishment of public used oil collection centers and recycling programs and provide technical assistance to persons who organize such programs.

(2) All government agencies, and businesses that change motor oil for the public, are encouraged to serve as public used oil collection centers.

(3) A public used oil collection center must:

(a) Notify the department annually that it is accepting used oil from the public; and

(b) Annually report quantities of used oil collected from the public.

(4) The Department of Agriculture and Consumer Services shall assist the department in inspecting public used oil collection centers.

(5) No person may recover from the owner or operator of a used oil collection center any costs of response actions, as defined in s. 376.301, resulting from a release of either used oil or a hazardous substance or use the authority of ss. 376.307, 376.3071, and 403.724 against the owner or operator of a used oil collection center if such used oil is:

(a) Not mixed with any hazardous substance by the owner or operator of the used oil collection center;

(b) Not knowingly accepted with any hazardous substances contained therein;

(c) Transported from the used oil collection center by a certified transporter pursuant to s. 403.767;

(d) Stored in a used oil collection center that is in compliance with this section; and

(e) In compliance with s. 114(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended.

This subsection applies only to that portion of the public used oil collection center used for the collection of used oil and does not apply if the owner or operator is grossly negligent in the operation of the public used oil collection center. Nothing in this section shall affect or modify in any way the obligations or liability of any person under any other provisions of state or federal law, including common law, for injury or damage resulting from a release of used oil or hazardous substances. For the purpose of this section, the owner or operator of a used oil collection center may presume that a quantity of no more than 5 gallons of used oil accepted from any member of the public is not mixed with a hazardous substance, provided that such owner or operator acts in good faith.

History.—

s. 33, ch. 88-130; s. 10, ch. 89-188.

HRS Pinellas County Public Health Unit

October 21, 1996

Tim Hagan
HOWCO Environmental Services, Inc.
843 43rd Street South
St. Petersburg, FL 33711-1922

Re: **528624557**
HOWCO Environmental Services Inc.
St. Petersburg
PINELLAS

Dear Mr. Hagan:

On October 16-17, 1996 a reinspection was performed at the referenced facility, to determine the level of compliance with issues initially addressed in this agency's June 11, 1996 non-compliance letter. The present inspection was a multi-agency effort, with the following representatives: Roy Williams, City of St. Petersburg Fire Department; Jose Rodriguez-Lugo, Pinellas County Environmental Management; and the DEP Hazardous Waste Program, with Roger Evans, Randy Strauss, and William Crawford. A copy of my report is enclosed for your file.

It is acknowledged that you have provided this agency with a current site plan, sealed by your engineer as of September 13, 1996. As we have previously discussed you need to provide this agency with a written statement regarding your efforts to meet the compliance issues addressed in the June 1996 letter. During the recent visit, you made available a draft version of your reply; please forward that document to this agency.

With respect to the present reinspection, the following issues require your attention and a timely response:

- No release detection records exist for the underground piping connecting the East and West tank farms. You indicated that you will be having a Pollutant Contractor perform line tightness testing within the 30 days of October 17, 1996. Please forward the test results upon completion of the test.

- Initiate repair to the roof of tank #142, which has visible holes. It is recommended that a non-destructive evaluation of the tank integrity be performed in conjunction with the repair. This repair issue was initially noted on the May 15, 1996 compliance inspection.

- On the May 15, 1996 inspection it was noted that the western concrete saddle of tank #130 was damaged. Since that time, it has become apparent that this tank is part of the flow-through process area. Therefore, it becomes a recommendation that this structural defect be repaired.

PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4175 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624-6966
TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

LAWTON CHILES, GOVERNOR

- The May 15, 1996 inspection and subsequent letter addressed structural defects associated with the walls and floors of the western and eastern containment units. Please advise this agency as to the steps you have taken to repair these areas, and to provide an impervious structure.

- Provide a copy of the Storage Tank Registration Form (STRF) documenting your notification of DEP Tallahassee of the closed status of tank #120.

Upon completion of the repairs to Tank #142 a reinspection will be performed by this agency.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,

Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

POLLUTANT STORAGE TANK SYSTEM
INSPECTION REPORT FORM - COVER PAGE

PRINTED: 10/14/96

FACILITY ID #: 528624557 COUNTY: PINELLAS
FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC
FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG
FACILITY CONTACT: TIM HAGAN PHONE: (813) 327-8467
OWNER: HOWCO ENVIRONMENTAL SERVICES INC PHONE: (813) 327-8467
OWNER ADDRESS: 843 43RD ST S, SAINT PETERSBURG, FL, 33711-1922
OWNER CONTACT: TIM HAGAN OWNER CHANGE DATE: 06/16/93
LATITUDE:27-45-47 LONGITUDE:82-41-32 FAC TYPE: NON-RETAIL BUSINESS
LAST UST COMPLIANCE DATE:00/00/00 LAST AST COMPLIANCE DATE:11/02/94
CONTAMINATION DATA AVAILABLE: OTHER ATRP

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
1	2000	A	XX/XX	A	D	C	I	B
100	29500	L	XX/80	A	ACK	BI	M	U
101	28500	L	XX/80	A	ACK	BI	M	U
105	14000	L	XX/80	A	CKM	BI	M	U
106	9870	L	XX/80	A	CKM	BI	M	U
120	21775	L	XX/80	A	ACK	BI	M	U
121	27989	L	XX/80	A	ACK	BI	M	U
122	27989	L	XX/80	A	ACK	BI	M	U
123	27989	L	XX/80	A	ACK	BI	M	U
124	27989	L	XX/80	A	ACK	BI	M	U
125	18040	L	XX/80	A	ACK	BI	M	U
126	18565	L	XX/80	A	ACK	BI	M	U
127	18565	L	XX/80	A	ACK	BI	M	U
128	23792	L	XX/80	A	ACK	BI	M	U
129	21775	L	XX/80	A	ACK	BI	M	U
140	26041	L	XX/80	A	ACK	CKM	M	U
141	17432	L	XX/80	A	ACK	CKM	M	U
142	17432	L	XX/80	A	ACK	CKM	M	U
143	17013	L	XX/80	A	ACK	CKM	M	U
144	18886	L	XX/80	A	ACK	CKM	M	U
150	15000	L	XX/80	A	ACK	CKM	M	U
151	15000	L	XX/80	A	ACK	CKM	M	U
152	28130	L	XX/80	A	ACK	CKM	M	U
153	20531	L	XX/80	A	ACK	CKM	M	U
154	18172	L	XX/80	A	ACK	CKM	M	U
155	20139	L	XX/80	A	ACK	CKM	M	U
160	14792	L	XX/80	A	ACK	CKM	M	U

MORE TANKS LISTED NEXT PAGE

INSPECTION TYPE (ALL THAT APPLY)
__ ROUTINE
__ INSTALL
__ ABANDONED
__ DISCHARGE
__ CLOSURE
X REINSPECT

SITE INFORMATION (ALL THAT APPLY)
__ NEAR PUB WELL
X CONTAMINATED
__ COMPLAINT
__ ACID TANKS
__ REPAIRED
__ UPGRADED
__ UST & (AST)
__ HAZARD MAT

DEP DISTRICT OR LOCAL PROGRAM: PINELLAS CNTY - ENGINEERING

INSPECTOR NAME (PRINT) E M ROGGELIN CONTACT NAME (PRINT) Tim Hagan

E M Roggelin 10-16-96
INSPECTOR'S SIGNATURE & DATE

Tim Hagan 10-17-96
CONTACT'S SIGNATURE & DATE

10-17-96

STATE OF FLORIDA

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
161	14792	L	XX/80	A	CKM	BI	M	U
162	14792	L	XX/80	A	CKM	BI	M	U
163	14792	L	XX/80	A	ACK	CKM	M	U
164	18832	L	XX/80	A	ACK	CKM	M	U
165	18618	L	XX/80	A	ACK	CKM	M	U
166	15000	L	XX/80	A	ACK	CKM	M	U
170	11000	L	XX/80	A	ACK	ACK	M	U
171	9607	L	XX/80	A	ACK	ACK	M	U
172	9703	L	XX/80	A	ACK	ACK	M	U
173	5500	L	XX/80	A	ACK	ACK	M	U
174	2898	L	XX/80	A	ACK	ACK	M	U
180	56796	L	XX/80	A	ACK	CKM	M	U
2	4000	D	XX/XX	A	D	C	I	B
3	3000	D	XX/87	A	AEK	D	BC	U

MULTI-AGENCY INSPECTION:

JOSÉ RODRIGUEZ-HUGO (PINELLAS COUNTY ENV. MGMT.)
ROGER EVANS
RANDY STRAUSS } DEP SOUTHWEST HAZARDOUS WASTE PROGRAM
WILLIAM C. CRAWFORD
ROY WILLIAMS CITY ST. PETERSBURG FIRE DEPT

FACILITY ID #: 528624557 COUNTY: PINELLAS
FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC
FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG
FACILITY CONTACT: TIM HAGAN PHONE: (813) 327-8467

COMMENTS: (A) REVIEWED HOWCO'S DRAFT RESPONSE LETTER TO MAY 15, 1996 LETTER. (B) RCND SITE PLAN.

ITEM #11: NO RELEASE DETECTION RECORDS FOR UNDERGROUND PIPE CONNECTING WEST & EAST FARMS SINCE MAY 1996.

ITEM #23: FORMER USTs NOW SERVING AS ASTs MUST MEET 62-762 FAC REFERENCE STANDARDS BY DECEMBER 1999.

ITEM #28: REPAIR #142 TANK WITH VISIBLE HOLES IN TANK ROOF. PROVIDE NON-DESTRUCTIVE EVALUATION OF TANK INTEGRITY. (NOTE: TANK #130 SADDLE DAMAGED)

ITEM #32: REFER TO MAY 15, 1996 INSPECTION REGARDING COMMENTS ON CONDITION OF CONTAINMENT WALLS & FLOORS; CONTINUE REPAIR PROCESS.

ITEM #35: FACILITY HAS CHOSEN PRESSURE-TEST OF BULK PIPING (UNDERGROUND); TO BE PERFORMED WITHIN 30 DAYS AS INDICATED VERBAL

- VISUAL CHECKLIST OF TANKS & CONTAINMENT.
- SEND COPY of STRF for Tank #120 (ITEM #1)
- VISUAL INSPECTION DOCUMENTATION ADEQUATE SINCE MAY 1996
- PHOTOS TAKEN OF FACILITY.
- ADDITIONAL CORRESPONDENCE CONCERNING TANK #120 CLOSURE, WILL BE FORTHCOMING FROM AGENCY.

Name: HRWCD
Facility I.D.#: 528624557
Date: 10-16-97

ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
I.	REGISTRATION/NOTIFICATION: Comments:					
	1. Facility has registered all applicable tanks on site; 62-762.400	1.			X	
	2. Current registration placard is properly displayed; 62-762.410 (6) 1996-1997	2.	X			
	Proper notification has been made for the following; 62-762.450:					
	3. Abandonment and closure (30 days prior); (1) (a)	3.				X
	4. Change of ownership (30 days after); (1) (b)	4.				X
	5. Retrofitting, replacement or upgrading; (10 days prior); (1) (c)	5.				X
	6. Change of tank status (in service/out of service); (1) (d)	6.				X
	7. Change of facility status (e.g. substances stored); (1) (e)	7.				X
	8. Change of method of financial responsibility (within 30 days); (2)	8.				X
	9. The facility owner/operator notified D.E.R. of internal tank inspection 24 hrs prior to the test; (3)	9.				X
	10. Loss of greater that 100 gallons on an impervious surface or 500 gallons inside secondary containment within one working day; .450 (4)	10.				X
II.	RECORDS KEEPING: Comments:					
	11. All records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	11.		X		
	12. Some, but not all records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	12.	X			
III.	REPORTING/DISCHARGE RESPONSE/ REPAIRS: Comments:					
	Proper reporting requirements met for the following; 62-762.460:					
	13. Integral piping tightness test failure within 10 days; (1)	13.				X
	14. Pollutant discharge exceeding 25 gallons on a pervious surface; (2)	14.				X
	15. Positive response of a release detection device with one working day; (3)	15.				X
	The owner or the operator of the system which has discharged has:					
	16. Taken it out-of-service; 62-762.700 (1), had it repaired or replaced; .700, or properly closed it; .800	16.				X
	17. Removed any regulated substances from the system; 62-762.820 (1)	17.				X
	18. Tightness tested all repaired components before placing them back in service; 62-762.700 (5) & (6)	18.				X
	19. Begun initial corrective actions for a release; 62-762.820 (2)	19.				X
IV.	INVENTORY REQUIREMENTS FOR TANKS IN CONTACT WITH THE SOIL: Comments: OTHER POLLUTANTS					
	20. All inventory requirements maintained in accordance with 62-762.720 (1)	20.				X
	21. Some, but not all inventory requirements maintained in accordance with 62-762.720 (1)	21.				X

Name: Hess
Facility I.D.#: 320624557
Date: 10-16-96

ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

			Yes	No	Unk	N/A
V.	PERFORMANCE STANDARDS/CATHODIC PROTECTION: Comments:					
	Storage tank criteria; 62-762.500					
	22. Meets construction upgrading schedule; .510 and .520 1999	22.				X
	23. Meets applicable storage tank standards; (1), (2) & (3) USTs (former) as ASTs.	23.			X	
	24. Tank has secondary containment system; .500 (6) addition	24.	X			
	25. Tank equipped with overfill protection; (3) (f) 1-4, (g)	25.				X
	Piping criteria					
	26. Meets new piping standards with secondary containment; .500 (4) & .600 (4)	26.				X
	27. Meets construction upgrading schedule; 62-762.510 (3) , & .520 (2)	27.				X
	Repairs to storage tank systems; 62-762.700					
	28. Failed storage tank system component properly required; (1)-(4) tank # 142	28.		X		
	29. Tightness testing of the required component prior to being brought back into service; (5)	29.				X
	Cathodic Protection; 62-762.730					
	30. Cathodic protection system for tank and piping provides continuous protection; (1)-(4)	30.				X
	Secondary containment; 62-762.500					
	31. Does containment are have sufficient volume; .500 (6) (a) (2)	31.	X			
	32. Is the containment area made out of impervious material in accordance with Chapter 62-762, F.A.C., requirements; (6) (a) (1) Hollow block, cracking walls/floor.	32.		X		
	33. Is the containment area equipped with drainage system or protected from accumulation of rain; (6) (a) (3)	33.	X			
	34. Hydrant pits equipped with spill prevention equipment; (5)	34.				X

VI.	RELEASE DETECTION/MONITOR WELLS: Comments: underground line					
	35. Facility has an approved released-detection system; 62-762.600 & 62-762.860	35.		X		
	36. Monitoring wells properly designed, constructed and installed; 62-762.640 or 62-762.600 (6)	36.				X
	37. Interstitial monitoring adequate to detect a release from integral piping; 62-762.600 (4) & (5)	37.				X

VII.	OUT-OF SERVICE STATUS: Comments:					
	38. Are the corrosive protection devices properly maintained; 62-762.800 (1) (a)	38.				X
	39. Is the vent line and other ancillary equipment properly secured and maintained; (1) (b)	39.				X
	40. Test performed to insure the integrity of out-of-service system prior to being returned to service; (1) (c)	40.				X

VIII.	VARIANCE: Comments:					
	41. Has the facility for an Alternate Procedure; 62-762.850 (1)	41.				X

IX.	OTHERS: Comments:					
	42. Any other violation noted during inspection (Explain in comments)	42.				X

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

May 23, 1996

Mr. Raoul Clarke
Chief Hazardous Waste Section
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Raoul:

I would like to thank you and confirm our telephone conversation on Thursday, May 16, 1996. During our conversation I explained that part of HOWCO's process for recycling used oil includes processing the used oil by distillation. After heating the used oil to a temperature of 250°F, the water in the used oil, and any halogen compounds that have a vapor point of 250°F or less, are turned to steam and driven out of the used oil. After condensing the water and vapors back into a liquid, the water settles out and is treated in our waste water treatment facility. The remaining light ends are then either burned on site or marketed to off-specification used oil burning facilities.

279.50(b)(3)(ii) also.

As we interpreted the 279.10(E)(2), these light ends are "used oil material" derived from used oil. The halogen level can exceed 4,000 ppm, and can be transported and burned for energy recovery as a nonhazardous, off-specification used oil fuel. Specifically, Rinker Materials Corporation has an off-specification used oil permit and would be permitted to accept the light end as off-specification used oil fuel.

If I have misunderstood the provision of Section 279.10(E)(2) or our conversation regarding the Department's position on this matter please let me know immediately since HOWCO will be operating under these guidelines.

If you have any further comments, please do not hesitate to call me.

Sincerely,

Tim Hagan
President/CEO

TH/jh

843 43rd Street So. • St. Petersburg, FL 33711 • (813) 323-0818 • 1-800-334-6926 • Fax 1-813-323-2249

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 14, 1996

Mr. Tim Hagan, President
HOWCO Environmental Services
843 43rd Street South
St. Petersburg, Florida 33711

Dear Mr. Hagan:

Thank you for your May 23 letter concerning processing used oil and the resulting light ends. I apologize that it has taken so long to respond to your letter.

I agree with your letter if the following assumption is correct. Your facility tests all used oil before picking it up and the used oil brought to your facility has not been mixed with hazardous waste or has successfully met the rebutable presumption and this is documented. If this is true then you have several different "materials derived from used oil" after the processing stages are complete. The water, which is to be disposed of is subject to the hazardous waste determination and proper disposal (in your case I believe you are hard piped to a POTW). This material is regulated under 40 CFR Part 279.10(e)(3). The used oil fuel, after it has been analyzed and found to be "on-spec" is managed under 40 CFR Part 279.11 and marketed as on-specification used oil fuel. The light ends are also "materials derived from used oil" but since they are to be burned for energy recovery are regulated as used oil under Part 279 as specified in 40 CFR Part 279.10(e)(2).

The classification of these light end "materials derived from used oil" as on-spec or off-spec is not clear. It is my opinion that they should be managed as off-spec used oil fuel and burned for energy recovery by a facility which has notified as a burner of off-specification used oil fuel since the light ends (hologenated materials) are concentrated but still have BTU value. Occasional testing to verify BTU value is suggested.

I hope this has answered your concerns. Let me know if you have further questions.

Sincerely,

Raoul Clarke

Raoul Clarke, Administrator
Hazardous Waste Management Section

RC/rc

cc: Satish Kastury
Mike Redig
Bill Kutash
Diana Coleman
Chris McGuire

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 14, 1996

Mr. Tim Hagan, President
HOWCO Environmental Services
843 43rd Street South
St. Petersburg, Florida 33711

Dear Mr. Hagan:

Thank you for your May 23 letter concerning processing used oil and the resulting light ends. I apologize that it has taken so long to respond to your letter.

I agree with your letter if the following assumption is correct. Your facility tests all used oil before picking it up and the used oil brought to your facility has not been mixed with hazardous waste or has successfully met the rebutable presumption and this is documented. If this is true then you have several different "materials derived from used oil" after the processing stages are complete. The water, which is to be disposed of is subject to the hazardous waste determination and proper disposal (in your case I believe you are hard piped to a POTW). This material is regulated under 40 CFR Part 279.10(e)(3). The used oil fuel, after it has been analyzed and found to be "on-spec" is managed under 40 CFR Part 279.11 and marketed as on-specification used oil fuel. The light ends are also "materials derived from used oil" but since they are to be burned for energy recovery are regulated as used oil under Part 279 as specified in 40 CFR Part 279.10(e)(2).

The classification of these light end "materials derived from used oil" as on-spec or off-spec is not clear. It is my opinion that they should be managed as off-spec used oil fuel and burned for energy recovery by a facility which has notified as a burner of off-specification used oil fuel since the light ends (hologenated materials) are concentrated but still have BTU value. Occasional testing to verify BTU value is suggested.

I hope this has answered your concerns. Let me know if you have further questions.

Sincerely,

Raoul Clarke

Raoul Clarke, Administrator
Hazardous Waste Management Section

RC/rc

cc: Satish Kastury
Mike Redig
Bill Kutash
Diana Coleman
Chris McGuire

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DISTRICT ROUTING SLIP

TO: MR. BILL KUTASH DATE: 10-15-96

CC To:

	PENSACOLA	**NORTHWEST DISTRICT**	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Sopchoppy	Northwest District Satellite Office	
✓	**TAMPA**	**SOUTHWEST DISTRICT**	
	Punta Gorda	Southwest District Branch Office	
	Bartow	Southwest District Satellite Office	
	ORLANDO	**CENTRAL DISTRICT**	
	Melbourne	Central District Satellite Office	
	JACKSONVILLE	**NORTHEAST DISTRICT**	
	Gainesville	Northeast District Branch Office	
	FORT MYERS	**SOUTH DISTRICT**	
	Marathon	South District Branch Office	
	WEST PALM BEACH	**SOUTHEAST DISTRICT**	
	Port St. Lucie	Southeast District Branch Office	

☐ Reply Optional Date Due _____ ☐ Reply Required Date Due: _____ ☐ Info Only

Comments:

D.E.P.
OCT 16 1996
SOUTHWEST DISTRICT
TAMPA

Raoul Clarke 904-488-0300
From: Tel.:

08-18-93

Department of
Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 14, 1996

Ms. Laurel Lockett
Carlton Fields
Post Office Box 3239
Tampa, Florida 33601-3239

Dear Ms. Lockett:

Thank you for your July 22 letter confirming information discussed between your firm and the Department regarding the management of solvents and used oil.

I believe your letter is a correct interpretation of what was discussed and the statements made in your letter are correct. I would like to reiterate that the Department's guidance on obtaining a representative sample (frequency and number of samples) is advisory only. A sampling plan, referred to as a Quality Assurance Project Plan or QAPP, reviewed and acknowledged by the Department, is a sound option. The Southwest District office staff would be the appropriate reviewers of any such plan.

If we can be of further assistance to you and your client please contact us.

Sincerely,

Raoul Clarke

Raoul Clarke, Administrator
Hazardous Waste Management Section

cc: Bill Kutash
Satish Kastury
Mike Redig
Diana Coleman

CARLTON FIELDS
ATTORNEYS AT LAW

ONE HARBOUR PLACE
777 S. HARBOUR ISLAND BOULEVARD
TAMPA, FLORIDA 33602-5799

MAILING ADDRESS:
P.O. BOX 3239, TAMPA, FL 33601-3239
TEL (813) 223-7000 FAX (813) 229-4133

July 22, 1996

Mr. Raoul Clarke
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Characterization and Handling of Used Petroleum Solvents
Our File 31028/59598

Dear Mr. Clarke:

I would like to confirm for our client, Howco Environmental Services, some information discussed during a telephone conversation between you and Christina Bohannan of this office on July 15, 1996.

As she explained, our client is currently operating a used oil management facility and is exploring the possibility of taking in used "Howco-clean" petroleum parts cleaner from parts-washing facilities to be recycled along with other used oil. "Howco-clean" does not contain any chlorinated solvents, and might be useable, in other applications, as a lubricant, although it will be used here as a cleaning agent. Howco does not wish to operate as a TSD facility for hazardous waste and therefore wants to avoid bringing anything hazardous back to the facility.

As an initial matter, you confirmed our understanding that the Department does not consider a used petroleum product such as "Howco-clean" to constitute "used oil" under applicable regulations. As such, the Department would not consider this "solvent" mixed with used oil as exempt from hazardous waste regulation under the used oil exception. Therefore, Christina discussed with you other possibilities for handling spent parts cleaner in which our client could pursue the proposed venture while avoiding inadvertently receiving hazardous waste.

As an initial matter, it is the generator's responsibility to determine whether any waste is "hazardous". If the used parts cleaner is in two fairly distinct phases (e.g. liquid and bottom "sludge"), these phases can be tested separately. The

Department's policy is that if one of these phases is non-hazardous according to representative sampling, then that phase may be removed from the second phase (whether the second phase is hazardous or not), transported and treated independently as a non-hazardous waste at a non-TSD facility. As such, such material could be recycled by Howco at its facility.

With respect to obtaining a representative sample, EPA's document SW 846 states that chemical measurements will be considered reliable estimates of the true properties of the waste if the measurements are "sufficiently accurate and precise." The document explains that high accuracy and precision in sampling are required if the concentration of contaminants in the waste is near the regulatory threshold. In addition, it says that sampling accuracy can be increased by random sampling, and that both accuracy and precision are enhanced by increasing the number and size of samples. You agreed with our conclusion that EPA's document gives only general information and does not require or recommend any certain number or size of samples.

With regard to the Department's policy on the subject, you indicated that the Department would rely upon TCLP testing to determine the properties of a representative sample. You stated that there is no real rule on the number of samples that must be taken, but that the Department would recommend that samples be taken from the first three batches of waste from each generator initially and once per generator thereafter each time the process changes. However, you also said that the DEP document on the subject of "Guidance on Management Practices for Handling Mineral Spirits and Determining When It May Be Mixed With Used Oil" dated June 23, 1992 applies to our solvent. Language on page three of that document seems to indicate that the used solvent should be sampled once per generator initially and once per generator thereafter each time the process is changed.

When asked about composite sampling, you responded that the Department's policy is that it is most appropriate where the waste streams and processes are very similar. Your opinion was that composite sampling would probably become more viable after initial independent samples demonstrate such similarity.

Because there is no general rule regarding sampling, you explained that our client may develop a sampling plan and submit it to the Department for review and comment. We will advise our client of this option.

This letter explains our understanding of the current status of regulation with respect to the management of solvents. If any part is in error, please respond with any corrections, clarifications, or additions. Thank you for your attention in this matter. If you have any questions, please contact Laurel Lockett of our office.

Sincerely,

Jeanette Flores
(for Laurel Lockett)

LEL:cb

cc: Mr. Tim Hagan

T#467483.1

Howco/St. Petersburg Inspection - October 16, 1996

Participants:

Bill Crawford, Roger Evans, Randy Strauss - FDEP; Jose Rodriquez - Pinellas Co. DEM Air Program; Ernest Roggelin - HRS Pinellas Co. Storage Tank Program; Roy Williams - City of St. Petersburg Fire & Rescue/Prevention Div.

Purpose:

Multi-media compliance inspection of air program, used oil, solid waste, PCW, storage tank and fire and public safety requirements. Verify sources and waste determination procedures for used oil, PCW, exempt and other solid wastes accepted from off-site, and determine characterization and disposition of resulting products and wastes generated on-site. Review processing plant operations and verify process descriptions, flow diagrams, and records as pertinent to fire prevention/public safety, air pollution control and waste management requirements.

Applicable Regulations and Permits:

40 CFR 279 & 62-710 F.A.C. - Used Oil Management Standards

General Permit - Used Oil Recycling Facility

40 CFR 262.11 - Hazardous Waste Determination Requirement

62-740 F.A.C. - Petroleum Contact Water (PCW) Management Standards

62- 762 F.A.C. - Aboveground Storage Tank Regulations

Air Permit - 62-204 through 62-297 F.A.C. as applicable

Industrial Wastewater Discharge Permit - City of St. Petersburg POTW

National and City of St. Petersburg Fire & Public Safety Codes/Standards

Records Required

- Used oil pick-ups - past year
- PCW pick-ups/Waste profiles - past year
- Processed oil shipments/analyses - past year
- Burner fuel analyses
- Other solid wastes received (bulk/soil wastes, drummed wastes) - past year
- Off-site disposal locations/waste analyses for other wastes - past year
- Any analyses available for on-site generated waste (filter press sludge, process plant solids, wastewater treatment carbon/sand filter waste)
- Tank/secondary containment inspections, underground piping MW leak detection records
- Training records

Background Information/General Questions:

1. Are there process flow schematic diagrams w/ sampling port locations of the used oil and/or wastewater plants?

2. Is there an inventory of solid wastes on-site other than those stored or in-process within the oil and wastewater plants, i. e. tanker contents, solid waste drums, solid waste pile. Is there a liquid/solid separation operation - solids to solid waste pile, liquids to oil/wastewater plant?

3. What wastes other than automotive used oil are transported and processed in the processing plant, i.e. anti-freeze, CESQG waste solvent, parts washer solvent (mineral spirits, citrus-based, high flash non-listed solvents), industrial machine oils and cutting/cooling fluids, waste gasoline? Are these mixed in the trucks or segregated from automotive used oils?

4. What is the make and model of "sniffer" used? Is it specific for halogens/chlorine - or a general OVA? How many Chlor-D-Tect Kits are purchased/used per month?

5. General discussion of '94 and '95 Used Oil Annual Reports. Do quantities include PCW? Why is there no amount listed for "marketed as on-spec or off-spec fuel?" What are the "industrial processes" oil is used for - facilities? What is the amount of used oil fuel burned on-site?

6. Is new parts washer solvent supplied and spent solvent picked-up for processing/recycling?

7. What and where are "YBOR #1-#3" tanks (185-187) and "BARGE-TAMPA" (196) listed on "Tank Data Sheet?"

8. Is average analysis available for "light ends" - storage location/amounts/disposition - DEP WM permit says goes to wastewater treatment?

9. Disposal location/transport method of scrap filters?

10. Update status of underground piping from wash rack sump to process plant.

11. What is minimum amount for no-charge pick-up - presuming no water/used oil?

12. Names and titles of plant Emergency Coordinators

& associated records review.

1. Record review
2. Names & addresses / titles employees
3. ~~Port~~ Washers - ~~HEPC~~
4. YBOR Tanks? & Barge - Tampa?

a. Records - time periods.
b. Specific questions / plant tour

5. Call Ernie & Jack - OK to pre-notify Tim ~~of~~ ~~EPC~~ insp & records we will be looking at!

6. Economics - Beth - minimums.

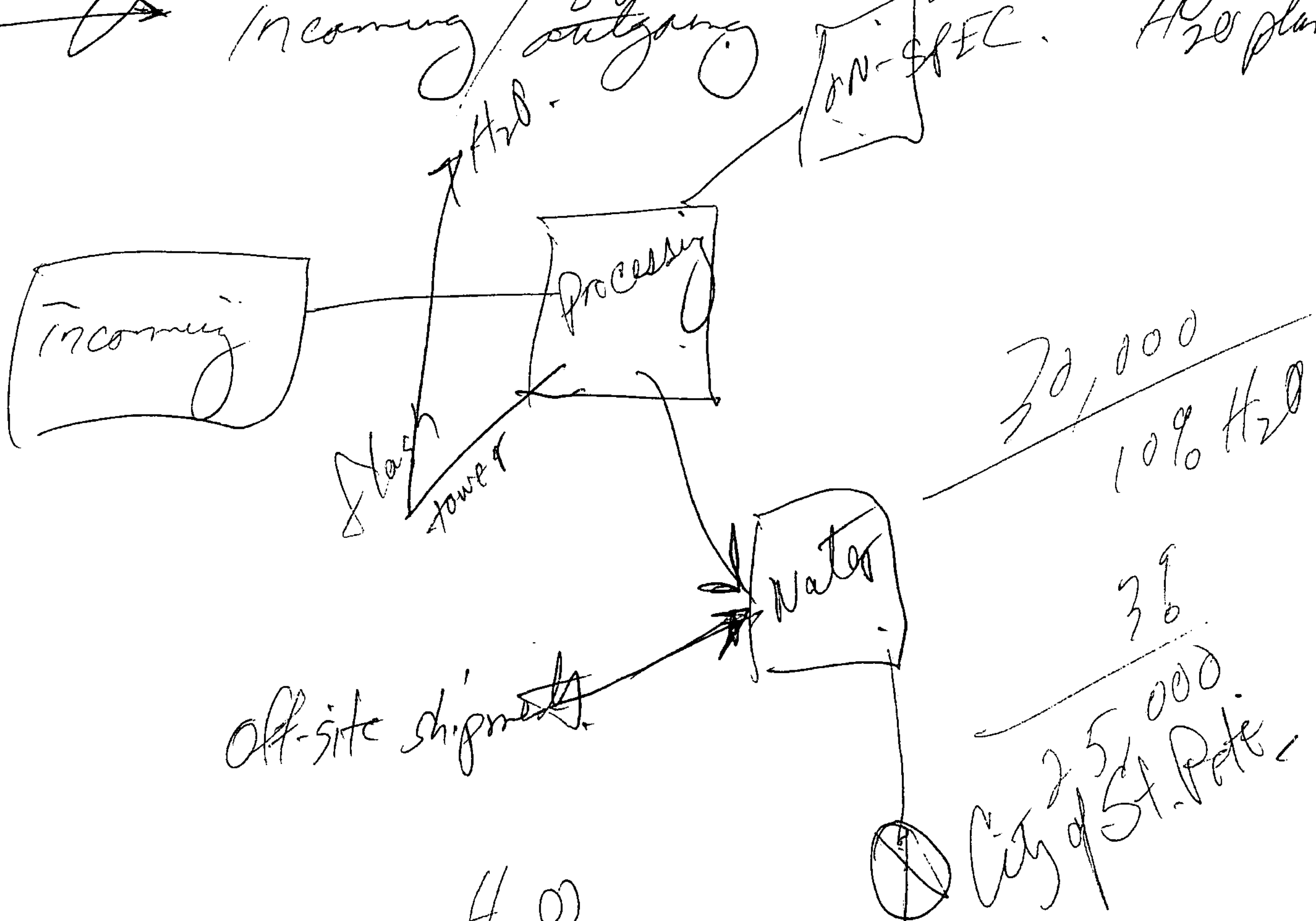
7. Hot loads

8. Customers that are charged vs. no-charge.

9. Howco Annual Report - can get from Tally?

a. Pick-Up Records.
b. Purchase records of Chlor-D-Tect kits
c. Type of Sniffers? - literature
d. Miscellaneous wastes - Bent sails records sources

Q. Chambers receipts.
Q. ~~Depo~~ What's the disposition / composition of the flash tower condensate.
for Permit ~~App~~ says go H_2O treatment —
A. 80% is Shipped. Atmosphere, burning, incoming / outgoing ON-SPEC. H_2O plant



H_2O

6% ≤	6 to 20	≥ 20%
storage tank air agitated 120-129	250 °F "H_2O / lightends" flash tower	alcohol / emulsifiers

h. Air Permit says virgin No. 2 fuel oil. — Tanks has no record of virgin oil storage tank.
34.5 gal/hour - 4.8 MM BTU/hour.

i. Waste Determination of used charcoal from flash tower.

Q's — Transporters. — outgoing

Q - Is there a process flow. schematic diagram of the plant.

Records

Inventory of solid waste on site — waste characterizations/profiles, generators, analyses, dispositions

R. Strauss Copy

Howco/St. Petersburg Inspection - October 16, 1996

Used oil VAS NoRA

Participants:

Bill Crawford, Roger Evans, Randy Strauss - FDEP; Jose Rodriquez - Pinellas Co. DEM Air Program; Ernest Roggelin - HRS Pinellas Co. Storage Tank Program; Roy Williams - City of St. Petersburg Fire & Rescue/Prevention Div.

Purpose:

Multi-media compliance inspection of air program, used oil, solid waste, PCW, storage tank and fire and public safety requirements. Verify sources and waste determination procedures for used oil, PCW, exempt and other solid wastes accepted from off-site, and determine characterization and disposition of resulting products and wastes generated on-site. Review processing plant operations and verify process descriptions, flow diagrams, and records as pertinent to fire prevention/public safety, air pollution control and waste management requirements.

Applicable Regulations and Permits:

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62-740 F.A.C. - Petroleum Contact Water (PCW) Management Standards

62- 762 F.A.C. - Aboveground Storage Tank Regulations

Air Permit - 62-204 through 62-297 F.A.C. as applicable

Industrial Wastewater Discharge Permit - City of St. Petersburg POTW

National and City of St. Petersburg Fire & Public Safety Codes/Standards

Records Required

- Used oil pick-ups - past year ✓ analysis for each truck
- PCW pick-ups/Waste profiles - past year ✓
- Processed oil shipments/analyses - past year ✓
- Burner fuel analyses
- Other solid wastes received (bulk/soil wastes, drummed wastes) - past year ✓
- Off-site disposal locations/waste analyses for other wastes - past year ✓
- Any analyses available for on-site generated waste (filter press sludge, process plant solids, wastewater treatment carbon/sand filter waste) Tim said NO
- Tank/secondary containment inspections, underground piping MW leak detection records → Ernie has.
- Training records ✓

✓ MSDS on Parts Washer Solvent - Howco Klean,

✓ Bio-Soft MSDS.

Snap-ON Sniffer. ? — Make-Up model.
→ audible alarm (no dial,

Background Information/General Questions:

1. Are there process flow schematic diagrams w/ sampling port locations of the used oil and/or wastewater plants? No piping diagram — generalized process flow schematic —

2. Is there an inventory of solid wastes on-site other than those stored or in-process within the oil and wastewater plants, i. e. tanker contents, solid waste drums, solid waste pile. Is there a liquid/solid separation operation - solids to solid waste pile, liquids to oil/wastewater plant? roll-off's, drums. — vac trucks — solids separated - out in the cone clarifier — dirt going to dirt burner - Geologic. Also piles to Chambers Landfill.

3. What wastes other than automotive used oil are transported and processed in the processing plant, i.e. anti-freeze, CESQG waste solvent, parts washer solvent (mineral spirits, citrus-based, high flash non-listed solvents), industrial machine oils and cutting/cooling fluids, waste gasoline? Are these mixed in the trucks or segregated from automotive used oils? antifreezes — customer makes ~~a general~~ signs statement — Tim say do not pick-up CESQG waste solvent unless — they're mixed in used oil w/out their knowledge — customer signs certification waste is not hazardous

4. What is the make and model of "sniffer" used? Is it specific for halogens/chlorine - or a general OVA? How many Chlor-D-Tect Kits are purchased/used per month? Make - model of ~~[illegible]~~ sniffer. purchased X-Ray Fluorescence for every truckload.

5. General discussion of '94 and '95 Used Oil Annual Reports. Do quantities include PCW? Why is there no amount listed for "marketed as on-spec or off-spec fuel?" What are the "industrial processes" oil is used for - facilities? What is the amount of used oil fuel burned on-site? Tough Patch?

Talk to Cathy Clemson. — Probably includes PCW — source defined

PPW —

> 90% going to 17 state fuel burners.

10% marketed to Phosphate industry in past — not in past year.

Plan to blend spent solvent back into oil processing plant. don't plan to distill

6. Is new parts washer solvent supplied and spent solvent picked-up for processing/recycling?

*MSDS — ~~Ashland~~ Howco Clean — high flash solvent - petroleum-based solvent - re-label. 6 machines out now. Are doing TCLP testing have done 4 - passing so far,

7. What and where are "YBOR #1-#3" tanks (185-187) and "BARGE-TAMPA" (196) listed on "Tank Data Sheet?"

Rented tanks from - Radiant Oil. (Phone listing 2004 Durham 247-4735.

Rented → Barge Product - International Ship Port of Tampa,

8. Is average analysis available for "light ends" - storage location/amounts/disposition - DEP WM permit says goes to wastewater treatment?

There were 5 tanks w/ this product.

Light ends is by-product of distillation process - trying to reduce, Analysis is being done

① → on light-ends - gasoline - Tim sez,

② → Blended back in to used-oil for sale.

9. Disposal location/transport method of scrap filters?

Still ship in Roll-offs. ~~[illegible]~~ U.S. Foundry, Miami Some Tim Trucks Some U.S. Foundry picks-up.

10. Update status of underground piping from wash rack sump to process plant.

Don't know - sez can get it.

3 to 4 that run from one containment.

11. What is minimum amount for no-charge pick-up - presuming no water/used oil?

4-~~5~~ drums. —

12. Names and titles of plant Emergency Coordinators

① Tim Hagan

② Lynn Le Master - Plant Manager ③ Bob Boyette, EC.

13. Disposition of alcohol. - stays w/ oil - IPA usage 50 gallons in 30,000 gal batch. 200-400 gal month.

Two tanks for storing oil for burning — 36 & 37. — Samples taken over the top, w/ Coliwasa.

Other issues that arose:

① Jose - 400 gal IPA per month.

②

HOWCO
ENVIRONMENTAL SERVICES
843 43rd Street South
St. Petersburg, Florida 33711

EPA I.D. FLD 152-764-767

EMERGENCY CONTACT: 1-800-435-8467

U.A.U.O.S.

177208

F671-1 RTE:5HV STP:5 FRQ:14

CERTIFIED MANIFEST/INVOICE No. 177208

BILL TO:
MONTGOMERY WARD #2565
3302 M.L.K. BLVD.
TAMPA, FL 33607
(813) 877-6161

GENERATOR/CUSTOMER:
MONTGOMERY WARD #2565
3302 M.L.K. BLVD.
TAMPA, FL 33607
(813) 877-6161
E. FORTE

HM	PROPER SHIPPING NAME/DESCRIPTION	HAZARD CLASS	I.D. Number	Pkg. Grp.	Unit	Estimated Quantity	Actual Quantity	Unit Price	Total Price
X	Fuel Oil (*No. 1, 2, 4, 5, or 6*) Flammable Liquid	3	NA1993	III	Gls.				
X	Flammable Liquids, n.o.s. (*Used Antifreeze*)	3	UN1993	I				0.65	
X	Combustible Liquid, n.o.s. (*Used Oil*)	COMBUSTIBLE LIQUID	NA1993	III		200	200		N/C
X	Combustible Liquid, n.o.s. (*Used Oil & Water Mix*)	COMBUSTIBLE LIQUID	NA1993	III				0.65	
X	Combustible Liquid, n.o.s. (*Water Soluble Oil*)	COMBUSTIBLE LIQUID	NA1993	III				0.85	
X	Combustible Liquid, n.o.s. (*Petroleum Contact Water*)	COMBUSTIBLE LIQUID	NA1993	III					
	Used Oil Filters								
	Empty Drums								
	Contaminated Absorbent							150.00	
	Clean Absorbent								
	Absorbent Setup (1 Clean ABS & Empty Drum)							100.00	
	Sludge							2.25	
	Dexsil Charge							10.00	
	Call In Charge							25.00	
	Service Charge-Minimum Gallon							75.00	
	TOTAL					200	200		N/C

ARRIVAL TIME	DEPART TIME	CASH	CHARGE	CHECK NO.	C.O.D.	P.O. REQ'D	CUSTOMER P.O.#
1100	1115	N/A	N/A	N/A	STOP	NO	N/A

TRANSPORTER/RECYCLER/CERTIFICATION

THIS IS TO CERTIFY THE ABOVE DESCRIBED MATERIALS HAVE BEEN PICKED UP AND WILL BE TRANSPORTED, TREATED, REPROCESSED AND/OR DISPOSED OF IN A MANNER PURSUANT TO ALL FEDERAL, STATE AND LOCAL LAWS AND GUIDELINES.

DRIVERS SIGNATURE #420 DATE 10-9-96 TRUCK/TRAILER # 37

C.O.D. Amt: 43.85

THIS IS TO CERTIFY THAT THE ABOVE-NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

ENTERED

PER

OIL FILTER DRUMS TO BE SERVICED 0 HALOGEN LEAK DETECTOR: ✓ PASS NA FAIL DEXSIL TEST RESULTS: N/A PPM

COMMENTS:

HOWCO FACILITY SIGNATURE (FOR PCW) RECEIVING DATE

BY MY SIGNATURE BELOW I ACKNOWLEDGE AND AGREE WITH THE ABOVE AND FURTHER ACKNOWLEDGE THAT I HAVE READ AND AGREE TO THE PROVISIONS AND TERMS SET FORTH ON THE REVERSE SIDE OF THIS MANIFEST.

X [signature] CUSTOMER SIGNATURE

ACM TITLE

10-9-96 DATE

NATIONAL OIL RECYCLING ASSOCIATION

ACCOUNTING COPY

FORM #701

Environmental Conservation Laboratories
10207 General Drive
Orlando, Florida 32824
407 / 826-5314
Fax 407 / 850-6945

ENCO Laboratories
DHRS Certification No. 83318, E83182

CLIENT : Howco Envir. Services Inc.
ADDRESS: 843 43rd. St. South
St. Petersburg, FL 33711

REPORT # : OR3932
DATE SUBMITTED: April 11, 1996
DATE REPORTED : April 17, 1996
DATE AMENDED : April 19, 1996

PAGE 1 OF 6

ATTENTION: Richard Dillen

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

PROJECT #: P.O.#012782

SW-328 Solid Waste

03/28/96

Post-it® Fax Note 7671	Date 4-22-96	# of pages ▶ 6
To Bill Gresham	From Richard Dillen	
Co./Dept. Chambers	Co. HOWCO	
Phone #	Phone # 813-323-0818	
Fax # 632-8966	Fax # 813-323-2249	

PROJECT MANAGER Tracy A. Atkins

ENCO LABORATORIES
REPORT # : OR3932
DATE REPORTED: April 17, 1996
DATE AMENDED : April 19, 1996
REFERENCE : P.O.#012782
PROJECT NAME : SW-328 Solid Waste

RESULTS OF ANALYSIS

EPA METHOD 8020A - VOLATILE AROMATICS	SW-328 SOLID WASTE	Units
Methyl tert-butyl ether	1000 U D	µg/Kg
Benzene	6300 D	µg/Kg
Toluene	87000 D2	µg/Kg
Chlorobenzene	2500 D	µg/Kg
Ethylbenzene	39000 D	µg/Kg
m-Xylene & p-Xylene	140000 D2	µg/Kg
o-Xylene	66000 D2	µg/Kg
1,3-Dichlorobenzene	500 U D	µg/Kg
1,4-Dichlorobenzene	1100 D	µg/Kg
1,2-Dichlorobenzene	2400 D	µg/Kg
Surrogate:	**% RECOV**	**LIMITS**
Bromofluorobenzene	110	40-170
Date Analyzed	04/04/96	

EPA METHOD 9073 - TOTAL PETROLEUM HYDROCARBONS	SW-328 SOLID WASTE	Units
Total Petr. Hydrocarbons	61000 D3	mg/Kg
Date Analyzed	04/04/96	

D = Analyte value determined from a 1:500 dilution of the sample
D2 = Analyte value determined from a 1:1250 dilution of the sample
D3 = Analyte value determined from a 1:50 dilution of the sample
U = Compound was analyzed for but not detected.

ENCO LABORATORIES
REPORT # : OR3932
DATE REPORTED: April 17, 1996
DATE AMENDED : April 19, 1996
REFERENCE : P.O.#012782
PROJECT NAME : SW-328 Solid Waste

RESULTS OF ANALYSIS

TCLP METALS	METHOD	SW-328 SOLID WASTE	LAB BLANK	Units
TCLP Arsenic	7060	0.010 U	0.010 U	mg/L
Date Analyzed		04/13/96	04/13/96	
TCLP Barium	7080	1.37	20 U	mg/L
Date Analyzed		04/16/96	04/16/96	
TCLP Cadmium	7130	0.023	0.8 U	mg/L
Date Analyzed		04/14/96	04/14/96	
TCLP Chromium	7190	0.10 U	0.10 U	mg/L
Date Analyzed		04/14/96	04/14/96	
TCLP Lead	7420	0.240	0.10 U	mg/L
Date Analyzed		04/14/96	04/14/96	
TCLP Mercury	7470	0.005 U	0.005 U	mg/L
Date Analyzed		04/16/96	04/16/96	
TCLP Selenium	7740	0.010 U	0.010 U	mg/L
Date Analyzed		04/16/96	04/16/96	
TCLP Silver	7760	0.040 U	0.040 U	mg/L
Date Analyzed		04/14/96	04/14/96	

U = Compound was analyzed for but not detected.

ENCO LABORATORIES
REPORT # : OR3932
DATE REPORTED: April 17, 1996
DATE AMENDED : April 19, 1996
REFERENCE : P.O.#012782
PROJECT NAME : SW-328 Solid Waste

RESULTS OF ANALYSIS

EPA METHOD 8020A - VOLATILE AROMATICS	LAB BLANK	Units
Methyl tert-butyl ether	250 U D	µg/Kg
Benzene	125 U D	µg/Kg
Toluene	125 U D	µg/Kg
Chlorobenzene	125 U D	µg/Kg
Ethylbenzene	125 U D	µg/Kg
m-Xylene & p-Xylene	250 U D	µg/Kg
o-Xylene	125 U D	µg/Kg
1,3-Dichlorobenzene	125 U D	µg/Kg
1,4-Dichlorobenzene	125 U D	µg/Kg
1,2-Dichlorobenzene	125 U D	µg/Kg
Surrogate:	**% RECOV**	**LIMITS**
Bromofluorobenzene	102	40-170
Date Analyzed	04/04/96	

EPA METHOD 9073 - TOTAL PETROLEUM HYDROCARBONS	LAB BLANK	Units
Total Petr. Hydrocarbons	3 U	mg/Kg
Date Analyzed	04/04/96	

D = Analyte value determined from a 1:125 dilution of the sample
U = Compound was analyzed for but not detected.

ENCO LABORATORIES
REPORT # : OR3932
DATE REPORTED: April 17, 1996
DATE AMENDED : April 19, 1996
REFERENCE : P.O.#012782
PROJECT NAME : SW-328 Solid Waste

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
EPA Method 8020A				
Benzene	102/ 92/108	70-134	10	19
Toluene	96/ 88/100	67-134	9	19
Chlorobenzene	104/ 92/104	62-144	12	27
EPA Method 9073				
Total Petr. Hydrocarbons	87/ 93/ 98	69-124	7	15

Environmental Conservation Laboratories Comprehensive QA Plan #960038G

< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

ENCO LABORATORIES
REPORT # : OR3932
DATE REPORTED: April 17, 1996
DATE AMENDED : April 19, 1996
REFERENCE : P.O.#012782
PROJECT NAME : SW-328 Solid Waste

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
TCLP Metals				
TCLP Arsenic, 7060	84/ 90/ 92	56-125	7	15
TCLP Barium, 7080	103/105/101	68-120	2	12
TCLP Cadmium, 7130	102/104/102	75-125	2	10
TCLP Chromium, 7190	106/102/ 96	80-115	4	12
TCLP Lead, 7420	93/ 94/103	75-115	1	10
TCLP Mercury, 7470	104/104/100	75-125	<1	12
TCLP Selenium, 7740	89/ 86/110	38-129	4	15
TCLP Silver, 7760	88/ 95/ 98	80-115	8	10

Environmental Conservation Laboratories Comprehensive QA Plan #960038

< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

Environmental Conservation Laboratories
10207 General Drive
Orlando, Florida 32824
407 / 826-5314
Fax 407 / 850-6945

ENCO Laboratories

DHRS Certification No. 83318, E83182

CLIENT : Howco Envir. Services Inc.
ADDRESS: 843 43rd. St. South
St. Petersburg, FL 33711

REPORT # : OR3932
DATE SUBMITTED: April 11, 1996
DATE REPORTED : April 17, 1996
DATE AMENDED : April 19, 1996

ATTENTION: Richard Dillen

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

PROJECT #: P.O.#012782

SW-328 Solid Waste

03/28/96

Post-it® Fax Note 7671	Date 4-22-96	# of pages ▶ 6
To Bill Gresham	From Richard Dillen	
Co./Dept. Chambers	Co. Howco	
Phone #	Phone # 813-323-0818	
Fax # 632-8966	Fax # 813-323-2249	

PROJECT MANAGER Tracy A. Atkins

CERTIFICATE OF ANALYSIS

EPA METHOD 8010

VOLATILE HALOCARBONS	RESULTS	DETECTABLE LIMIT
Dichlorodifluorromethane	BDL	0.2 mg/kg
Chloromethane	BDL	0.2 mg/kg
Vinyl Chloride	BDL	0.2 mg/kg
Bromomethane	BDL	0.2 mg/kg
Chloroethane	BDL	0.2 mg/kg
Trichlorofluoromethane	BDL	0.2 mg/kg
1,1-Dichloroethene	BDL	0.2 mg/kg
Methylene Chloride	BDL	0.2 mg/kg
t-1;2-Dichloroethene	BDL	0.2 mg/kg
1,1-Dichloroethane	BDL	0.2 mg/kg
Chloroform	BDL	0.2 mg/kg
1,1,1-Trichloroethane	BDL	0.2 mg/kg
Carbon Tetrachloride	BDL	0.2 mg/kg
1,2-Dichloroethane	BDL	0.2 mg/kg
1,2-Dichloropropane	BDL	0.2 mg/kg
Trichloroethene	BDL	0.2 mg/kg
Bromodichloromethane	BDL	0.2 mg/kg
c-1,3-Dichloropropene	BDL	0.2 mg/kg
t-1,3-Dichloropropene	BDL	0.2 mg/kg
1,1,2-Trichloroethane	BDL	0.2 mg/kg
Tetrachloroethene	3.8 mg/kg	0.2 mg/kg
Dibromochloromethane	BDL	0.2 mg/kg
Chlorobenzene	BDL	0.2 mg/kg
Bromoform	BDL	0.2 mg/kg
1,1,2,2-Tetrachloroethane	BDL	0.2 mg/kg
1,3-Dichlorobenzene	BDL	0.2 mg/kg
1,4-Dichlorobenzene	BDL	0.2 mg/kg
1,2-Dichlorobenzene	BDL	0.2 mg/kg

EPA METHOD 9073

TOTAL PETROLEUM HYDROCARBONS	RESULT	DETECTABLE LIMIT
Total Petroleum Hydrocarbons	35300 mg/kg	300 mg/kg

BDL = Below Detection Limit

All analyses were performed in accordance with E.P.A., A.S.T.M., Standard Methods or other F.D.E.R. approved procedures.

Respectfully submitted,

Richard Dillen
Laboratory Chemist

cc: Accounting.
Customer Service

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

September 9, 1996

HOWCO NUMBER: SW-Comp. 2

MATRIX: Soil

DATE RECEIVED: August 29, 1996

DATE COMPLETED: September 9, 1996

CERTIFICATE OF ANALYSIS

TOTAL METALS

ANALYSIS	METHOD	RESULTS	DETECTABLE LIMIT
Arsenic	7060	1.73 mg/kg	0.56 mg/kg
Barium	7080	123 mg/kg	0.1 mg/kg
Cadmium	7130	3.73 mg/kg	0.1 mg/kg
Chromium-Total	7190	27.6 mg/kg	0.17 mg/kg
Lead	7420	121 mg/kg	0.29 mg/kg
Mercury	7470	BDL	0.03 mg/kg
Selenium	7740	BDL	0.26 mg/kg
Silver	7760	BDL	0.24 mg/kg

TCLP METALS

ANALYSIS	METHOD	RESULTS	DETECTABLE LIMIT
Lead	6010	0.04 mg/L	0.03 mg/L

EPA METHOD 8020

VOLATILE AROMATICS	RESULTS	DETECTABLE LIMIT
Methyl Tert Butyl Ether	BDL	0.2 mg/kg
Benzene	BDL	0.2 mg/kg
Toluene	13.3 mg/kg	0.2 mg/kg
Ethylbenzene	5.9 mg/kg	0.2 mg/kg
m-Xylene & p-Xylene	28.2 mg/kg	0.2 mg/kg
o-Xylene	14.4 mg/kg	0.2 mg/kg
Chlorobenzene	BDL	0.2 mg/kg
1,2-Dichlorobenzene	BDL	0.2 mg/kg
1,3-Dichlorobenzene	BDL	0.2 mg/kg
1,4-Dichlorobenzene	BDL	0.2 mg/kg

BDL = Below Detection Limit
All analyses were performed in accordance with E.P.A., A.S.T.M., Standard Methods or other F.D.E.R. approved procedures.

843 43rd Street So. • St. Petersburg, FL 33711 • (813) 323-0818 • 1-800-334-6926 • Fax 1-813-323-2249

CERTIFICATE OF ANALYSIS

EPA METHOD 8010

VOLATILE HALOCARBONS	RESULTS	DETECTABLE LIMIT
Dichlorodifluorromethane	BDL	0.2 mg/kg
Chloromethane	BDL	0.2 mg/kg
Vinyl Chloride	BDL	0.2 mg/kg
Bromomethane	BDL	0.2 mg/kg
Chloroethane	BDL	0.2 mg/kg
Trichlorofluoromethane	BDL	0.2 mg/kg
1,1-Dichloroethene	BDL	0.2 mg/kg
Methylene Chloride	BDL	0.2 mg/kg
t-1,2-Dichloroethene	BDL	0.2 mg/kg
1,1-Dichloroethane	BDL	0.2 mg/kg
Chloroform	BDL	0.2 mg/kg
1,1,1-Trichloroethane	BDL	0.2 mg/kg
Carbon Tetrachloride	BDL	0.2 mg/kg
1,2-Dichloroethane	BDL	0.2 mg/kg
1,2-Dichloropropane	BDL	0.2 mg/kg
Trichloroethene	BDL	0.2 mg/kg
Bromodichloromethane	BDL	0.2 mg/kg
c-1,3-Dichloropropene	BDL	0.2 mg/kg
t-1,3-Dichloropropene	BDL	0.2 mg/kg
1,1,2-Trichloroethane	BDL	0.2 mg/kg
Tetrachloroethene	7.6 mg/kg	0.2 mg/kg
Dibromochloromethane	BDL	0.2 mg/kg
Chlorobenzene	BDL	0.2 mg/kg
Bromoform	BDL	0.2 mg/kg
1,1,2,2-Tetrachloroethane	BDL	0.2 mg/kg
1,3-Dichlorobenzene	BDL	0.2 mg/kg
1,4-Dichlorobenzene	BDL	0.2 mg/kg
1,2-Dichlorobenzene	BDL	0.2 mg/kg

EPA METHOD 9073

TOTAL PETROLEUM HYDROCARBONS	RESULT	DETECTABLE LIMIT
Total Petroleum Hydrocarbons	23800 mg/kg	300 mg/kg

BDL = Below Detection Limit
All analyses were performed in accordance with E.P.A., A.S.T.M., Standard Methods or other F.D.E.R. approved procedures.

Respectfully submitted,

Richard Dillen
Laboratory Chemist

cc: Accounting.
Customer Service

HOWCO
ENVIRONMENTAL SERVICES
"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." ™

September 9, 1996

HOWCO NUMBER: SW-Comp. 1

MATRIX: Soil

DATE RECEIVED: August 29, 1996

DATE COMPLETED: September 9, 1996

CERTIFICATE OF ANALYSIS

TOTAL METALS

ANALYSIS	METHOD	RESULTS	DETECTABLE LIMIT
Arsenic	7060	2.05 mg/kg	0.56 mg/kg
Barium	7080	131 mg/kg	0.1 mg/kg
Cadmium	7130	4.16 mg/kg	0.1 mg/kg
Chromium-Total	7190	35.5 mg/kg	0.17 mg/kg
Lead	7420	127 mg/kg	0.29 mg/kg
Mercury	7470	BDL	0.03 mg/kg
Selenium	7740	BDL	0.26 mg/kg
Silver	7760	BDL	0.24 mg/kg

TCLP METALS

ANALYSIS	METHOD	RESULTS	DETECTABLE LIMIT
Lead	6010	0.05 mg/L	0.03 mg/L

EPA METHOD 8020

VOLATILE AROMATICS	RESULTS	DETECTABLE LIMIT
Methyl Tert Butyl Ether	BDL	0.2 mg/kg
Benzene	BDL	0.2 mg/kg
Toluene	30.2 mg/kg	0.2 mg/kg
Ethylbenzene	8.3 mg/kg	0.2 mg/kg
m-Xylene & p-Xylene	51.7 mg/kg	0.2 mg/kg
o-Xylene	26.5 mg/kg	0.2 mg/kg
Chlorobenzene	BDL	0.2 mg/kg
1,2-Dichlorobenzene	BDL	0.2 mg/kg
1,3-Dichlorobenzene	BDL	0.2 mg/kg
1,4-Dichlorobenzene	BDL	0.2 mg/kg

BDL = Below Detection Limit
All analyses were performed in accordance with E.P.A., A.S.T.M., Standard Methods or other F.D.E.R. approved procedures.

HOWCO
ENVIRONMENTAL SERVICES
843 43rd Street South
St. Petersburg, Florida 33711

EPA I.D. FLD 152-764-767

EMERGENCY CONTACT: 1-800-435-8467

U.A.U.O.S.

177208

F671-1 RTE:5HV STP:5 FRQ:14

CERTIFIED MANIFEST/INVOICE No. 177208

BILL TO:
MONTGOMERY WARD #2565
3302 M.L.K. BLVD.
TAMPA, FL 33607
(813) 877-6161

GENERATOR/CUSTOMER:
MONTGOMERY WARD #2565
3302 M.L.K. BLVD.
TAMPA, FL 33607
(813) 877-6161
E. FORTE

HM	PROPER SHIPPING NAME/DESCRIPTION	HAZARD CLASS	I.D. Number	Pkg. Grp.	Unit	Estimated Quantity	Actual Quantity	Unit Price	Total Price
X	Fuel Oil (*No. 1, 2, 4, 5, or 6*) Flammable Liquid	3	NA1993	III	Gls.				
X	Flammable Liquids, n.o.s. (*Used Antifreeze*)	3	UN1993	I				0.65	
X	Combustible Liquid, n.o.s. (*Used Oil*)	COMBUSTIBLE LIQUID	NA1993	III		200	200		N/C
X	Combustible Liquid, n.o.s. (*Used Oil & Water Mix*)	COMBUSTIBLE LIQUID	NA1993	III				0.65	
X	Combustible Liquid, n.o.s. (*Water Soluble Oil*)	COMBUSTIBLE LIQUID	NA1993	III				0.85	
X	Combustible Liquid, n.o.s. (*Petroleum Contact Water*)	COMBUSTIBLE LIQUID	NA1993	III					
	Used Oil Filters								
	Empty Drums								
	Contaminated Absorbent							150.00	
	Clean Absorbent								
	Absorbent Setup (1 Clean ABS & Empty Drum)							100.00	
	Sludge							2.25	
	Dexsil Charge							10.00	
	Call In Charge							25.00	
	Service Charge-Minimum Gallon							75.00	
	TOTAL					200	200		N/C

ARRIVAL TIME	DEPART TIME	CASH	CHARGE	CHECK NO.	C.O.D.	P.O. REQ'D	CUSTOMER P.O.#
1100	1115	N/A	N/A	N/A	STOP	NO	N/A

TRANSPORTER/RECYCLER/CERTIFICATION

THIS IS TO CERTIFY THE ABOVE DESCRIBED MATERIALS HAVE BEEN PICKED UP AND WILL BE TRANSPORTED, TREATED, REPROCESSED AND/OR DISPOSED OF IN A MANNER PURSUANT TO ALL FEDERAL, STATE AND LOCAL LAWS AND GUIDELINES.

DRIVERS SIGNATURE #420 DATE 10-9-96 TRUCK/TRAILER # 37

THIS IS TO CERTIFY THAT THE ABOVE-NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

ENTERED

PER

CHD Amt: 43.85

OIL FILTER DRUMS TO BE SERVICED 0 HALOGEN LEAK DETECTOR: ✓ PASS N/A FAIL DEXSIL TEST RESULTS: N/A PPM

COMMENTS:

HOWCO FACILITY SIGNATURE (FOR PCW) RECEIVING DATE

BY MY SIGNATURE BELOW I ACKNOWLEDGE AND AGREE WITH THE ABOVE AND FURTHER ACKNOWLEDGE THAT I HAVE READ AND AGREE TO THE PROVISIONS AND TERMS SET FORTH ON THE REVERSE SIDE OF THIS MANIFEST.

X CUSTOMER SIGNATURE | TITLE ACM | DATE 10-9-96

NATIONAL OIL RECYCLERS NORAMCO

ACCOUNTING COPY

DEP Form # 62-710.900(3)
Form Title Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date June 6, 1995

Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Annual Report by Used Oil and Used Oil Filter Handlers*

(*Handlers are any persons subject to the registration requirements of Rule 62-710.500 and 62-710.850, F.A.C. [see Section A, Box 5 below])

For reporting period January 1, 1995 through December 31, 1995

Use the information recorded in your Record Keeping forms [62-710.900(2)] to complete this document

SECTION A To be completed by all registered persons

1. Company Name: HOWCO ENVIROMENTAL SERVICES 2. Telephone No. (813) 327-8467

Mailing Address 843 - 43RD STREET SOUTH

ST. PETERSBURG, FL 33711 3. EPA ID # FLD 152 764 767

☐ Check box if changed since last registration

4. Name of person preparing report (please print) Cathy Clemson

Affiliation with business Controller

Phone number (if different than Number 2, above) (___) _____

5. Type of operation (check as many as apply)

Used Oil : ☑ Transporter ☑ Transfer Facility ☑ Processor ☑ Marketer ☐ Burner of off-spec used oil

Used Oil Filter : ☑ Processor

SECTION B To be completed by all registered used oil handlers. Note: Filter operations complete Section C (Optional)	Automotive	Industrial	Mixed
1. Amount (in gallons) of Used Oil and Oily Waste Collected			8,034,532
2. Amount (in gallons) of Used Oil and Oily Waste Marketed, Disposed of or End Used			
N - Not an end use, transferred to another facility			
O - Marketed as an on-spec used oil fuel			
F - Marketed as an off-spec used oil fuel			
I - Marketed for an industrial process			2,973,097
B - Burned as off-spec used oil fuel			
D - Disposal Landfilled			
Wastewater Treatment Unit			4,004,428
Incinerator			
Other			

3. Total amount (in gallons) of used oil collected (Total of boxes from Part 1 of this section) 8,034,532

4. Total amount (in gallons) of used oil end used (Total of boxes from Part 2 of this section) 6,977,525

5. End of year on hand estimate (Difference between the amounts in boxes 3 and 4 above) 1,057,007

Post-it® Fax Note 7671	Date 10/15/96	# of pages ▶ 8
To Rocky Strauss	From Joan Fluor	
Co./Dept. DEP	Co. DEP	
Phone #	Phone # 904/488-0300	
Fax # 813/744-6125	Fax # SC 278-0300	

C-1 2-96

DEP Form # 62-710.900(3)
Form Title Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date June 8, 1995

Section C (Optional)
To be completed by Filter Handlers (use table in Direction 1 to convert tons of filters to numbers)

1. Number of used oil filters collected		1,097,750
2. Number of used oil filters end used	transferred to another registered facility	
	burned for energy recovery in WTE	
	recycled at metal foundry	1,072,750
	TOTAL	1,072,750
3. End of year, on hand estimate (difference between totals of lines 1 and 2)		25,000
4. Gallons of used oil collected as a result of filter processing		N/A
5. Gallons of used oil transferred to a used oil handler		N/A
6. Volume of oily waste collected as a result of filter processing		N/A
7. Volume of oily waste managed		N/A
8. Description of oily waste management		

Directions for completing section C (Optional)

1. List the number of used oil filters collected using the following table

One 55-gallon drum of crushed used oil filters = approximately 400 used oil filters
One 55-gallon drum of uncrushed used oil filters = approximately 250 used oil filters
One ton of drained used oil filters = approximately 2,360 used oil filters

2. List the number of used oil filters according to how they were managed by your operation. Enter the sum of all end use categories in the bold block.

3. Enter the number of filters on hand at your site as of Dec. 31 of last year.

4. Fill in the gallons of used oil collected by your filter operation.

5. Enter the gallons of used oil transferred to a used oil transporter or processor.

6. List the volume (gallons or cubic yards) of the oily wastes collected through your filter handling. Oily wastes are defined in 62-710.200(1) and include bottom sludges, sorbents, wipes etc.

7. List the volume (gallons or cubic yards) of the oily waste managed by your operation.

8. Describe how these oily wastes were managed (sent to WTE, hazardous waste facility etc.).

Any questions concerning this form may be referred to the Used Oil Coordinator, Hazardous Waste Management Section, Bureau of Solid and Hazardous Waste, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL, 32399-2400, (904) 488-0300.

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form #	17-710.500(1)
Form Title	Annual Report by Used Oil Facilities and Transporters
Effective Date	January 12, 1990
DER Application No.	(Filled in by DER)

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1994 through December 31, 1994

SECTION A
(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: Howco Environmental Services
   Mailing Address: 843 43rd Street South
   St. Petersburg, FL 33711
   ☐ Check if changed since last registration

2. Telephone No. (813) 327-8467

3. Used Oil Registration No.: 50119-UO
   FLD 152-764-767 -UO

4. Name of person preparing report (please print) Cathy Clemson
   Affiliation with business Controller
   Phone No., if different than 2 (____)

5. Type of operation (check as many as apply)
   ☒ Collection Facility
   ☒ Transporter
   ☒ Recycling Facility

SECTION B
(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			

Post-it® Fax Note 7671	Date 3/14/95 # of pages 2
To Kathy	From Jan Flint
Co./Dept. Howco	Co. DEP
Phone #	Phone # 904-488-0300
Fax # 813-323-2249	Fax #

Page 1 of 3

DER Form # 17-710.520(3)
Annual Report for Used Oil Processors and Transporters
Effective Date: January 17, 1995
DER Application No. _____ (Issued by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			5,931,343
10. AG – Agricultural			86,075
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			618,981
12. MI – Military (all except ships and port facilities)			6,704
13. PC – Public Used Oil Collection Centers			30,220
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			143,860
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			-0-
16. OF – Sources Outside Florida			-0-
17. SH – Ships, Port Facilities, Marinas			113156
18. OT – Other Sources (specify) MUNICIPALITIES, COUNTRY CLUBS			132,845
19. BI – Beginning Inventory			473,125
20. TR or RE – Used Oil Transporter or Recycling Facility			19,605
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			7,086,639
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			-0-
23. MBI – Marketed as a Fuel In-State or On-Site Burner			-0-
24. MBO – Marketed as a Fuel Out-of-State			-0-
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____	--		3,749,075
26. MINO – Marketed for an Industrial Process Out-of-State (specify process) _____			-0-
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☒ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify) _____			2,814,753
28. EI – Total Inventory on Hand (end of year)			522,811
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			7,086,639
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) PHOSPHATE			13,688

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

CATHY CLEMSON
Name of Authorized Person (Please print or type)

Cathy Clemson 3/29/95
Signature of Authorized Person Date

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # 17-710.900(3)
Annual Report by
Form Title Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No _____ (Filled in by DER)

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1993 through December 31, 1993

SECTION A
(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: HOWCO ENVIRONMENTAL SERVICES
Mailing Address: 843 43RD ST. SOUTH
ST. PETERSBURG, FLORIDA 33711
☐ Check if changed since last registration

2. Telephone No (813) 323-0818

3. Used Oil Registration No.: 50119 -UO

4. Name of person preparing repon (please print)
CATHY CLEMSON
Affiliation with business: CONTROLLER
Phone No., if different than 2 (____) _____

5. Type of operation (check as many as apply)
☒ Collection Facility
☒ Transporter
☒ Recycling Facility

SECTION B
(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			-0-*

*REPORTED UNDER TIM'S OIL RECOVERY 50010-UO

DER Form # 17-710.900(3)
Form Title Annual Report by Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No. _____ (Filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			
10. AG – Agricultural			
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			
12. MI – Military (all except ships and port facilities)			
13. PC – Public Used Oil Collection Centers			
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			
16. OF – Sources Outside Florida			
17. SH – Ships, Port Facilities, Marinas			
18. OT – Other Sources (specify)			
19. BI – Beginning Inventory			
20. TR or RE – Used Oil Transporter or Recycling Facility			
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			
23. MBI – Marketed as a Fuel In-State or On-Site Burner			
24. MBO – Marketed as a Fuel Out-of-State			
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____			
26. MINO – Marketed for an Industrial Process Out-of-State (specify process) _____			
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☐ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify) _____			
28. EI – Total Inventory on Hand (end of year)			
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) _____			

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Tim HAGAN
Name of Authorized Person (Please print or type)

Jim Hagan 3-3-94
Signature of Authorized Person Date

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # 17-709.900(3)
Annual Report by
Form Title Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No
Filled in by DER

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1993 through December 31, 1993

SECTION A
(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: TIM'S OIL RECOVERY
Mailing Address: 843 - 43RD ST. SOUTH
ST. PETERSBURG, FLORIDA 33711
☐ Check if changed since last registration

2. Telephone No (813) 327-8467

3. Used Oil Registration No.:
50010 UC

4. Name of person preparing report (please print)
CATHY CLEMSON
Affiliation with business: CONTROLLER
Phone No., if different than 2 (____) _____

5. Type of operation (check as many as apply)
[X] Collection Facility
[X] Transporter
[X] Recycling Facility

SECTION B
(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			

Post-it® Fax Note 7671 | Date 10/15/96 | # of pages ▶ 8

To Ronny Strauss	From Joan Flint
Co./Dept. DEP	Co. DEP
Phone #	Phone # 904/488-0300
Fax # 813/744-6125	Fax # SC 278-0300

DEA Form #: 17-710.900(3)
Form Title: Annual Report by Used Oil Facilities and Transporters
Effective Date: January 17, 1990
DEA Application No: _____ (Filled in by DEA)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			3,366,577
10. AG – Agricultural			69,640
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			909,842
12. MI – Military (all except ships and port facilities)			-0-
13. PC – Public Used Oil Collection Centers			15,750
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			172,885
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			-0-
16. OF – Sources Outside Florica			-0-
17. SH – Ships, Port Facilities, Marines			88,515
18. OT – Other Sources (specify) Municipalities, Country Club			130,214
19. BI – Beginning Inventory			631,501
20. TR or RE – Used Oil Transporter or Recycling Facility			3,435
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			5,388,359
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			-0-
23. MBI – Marketed as a Fuel In-State or On-Site Burner			1,851,395.
24. MBO – Marketed as a Fuel Out-of-State			-0-
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____		1,015,803.	
26. MINO – Marketed for an Industrial Process Out-of-State (specify process) _____			-0-
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☒ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify) _____			2,048,036
28. EI – Total Inventory on Hand (end of year)			473,125
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			5,388,359
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) Phosphate			1,015,803

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Tim Hagan, President
Name of Authorized Person (Please print or type)

Tim Hagan 3-3-94
Signature of Authorized Person Date

Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form # 62-710.900(3)
Form Title Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date June 6, 1995

Annual Report by Used Oil and Used Oil Filter Handlers*

(*Handlers are any persons subject to the registration requirements of Rule 62-710.500 and 62-710.850, F.A.C. [see Section A, Box 5 below])

For reporting period January 1, 1995 through December 31, 1995

Use the information recorded in your Record Keeping forms [62-710.900(2)] to complete this document

SECTION A To be completed by all registered persons

1. Company Name: HOWCO ENVIROMENTAL SERVICES 2. Telephone No. (813) 327-8467

Mailing Address 843 - 43RD STREET SOUTH

ST. PETERSBURG, FL 33711 3. EPA ID # FLD 152 764 767

☐ Check box if changed since last registration

4. Name of person preparing report (please print) Cathy Clemson

Affiliation with business Controller

Phone number (if different than Number 2, above) ( )

5. Type of operation (check as many as apply)

Used Oil : ☑ Transporter ☑ Transfer Facility ☑ Processor ☑ Marketer ☐ Burner of off-spec used oil

Used Oil Filter : ☑ Processor

SECTION B To be completed by all registered used oil handlers.

Note: Filter operations complete Section C (Optional)

	Automotive	Industrial	Mixed
1. Amount (in gallons) of Used Oil and Oily Waste Collected			8,034,532
2. Amount (in gallons) of Used Oil and Oily Waste Marketed, Disposed of or End Used			
N - Not an end use, transferred to another facility			
O - Marketed as an on-spec used oil fuel			
F - Marketed as an off-spec used oil fuel			
I - Marketed for an industrial process			2,973,097
B - Burned as off-spec used oil fuel			
D - Disposal Landfilled			
Wastewater Treatment Unit			4,004,428
Incinerator			
Other			

3. Total amount (in gallons) of used oil collected (Total of boxes from Part 1 of this section) 8,034,532

4. Total amount (in gallons) of used oil end used (Total of boxes from Part 2 of this section) 6,977,525

5. End of year on hand estimate (Difference between the amounts in boxes 3 and 4 above) 1,057,007

Post-it® Fax Note 7671	Date 10/15/96	# of pages ▶ 8
To Ronny Strauss	From Joan Fenner	
Co./Dept. DEP	Co. DEP	
Phone #	Phone # 904/488-0300	
Fax # 813/744-6125	Fax # SC 278-0300	

C-1 12/9/96

DEP Form # 62-710.900(3)
Form Title Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date June 8, 1995

Section C (Optional)
To be completed by Filter Handlers (use table in Direction 1 to convert tons of filters to numbers)

1. Number of used oil filters collected	1,097,750
2. Number of used oil filters end used	
transferred to another registered facility	
burned for energy recovery in WTE	
recycled at metal foundry	1,072,750
TOTAL	1,072,750
3. End of year, on hand estimate (difference between totals of lines 1 and 2)	25,000
4. Gallons of used oil collected as a result of filter processing	N/A
5. Gallons of used oil transferred to a used oil handler	N/A
6. Volume of oily waste collected as a result of filter processing	N/A
7. Volume of oily waste managed	N/A
8. Description of oily waste management	

Directions for completing section C (Optional)

1. List the number of used oil filters collected using the following table

One 55-gallon drum of crushed used oil filters = approximately 400 used oil filters
One 55-gallon drum of uncrushed used oil filters = approximately 250 used oil filters
One ton of drained used oil filters = approximately 2,360 used oil filters

2. List the number of used oil filters according to how they were managed by your operation. Enter the sum of all end use categories in the bold block.

3. Enter the number of filters on hand at your site as of Dec. 31 of last year.

4. Fill in the gallons of used oil collected by your filter operation.

5. Enter the gallons of used oil transferred to a used oil transporter or processor.

6. List the volume (gallons or cubic yards) of the oily wastes collected through your filter handling. Oily wastes are defined in 62-710.200(1) and include bottom sludges, sorbents, wipes etc.

7. List the volume (gallons or cubic yards) of the oily waste managed by your operation.

8. Describe how these oily wastes were managed (sent to WTE, hazardous waste facility etc.).

Any questions concerning this form may be referred to the Used Oil Coordinator, Hazardous Waste Management Section, Bureau of Solid and Hazardous Waste, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL, 32399-2400, (904) 488-0300.

DEP - SOL./HAZ. WASTE TEL:904-921-8061 Mar 14 95 10:27 No.008 P.01

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Annual Report by Used Oil Facilities and Transporters

"Please refer to instructions when completing this form"

For reporting period January 1, 1994 through December 31, 1994

SECTION A (To be filled out by Transporters and Collection and Recycling Facility Operators)	
1. Company Name: Howco Environmental Services Mailing Address: 843 43rd Street South St. Petersburg, FL 33711 ☐ Check if changed since last registration	2. Telephone No. (813) 327-8467 3. Used Oil Registration No.: 50119-UO FLD 152-764-767 -UO
4. Name of person preparing report (please print) Cathy Clemson Affiliation with business: Controller Phone No., if different than 2 (____)	5. Type of operation (check as many as apply) ☒ Collection Facility ☒ Transporter ☒ Recycling Facility

SECTION B (To be filled out by Collection Facility Operators Only)			
Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			

Post-it® Fax Note 7671	Date 3/14/95	# of pages ▶ 2
To Kathy	From Jim Feeny	
Co./Dept. Howco	Co. DEP	
Phone #	Phone # 904-488-0300	
Fax # 813-323-2249	Fax #	

DER Form #	17-710.900(3) Annual Report by Used Oil Facilities and Transporters
Effective Date	January 17, 1993
DER Application No.	(filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			5,931,343
10. AG – Agricultural			86,075
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			618,981
12. MI – Military (all except ships and port facilities)			6,704
13. PC – Public Used Oil Collection Centers			30,220
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			143,860
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			-0-
16. OF – Sources Outside Florida			-0-
17. SH – Ships, Port Facilities, Marinas			113156
18. OT – Other Sources (specify) MUNICIPALITIES, COUNTRY CLUBS			132,845
19. BI – Beginning Inventory			473,125
20. TR or RE – Used Oil Transporter or Recycling Facility			19,605
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			7,086,639
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			-0-
23. MBI – Marketed as a Fuel In-State or On-Site Burner			-0-
24. MBO – Marketed as a Fuel Out-of-State			-0-
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) ______			3,749,075
26. MINO – Marketed for an Industrial Process Out-of-State (specify process) ______			-0-
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☒ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify) ______			2,814,753
28. EI – Total Inventory on Hand (end of year)			522,811
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			7,086,639
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) PHOSPHATE			13,688

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

CATHY CLEMSON
Name of Authorized Person (Please print or type)

Cathy Clemson 3/29/95
Signature of Authorized Person Date

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # 17-710.900(3)
Annual Report by
Form Title Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No. (Filled in by DER)

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1993 through December 31, 1993

SECTION A
(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: HOWCO ENVIRONMENTAL SERVICES
Mailing Address: 843 43RD ST. SOUTH
ST. PETERSBURG, FLORIDA 33711
☐ Check if changed since last registration

2. Telephone No (813) 323-0818

3. Used Oil Registration No.: 50119 -UO

4. Name of person preparing repon (please print)
CATHY CLEMSON
Affiliation with business: CONTROLLER
Phone No., if different than 2 (____) ____

5. Type of operation (check as many as apply)
☒ Collection Facility
☒ Transporter
☒ Recycling Facility

SECTION B
(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			-0-*

*REPORTED UNDER TIM'S OIL RECOVERY 50010-UO

DER Form # 17-710.900(3)
Form Title Annual Report by Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No. _____ (Filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			
10. AG – Agricultural			
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			
12. MI – Military (all except ships and port facilities)			
13. PC – Public Used Oil Collection Centers			
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			
16. OF – Sources Outside Florida			
17. SH – Ships, Port Facilities, Marinas			
18. OT – Other Sources (specify)			
19. BI – Beginning Inventory			
20. TR or RE – Used Oil Transporter or Recycling Facility			
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Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			
23. MBI – Marketed as a Fuel In-State or On-Site Burner			
24. MBO – Marketed as a Fuel Out-of-State			
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____			
26. MINO – Marketed for an Industrial Process Out-of-State (specify process) _____			
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☐ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify) _____			
28. EI – Total Inventory on Hand (end of year)			
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) _____			

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Tim HAGAN
Name of Authorized Person (Please print or type)

Jim Hagan 3-3-94
Signature of Authorized Person Date

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # 17-710.900(3)
Form Title Annual Report by Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No. _____ (Filled in by DER)

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1993 through December 31, 1993

SECTION A
(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: TIM'S OIL RECOVERY
Mailing Address: 843 - 43RD ST. SOUTH
ST. PETERSBURG, FLORIDA 33711
☐ Check if changed since last registration

2. Telephone No (813) 327-8467

3. Used Oil Registration No.: 50010 -UC

4. Name of person preparing report (please print)
CATHY CLEMSON
Affiliation with business: CONTROLLER
Phone No., if different than 2 (____) _____

5. Type of operation (check as many as apply)
☒ Collection Facility
☒ Transporter
☒ Recycling Facility

SECTION B
(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			

Post-it® Fax Note 7671 | Date 10/15/96 | # of pages ▶ 8/1
To Ronny Strauss | From Joan Flint
Co./Dept. DER | Co. DER
Phone # | Phone # 904/488-0300
Fax # 813/744-6125 | Fax # SC 278-6300

DER Form # 17-710.900(3)
Form Title Annual Report by Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No _____ (Filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)			3,366,577
10. AG – Agricultural			69,640
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations			909,842
12. MI – Military (all except ships and port facilities)			-0-
13. PC – Public Used Oil Collection Centers			15,750
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			172,885
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			-0-
16. OF – Sources Outside Florida			-0-
17. SH – Ships, Port Facilities, Marines			88,515
18. OT – Other Sources (specify) Municipalities, Country Club			130,214
19. BI – Beginning Inventory			631,501
20. TR or RE – Used Oil Transporter or Recycling Facility			3,435
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			5,388,359
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	**Automotive**	**Industrial**	**Mixed**
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			-0-
23. MBI – Marketed as a Fuel In-State or On-Site Burner			1,851,395.
24. MBO – Marketed as a Fuel Out-of-State			-0-
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____		1,015,803.	
26. MINO – Marketed for an Industrial Process Out-of-State (specify process) _____			-0-
27. DS – Disposal - Underline type of material and specify disposal method and amount. Type: Bottom Sediment, Water, Oily Waste, Other. Method: ☐ Landfill ☒ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify) _____			2,048,036
28. EI – Total Inventory on Hand (end of year)			473,125
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			5,388,359
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) Phosphate			1,015,803

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Tim Hagan, President
Name of Authorized Person (Please print or type)

Tim Hagan 3-3-94
Signature of Authorized Person Date

BEST AVAILABLE COPY

H /CO ENVIRONMENTAL SERVICE GENERATOR'S WASTE MATERIAL PROFILE SHEET

WASTE PROFILE SHEET CODE

A. GENERAL INFORMATION

GENERATOR NAME: Sunshine Buick Isuzu
FACILITY ADDRESS: 1411 Solana Rd. PO Box 636, Naples Fla, 33940
TECHNICAL CONTACT: Grant Brosseau
NAME OF WASTE: ABS / Transmission Fluid (Mixture)
PROCESS GENERATING WASTE: Auto Related

TRANSPORTER: Howco Environmental Services
TRANSPORTER PHONE: 1-800-872-0715
GENERATOR US EPA ID #:
GENERATOR STATE ID #:
TITLE: Service Mgr
PHONE: 941-649-1100
QUANTITY: 2 - 55 gal Drums (@ 385 # 30 each)

B. PHYSICAL CHARACTERISTICS OF WASTE

COLOR	ODOR	PHYSICAL STATE @ 70°F	LAYERS	FREE LIQUIDS
Brown / pink	☐NONE ☒MILD ☐STRONG DESCRIBE Trans Fluid	☐SOLID ☒SEMI-SOLID ☐LIQUID ☐POWDER	☒MULTILAYERED ☐BI-LAYERED ☐SINGLE PHASED	☒YES ☐NO VOLUME 10% %

pH	SPECIFIC GRAVITY	FLASH POINT	
☐<2 ☐2-4 ☐4.1-6.9 ☐7 ☐7.1-10 ☐10.1-12.5 ☐>12.5 ☐N/A ☐EXACT ____	☐<.8 ☐.8-1.0 ☐1.1-1.2 ☐1.3-1.4 ☐1.5-1.7 ☐>1.7 ☐EXACT ____	☐<70°F ☐70°F-100°F ☐101°F-139°F ☐140°F-200°F ☐>200°F ☐NO FLASH ☐EXACT ____	☐CLOSED CUP ☐OPEN CUP

C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

Component	%
ABS	90 %
Trans Fluid	10 %
	%
	%
	%
	%
	%

D. METALS

☐TOTAL (ppm) ☐EPA EXTRACTION PROCEDURE (mg/L)

ARSENIC (As):		SELENIUM (Se):	
BARIUM (Ba):		SILVER (Ag):	
CADMIUM (Cd):		COPPER (Cu):	
CHROMIUM (Cr):		NICKEL (Ni):	
MERCURY (Hg):		ZINC (Zn):	
LEAD (Pb):		HALLIUM (Tl):	
CHROMIUM-HEX (Cr + 6):		:	

CHECK ONE BOX

- ☐SOLIDS OS SLUDGES THAT ARE NOT PETROLEUM RELATED; EXPLAIN:
- ☐SOLIDS OR SLUDGES CONTAMINATED WITH USED OIL
- ☐SOLIDS OR SLUDGES CONTAMINATED WITH VIRGIN PETROLEUM OIL
- ☐WASTEWATER THAT IS NOT PETROLEUM RELATED; EXPLAIN:
- ☐WASTEWATER CONTAMINATED WITH USED OIL
- ☐WASTEWATER CONTAMINATED WITH VIRGIN OIL
- ☐WASTEWATER CONTAMINATED WITH FUEL
- ☐USED OIL
- ☐VIRGIN FUEL
- ☐OTHER: Solids Contaminated with New Transmission Fluid
- ☐SOIL THAT IS NOT PETROLEUM RELATED; EXPLAIN:
- ☐SOIL CONTAMINATED WITH USED OIL
- ☐SOIL CONTAMINATED WITH VIRGIN OIL
- ☐SOIL FROM UST REGULATED BY 40 CFR, PART 280

NONHAZARDOUS CERTIFICATION

I, the undesigned, under penalty of the law do hereby certify to the best of my knowledge, the recyclable material submitted for acceptance to HOWCO is not a listed hazardous waste and does not exhibit any of the characteristics of a hazardous waste as defined in 40 CFR 261 of the toxicity characteristic revision rules as specified in the March 29, 1990, Federal Register. I further certify that the recyclable material submitted for acceptance to HOWCO is classified as nonhazardous in its state of generation and that I am authorized to execute this document.

TOXIC SUBSTANCE CONTROL ACT

I, the undersigned, under penalty of law do hereby certify that the materials submitted for acceptance to HOWCO does not contain any detectable concentrations of PCB's as defined in Section 6 (E) of TSCA (15USC2605) and (40CFR Part 761).

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

COMPANY	AUTHORIZED SIGNATURE	TITLE	DATE
X Sunshine Buick Isuzu	X G Brosseau	Service Manager	9/10/96

ER 0
DATA SAVED TO BIN # 108

EPA 601/8010 - HALOCARBNS 09/18/96 12:47:51 CH= "B" PS= 1.

FILE 1. METHOD 0. RUN *** INDEX *** BIN 108

PEAK#	AREA%	RT	AREA BC
1	100.	5.49	3417 01
TOTAL	100.		3417

WARNING - MEMORY AT 0. K - UNPROTECTED CHROMATOGRAMS WILL BE REPLACED

ER @

DATA SAVED TO BIN # 56

EPA 602/8020 - AROMATICS 09/18/96 12:47:51 CH= "A" PS= 1.

FILE 1. METHOD 0. RUN *** INDEX *** BIN 56

PEAK#	AREA%	RT	AREA	PC
1	70.516	2.53	177510	01
2	9.844	35.12	24780	02
3	13.259	35.34	33377	03
4	6.381	36.67	16062	01
TOTAL	100.		251729	

WARNING - MEMORY AT 0. K - UNPROTECTED CHROMATOGRAMS WILL BE REPLACED

CHANNEL B INJECT 09/18/96 12:47:51 REPLAYED FROM BIN # 108

ER 0
DATA SAVED TO BIN # 107

EPA 601/8010 - HALOCARBNS 09/18/96 11:00:07 CH= "B" PS= 1.

FILE 1. METHOD 0. RUN *** INDEX *** BIN 107

PEAK#	AREAX	RT	AREA	BC
1	100.	5.86	3584	01
TOTAL	100.		3584	

WARNING - MEMORY AT 3. K - UNPROTECTED CHROMATOGRAMS WILL BE REPLACED

50ml #17577

CHANNEL A INJECT 09/18/96 12:47:51 STORED TO BIN # 56

AT 64
CS .5

2.53

Check Manifest
vs.

manifest item #2

Lab ID

ER 0
DATA SAVED TO BIN # 55

EPA 602/8020 - AROMATICS 09/18/96 11:00:07 CH= "A" PS= 1.

FILE 1. METHOD 0. RUN *** INDEX *** BIN 55

PEAK#	AREA%	RT	AREA BC
1	100.	2.65	176001 01
TOTAL	100.		176001

WARNING - MEMORY AT 3. K - UNPROTECTED CHROMATOGRAMS WILL BE REPLACED

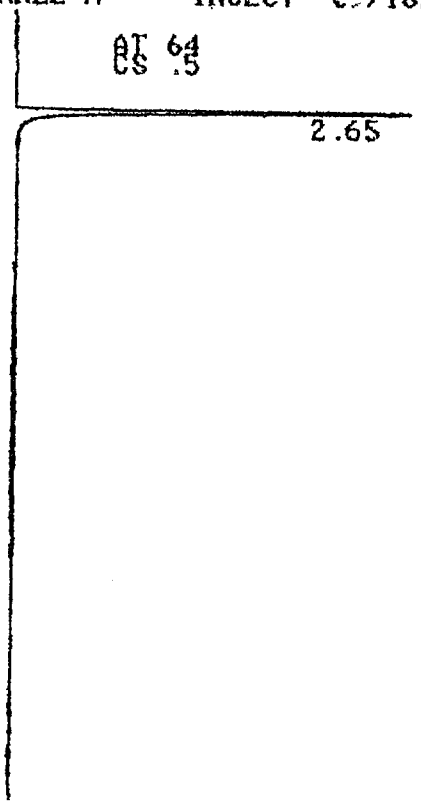
CHANNEL B INJECT 09/18/96 11:00:07 REPLAYED FROM BIN # 107

AT 16
CS .5

5.86

BLANK

CHANNEL A INJECT ../18/96 11:00:07 STORED TO BIN # 55



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:
HOWCO Environmental Services
843 Forty Third Street South
St. Petersburg, FL 33711

Issue Date: JUN 20 1996
Permit No.: 1030153-002-AO
County: Pinellas
Expiration Date: 06/24/2001
Project: Oil Recycling Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Florida Department of Environmental Protection:

For the operation of one (1) oil heater, two (2) heated oil tanks, a condensing unit, and a flash tower at an oil recycling operation. Waste oil is heated in the tanks to 190 degrees F to expedite separation of water from oil. The tanks are "cooked" for approx. one week. During this process negligible amounts of volatile organic compounds (VOC's) are released (< 0.0005 TPY). The oil heater is used to heat the tanks. The oil heater is a Hy-Way Vertical Helical Coil Thermal Fluid Heater, Model MKVO-600. It is used to heat tanks of waste oil to approximately 190 degrees F to expedite separation of water from oil. It is fired on virgin No. 2 fuel oil with a maximum sulfur content of 0.5% or "on-specification" used No. 5 fuel oil at with a maximum sulfur content of 0.75%, at a maximum fuel firing rate of 34.5 gallons/hour (corresponds to 4.8 MMBtu/hour).

The flash tower, which is used to evaporate water from the used oil, is a completely enclosed system, no emissions are released during normal operation. The flash tower is equipped with temperature sensing equipment which will shutdown the entire oil recycling operation if the tower's temperature exceeds its normal operating range. In the event of a failure of the temperature sensing equipment and the tower's temperature exceeds its normal operating range, emissions will be vented to a storage tank then through a charcoal filter prior to venting to the atmosphere. The condensing unit evaporates any gasoline in the used oil and condenses it for reuse. VOC emissions from gasoline storage are vented through a charcoal filter for control. VOC emissions from the condensing unit are negligible (< 0.01 TPY).

Description (continued):

Location: 843 43rd Street South, St. Petersburg

UTM: 17-333.2 E 3071.6 N

Facility ID No.: 1030153 **Emission Unit ID No.:** 003

Note: Please reference Permit No. and Emission unit ID No. in all correspondence, test report submittals, applications, etc.

Replaces Permit Nos.: AC52-225533 and AO52-249212

[*Permitting Note: This permit includes the new oil heater (permitted on AC52-266246) which replaced the previously existing Hy-Way Model No. 58 SF oil heater at this facility which was included on operation permit AO52-249212. This new permit replaces that permit.*]

Specific Conditions:

1. A part of this permit is the attached 15 General Conditions. [Rule 62-4.160, F.A.C.]

2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-2 through 62-297, or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

Operation and Emission Limitations

3. This source is permitted for continuous operation (8,760 hrs/yr). [Construction permit AC52-266246]

4. This oil heater is permitted to burn only the following fuels:

   A. virgin No. 2 fuel oil with a maximum sulfur content of 0.5% by weight; and

   B. "on-specification" *(see Specific Condition No. 5)* used No. 5 fuel oil with a maximum sulfur content of 0.75% by weight.

[Construction permit AC52-266246]

Specific Conditions:

5. This source is permitted to burn "on-specification" used No. 5 oil. "On specification" used oil is defined as used oil that meets the 40 CFR Part 279 (Standards for the Management of Used oil) specifications listed below. Used oil that does not meet <u>any</u> of the following specifications is considered "off-specification" oil and shall not be burned.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	4,000 ppm maximum *
Flash Point	100 °F minimum
PCB's	less than 50 ppm

* The permittee shall have on record certification that the used fuel oil received at the facility having halogen levels between 1000 and 4000 ppm, inclusive, has not been mixed with any hazardous waste (40 CFR 279.10(b)(ii)). The records shall be retained for a minimum of two tears and made available upon request.

(See also Specific Condition No. 14 for sample analysis and recordkeeping requirements.)
[Rule 403.769(3)(b), Florida Statutes and 40 CFR 279.10 & 279.11]

6. The fuel oil firing rate for this oil heater shall not exceed 34.5 gallons per hour *(corresponds to approximately 4.8 MMBtu/hr)*.
[Construction permit AC52-266246]

7. Visible emissions from the oil heater's stack shall not be equal to nor greater than 20% opacity.
[Rule 62-296.310(2)(a), F.A.C.]

8. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C. and Pinellas County Ordinance No. 89-70, Subpart 6.620]

<u>Compliance Testing Requirements</u>

9. The oil heater's exhaust stack shall be tested for visible emissions <u>annually</u> on or during the 60 day period prior to the date of March 13 of each year. Copies of the test data shall be submitted to the Air Section of the Southwest District Office of the Department of Environmental Regulation, <u>and</u> the Air Quality

(continued)

Specific Conditions:

9. (continued)

Division of the Pinellas County Department of Environmental Management within 45 days of the testing. *(See Specific Condition Nos. 11, 12, 14 and 15 for additional information to be submitted as part of the test report.)*
[Rules 62-297.310(7)(a)4., and 62-297.310(8)(b), F.A.C.]

10. Compliance with the visible emission limitation of Specific Condition No. 7 shall be determined using EPA Method 9 and shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.
[Rules 296.310(2)(c) and 62-297.310(4)(a)2., F.A.C.]

11. The initial compliance tests shall be conducted while the oil heater is firing No. 5 "on-specification" used oil unless used oil is not available at the time of testing. Subsequent annual testing shall be conducted while firing No. 5 "on-specification" used oil unless used oil has been fired in the oil heater for less than 400 hours during the previous 12 month period. In that case the test may be conducted while firing new No. 2 fuel oil. A statement of the type of oil fired during the test, with a fuel oil certification, shall be included with all test reports
[Rules 62-297.310(7)(a)4. and 62-297.310(8), F.A.C.]

12. Testing of emissions shall be conducted during firing of the oil heater at permitted capacity (defined as a fuel firing rate within 90-100% of the maximum permitted fuel firing rate of 34.5 gallons hour *(4.8 MMBtu/hour)*). If it is impractical to test at permitted capacity, a compliance test may be conducted at a lower rate. Subsequent unit operation is limited to 110% of the tested rate until a new test is conducted. Once the unit is so limited, operation at higher fuel firing rates is allowed for no more than 15 consecutive days for purposes of additional compliance testing. The test results shall be submitted to the Southwest District Office of the Department and the Pinellas County Department of Environmental Management within 45 days of testing. Acceptance of the test by the Department will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted fuel oil firing rate of 34.5 gallons/hour be exceeded. A statement of the oil firing rate during the test shall be included with all test reports. Failure to submit the process rate or operating under conditions that are not representative of normal operating conditions may invalidate the test and fail to provide reasonable assurance. [Rule 62-297.310(2), F.A.C.]

Specific Conditions:

13. The permittee shall notify the Air Quality Division of the Pinellas County Department of Environmental Management at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.
[Rule 62-297.310(7)(a)9., F.A.C.]

Compliance Documentation and Recordkeeping Requirements

14. In order to document ongoing compliance with the maximum sulfur content and "on-specification" used oil requirements of Specific Condition Nos. 4 and 5, the permittee shall collect a sample from each batch of used No. 5 fuel oil delivered for firing in the oil heater. This sample shall be analyzed for sulfur content and the parameters listed in Specific Condition No. 5 using appropriate EPA or ASTM test methods. As an alternative, a representative oil analysis provided by the used fuel oil supplier may be used to satisfy this requirement provided the certification includes all of the required parameters. Records of the used oil analysis shall be retained for a two year period and made available for inspection upon request. A copy of the most recent used oil analysis shall be submitted with all compliance test reports.
[Rule 62-4.070(3), F.A.C.]

15. Documentation of compliance with the No. 2 fuel oil sulfur content limitation of Specific Condition No. 4 shall be submitted to the Department with all required compliance test reports. This documentation may take the form of results of a fuel analysis done in accordance with an appropriate ASTM method, or by fuel supplier documentation that the fuel oil delivered for use in the oil heater met the specifications for No. 2 fuel oil. (See Specific Condition No. 16).
[Rule 62-4.070(3), F.A.C.]

16. In order to document continuing compliance with Specific Condition No. 4, records shall be maintained of the sulfur content, in % by weight, of No. 2 fuel oil delivered for use in the oil-heater. On the basis of the requirements of Department of Agriculture and Consumer Services Rule 5F-2001 (which requires that No. 2 oil sold in Florida have a maximum sulfur content not to exceed 0.5%), reasonable assurance that the sulfur content requirement is being met can also be provided through vendor supplied documentation that the fuel oil delivered for use in the gas turbine meets the above specifications for No. 2 fuel oil. The above records shall be maintained for a minimum of the most recent two year period and made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

Specific Conditions:

17. In order to document compliance with Specific Condition No. 4, records shall be kept of each period that "on-specification" used No. 5 oil is fired in the oil heater. These records shall show the date, the hours of operation firing used oil, and the estimated quantity of used oil fired. The above records shall be maintained in a form suitable for inspection, retained for a minimum of a two year period, and made available upon request. [Rule 62-4.070(3), F.A.C.]

Reporting Requirements

18. The permittee shall submit to the Air Quality Division of the Pinellas County Department of Environmental Management each calendar year on or before March 1, a completed (including the Emissions Report section) DER Form 62-213.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

Permit Renewal

19. At least two applications for an operation permit renewal shall be submitted to the Southwest District Office of the Department, with one copy also submitted to the Air Quality Division of the Pinellas County Department of Environmental Management, no later than April 24, 2001 (60 days prior to the expiration date of this permit). To properly apply for an operation permit, the applicant shall submit the following:

A. the appropriate application form (DEP Form 62-210.900(2), *Application for Air Permit - Short Form*) noting any deviations from the construction permit application;

B. the appropriate operation permit amendment fee;

[Rule 62-4.090(1), F.A.C.]

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

W.C. Thomas, P.E.
District Air Program Administrator

Used Oil Usage Note: This permit allows the burning of used oil which subjects the permittee to DEP Rule 62-710, F.A.C. In brief, this rule requires a registration fee of $25 if more than 10,000 gallons of used oil is burned annually, along with certain recordkeeping and reporting requirements.

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

GENERAL CONDITIONS:

a. Have access to and copy any records that must be kept under the conditions of the permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. a description of and cause of non-compliance; and

b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Pinellas County Public Health Unit

Facsimile Cover Sheet

To:	Beth Knauss Randy Strauss
Company/Agency/ Department:	DEP Tampa
Phone:	744-6100
Fax:	744-6125
From:	EM ROEGELIN
Agency:	Pinellas County Public Health Unit Environmental Engineering 4175 E. Bay Drive, Suite 300 Clearwater, FL 34624-6966
Phone:	(813) 538-7277 SC 558-7277
Fax:	(813) 538-7293
Date:	9-27-96
Pages including this cover page	5

Comments:

DN 52624557

CITY OF ST. PETERSBURG

August 20, 1996

St. Petersburg Fire & Rescue
Prevention Division
400 Dr.M.L.K. Street South
St. Petersburg, FL 33701

HRS PINELLAS COUNTY PUBLIC HEALTH
AUG 27 1996
ENVIRONMENTAL ENGINEERING

Tim Hagan
Howco Environmental
843 - 43rd Street South
St. Petersburg, FL 33711

Good Day Tim:

Thank you for meeting with me on 8/15/96 to discuss future plans. On 8/14/96, Inspector Pashkow and myself met with your plant manager, Lynn Lemasters and Engineer, Walter Djordjevic to discuss the status of the plant, review emergency and contingency plans and to follow up on our previous visits to review plant safety. Our goal was aimed to renew the fire department hazardous materials permit.

Upon review of the plants operation and a physical survey of the property, several items were noted and consequently the Fire Prevention Division has so noted:

* Plants blueprints and tank schedules do not indicate the correct products presently stored in some tanks.

* Tanks therefore are not correctly identified with proper placards or names of products.

* NFPA 704 Placards are not in place.

* 100 lb. Temporary portable propane tank not identified or secured.

* The question of impervious containment still exists.

* A centrifugal separator appliance has been installed without permits or engineering.

* New electrical work requires permits.

* Several containment sumps plugged at loading pad locations.

* The old diesel burner was reinstalled, without permits or Engineering, to a new location. This equipment requires containment and/or separation from tank farm.

* Housekeeping of waste oil, especially within containment area of the main burner/flash tower.

* 55 gallon poly drums containing 99% isopropyl alcohol and bio-soft emulsifier are located precariously close to burners and heat exchangers. This mixing process has not been Engineer certified, nor has its location with respect to ignition sources. This process is not in a contained location. The alcohol is stored in black poly 55 gal. drums without shade protection.

* Oil filter crusher shed construction is not permitted.

* There is a greater quantity of "light ends" stored on location than was previously permitted.

* "Light ends", the bi-product of the distilling and separating processes of used oils, is not defined as to its chemical analysis or flashpoint.

* Additional containment walls to separate flammable/combustible storage may be required.

* Lightning protection and grounding requirements of tanks as required per NFPA 780, 1995 Edition.

* Oil has been spilled outside of oil filter storage containment at SW corner of property.

* Several oil filter storage drums were overturned and leaking outside of secondary containment location in main yard.

In view of these noted areas of concern, to include the installation of new and used equipment, mixing processes, and additional quantities of low flashpoint liquid production and storage, the Fire Marshal's Office requires a petroleum engineer to certify the plant processes and layout within the scope of good engineering practices for overall safety, City Code 13-167.

I look forward hearing from you within a reasonable time to address these issues and confirm plant safety.

If I can be of further assistance, please do not hesitate to call.

Respectfully,

Lt. Jan A. Radjeski
Prevention Division

JAR/jmr

FILE

HOWCO ENVIRONMENTAL SERVICES

TANK DATA SHEET

04/12/96

tankstat.frx

No.	Description	Style	Diameter/ Width	Length	Height	Adj(in.)	Capacity	Gals/in.
100	Oil Plant	Horizontal	12ft. 0in.	35ft. 10in.		12.00	30,314	N/A
101	Oil Plant	Horizontal	12ft. 0in.	34ft. 1in.		3.50	28,833	N/A
105	Water Plant	Vertical	10ft. 5in.	24ft. 2in.		50.00	15,405	53.12
106	Water Plant	Vertical	7ft. 11in.	26ft. 11in.		13.00	9,911	30.66
120	Oil Plant	Vertical	10ft. 6in.	36ft. 3in.		46.50	23,479	53.97
121	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
122	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
123	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
124	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
125	Oil Plant	Vertical	9ft. 6in.	36ft. 3in.		44.50	19,220	44.18
126	Oil Plant	Vertical	10ft. 8in.	31ft. 2in.		42.00	20,832	55.70
127	Oil Plant	Vertical	10ft. 6in.	30ft. 1in.		42.50	19,485	53.98
128	Oil Plant	Vertical	12ft. 6in.	28ft. 1in.		43.00	25,779	76.50
129	Oil Plant	Vertical	10ft. 6in.	36ft. 3in.		46.50	23,479	53.97
130	Oil Plant	Horizontal	8ft. 0in.	21ft. 2in.		3.00	7,958	N/A
131	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		2.50	3,969	N/A
132	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		2.00	3,969	N/A
133	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		3.00	3,969	N/A
134	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		6.00	3,969	N/A
135	Oil Plant	Horizontal	8ft. 0in.	16ft. 0in.		0.00	6,716	N/A
136	Oil Plant	Horizontal	10ft. 0in.	17ft. 1in.		1.50	10,036	N/A
137	Oil Plant	Horizontal	10ft. 0in.	18ft. 0in.		6.00	10,576	N/A
140	Water Plant	Vertical	19ft. 11in.	13ft. 0in.		51.00	30,295	94.20
141	Water Plant	Vertical	12ft. 11in.	19ft. 11in.		53.00	19,521	81.68
142	Water Plant	Vertical	12ft. 11in.	19ft. 11in.		56.50	19,521	81.68
143	Water Plant	Vertical	10ft. 2in.	29ft. 5in.		49.00	17,662	50.60
144	Water Plant	Vertical	10ft. 5in.	31ft. 2in.		48.00	19,867	53.12
150	Water Plant	Vertical	10ft. 5in.	31ft. 2in.		15.00	19,867	53.12
151	Water Plant	Vertical	10ft. 5in.	31ft. 2in.		17.00	19,867	53.12
152	Water Plant	Vertical	12ft. 0in.	35ft. 1in.		13.00	29,679	70.50
153	Water Plant	Vertical	10ft. 0in.	36ft. 11in.		6.00	21,100	48.96
154	Water Plant	Vertical	9ft. 6in.	36ft. 2in.		48.00	19,176	44.18
155	Water Plant	Vertical	10ft. 0in.	35ft. 11in.		46.00	21,100	48.96
160	Water Plant	Vertical	10ft. 6in.	23ft. 8in.		64.50	15,088	53.12
161	Water Plant	Vertical	10ft. 5in.	23ft. 8in.		64.50	15,086	53.12
162	Water Plant	Vertical	10ft. 6in.	23ft. 8in.		64.50	15,329	53.98
163	Water Plant	Vertical	10ft. 6in.	23ft. 8in.		64.50	15,329	53.98
164	Water Plant	Vertical	10ft. 6in.	30ft. 11in.		50.00	20,025	53.98

04/22/96
tankstat.frx

FILE

ROWCO ENVIRONMENTAL SERVICES

TANK DATA SHEET

No.	Description	Style	Diameter/ Width	Length	Height	Adj(in.)	Capacity	Gals/In.
165	Water Plant	Vertical	10ft. 0in.	30ft. 8in.		60.00	18,016	48.96
166	Water Discharge	Vertical	10ft. 10in.	31ft. 1in.		8.00	21,431	57.46
170	Oil Plant	Vertical	10ft. 5in.	17ft. 6in.		2.00	11,155	53.12
171	Oil Plant	Vertical	9ft. 0in.	22ft. 8in.		40.00	10,786	39.65
172	Oil Plant	Vertical	8ft. 0in.	27ft. 0in.		1.50	10,152	31.33
173	Oil Plant	Vertical	8ft. 6in.	14ft. 0in.		4.00	5,942	35.37
174	Oil Plant	Vertical	6ft. 6in.	12ft. 0in.		0.00	2,979	20.69
180	Water Plant	Vertical	20ft. 11in.	23ft. 9in.		79.50	61,044	214.19
181	Ft Myers # 1	Vertical	10ft. 6in.	31ft. 9in.		57.00	20,564	53.97
182	Ft Myers # 2	Vertical	10ft. 0in.	32ft. 1in.		20.00	18,848	48.96
183	Ft Myers # 3	Vertical	10ft. 6in.	32ft. 9in.		23.00	21,212	53.97
184	Ft Myers # 4	Vertical	10ft. 6in.	31ft. 7in.		56.00	20,456	53.97
185	YBOR #1	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
186	YBOR #2	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
187	YBOR #3	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
191	Batch Tank TK-A	Vertical	10ft. 0in.	17ft. 5in.		8.00	10,232	48.96
192	Batch Tank TK-B	Vertical	12ft. 0in.	12ft. 2in.		9.00	10,293	70.50
193	Rolloff 1	Rectangular	6ft. 8in.	21ft. 7in.	5ft. 7in.	0.00	6,009	89.69
194	Rolloff 2	Rectangular	7ft. 0in.	19ft. 6in.	3ft. 11in.	0.00	3,999	85.09
195	SLUDGE CONE	Vertical	0ft. 1in.	0ft. 1in.		0.00	0	0.00
196	BARGE - TAMPA	Rectangular	0ft. 1in.	0ft. 1in.	0ft. 1in.	0.00	0	0.00
197	FT. MYERS - TR TO TRL	Horizontal	0ft. 1in.	0ft. 1in.		0.00	0	N/A

Number of Tanks: 60 Total Capacity: 1,047,276

Atc savings $86 2-4585

USED OIL PROCESSING FACILITY

GENERAL PERMIT RENEWAL

FOR

HAGAN HOLDING COMPANY

DBA HOWCO ENVIRONMENTAL SERVICES
843 43RD STREET SOUTH
ST. PETERSBURG, FL 33711

(813) 327-8467
(813) 323-0818

OCTOBER, 1995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SOUTHWEST DISTRICT
BY

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OCTOBER, 1995

HOWCO Environmental Services (HOWCO) is a wholly-owned subsidiary of Hagan Holding Company, a Florida-based firm, located at 843 43rd Street South, St. Petersburg, Florida 33711, staffed with multi disciplined, well qualified employees dedicated to improving the environment. For purposes of this plan HOWCO Environmental Services will be referred to as HOWCO.

HOWCO offers over 20 years of environmental and recycling experience in the areas of used-oil reclamation, industrial waste processing, and emergency spill responses.

HOWCO's primary goal is to "conserve limited natural resources through recycling while protecting the environment, public health and welfare."

HOWCO is a solid, growing company dedicated toward meeting the environmental needs of Florida.

HOWCO Environmental Services facilities are situated on 28 lots and 3 vacated utilities easements with the following boundaries: north 8th Avenue South, east 43rd Street South, south 9th Avenue South, and west 44th Street South, comprising 3.20 acres more or less. The address of the facility is 843 43rd Street South, St. Petersburg, FL 33711. At this facility the company is performing

oil recycling from used oil collected at various locations and brought to the plant and is pretreating industrial waste and emergency spill recovery brought to the plant for pretreatment and disposal.

At this location the processing for the sludge brought to the plant is the result of vacuum cleaning of different oil tanks and water oil separators as well as sludge generated in water pretreatment operation. The company cleans, compacts or shreds the used and discarded oil filters, recovers oil and prepares metal for recycling as scrap metal.

The company also operates a lab, at this plant, which is capable of performing all liquid and solid chemical testing required to certify our various waste streams, generated during the operation of: Oil Recovery, Plant, Waste Water Pre-treatment Plant, Sludge Processing Facilities and Used Oil Filters Processing.

Oil Recovery Plant

The collected non-hazardous used oil is processed through the oil recovery plant.

The following are the major feedstock sources:

1. Automotive crankcase oil.
2. Oil/water emulsions from ships, barges and other sources.
3. Automotive oils recovered from oil/water separators.
4. Water contaminated virgin oils.
5. Virgin oils recovered from tank cleanings and tank removals.

All feedstock materials are tested in the existing laboratory facility at the plant site and classified in the three following categories:

1. Oils with less than 6% water.
2. Oils with more than 6% water.
3. Oils with more than 20% water.

Oil recovery processes are performed utilizing the following equipment:

1. 30,000 gallon heating tank/heat exchanger.

2. 760 square foot horizontal heater/heat exchanger.

3. Sweco 200 mesh shaker filter.

4. Hi-Way 2.4 million BTU diesel fired heater.

5. Storage tanks (see Table No.2-1 for number and function).

6. Various pumps, piping, valves, and can filters.

A. Oils with less than 6% water: Oils exhibiting water levels less than 6% are pumped by one of four pumps (numbered One (1) through Four (4)) and heated via the 760 square foot horizontal heat exchanger to 140°F to facilitate flow and are filtered through the SWECO 200 mesh shaker filter to remove solids. The oil is then pumped to a storage tank for batching. Once a storage tank is filled it is mixed using air and a laboratory analysis is performed per FDER and EPA requirements prior to shipment for sale.

B. Oils with water 6% to 20% are recovered utilizing a Flash Tower Process: This oil recovery process is performed utilizing the following equipment:

1. Flash Tower

2. Hi- way 2.4 million BTU diesel fired heater.

3. Reboiler - 760 square foot horizontal heat exchanger.

4. Condenser

5. Cooling Tower

6. Water Cooling Fan

7. Cooling Water Pump

8. Water Storage Tank

9. Heat Exchanger

10. SWECO 200 Mesh Shaker Filter

11. Finished product oil storage tanks

12. Three pumps Five (5) to Seven (7)

13. Piping, Valves and Charcoal Filters.

Oils with water 6% to 20% , are pumped by pump #5 of three pumps numbered Five (5) to Seven (7), preheated in a Heat Exchanger, an energy saving device used for preheating the stream of raw oil and cooling off the finished product, mixed with recirculated oil pumped by pump #6, heated via a Reboiler to 250°F, processed through the Flash Tower in which the evaporated water is separated from heated oil and then as water free oil is cooled to approximately 140°F and filtered through the SWECO 200 mesh shaker filter to remove solids. The processed oil is then batched in the same manner described for Oils less than 4% water.

The evaporated water is condensate by exchanging the heat with the stream of cooling water pumped through the condenser (Horizontal Heat Exchanger) from the cooling tower. Condensate water is then pumped into a storage tank for further processing through the water pretreatment plant.

C. Oils with more than 20% water: Oils exhibiting water levels greater than 20% are batched in 27,000 gallon batches for thermal/chemical treatment. These oils are typically emulsions that will not separate by gravity. A technician performs a "bench treat" to determine the most appropriate emulsion breaking chemical. The 27,000 gallon batch is heated in one of two 30,00 gallon heating tanks/heat exchanger tanks to approximately 190°F. The emulsion breaking chemical is injected and mixed into the batch. The batch is then allowed to cool to ambient temperature in order to facilitate the separation process.

The recoverable oil is pumped into a holding tank, and the remaining water high in COD is pumped to the Water Plant for pretreating and blending prior to discharge in the city sewer for further treatment in the city's southwest sewage treatment plant. Oil is then pumped through the 760 square foot horizontal heat exchanger to be reheated to 140°F and facilitate flow and is filtered through the SWECO 200 mesh shaker filter to remove solids. The processed oil is then batched in the same manner as described for oils with less than 4% water.

Table No.2-1

Storage Tanks in the Oil Processing Plant

Tank #	Capacity (gal)	Product
100	30,000	untreated oil and heating tank
101	30,000	untreated oil and heating tank
120	20,000	processed oil
121	30,000	processed oil
122	30,000	processed oil
123	30,000	processed oil
124	30,000	processed oil
125	20,000	processed oil
126	20,000	processed oil
127	20,000	processed oil
128	25,000	processed oil
129	20,000	processed oil
130	5,000	oil receiving
131	5,000	oil receiving
132	5,000	oil receiving
133	5,000	oil receiving
134	5,000	oil receiving
135	5,000	oil receiving
136	10,000	temp storage
137	10,000	temp storage
170	10,000	water soluble oil
171	10,000	antifreeze
172	10,000	water
173	3,000	untreated oil

Wastewater Pretreatment Plant

The industrial wastewater, emergency spill recoveries and waste generated in the HOWCO plant during oil recovery processes are pretreated in the water plant.

This water plant is operated under the City of St. Petersburg, Wastewater Discharge Permit #SPFL-5093-86-32. This permit was issued on July 1, 1990 and allows a discharge of a maximum of 28,800 gallons of treated wastewater into the city's sewage treatment plant. The permit is in effect to set effluent limitations in accordance with tables included in the permit agreement.

The water pretreatment procedure is performed utilizing the following equipment:

1. Batch treatment tank 15,500 gallons.
2. Batch treatment tank 7,500 gallons.
3. Air stripper.
4. Storage tanks (see Table No.2-2 for number and function).
5. Chemical additive storage tanks.
6. Various pumps, piping, valves and can filters.

The collected industrial wastewater, and emergency spill recoveries are brought to the plant for treatment in 7,200 gallon tank trailers, and the recovered wastewater is brought in truck tanks. Each truck or trailer load is tested for chemical constituents and COD.

The waters generated and transferred from oil recovery operations are also tested for COD. After testing these waters are pumped into six untreated water storage tanks numbered 160 to 165 inclusive in accordance with COD content.

After each tank is filled the water is allowed enough time to achieve gravity separation of oil from water. Oil being lighter floats on top of the water and is removed by decanting each tank before water from each particular tank is further processed.

Based on the results of the tests performed by the lab on daily samples from the tanks in the 160 series, the operator performs mathematical calculations to determine the amount of gallons, based on COD levels to be pumped from each tank into a large blending tank, numbered 180. Typically 50,000 gallons are pumped into this tank which has a holding capability of 60,000 gallons. The COD level for this particular tank is 11,000. The specific gallons as determined by the mathematical calculation and a weighted average are pumped from each of the 160 series tanks into 180. This is

typically done at the end of the day, so that this tank can be mixed utilizing an aeration method overnight to get a homogenous mix prior to treatment operation during the next work day.

Treatment is performed in two batch tanks; one holding 15,500 gallons and the other holding 7,500 gallons. These tanks are denoted as A and B, B being the larger. The waste stream is treated with potassium permanganate as an oxygen agent in order to reduce the level of phenols.

After the dissolved air flotation process is completed the stream is pumped into treated water holding tanks 150, 151, 152, 153 or 166 then through an air stripper and finally discharged into the city public sewer with a COD content of 9,000 - 10,000.

Table No. 2-2

Storage Tanks in the Wastewater Treatment Plant

Tank #	Capacity (gal)	Product
105	12,000	burner fuel
106	10,000	water soluble oil
140	25,000	sump receiving
141	20,000	sump receiving
142	20,000	oil water separator tanks
143	20,000	oil water separator tanks
144	20,000	oil water separator tanks
150	20,000	treated water
151	20,000	treated water
152	30,000	treated water
153	20,000	treated water
154	20,000	oil water separator tanks
155	20,000	oil water separator tanks
160	15,000	untreated wastewater
161	15,000	untreated wastewater
162	15,000	untreated wastewater
163	15,000	untreated wastewater
164	20,000	untreated wastewater
165	20,000	untreated wastewater
166	20,000	treated water
180	60,000	untreated water

Sludge Processing Facility

The sludge brought to the plant as the result of vacuum cleaning of different oil or wastewater tanks and sludge generated in the water pretreatment plant are processed through the sludge processing facility.

The sludge brought to the plant are pumped into open top containers where they are allowed to be dewatered by gravity and then spread out to dry before being sent to proper disposal facilities. The sludge generated in the wastewater treatment plant are pumped directly to the sludge press.

The following equipments are utilized for sludge processing:

1. Sludge Press
2. Storage Tank with 11,000 gallon capacity

Sludge pumped to the sludge press are exposed to pressure. This pressure expels water and any traces of oil and compresses the solids into cake. Expelled water and traces of oil are collected in a sump and pumped to the storage tanks 140 and 141 in the water plant for reprocessing. The sludge cake is removed to the drying beds for drying and shipment to disposal locations.

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Used Oil Filters Processing

Used and discarded oil filters are at the present time cleaned of oil and compacted. The oil is recovered and the filters are compacted for further processing in a permitted scrap facility.

Drums with covers are used for collection, shipment and storage of used and discarded filters so that all dripping oil is collected in the drum thus preventing any spillage and contamination of the environment.

HOWCO operates 24 hours per day seven days per week on an as-needed or emergency basis. Normal working hours for receiving materials are 7:00 a.m. to 5:00 p.m., Monday thru Friday. HOWCO receives, handles and recycles used oils, industrial wastewater, industrial sludge, petroleum contaminated solids, used automobile oil filters and analytical samples.

Prequalification: The process begins with Prequalification prior to arrival at the facility of all materials in accordance with all EPA, FDEP, and local laws and regulations. HOWCO has adopted the following waste profile procedures:

1. HOWCO obtains a detailed physical description of the waste stream from the generator including Material Safety Data Sheets. This is documented on our Waste Profile sheet.
2. Generators are required to prequalify their shipments. This can be effected in two ways:

   (A) By submitting a satisfactory analytical data from a lab certified by the Department of Health & Rehabilitative Services in conjunction with the Florida DEP.

(B) By forwarding a sample of the material to HOWCO for performance of Hazardous Characteristics Testing and Treatment Feasibility Studies.

3. Once the determination has been made regarding acceptance of the material, HOWCO contacts the generator to schedule transportation. If HOWCO is to perform transportation, the designated HOWCO driver will physically inspect the material and monitor the material for halogens using a sniffer, if this test should prove to be positive, a second test will be performed using a Dexsil 4000 test kit before pumping. Upon arrival at the HOWCO plant a core sample of the waste taken must meet the prequalifying sample characteristics and/or the analytical data originally supplied.

If the generator is transporting or has arranged independent transportation, the truck is stopped at the gate in order for a representative sampling to be performed for matching with the original profile. If there are no problems, the waste is received into the facility and directed to the appropriate loading pad for unloading in the designated storage tank to await its turn in processing.

Manifest document: Upon receipt of the waste, a manifest document is prepared, an original and two copies.

1. HOWCO signs and dates each copy of the manifest and/or bill of lading to certify that the waste described by the manifest and/or bill of lading has been received.
2. Notes on the manifest and/or bill of lading and a discrepancy report will be filed internally to indicate significant discrepancies in the shipment.
3. Original is returned after processing and certification to the generator.
4. Copy #1 is kept by HOWCO.
5. Copy #2 is given to the generator after HOWCO certifies receipt by the transporter.

HOWCO rejects and returns all wastes that are improperly packaged, do not match the waste profile or are suspect in any way.

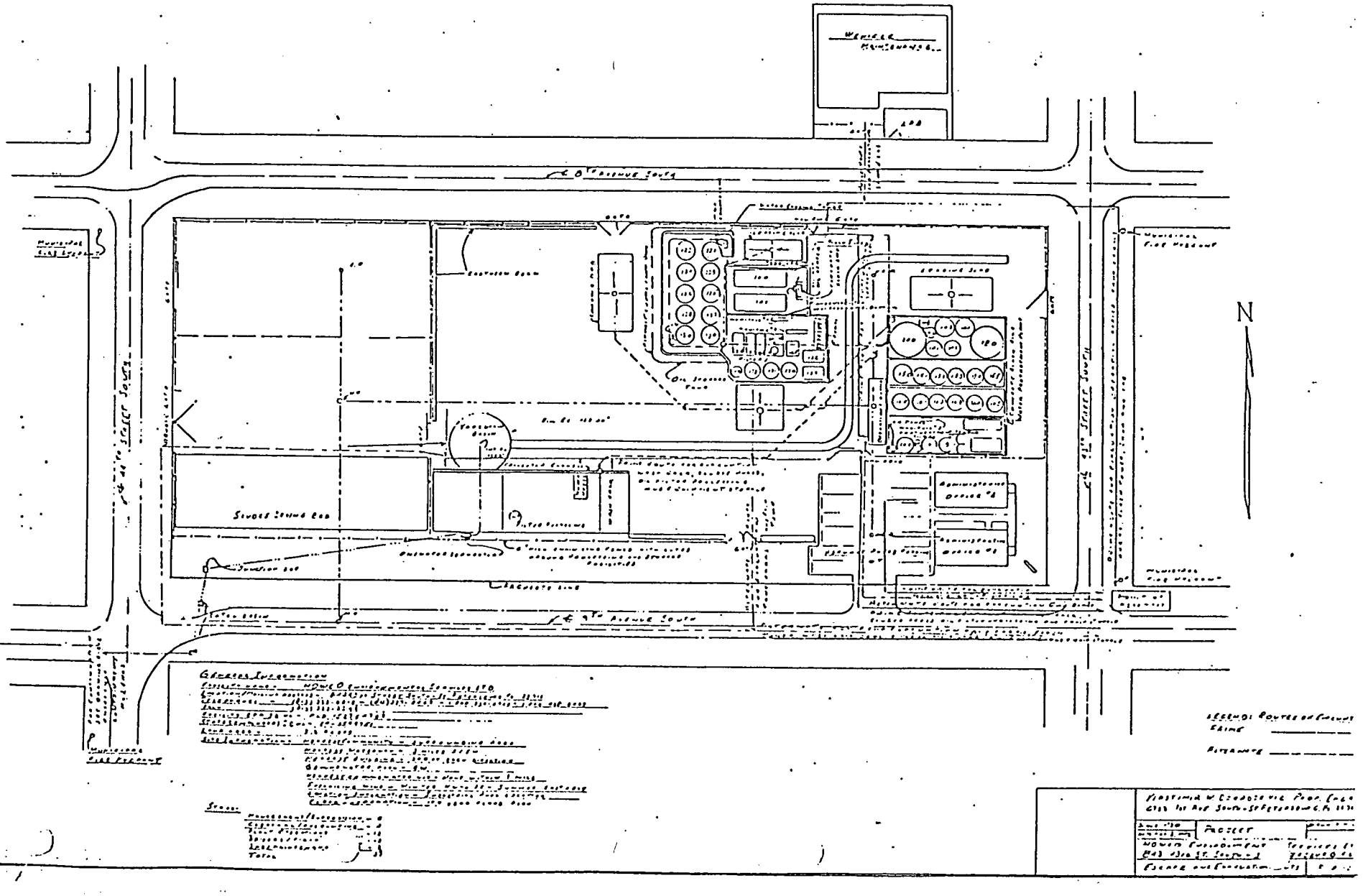
Operating records: HOWCO maintains a written record at the facility which includes all wastes received or shipped in or out of the facility. Receiving/shipping information includes:

1. Generator, transporter and driver.
2. Job number, bill of lading number, manifest number, and generator number.
3. Quantity, type and condition of waste and receiving area number.

The outgoing recycled product information includes customer and location, transporter, driver, bill of lading number, date of shipment, total gallonage and batch number.

Other operating records include results of waste analysis, record of all incidents that require implementation of emergency contingency plan, records and results of inspections, monitoring or testing conducted, and records of notice to generators.

PLANT LAYOUT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