



DATE: 4/3/23

Sheila E. Schneider, MSCM  
Pinellas County Air Quality  
509 East Avenue South, Suite 138  
Clearwater, FL 33756

**Re: Notice of Violation AQE-23-00017– HOWCO Environmental Services, Air Permit No. 1030153-018-AO dated March 1, 2023**

Dear Ms. Schneider:

Thank you for providing the additional time to allow HOWCO to review the supplemental materials made available by County staff, and to work further with a process treatment specialist to attempt to identify and address potential sources of odors that might be coming from HOWCO's operations.

At the outset we note that the initial complaint made on February 11, 2023, which prompted the inspections referenced in the your letter, was as the result of "smells of propane" reported at a location approximately 0.3 mi north of HOWCO's facility, which the complainant assumed were coming from HOWCO. As discussed with County staff, HOWCO could not have possibly been the source of any odors detected on February 11 -- February 11 was a Saturday, and HOWCO had no operations of any kind on that day. Further, mercaptan -- the odorant added to natural gas and propane -- is a very unique smell added to natural gas/propane for the specific purpose of ensuring that leaks of those gases are detected and correctly identified as such. From the written inspection report provided, we understand that there were and continue to be numerous complaints of odors with the mercaptan signature north of the HOWCO facility. (See the inspection narrative at time entry 1405 regarding discussions with employees at Fairmount Park Elementary School where "Both employees emphasized that the odors were mercaptan/natural gas- not burnt oil.") HOWCO does not use propane/natural gas. Ongoing source(s) of propane/nature gas leaks or releases are not associated with HOWCO, but for obvious reasons should be identified.

The inspection report also noted "strong odors" of "gasoline" in the vicinity. According to the inspection report, the inspectors observed "two tanker trucks filling/dumping gasoline" and then later "a total of 4 tankers being filled during field investigation" at a petroleum fueling facility located north of HOWCO. From the report and discussions with County staff, we understand that those strong gasoline odors have been associated with McMullen Oil's fueling facility. HOWCO does not process or handle fertilizers or fertilizer waste, and those odors could not be emanating from HOWCO.

According to the County's March 1, 2023 letter, an "odor appeared to be coming from the Oil Recycling Operation Exhaust." However, the videos taken by the PCAQ personnel on February 16, 2023 and referenced in the inspection report provided to HOWCO in support of the letter demonstrate that the observed emissions were not from HOWCO's plant exhaust. That fact is actually stated in one of the supporting PCAQ video tapes, where an inspector can be heard to say that the observed "emissions" are "not from the stack... the emissions appear to be coming from an area where they are working on tanks, possibly draining one tank into another." The videos were taken from the northeast corner of the HOWCO facility looking to the southwest. On the day in question, HOWCO personnel were pressure washing Tank #111 which is located at the southwest corner of the facility and is not a component of the facility regulated by the air permit. The "hum" of pressure washer compressor can be clearly heard throughout the videos. (Also, there was a reference in the inspection report that this tank was observed as "tilted" during the inspection as compared with prior site visits, which was incorrect. This horizontal tank has always been mounted at a slight angle to facilitate tank drainage.

Nonetheless, HOWCO has conducted an extensive evaluation of its Plant operations in an attempt to identify and address possible sources of odors. Two possible areas of emission odor were identified and have been addressed as described below:

1) Exhaust port of charcoal filter used to vent the light ends recovery tank.

Historical condition. When used oil is heated in the cooker tank above boiling temperature, any water that is in the oil will vent off as steam. The steam travels through a fan condenser unit that cools the steam, converting it back to a liquid phase. This liquid is then piped to the light ends distillate tank. That tank must be vented as it is filled. Historically, the air being vented from the tank during tank filling has been routed through a charcoal filter and vented to atmosphere. The charcoal filter and vent were located approx. 30 feet off the ground, on the catwalk near the tops of the storage tanks.

Process Improvement. To address possible odors from this venting process, the "exhaust" from the charcoal filter now is piped down through a deodorized mist sprayer which removes potential odors. Basically, the exhaust tube of the charcoal filter box that previously vented to atmosphere is now directed into the bottom of a 12" PVC pipe that has been fitted with a misting system using of a water/deodorizer mixture to eliminate any potential odor before venting to atmosphere. The mist/deodorized water is collected and recirculated, and is refreshed periodically.

2) Exhaust from Air Stripper No. 2

Historical condition. Treated petroleum product & water (PPW) has been piped to a storage tank, then run through Air Stripper No. 2 (EU 004) prior to piping to the discharge tank. Historically, to address phenols in the treated water, CLO<sub>2</sub> (chlorine dioxide) has been injected into the treated water after the air stripper and prior to piping to the discharge tank.

Process Improvement. Through experimentation with samples of untreated, treated and post-CLO<sub>2</sub> PPW, it was determined that in addition to treatment of phenols, the CLO<sub>2</sub> reduces residual odor in the treated PPW. In order to reduce the potential for odors emanating from

Air Stripper No. 2, treated PPW is now transferred directly into the discharge tank, where  $\text{ClO}_2$  is added. The contents of the entire tank is then run through the air stripper until criteria for permitted discharge from the tank have been met. To the extent that these process improvements require a permit modification, we believe they constitute minor modifications, and we request approval of same.

HOWCO has been a member of this community for over 40 years and has always worked with the County to address any concerns. As outlined above, HOWCO does not believe it is the source of the odors that are the subject of neighbors' complaints as have been documented, but has worked to address potential sources related to its operation. As discussed with staff, in order to address odor issues in the area, if believed to be related to HOWCO operations, it is imperative that the County contact HOWCO by phone immediately when odors are alleged so that a real time investigation can be undertaken. The fact that this issue is intermittent and sporadic suggests that it is not the result of routine operations of the HOWCO facility, but a result of other contributors in the surrounding area.

The following individuals at HOWCO should be contacted in the order listed upon receipt of a complaint so that it may be promptly and accurately diagnosed:

1. Prima Mull (Plant Manager): **813-944-7966**
2. Lee Morris (Director Operations) **727-543-5429**
3. Tim Hagan (President/CEO) **727-804-4446**

HOWCO looks forward to continued collaboration with the County as necessary to address any remaining concerns.

Respectfully,

A handwritten signature in blue ink, appearing to read "Lee A. Morris".

Lee A. Morris  
Director – Operations  
HOWCO Environmental Services