



# FLORIDA DEPARTMENT OF Environmental Protection

South District  
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**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

October 4, 2021

Lee Morris, Director - Operations  
Howco Environmental Services  
3701 Central Avenue  
Saint Petersburg, Florida 33713  
E-mail: [LeeMorris@howcousa.com](mailto:LeeMorris@howcousa.com)

Re: Howco Environmental Services  
2650 Edison Ave., Fort Myers, FL  
Facility ID No. FL0001000611  
Lee County - HW

Dear Mr. Morris:

Department personnel conducted a compliance inspection of the above-referenced facility on August 31, 2021. Based on the information provided during the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Karen Bayly at (239) 344-5616, or via e-mail at [Karen.Bayly@FloridaDEP.gov](mailto:Karen.Bayly@FloridaDEP.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jennifer L. Carpenter".

Jennifer Carpenter  
Assistant Director  
South District  
Florida Department of Environmental Protection

Enclosure: Inspection Report

Cc: Prima Mull, Howco Environmental Services [primamull@howcousa.com](mailto:primamull@howcousa.com)



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

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**FACILITY INFORMATION:**

**Facility Name:** Howco Environmental Services  
**On-Site Inspection Start Date:** 08/31/2021 **On-Site Inspection End Date:** 08/31/2021  
**ME ID#:** 61495 **EPA ID#:** FL0001000611  
**Facility Street Address:** 2650A Edison Ave, Fort Myers, Florida 33916-5306  
**Contact Mailing Address:** 3701 Central Ave, St Petersburg, Florida 33713  
**County Name:** Lee **Contact Phone:** (727) 327-8467

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Used Oil Transfer Facility Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Karen R. Bayly, Inspector  
**Other Participants:** xxx

**LATITUDE / LONGITUDE:** Lat 26° 37' 59.1026" / Long 81° 51' 31.8512"

**NAIC:** 324110 - Petroleum Refineries

**TYPE OF OWNERSHIP:** Private

**Introduction:**

A compliance evaluation inspection was conducted by Florida Department of Environmental Protection (FDEP) hazardous waste staff at Howco Environmental Services (facility) on 08-31-2021 to verify the facility's compliance status with state and federal hazardous waste, used oil and universal waste rules and regulations. The following is a summary of my observations.

A file review reflects the facility is currently registered with FDEP as a used oil transporter for hire, transfer facility, filter transporter and filter transfer facility. The registration expires on 06-30-2022. A Certificate of Liability Insurance Acord was submitted and is valid from 06-28-2021 to 06-28-2022.

The storage tank system (Facility ID9300283) was last inspected by Lee County Division of Natural Resources staff on 04-21-2021. According to the inspection report, the three regulated aboveground storage tanks were in good condition and the secondary containment was clean, well-sealed and free of debris.

The facility was last inspected by FDEP hazardous waste staff on 08-10-2017.

According to previous inspection reports, the facility has been operating at this location since 1991. Lee County Property Appraiser records identify Kenneth Ryan as the current property owner of 2650 Edison Ave., Fort Myers, FL. Howco leases a portion of the bulk storage area from Ryan Petroleum.

The facility is unmanned. All records associated with the facility are maintained at the Howco Environmental Services in St. Petersburg, FL. Prior to the inspection, Prima Mull, Operations Manager, was contacted regarding the inspection. Ms. Mull granted permission to conduct the inspection, unescorted, and agreed to provide all requested documentation electronically. Upon arriving at the facility, I met with a representative of Ryan Petroleum and was granted permission to conduct the inspection.

## Howco Environmental Services Inspection Report

Inspection Date: 08/31/2021

### Process Description:

This facility primarily operates as a used oil and used oil filter transporter and transfer facility. Used oil, used oil filters, used antifreeze and oily water is picked up from generators and transported to this site for consolidation and eventual transport to the Howco Environmental facility in St. Petersburg (EPA ID No. FLD152764767). According to Ms. Mull, this facility has one truck and one driver for pick-ups; and operates Monday to Thursday. The truck has three compartments: 3,000-gallons for used oil, 1,000-gallons for used antifreeze, 1,000-gallons for oily water and is equipped to transport up to thirteen 55-gallon drums of used oil filters. Ms. Mull verified that the FDEP used oil transporter registration is maintained in the truck. It was estimated the facility picks up approximately 8,000-9,000 gallons of fluids per week. Ms. Mull also verified that spill control equipment including dry absorbent, boom, absorbent pads, etc. is maintained on the truck.

At the time of the inspection, the truck and driver were not at the facility. According to Ms. Mull, the truck is off-loaded every day and pumped into the designated storage tanks. Before off-loading waste fluids, the driver measures the before (and end) volume of the storage tanks. The driver then connects a hose to a valve header which is situated within the containment structure (see photo). Beneath the valve header is a metal box to collect drips, etc. from the hoses. Drivers open the lid when loading/off-loading fluids. At the time of the inspection, the lid was on the box which prevents rainwater from collecting, and was not inspected. Fluids that collect in the box are removed and properly managed. What appeared to be weathered staining was noted on the outside of the containment wall, adjacent to the valve header (see photo). Ms. Mull was provided a photo. \*Immediately following the inspection, documentation was provided reflecting the wall had been repainted.

Each storage tank is a vertical aboveground, single-walled tank that is 20,000-gallons in capacity. The tanks are labeled according to the contents and numbered 1-4. Tanks 1 and 2 contain used oil; however it was noted that 'used oil' was very faint on tank 2 and should be relabeled. Tank 3 is labeled 'PPW' and tank 4 is labeled 'used antifreeze'. It is recommended to clearly label tank 3 with words identifying its contents. Waste fluids are transported weekly from this facility to the Howco Environmental St. Petersburg facility where the used oil is recycled and sold as burner fuel, used antifreeze is recycled, and oily water is separated, treated and either discharged to the city or burned. Ms. Mull was provided photos of the storage tanks. \*Immediately following the inspection, documentation was provided reflecting tank 2 was clearly labeled 'used oil'.

The four storage tanks are situated within a concrete secondary containment structure. The containment structure is part of a larger containment structure that includes fuel tanks owned/operated by Ryan Petroleum. At the time of the inspection, the containment structure contained approximately 1-2 inches of rainwater, algae and organic matter (see photos). The interior walls of the containment structure appeared in good condition and coated with a sealant/coating; however it was not possible to evaluate the base of the structure. A file review reflects the facility applied an impervious sealant inside the secondary containment structure in 2017. Following the inspection, Ms. Mull was provided photos of the containment structure. \*Immediately following the inspection, documentation was provided reflecting the containment structure was cleaned, evaluated and verified in good condition. A follow-up inspection was conducted by FDEP hazardous waste staff on 09-29-2021 and confirmed the containment structure and sealant were in good condition.

Two closed 55-gallon steel drums were observed adjacent to the containment structure (see photo). One drum was approximately half full of spent/oily absorbent material and the second drum was approximately half full of trash. Neither drum was labeled. According to Ms. Mull, drums of spent absorbent are placed in the used oil filter trailer and transported to the Howco St. Petersburg facility for disposal. Ms. Mull was provided photos of the drums. \*Immediately following the inspection, documentation was provided reflecting both drums were labeled.

Also noted outside adjacent to the containment structure was an approximate 200-gallon steel aboveground storage tank (see photo). The tank was closed, not labeled and appeared empty. Ms. Mull was provided a photo of the tank. \*Immediately following the inspection, documentation was provided reflecting the tank is empty and belongs to Ryan Petroleum.

55-gallon drums of used oil filters are stored inside a 53-foot trailer parked over a concrete surface (see photos). The trailer is swapped out when full and transported to the Howco Environmental St. Petersburg facility. The trailer was not inspected however the drums appeared labeled, closed and in good condition. According to the previous inspection report, the drums are on a wood surface situated on top of the metal base of the trailer. It was noted that the wood surface is starting to wear. No petroleum discharges were noted inside or beneath the trailer. Ms. Mull indicated they are aware of the wood surface wearing and looking into replacing it.

# Howco Environmental Services Inspection Report

Inspection Date: 08/31/2021

Driver training records were provided for Jeff Milby following the inspection. Records reflect Mr. Milby received Used Oil Management, RCRA Hazardous Waste Management, HAZWOPER 1st Response, Hazard Communication (GHS), DOT Hazardous Materials Transportation and Ladder and Stairs Safety training in January 2021. In addition, sign off records were provided reflecting Mr. Milby has reviewed the recently updated driver manual which includes used oil screening procedures. The used oil screening procedures portion of the updated manual was provided by Ms. Mull. According to the manual, all liquids (PPW, used oil, used antifreeze) are screened with halogen leak detectors (sniffers) and/or Dexsil tests, before loading onto the truck. Sniffers are serviced and calibrated by lab chemists quarterly. If the frequency of beeps increases while using the sniffer, the liquid is suspect of being mixed with halogenated compounds and a Dexsil test is conducted. If the Dexsil test indicates less than 1000 ppm, the liquid is collected and documented. If the results indicate greater than 1000 ppm, the liquid is rejected and documented. Ms. Mull indicated that they have not detected any exceedances greater than 1000 ppm at this facility. It is recommended to routinely check the expiration dates on the Dexsil test kits and replace as necessary. Acceptance and delivery records were provided by Ms. Mull following the inspection. No issues were noted.

## PHOTO ATTACHMENTS:

valve header



containment structure



staining on exterior wall



containment structure





# Howco Environmental Services Inspection Report

Inspection Date: 08/31/2021

spent absorbent and trash drums



200-gallon AST



used oil filter trailer



used oil filter trailer



Inspection Date: 08/31/2021

**1.0: Pre-Inspection Checklist**

## Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)			✓
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			✓

**Howco Environmental Services Inspection Report**

Inspection Date: 08/31/2021

**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Karen R. Bayly

Inspector

**Principal Investigator Name****Principal Investigator Title**

DEP

10/04/2021

**Principal Investigator Signature****Organization****Date**

xxx

**Representative Name**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

**Report Approvers:****Approver:**

Karen R. Bayly

**Inspection Approval Date:**

10/04/2021