



# FLORIDA DEPARTMENT OF Environmental Protection

Central District Office  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

May 13, 2022

Linnea Mendoza, Quality Assurance Officer  
Hagan Holding Company, d/b/a HOWCO Environmental Services  
24133 SR 40  
Astor, Florida 32102  
linneamendoza@howcousa.com

Re: Hagan Holding Company, d/b/a HOWCO Environmental Services  
HW Facility ID # FLD101828689  
Lake County

Dear Ms. Mendoza:

Department personnel conducted an inspection of the above-referenced facility on March 31, 2022. Based on the information provided during and after the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Miranda Rothenberger at 407-897-4301 or via e-mail at [Miranda.Rothenberger@FloridaDEP.gov](mailto:Miranda.Rothenberger@FloridaDEP.gov).

Sincerely,

A handwritten signature in black ink that reads "Daniel K. Hall".

Daniel K. Hall, Environmental Manager  
Central District  
Florida Department of Environmental Protection

Enclosure: March 31, 2022 Inspection Report

cc: Lee Morris, Director of Operations, [LeeMorris@howcousa.com](mailto:LeeMorris@howcousa.com)  
Miranda Rothenberger, FDEP



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

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**FACILITY INFORMATION:**

**Facility Name:** Hagan Holding Company dba HOWCO Environmental Services  
**On-Site Inspection Start Date:** 03/31/2022 **On-Site Inspection End Date:** 03/31/2022  
**ME ID#:** 63050 **EPA ID#:** FLD101828689  
**Facility Street Address:** 24133 State Road 40, Astor, Florida 32102-3031  
**Contact Mailing Address:** 3701 Central Ave, Saint Petersburg, Florida 33713-8338  
**County Name:** Lake **Contact Phone:** (727) 967-8912

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Used Oil:** On-Spec, Oil Filters, Processor **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Mercury Containing Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Miranda Rothenberger, Inspector  
**Other Participants:** Gina Laddick, Inspector; Dan Medici, Supervisor

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

**NAIC:** 324110 - Petroleum Refineries

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On March 31, 2022, Miranda Rothenberger and Gina Laddick, Florida Department of Environmental Protection (FDEP or Department) inspected Hagan Holding Company dba HOWCO Environmental Services (HOWCO or Facility) for compliance with state and federal hazardous waste and used oil regulations. The facility was represented by Dan Medici, Supervisor.

HOWCO is a registered used oil transporter, transfer facility, processor, marketer, filter transporter, filter transfer facility, and filter processor. The company is headquartered in St. Petersburg, Florida. The St. Petersburg facility is a registered used oil transporter and processor as well as oil filter transporter and processor.

Prior to HOWCO beginning operations at this site, North Florida Oil was operating as a used oil and used oil filter transporter and processor at this location. HOWCO took over the operations in 2000. HOWCO was issued EPA ID FLD101828689 on September 27, 2006. The facility is connected to the St. John's River Utility sewer and water systems. The facility has 5 employees and operates from 8:00AM to 5:00PM, Monday through Friday. The property is owned by Hagan Holding Company, 3701 Central Avenue, St. Petersburg, Florida 33713.

HOWCO currently operates under Used Oil Processing Facility permit numbers 27221-HO-006 and 27221-SO007, which expire on August 25, 2025.

**Inspection History (5 years)**

The facility was inspected on July 14, 2020 and was out of compliance. Violations included failure to keep used oil on secondary containment when stored outside and failure to maintain a contingency plan on site. The case

## Hagan Holding Company dba HOWCO Environmental Services Inspection Report

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was closed without formal enforcement.

The facility was inspected on September 12, 2018 and was in compliance.

### Process Description:

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

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

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

The tank designations and capacities were as follows:

- Tank #1: PCW from treatment processed (8,225 gal)
- Tank #2: Used Oil (27,640 gal)
- Tank #3: Used Oil (27,640 gal)
- Tank #4: Used Oil (10,000 gal)
- Tank #5: Used Oil (27,640 gal)
- Tank #6: Used Antifreeze (10,000 gal)
- Tank #7: Burner Fuel (8,000 gal)
- Tank #8: Used Oil (29,000 gal)
- Tank #9: Used Oil (38,000 gal)
- Tank #10: Used Oil heated tank (15,000 gal)
- Tank #11: Used Oil heated tank (15,000 gal)

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

### Maintenance Shop

Stored on site was a 2000-gallon double walled tank with diesel fuel used for fueling vehicles and equipment, a 500-gallon double walled tank filled with oil for vehicle oil changes, and a 55-gallon drum of antifreeze located in the shop for use in the vehicles. The facility generates waste from maintenance activities in the maintenance shop. Located under a roof near the maintenance shop were a 55-gallon drum for used oil filters and two 55-gallon drums of used absorbent pads. All containers were properly labeled and closed. Located in the shop is a small quality analysis lab used for testing parameters such as total halogen content, flash point, and water content of used oil samples taken from incoming and outgoing used oil shipments. The shop stores product as well as spent mercury lamps. One shelving unit had loose universal waste lamps without containment and without a label [40 CFR 273.13(d)(1); 40 CFR 273.14(e)]. The facility submitted documentation on April 12, 2022

**Hagan Holding Company dba HOWCO Environmental Services Inspection Report**

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that the lamps have been shipped off site.

**Records**

Monthly inspection logs were reviewed on-site and found to be satisfactory.

A copy of the current permit and validated registration form and identification number were located on-site. The most updated copy of the Emergency Preparedness, Prevention & Contingency Plan (or Spill Prevention Control and Countermeasures Plan (SPCC)) was located on site.

Used oil acceptance records were requested electronically via email following the inspection on March 31, 2022. All records were received by April 20, 2022 and were found to be in compliance.

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

Type:	Violation
Rule:	273.13(d)(1) , 273.14(e)
Explanation:	<p>A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.</p> <p>Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".</p>
Corrective Action:	<p>The facility failed to contain or label spent mercury containing lamps on site.</p> <p>The facility is required to contain all universal waste lamps and mark the containment with one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".</p> <p>The facility submitted documentation on April 12, 2022 that the lamps have been shipped off site.</p>

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**Conclusion:**

Hagan Holding Company dba HOWCO Environmental Services was inspected on March 31, 2022 for compliance with state and federal hazardous waste and used oil regulations and was out of compliance.

## Hagan Holding Company dba HOWCO Environmental Services Inspection Report

Inspection Date: 03/31/2022

**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	✓		

## Hagan Holding Company dba HOWCO Environmental Services Inspection Report

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**Signed:**

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

<u>Miranda Rothenberger</u>	<u>Inspector</u>	
<b>Principal Investigator Name</b>	<b>Principal Investigator Title</b>	
	<u>DEP</u>	<u>05/11/2022</u>
<b>Principal Investigator Signature</b>	<b>Organization</b>	<b>Date</b>
<u>Gina Laddick</u>	<u>Inspector</u>	
<b>Inspector Name</b>	<b>Inspector Title</b>	
	<u>DEP</u>	
	<b>Organization</b>	
<u>Dan Medici</u>	<u>Supervisor</u>	
<b>Representative Name</b>	<b>Representative Title</b>	
	<u>Hagan Holding Company dba</u>	
	<u>HOWCO Environmental Serv</u>	
	<b>Organization</b>	

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:**

<b>Approver:</b>	<u>Daniel K. Hall</u>	<b>Inspection Approval Date:</b>	<u>05/12/2022</u>
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