

From: [Coffin, Pamela](#)
To: primamull@howcousa.com
Cc: [Grah, Genevieve](#); [Chang, Louise](#)
Subject: Hagan Holding Company dba Howco Environmental Services (EPAID: FL0001000611) Exit Interview
Date: Friday, December 1, 2023 2:50:00 PM

Good Afternoon Ms. Mull,

This email serves as a follow up to the routine compliance evaluation inspection conducted at Howco Environmental Services (Howco), located at 2650A Edison Ave, Fort Myers, Florida on November 29, 2023, by the Florida Department of Environmental Protection (DEP). Please provide the following supporting documentation and additional information to the department to facilitate in the completion of the inspection report:

1. Inspectors observed three (3) 55-gallon drums adjacent to the vertical storage tanks. Two were observed to be empty, while one was $\frac{3}{4}$ full of used absorbent material. The drum was not labeled. Additionally, two 5-gallon buckets containing used oil and oily rags were observed open and not labeled outside the containment structure. Please provide photo documentation of **properly labeled drums and containers** maintained on-site.
2. Inspectors did not observe a spill kit on-site. Please explain the **procedure in any case of spill**.
3. When was the **concrete containment structure last sealed**?
4. An approximate **200-gallon steel aboveground storage tank** was observed outside and adjacent to the containment structure. The tank was closed but inspectors noted fresh oil spillage around the bung hole. The Ryan Petroleum representative on site stated that the tank belongs to Howco. At the time of inspection, the tank was not properly labeled. Please provide an explanation as to how this tank is utilized and photo documentation of its proper labeling. [
5. **Acceptance and Delivery Records** for used oil, used oil filters, antifreeze, and PCW transported for the following months: October 2023, March 2023, September 2022, December 2021, and April 2021. [Rule 62-710.510(1)(d-g), and 40 CFR 279.46(b)(1-4)]
6. **Halogen Testing records** for transported used oil. If the information is on the shipping records, please let me know. [40 CFR 279.44(b)(1-2)]
7. What method do you use for **testing** (example sniffer test, dextil test)?
8. The facility must maintain **training records and annual updates** for all employees who handle used oil or hazardous waste [F.A.C. 62-710.600(2)(b, c, d)]. Please provide a training log and an example of training content for transporters/drivers that includes:
 - a. State and federal rules governing used oil
 - b. Proper used oil management practices, including spill response
 - c. SOP for halogen screening (including instrument specs and capabilities, calibration methods, procedures for loads in excess of 1,000 ppm)
 - d. Record keeping procedures for all loads accepted or rejected if applicable

9. **Truck(s) details**, such as compartments, tanks, and capacity of each.
10. Details on **weekly operations**, such as approximate gallons and quantities transported.
11. **Used oil filters** are stored inside a parked trailer on-site. How are used oil filters collected and managed at the facility?

Please submit the requested documentation by **December 15, 2023**. If you have any additional questions or concerns, please contact me via email or at the phone below.

Kind Regards,



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