



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

FACILITY INFORMATION:

Facility Name: Hagan Holding Company dba HOWCO Environmental Services
On-Site Inspection Start Date: 08/23/2024 **On-Site Inspection End Date:** 08/23/2024
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 **TSD:** Operating Non-Commercial TSD **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: Jennifer Parker, Inspector
Other Participants: 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 August 23, 2024 , Jennifer Parker, 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 3 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.

The facility was inspected on March 31, 2022 and was out of compliance. Violation included failure to contain or label spent mercury containing lamps on site. The case was closed without formal enforcement. 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 was closed without formal enforcement. The facility was inspected on September 12, 2018 and was in compliance.

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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.

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.

Records

Monthly inspection logs were reviewed on-site and found no issues.

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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

Conclusion:

Hagan Holding Company dba HOWCO Environmental Services was inspected on August 23, 2024 for compliance with state and federal used oil regulations and was in compliance.

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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	✓		

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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

Jennifer Parker
Principal Investigator Name

Inspector
Principal Investigator Title


Principal Investigator Signature

DEP
Organization

10/28/2024
Date

Dan Medici
Representative Name

Supervisor
Representative Title

HOWCO Environmental
Services

Organization

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: Jill M. Farris

Inspection Approval Date: 10/29/2024