



**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: 02/11/2025

On-Site Inspection End Date: 02/11/2025

ME ID#: 1038

EPA ID#: FLD152764767

Facility Street Address: 843 43rd St S, St Petersburg, Florida 33711-1922

Contact Mailing Address: 3701 Central Ave, Saint Petersburg, Florida 33713-8338

County Name: Pinellas

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, Used Oil, Oil Filters, Industrial Boiler, Processor **Other:** Both

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Marketer Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Coral Evans, Inspector

Other Participants: Betsy Loaiza, Environmental Specialist II, Prima Mull, Director of Sales and Operations

LATITUDE / LONGITUDE: Lat 27° 45' 40.8037" / Long 82° 41' 32.5519"

NAIC: 324110 - Petroleum Refineries

TYPE OF OWNERSHIP: Private

Introduction:

Hagan Holding Company dba HOWCO Environmental Services (HOWCO) was inspected by the Florida Department of Environmental Protection (Department) on February 11, 2025, to determine the facility's compliance with state and federal regulations governing used oil, universal waste, and Very Small Quantity Generators (VSQG) of hazardous waste. The facility initially notified as a Used Oil Transporter, Transfer Facility and Recycling Facility on February 26, 1986, under the name HOWCO Environmental Services, Inc. The Department has conducted a number of hazardous waste compliance inspections at this facility, most recently on January 17, 2024. The inspectors were accompanied by Prima Mull, Director of Sales and Operations, during the site walk through.

PERMITS

- Used Oil/Solid Waste Permit: Used Oil Permit #33721-HO-006 and a solid waste / materials processing facility Permit #33721- SO-007; issued on July 31, 2020, and expires on August 3, 2025.
- NPDES Stormwater Permit: Permit #FLR05B511; issued on January 16, 2021, and expires on January 15, 2026.
- City of St. Petersburg Industrial Wastewater Pretreatment Discharge Permit #SPFL-562219-CIU-86-32; issued January 15, 2025, and expires on January 14, 2028.

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Process Description:

HOWCO (Facility) is authorized to transport, store, and process used oil, oily wastewater, petroleum contact water (PCW), used antifreeze, and used oil filters under their permit. Additionally, HOWCO accepts oily waste solids from its customers for consolidation and subsequent disposal. HOWCO is also a VSQG of hazardous waste due to the lab waste generated during QA testing.

This facility is located on an approximately 3.2-acre property owned by Hagan Holdings, d/b/a HOWCO Environmental Services. HOWCO currently has approximately 16 employees. The hours of operation are Monday through Friday from 6 AM to 6 PM. The facility is connected to the City of St. Petersburg Utilities for water and sewer services.

The facility picks up used oil, used oil filters, used antifreeze, used absorbents, industrial wastewater, oily waste solids, and waste gas from their customers. HOWCO requires customers to analyze all new wastes prior to initial pick up and requires the generator to recertify every three years that there has been no change to the process and requires new waste analysis of each generators waste stream(s) every five years. As part of its acceptance criteria, drivers use halogen meters to test all used oil for halogen content. If the instruments indicate the halogen content is >1,000-ppm, the used oil is analyzed using a Dexsil kit. If that also shows the oil has a high halogen content, it is not picked up, unless the presumption of the material is hazardous is rebutted. All used oil arriving at the plant has been accepted in accordance with this criterion, and therefore there are no "rejected loads." Approximately 70 percent of their customers are "routing customers;" these are customers on a prearranged pickup schedule. The remaining customers are "at will" customers that call to schedule each pickup individually.

HAZMAT TRAILER/FACILITY SAFETY

HazMat and emergency response supplies are stored in a shed on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill response equipment. The facility has an emergency address system (i.e., the bullhorn) in place. The fire and emergency equipment is inspected monthly and tested annually.

USED OIL FILTER STORAGE AND ABSORBENT (ABS) AREA

HOWCO's other facilities located in Ft. Myers and Astor send their collected used oil filters to this location, as this facility is the hub for filter crushing. Drums of used oil filters are received from the collection routes run from this facility and from their sister facilities are staged in the filter processing area awaiting draining and crushing.

Facility personnel stated liquid waste collected from draining of the used oil filters via the crusher is sent to the on-site treatment plant for processing via the floor sump. The crushed used oil filter metal is sent off as scrap to Trademark Metals. Facility personnel stated that a new filter crusher (crushes approximately 8-10 drums an hour) was installed this year that is not as efficient as the previous crusher (crushed approximately 25 drums an hour).

Soiled oily absorbents are staged in 55-gallon drums. When the absorbent material is certified dry using the paint filter test, they are placed on a trailer and are shipped to Waste Management, Okeechobee, Florida, which is a Class I landfill, for disposal. Any liquids from this process are collected and sent to Tank #140 in the used oil plant.

At the time of the inspection numerous 55-gallon drums were observed staked, many missing labels to properly identify what was inside drums (Please note HOWCO's stickers were present on multiple drums but the contents of the container were not clearly marked, therefore it was not known what waste was present in each container). Aisle space adequate to allow for unobstructed movement of personnel or emergency equipment was not provided. As the facility was not meeting labeling requirements outlined in the permit, it was not possible to differentiate what drums contained oil contaminated solid waste versus used oil waste streams (see inspection photo #2-4, 7-8). Numerous 55-gallon drums were observed open, some exposed to weather conditions (see inspection photo #4-5, 7-17); while some were observed rusting, defective, and leaking (see inspection photo #1,

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5, 14-15, 18). Additionally, many areas of the Used Oil Filter Storage and Absorbent (ABS) Area appeared to have minor cracks and the surface was worn exposing the underlying possibly pervious surface (see inspection photo #1, 2, 7, 10-11, 13, 15-16, 18).

Per the permit Part II Subpart A – General Operating Conditions:

- 3. E. states, the Permittee shall maintain aisle space, as required pursuant to 40 CFR 279.52(a)(5), to allow the unobstructed movement of personnel, fire protection, and emergency response equipment to any area of the facility.

Per the Permit Part II Subpart C – Tank and Container Conditions:

- 10. states, if a container or tank holding used oil, used oil residues or used oil filters is not in good condition (e. g., rusting, bulging) or begins to leak, the Permittee shall transfer the waste to another container or tank which is in good condition [40 CFR 279.54(b)].

Per the Permit Part II Subpart B – Used Oil Conditions:

- 7. states, to prevent the release of used oil, oily waste or oily wastewater to the environment, the Permittee shall ensure that all tank and container systems, including ancillary equipment be provided with secondary containment that meet the requirements of 40 CFR 279.54 (d or e) and Rule 62-710.401(6), F.A.C. The secondary containment systems shall be maintained in accordance with the permit application and shall comply at a minimum with the requirements set forth below: (Please see the permit for further information).
- 8. states, the Permittee shall inspect the secondary containment system floor and perimeter walls for any cracks or gaps. If any cracks or gaps are found, the Permittee shall repair the cracks and gaps prior to beginning or resuming operation of the used oil processing facility [40 CFR 279.54(d)(2) and 40 CFR 279.54(e) (2)].

SLUDGE TANK (111)

Industrial Sludge is brought to the facility via tanker trucks where it is then discharged to Sludge Tank 111 for dewatering. The Sludge Tank is equipped with three screens and doors to separate solids from liquids. Facility representatives stated that when the tank is half full an orange light with flash and when the tank is three-fourths full an alarm will sound. When the Sludge Tank solids have reached capacity, the facility will empty the tank and self-transport the solidified oily sludge (solids), grease (off-spec), and wastewater treatment solids offsite to the Waste Management landfill in Okeechobee. This sludge disposal is documented on a non-hazardous waste manifest. The most recent waste analysis conducted on these materials must be provided to the Department.

BONE YARD/STORAGE LOT

A large pan was observed in this area. Facility personnel explained how this pan is used for decontamination of vacuum trucks. The vacuum trucks operated by the facility accumulate solids; periodically these solids are removed and placed into this drain pan. The material is allowed to dry out and then is placed into 55-gallon drums and sent to the Waste Management landfill in Okeechobee for disposal along with sludges and solid oily absorbents. The most recent waste analysis conducted on these materials must be provided to the Department.

TRUCK STORAGE

This area houses the facility's vehicle fleet (tankers, semis, ect.). Some of these vehicles are equipped with decks on the back to allow them to transport drums. This area appeared clean and well maintained.

USED ANTIFREEZE

Used antifreeze collected from customers is off-loaded and stored in Tank #105 and #106. This waste is sent to Heritage Crystal Clean, Fort Myers, for disposal. Facility personnel stated that HOWCO will no longer be providing used antifreeze removal services to its customers in the near future.

USED OIL PROPROCESSING PLANT

The facility currently has forty-eight aboveground storage tanks (ASTs); twenty-five of these tanks are regulated

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under the used oil permit. Twenty-three of these ASTs are also regulated by the Storage Tank Program and are registered under Storage Tank Facility #8624557. Eighteen tanks are dedicated to used oil storage, one tank is dedicated to motor fuel storage, two tanks are dedicated to used antifreeze storage, two tanks are dedicated to burner fuel (one inventory and one operational), one tank is dedicated to oily solids storage and one tank is dedicated to wastewater treatment sludge storage (Tank #108). According to facility personnel, the facility no longer has a tank dedicated to petroleum contact water (PCW) storage. The contents of each tank may change from time to time based on market conditions and is allowed as long as appropriate labeling is provided. The current facility configuration is outlined in Attachment B of the used oil permit. All tanks regulated under this permit are inside a secondary containment area.

At the time of the inspection, many areas of exposed concrete and cracks were visibly observed by Department inspectors in the secondary containment area of the Used Oil Processing Plant (please see the inspection photo log #42,43, 45-49, 52-54). Additionally, some absorbents were observed to address used oil releases in the secondary containment area of the Used Oil Processing Plant (see inspection photo #55, 58).

Per the Permit Part II Subpart B – Used Oil Conditions:

- 7. states, to prevent the release of used oil, oily waste or oily wastewater to the environment, the Permittee shall ensure that all tank and container systems, including ancillary equipment be provided with secondary containment that meet the requirements of 40 CFR 279.54 (d or e) and Rule 62-710.401(6), F.A.C. The secondary containment systems shall be maintained in accordance with the permit application and shall comply at a minimum with the requirements set forth below: (Please see the permit for further information).
- 8. states, the Permittee shall inspect the secondary containment system floor and perimeter walls for any cracks or gaps. If any cracks or gaps are found, the Permittee shall repair the cracks and gaps prior to beginning or resuming operation of the used oil processing facility [40 CFR 279.54(d)(2) and 40 CFR 279.54(e) (2)].

The Permittee is required to investigate any releases of contaminants to the environment at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. Pursuant to 40 Code of Federal Regulations (CFR) 260.10 [as adopted by reference in Rule 62-730.020(1), F.A.C.], and Chapter 62-780 F.A.C. corrective action requirements extend to all property under control of the Permittee and to all contamination that originated from discharges at the property under control of the Permittee.

At the time of the inspection, Department personnel noted two unlabeled 5-gallon buckets of used oil (see inspection photo #41 and 59) and tested the emergency eyewash station located in the Used Oil Processing Plant (see inspection photo #44). The eyewash station was not operational at the time of the inspection.

Per Part II Subpart A – General Operating Conditions:

- 5. states, the Permittee, pursuant to 40 CFR 279.57, must keep and maintain a written operating record at the Facility until closure of the Facility, which includes the following information:
 - b. The inspection records and release detection monitoring required in Rule 62-762.601, F.A.C. for aboveground process and storage tanks and integral piping.
 - d. Inspections of emergency and safety equipment.

On February 22, 2024, the facility provided the Department with a video clip showing the Oil Processing Plant's eye wash station is fixed and operable. The most recent inspection logs of emergency/safety equipment and release detection monitoring systems must be provided to the Department.

STORMWATER MANAGEMENT

Stormwater is collected throughout the facility, including from the water plant containment sumps, the oil plant containment sumps, the truck wash, the drum washing area, and the yard. This contact stormwater is routed to the water plant via sumps and pumps.

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General facility stormwater is routed through two oil/water separators in tandem prior to being discharged to the St. Petersburg MS4.

WASTEWATER TREATMENT UNIT (WWTU):

The facility uses tanker trucks to collect contaminated oil and select industrial wastewater. Contaminated oils are treated to recover the oil for resale. Pollutants are removed from contaminated industrial wastewater by passing them through a multiple process pretreatment system prior to discharge to the sanitary sewer.

Wastewater is batch treated in one of the two air strippers to remove any volatile chemicals. Treated wastewater is run through a second air stripper before being discharged to the City of St. Petersburg sanitary sewer system under Industrial Pretreatment permit #SPFL-562219-CIU-86-32. This treatment process is achieved through gravity separation, emulsion breaking, coagulation, flocculation, dissolved air flotation, and air stripping to remove oily wastes, as well as raising the pH to 10.9 units using sodium hydroxide.

MAINTENANCE SHOP

The facility's on-site concrete-block vehicle maintenance shop is located north of the main facility on 8th Street South. The shop generates used oil, used oil filters, used antifreeze and oily waste. At the time of the inspection, Department personnel observed two used oil spills with absorbent materials (see inspection photo #34, 36), unlabeled used oil drain pans in and around the shop (see inspection photo #30, 33, 35) and one open parts washer (see inspection photo #28-29), and approximately eighteen fire extinguishers awaiting disposal (see inspection photo #31).

Department personnel explained to facility staff that parts washers shall remain closed when not in use to prevent the chemicals from evaporating, as this is a form of treatment. At the time of the inspection, on-site staff closed the parts washer located in the maintenance building (see inspection photo #37).

Used oil generated in the maintenance shop is collected in two 250-gallon totes:

- One tote was observed outside of the maintenance shop unlabeled and not provided with secondary containment (see inspection photo log #32).
- One tote was located on a shelf inside the shop labeled with the words "Waste Oil" (see inspection photo log #27 and 38). While the building provides secondary containment for this tote, to prevent contamination the entire shop, the Department recommends that specifically designated containment that meets the requirements of 62-710.401 (6), F.A.C., be provided for this used oil tote.

LABORATORY

The facility's on-site laboratory is also located north of the main facility on 8th Street South (adjacent to the Maintenance Shop). Processed oil is randomly sampled biweekly and tested to confirm it is on-specification. Additional specification analyses are done off site by Eurofins. Chemical Oxygen Demand (COD) testing is conducted in the laboratory to satisfy the requirements of the Industrial Pretreatment permit. The spent vials from the COD process are hazardous waste containing acid and chromium. When this waste is deemed ready for disposal, it will need to be transported and disposed of by facilities authorized to handle hazardous waste. The laboratory also operates a Mass Spectrometer. The Mass Spectrometer produces hazardous waste in the spent vials which are 10% used oil and 90% solvent (F003). The laboratory uses a mercury thermometer and maintains a mercury spill kit. No Poly Chlorinated Biphenyl (PCB) sampling is conducted in-house. The bucket was properly labeled, and under the cover and containment of the laboratory building. Analyzed samples are retained in the facility's on-site laboratory for thirty days. At the end of the retention period, the samples are returned to the plant and processed.

OFFICE BUILDING

Spent fluorescent bulbs were observed in the office space. At the time of the inspection, the mercury containing bulbs were not containerized, not labeled with the words "Universal Waste" with an accumulation start date or a tracking system. No other waste streams are stored in this area. During the inspection, the facility provided the

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spent fluorescent bulbs with a closed, properly labeled container, and an accumulation start date (please see photo #65 of the inspection photo log).

RECORDS

- The facility provided the Department with a Contingency Plan/SPCC Plan (Version 8, dated May 1, 2020), that includes all the required information. The date of review should be noted in the written operating record at the facility.

Per the Permit Part II Subpart A – General Operating Conditions:

- 4.e. states, the Permittee shall perform at a minimum, an annual review of the Contingency Plan to ensure that it is up to date and contains current information. The date of review should be noted in the written operating record at the facility.

The facility shall provide the Department with documentation this plan is reviewed annually, at a minimum.

- The facility submitted their Annual Report on time, and their insurance is current and has been provided to the Department.

- Monthly inspections of the containment area were not available at the time of the inspection.

Per the Permit Part II Subpart C – Tank and Container Conditions:

- 8. states, the Permittee shall inspect the tank system in accordance with the permit application. At a minimum, these requirements shall also include:

- a. Inspecting, at least once a month, the condition of storage tank systems, including secondary containment, that contain, transfer, store, or are designed to contain, transfer, or store regulated substances;

- b. Developing and following a schedule and procedure for inspecting overfilling controls;

- c. Inspecting at least once a month, the aboveground portions of the tank system and the construction materials and area immediately surrounding the tank storage area.

- d. The results of the inspections in (a), (b), and (c) of this condition shall be maintained in the operating record at the facility.

The facility shall provide the Department with the monthly permit required inspections of the tank systems and secondary containment area.

- HOWCO has an electronic recordkeeping system that is used company wide. Selecting a customer's account gives access to all delivery, pick-ups, and waste profile documentation, including analytical results. The following manifest shipments were reviewed by the Department:

- Route 2: January 2023, November 2024, April 2024

- Route 3: February 2023, July 2023, March 2024, December 2024

- Route 4: April 2023, September 2023, May 2024, November 2024

The above routes were randomly selected by month and the associated records examined, including manifests, profiles, analytical results, and certifications. Inbound and outbound paperwork was included.

Currently, the only outgoing used oil is to clients, and before every load is delivered, the client is provided with a certificate of analysis to support the claim that the material is on-specification.

New Potential Violations and Areas of Concern:

Area of Concern

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Type: Area of Concern
Rule: 279.52(b)
Explanation: Per the Permit Part II Subpart A – General Operating Conditions:
• 4.e. states, the Permittee shall perform at a minimum, an annual review of the Contingency Plan to ensure that it is up to date and contains current information. The date of review should be noted in the written operating record at the facility.
Corrective Action: The facility shall provide the Department with documentation this plan is reviewed annually, at a minimum.

Type: Area of Concern
Rule: 279.54
Explanation: Per the Permit Part II Subpart C – Tank and Container Conditions:
• 8. states, the Permittee shall inspect the tank system in accordance with the permit application. At a minimum, these requirements shall also include:
a. Inspecting, at least once a month, the condition of storage tank systems, including secondary containment, that contain, transfer, store, or are designed to contain, transfer, or store regulated substances;
b. Developing and following a schedule and procedure for inspecting overfilling controls;
c. Inspecting at least once a month, the aboveground portions of the tank system and the construction materials and area immediately surrounding the tank storage area.
d. The results of the inspections in (a), (b), and (c) of this condition shall be maintained in the operating record at the facility.
Corrective Action: The facility shall provide the Department with the monthly permit required inspections of the tank systems and secondary containment area.

Type: Area of Concern
Rule: 279.57
Explanation: Per Part II Subpart A – General Operating Conditions:
5. states, the Permittee, pursuant to 40 CFR 279.57, must keep and maintain a written operating record at the Facility until closure of the Facility, which includes the following information:
b. The inspection records and release detection monitoring required in Rule 62-762.601, F.A.C. for aboveground process and storage tanks and integral piping.
d. Inspections of emergency and safety equipment.
Corrective Action: The most recent inspection logs of emergency/safety equipment and release detection monitoring systems must be provided to the Department.

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Type: Area of Concern
Rule: 62-730.030(2)
Question Number: 2.8
Question: Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)
Explanation: Sludge Tank: When the Sludge Tank solids have reached capacity, the facility will empty the tank and self-transport the solidified oily sludge (solids), grease (off-spec), and wastewater treatment solids offsite to the Waste Management landfill in Okeechobee. This sludge disposal is documented on a non-hazardous waste manifest.

Vacuum Trucks: The vacuum trucks operated by the facility accumulate solids; periodically these solids are removed. The material is allowed to dry out and then is placed into 55-gallon drums and sent to the Waste Management landfill in Okeechobee for disposal.

Per 62-730.030(2) F.A.C., states, a very small quantity generator (VSQG) which chooses to send its hazardous waste to an off-site treatment, storage or disposal facility shall document delivery of its hazardous waste through written receipts and other records which are retained for at least three years. The written receipts and other records shall include names and addresses of the generator and the treatment, storage or disposal facility, the type and amount of hazardous waste delivered, and the date of shipment.
Corrective Action: The most recent waste analysis conducted on these materials must be provided to the Department.

Type: Violation
Rule: 273.13(d)(1), 273.14
Explanation: At the time of the inspection, spent mercury-containing bulbs were not containerized, not properly labeled with the words "Universal Waste" and not provided with an accumulation start date or a tracking system.

40 CFR 273.13(d)(1) states, 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.
40 CFR 273.14 states, a small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste.
Corrective Action: CORRECTED: At the time of the inspection, the facility provided the spent fluorescent bulbs with a closed, properly labeled container, and an accumulation start date (please see photo #65 of the inspection photo log).

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Type: Violation
Rule: 279.22(b)(1), 279.22(b)(2)
Question Number: 5.2
Question: Are used oil containers/tanks in good condition? 279.22(b)(1)
Explanation: At the time of the inspection, some containers were observed rusting, defective, and/or leaking (see inspection photo log #1, 5, 14-15, 18).

Per 40 CFR 279.22(b) states, Condition of units. Containers and aboveground tanks used to store used oil at generator facilities must be:
(1) In good condition (no severe rusting, apparent structural defects or deterioration); and
(2) Not leaking (no visible leaks).
Corrective Action: Within seven days of this notice, the facility shall provide the Department with photo documentation these containers are now properly managed.

Type: Violation
Rule: 279.22(c)(1)
Question Number: 5.4
Question: Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)
Explanation: Used Oil Filter Storage and Absorbent (ABS) Area:
Numerous 55-gallon drums were observed staked, many missing labels to properly identify what was inside drums (Please note HOWCOs stickers were present on multiple drums but the contents of the container were not clearly marked, therefore it was not known what waste was present in each container). As the facility was not meeting labeling requirements outlined in the permit, it was not possible to differentiate what drums contained oil contaminated solid waste versus used oil waste streams (see inspection photo #2-4, 7-8).

Maintenance Shop:
• Unlabeled used oil drain pans in and around the shop (Photo #30, 33, 35).
• One 250-gallon tote was observed outside of the maintenance shop unlabeled not provided with secondary containment (see inspection photo log #32).
• One 250-gallon tote was located on a shelf inside the shop labeled with the words "Waste Oil" (see inspection photo log #27 and 38).

Used Oil Processing Plant:
Two unlabeled 5-gallon buckets of used oil (Photo #41 and 59).

Per 40 CFR 279.22(c), states, Labels.(1) Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."
Corrective Action: Within seven days of this notice, the facility shall provide the Department with photo documentation these containers are now properly labeled.

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Type: Violation
Rule: 279.22(d)(2)
Question Number: 5.16
Question: contain the released oil? 279.22(d)(2)
Explanation: At the time of the inspection, multiple areas of used oil releases were observed by Department personnel. Absorbents were observed to address used oil releases in the secondary containment area of the Used Oil Processing Plant (see inspection photo #55, 58). Additionally, two used oil spills were observed with absorbent material deployed in the Maintenance Shop (see inspection photo #34, 36).

Per 40 CFR 279.229(d), states, Response to releases. Upon detection of a release of used oil to the environment that is not subject to the requirements of part 280, subpart F of this chapter and which has occurred after the effective date of the recycled used oil management program in effect in the State in which the release is located, a generator must perform the following cleanup steps:

- (1) Stop the release;
- (2) Contain the released used oil;
- (3) Clean up and manage properly the released used oil and other materials; and
- (4) If necessary, repair or replace

Corrective Action: Within seven days of this notice, the facility shall provide the Department with photo documentation these areas of released used oil are properly cleaned up.

Type: Violation
Rule: 279.52(a)(5)
Explanation: At the time of the inspection, aisle space adequate to allow for unobstructed movement of personnel or emergency equipment was not provided.

Per the permit Part II Subpart A – General Operating Conditions:
3.E. states, the Permittee shall maintain aisle space, as required pursuant to 40 CFR 279.52(a)(5), to allow the unobstructed movement of personnel, fire protection, and emergency response equipment to any area of the facility.

Corrective Action: Within seven days of this notice, the facility shall provide the Department with photo documentation adequate aisle space is now present.

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Type: Violation

Rule: 279.54(d), 279.54(d)(2), 279.54(e)(2)

Explanation: At the time of the inspection, many areas of exposed concrete and cracks were visibly observed by Department inspectors in the secondary containment area of the Used Oil Processing Plant (see inspection photo log #42,43, 45-49, 52-54).

Additionally, many areas of the Used Oil Filter Storage and Absorbent (ABS) Area appeared to have minor cracks and the surface was worn exposing the underlying possibly pervious surface (see inspection photo #1, 2, 7, 10-11, 13, 15-16, 18).

Per the Permit Part II Subpart B – Used Oil Conditions:

7. states, to prevent the release of used oil, oily waste or oily wastewater to the environment, the Permittee shall ensure that all tank and container systems, including ancillary equipment be provided with secondary containment that meet the requirements of 40 CFR 279.54 (d or e) and Rule 62-710.401(6), F.A.C. The secondary containment systems shall be maintained in accordance with the permit application and shall comply at a minimum with the requirements set forth below: (Please see the permit for further information).

8. states, the Permittee shall inspect the secondary containment system floor and perimeter walls for any cracks or gaps. If any cracks or gaps are found, the Permittee shall repair the cracks and gaps prior to beginning or resuming operation of the used oil processing facility [40 CFR 279.54(d)(2) and 40 CFR 279.54(e)(2)].

Corrective Action: Within seven days of this notice, the facility shall provide the Department with photo documentation that the visibly exposed concrete, cracks and/or gaps of the secondary containment systems have been adequately addressed.

Type: Violation

Rule: 62-710.401(6)

Question Number: 5.13

Question: Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)

Explanation: At the time of the inspection, one 250-gallon tote was observed outside of the Maintenance Shop unlabeled not provided with secondary containment (see inspection photo log #32).

Per 62-710.401(6), F.A.C., states, no person may store used oil in tanks or containers unless they are clearly labeled with the words “used oil,” are in good condition (no severe rusting, apparent structural defects or deterioration), and not leaking (no visible leaks). If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area. For underground storage tanks with capacities greater than 110 gallons and above ground storage tanks with capacities greater than 550 gallons, the facility shall comply with chapters 62-761 and 62-762, F.A.C.

Corrective Action: Within seven days of this notice, the facility shall provide the Department with photo documentation that this tote has been adequately addressed.

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Type: Violation
Rule: 62-710.401(6)
Question Number: 5.12
Question: Closed or otherwise protected from the weather? 62-710.401(6)
Explanation: At the time of the inspection, numerous 55-gallon drums were observed open, some exposed to weather conditions (see inspection photo log #4-5, 7-17).

Per 62-710.401(6), F.A.C., states, no person may store used oil in tanks or containers unless they are clearly labeled with the words "used oil," are in good condition (no severe rusting, apparent structural defects or deterioration), and not leaking (no visible leaks). If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area. For underground storage tanks with capacities greater than 110 gallons and above ground storage tanks with capacities greater than 550 gallons, the facility shall comply with chapters 62-761 and 62-762, F.A.C.

Corrective Action: Within seven days of this notice, the facility shall provide the Department with photo documentation that these drums are now properly managed.

Type: Violation
Rule: 62-710.850(5)(a)
Question Number: 5.25
Question: Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)
Explanation: At the time of the inspection, numerous containers of used oil filters were observed open exposed to weather conditions.

Per 62-710.850(5)(a) F.A.C., states, all persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface.

Corrective Action: Moving forward, the facility shall ensure that all containers holding used oil filters are protected from weather conditions or sealed at all times.

Conclusion:

At the time of the inspection, HOWCO was not operating in compliance with state and federal regulations governing used oil, universal waste, and Very Small Quantity Generators (VSQG) of hazardous waste.

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2.0: VSQG 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.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?			✓
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment			✓
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)		✓	

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5.0: Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)		✓	
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)			✓
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)		✓	
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✓
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers /tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)		✓	
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)		✓	
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			✓
5.16	contain the released oil? 279.22(d)(2)		✓	
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✓
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✓
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)			✓

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5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)			✓
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)			✓
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)			✓
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)			✓
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)		✓	
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)			✓
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			✓
5.29	contain the released oil? 62-710.850(5)(b)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 62-710.850(5)(b)4			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			

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5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			✓
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24			✓
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			✓
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned /operated by the same generator? 279.24(b)(3)			✓
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓

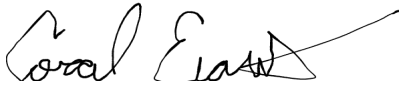
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5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓
Item No.	Marketing and Processing	Yes	No	N/A

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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

Coral Evans**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**03/05/2025**Date**Betsy Loaiza**Representative Name**Environmental Specialist II**Representative Title**DEP**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.

Prima Mull**Representative Name**Director of Sales and
Operations**Representative Title**HOWCO**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:**Michael Miller**Inspection Approval Date:**03/11/2025