



# FLORIDA DEPARTMENT OF Environmental Protection

**Ron DeSantis**  
Governor

**Alexis A. Lambert**  
Secretary

Southwest District  
13051 North Telecom Parkway #101  
Temple Terrace, Florida 33637-0926

April 7, 2025

Linnea Mendoza  
Hagan Holding Company  
3701 Central Ave  
Saint Petersburg, Florida 33713-08338  
[linneamendoza@howcousa.com](mailto:linneamendoza@howcousa.com)

Re: Warning Letter # WL25-33HW52SWD  
Hagan Holding Company dba HOWCO Environmental Services  
Facility ID No. FLD152764767  
Pinellas County

Dear Ms. Mendoza:

The Florida Department of Environmental Protection (Department) conducted a Hazardous Waste compliance inspection at your facility on February 11, 2025. During this inspection, possible violations of Title 40 Code of Federal Regulations (CFR), Parts 273 and 279; Chapter 403, Florida Statutes (F.S.); and Chapter 62-730 and 62-710, Florida Administrative Code (F.A.C.) were observed. A copy of the inspection report can be found at the following link: [https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=2.513273.1\]&\[profile=Discovery Compliance\]](https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=2.513273.1]&[profile=Discovery Compliance]).

During the inspection, Department personnel noted the following:

- Failure to comply with conditions of the Used Oil Processor Permit, and failure to comply with rules and regulations applicable to Used Oil, Universal Waste, and Very Small Quantity Generators (VSQG) of Hazardous Waste as noted in the inspection report linked above.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.141, 403.161 and 403.727, F.S.

Please contact Coral A. Evans at [Coral.A.Evans@FloridaDEP.gov](mailto:Coral.A.Evans@FloridaDEP.gov) or by phone at (813) 470-5912, within **7 days** of receipt of this Warning Letter to arrange a meeting. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with section 120.57(5), F.S. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,



Ms. Kelley M. Boatwright  
Southwest District Director  
Florida Department of Environmental Protection

ec: Coral A. Evans, DEP-SWD; [Coral.A.Evans@Floridadep.gov](mailto:Coral.A.Evans@Floridadep.gov)  
M. Brandon Miller, DEP-SWD; [Michael.B.Miller@Floridadep.gov](mailto:Michael.B.Miller@Floridadep.gov)  
Leslie Pedigo, DEP-SWD; [Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)  
Bradley Buselli, DEP-DWM; [bradley.buselli@floridadep.gov](mailto:bradley.buselli@floridadep.gov)  
Jeff Ray, DEP-DWM; [Jeff.A.Ray@FloridaDEP.gov](mailto:Jeff.A.Ray@FloridaDEP.gov)  
Michell Smith, DEP-DWM; [Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)  
Prima Mull, HOWCO; [primamull@howcousa.com](mailto:primamull@howcousa.com)



# FLORIDA DEPARTMENT OF Environmental Protection

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

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Southwest District Office  
13051 North Telecom Parkway #101  
Temple Terrace, Florida 33637-0926

## Site Report

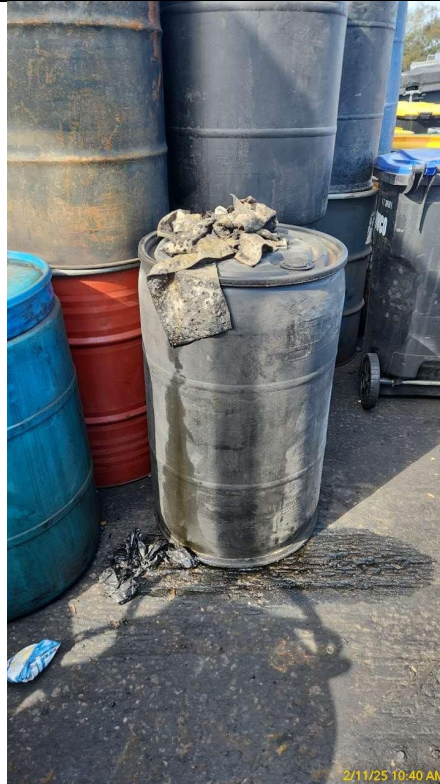
**Address:**  
**File #:**  
**Project Name:** Hagan Holding Company dba HOWCO Environmental Services (FLD152764767)  
Operating Permit Numbers: 33721-006-HO; 33721-007-SO  
**Inspection Date:** February 11, 2025  
**Inspectors:** Coral Evans.

## Digital Photo Log

**Type of Camera Used:** SM-S901U  
**Digital Recording Media:** NA  
**Were Photos Altered?:** No  
**Photographer:** Coral Evans

## Inspection Photos

<b>Image #:</b>	1
<b>Photo Description:</b>	Unlabeled leaking defective drum and absorbents exposed to environment
<b>Photo Location:</b>	27°45'40.5"N 82°41'33.9"W



<b>Image #:</b>	2
<b>Photo Description:</b>	Unlabeled 55-gallon drums, aisle space not present
<b>Photo Location:</b>	27°45'40.4"N 82°41'33.9"W



**Inspection Date:** February 11, 2025  
**Inspectors:** Coral Evans.

**Page:** 2 of 35

## Inspection Photos

Image #:	3
Photo Description:	Unlabeled 55-gallon drums, aisle space not present
Photo Location:	27°45'40.5"N 82°41'34.1"W



Image #:	4
Photo Description:	Unlabeled 55-gallon drums (some open and defective), aisle space not present
Photo Location:	27°45'40.5"N 82°41'34.0"W



Inspection Photos

Image #:	5
Photo Description:	Adequate aisle space not present (some open and defective containers)
Photo Location:	27°45'40.5"N 82°41'34.0"W
	
Image #:	6
Photo Description:	
Photo Location:	27°45'40.6"N 82°41'33.9"W
	

## Inspection Photos

<b>Image #:</b>	7
<b>Photo Description:</b>	Adequate aisle space not present, drums open and leaking, some unlabeled containers present
<b>Photo Location:</b>	27°45'40.6"N 82°41'34.3"W





<b>Image #:</b>	8
<b>Photo Description:</b>	Adequate aisle space not present, numerous unlabeled containers some open
<b>Photo Location:</b>	27°45'40.6"N 82°41'34.3"W



Inspection Photos

Image #:	9
Photo Description:	Open, unlabeled 55-gallon metal drum of used oil
Photo Location:	27°45'40.5"N 82°41'34.4"W
	
Image #:	10
Photo Description:	Open, unlabeled drum
Photo Location:	27°45'40.5"N 82°41'34.4"W
	

## Inspection Photos

Image #:	11
Photo Description:	Open containers of used oil filters
Photo Location:	27°45'40.4"N 82°41'34.5"W
	
Image #:	12
Photo Description:	Open containers of used oil filters
Photo Location:	27°45'40.4"N 82°41'34.5"W
	

## Inspection Photos

<b>Image #:</b>	13
<b>Photo Description:</b>	Adequate aisle space not present, containers observed open, and numerous drums unlabeled
<b>Photo Location:</b>	27°45'40.5"N 82°41'34.4"W



<b>Image #:</b>	14
<b>Photo Description:</b>	Unlabeled 55-gallon drum (open and defective)
<b>Photo Location:</b>	27°45'40.5"N 82°41'34.4"W



## Inspection Photos

<b>Image #:</b>	15
<b>Photo Description:</b>	Unlabeled 55-gallon drums (some open and defective)
<b>Photo Location:</b>	27°45'40.5"N 82°41'34.4"W



<b>Image #:</b>	16
<b>Photo Description:</b>	Unlabeled, open drums
<b>Photo Location:</b>	27°45'40.4"N 82°41'34.6"W



## Inspection Photos

<b>Image #:</b>	17
<b>Photo Description:</b>	Adequate aisle space not present, containers observed open, and numerous drums unlabeled
<b>Photo Location:</b>	27°45'40.6"N 82°41'34.5"W



<b>Image #:</b>	18
<b>Photo Description:</b>	Leaking roll-off of used oil filters
<b>Photo Location:</b>	27°45'40.8"N 82°41'34.4"W



## Inspection Photos

<b>Image #:</b>	19
<b>Photo Description:</b>	Leaking roll-off of used oil filters
<b>Photo Location:</b>	27°45'40.6"N 82°41'34.2"W



<b>Image #:</b>	20
<b>Photo Description:</b>	Adequate aisle space not present, containers observed open, and numerous drums unlabeled
<b>Photo Location:</b>	27°45'40.7"N 82°41'34.6"W



## Inspection Photos

<b>Image #:</b>	21
<b>Photo Description:</b>	Used oil filter crusher and drum disposal area (cracks observed in containment area)
<b>Photo Location:</b>	27°45'40.7"N 82°41'35.4"W



<b>Image #:</b>	22
<b>Photo Description:</b>	Used oil filter crusher and drum disposal area (cracks observed in containment area)
<b>Photo Location:</b>	27°45'40.6"N 82°41'35.0"W



Inspection Photos

Image #:	23
Photo Description:	Sludge tank valve from secondary containment area
Photo Location:	27°45'40.6"N 82°41'36.4"W
	
Image #:	24
Photo Description:	Sludge tank secondary containment area
Photo Location:	27°45'40.7"N 82°41'36.4"W
	

## Inspection Photos

<b>Image #:</b>	25
<b>Photo Description:</b>	Empty used oil filter container storage area
<b>Photo Location:</b>	27°45'40.9"N 82°41'36.0"W



<b>Image #:</b>	26
<b>Photo Description:</b>	Fence down from storm in bone yard/storage lot
<b>Photo Location:</b>	27°45'41.3"N 82°41'36.2"W



## Inspection Photos

Image #:	27
Photo Description:	250-gallon tote labeled "waste oil"
Photo Location:	27°45'43.5"N 82°41'31.8"W



Image #:	28
Photo Description:	Open parts washer
Photo Location:	27°45'43.5"N 82°41'31.8"W



Inspection Photos



Image #:	29
Photo Description:	Open parts washer
Photo Location:	27°45'43.6"N 82°41'31.8"W



Image #:	30
Photo Description:	Unlabeled 5-gallon bucket of used oil and a spent lead acid battery
Photo Location:	27°45'43.2"N 82°41'31.9"W



Inspection Photos

Image #:	31
Photo Description:	Fire extinguishers awaiting off-site removal
Photo Location:	27°45'43.5"N 82°41'32.0"W
	
Image #:	32
Photo Description:	Unlabeled 250-gallon tote of used oil not provided with secondary containment
Photo Location:	27°45'43.5"N 82°41'32.0"W
	

Inspection Photos

Image #:	33
Photo Description:	Unlabeled used oil drain pan
Photo Location:	27°45'43.5"N 82°41'32.2"W



Image #:	34
Photo Description:	Spill observed addressed with absorbents
Photo Location:	27°45'43.5"N 82°41'32.2"W



## Inspection Photos

<b>Image #:</b>	35
<b>Photo Description:</b>	Unlabeled 5-gallon bucket
<b>Photo Location:</b>	27°45'43.4"N 82°41'32.3"W



<b>Image #:</b>	36
<b>Photo Description:</b>	Spill observed addressed with absorbents, unlabeled 5-gallon bucket
<b>Photo Location:</b>	27°45'43.6"N 82°41'32.1"W



## Inspection Photos

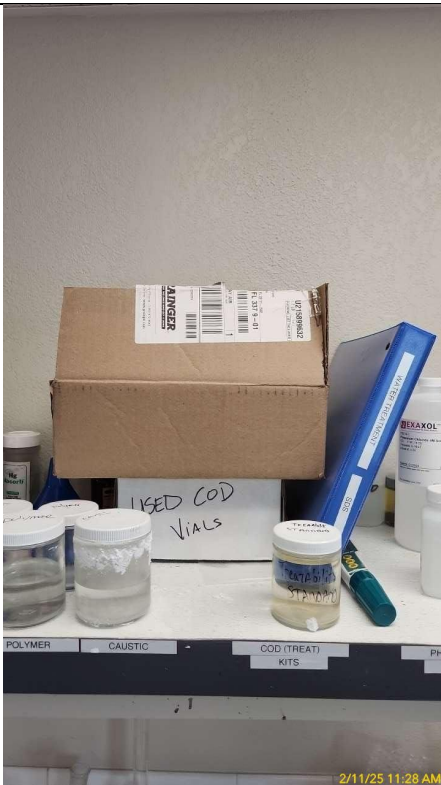

<b>Image #:</b>	37
<b>Photo Description:</b>	Closed parts washer
<b>Photo Location:</b>	27°45'43.5"N 82°41'32.0"W



<b>Image #:</b>	38
<b>Photo Description:</b>	250-gallon tote labeled "waste oil"
<b>Photo Location:</b>	27°45'43.5"N 82°41'31.9"W



## Inspection Photos

<b>Image #:</b>	39
<b>Photo Description:</b>	Hazardous waste COD vials
<b>Photo Location:</b>	27°45'43.0"N 82°41'31.5"W
	
<b>Image #:</b>	40
<b>Photo Description:</b>	Hazardous waste COD vials
<b>Photo Location:</b>	27°45'43.0"N 82°41'31.5"W
	

## Inspection Photos



Image #:	41
Photo Description:	Unlabeled 5-gallon bucket
Photo Location:	27°45'41.4"N 82°41'31.8"W



Image #:	42
Photo Description:	Exposed concrete in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.3"N 82°41'32.0"W



## Inspection Photos

<b>Image #:</b>	43
<b>Photo Description:</b>	Exposed concrete in the secondary containment area of the used oil processing plant
<b>Photo Location:</b>	27°45'41.3"N 82°41'32.0"W
	
<b>Image #:</b>	44
<b>Photo Description:</b>	Eye wash station not properly functioning in the used oil processing plant
<b>Photo Location:</b>	27°45'41.3"N 82°41'32.0"W
	

Inspection Photos

Image #:	45
Photo Description:	Exposed concrete in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.2"N 82°41'32.1"W
	
Image #:	46
Photo Description:	Exposed concrete in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.2"N 82°41'32.0"W
	

## Inspection Photos

Image #:	47
Photo Description:	Exposed concrete in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.1"N 82°41'32.0"W



Image #:	48
Photo Description:	Exposed concrete in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.1"N 82°41'32.0"W



Inspection Photos

Image #:	49
Photo Description:	Exposed concrete in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.1"N 82°41'32.0"W



Image #:	50
Photo Description:	
Photo Location:	27°45'41.2"N 82°41'32.3"W



Inspection Photos

Image #:	51
Photo Description:	
Photo Location:	27°45'41.2"N 82°41'32.6"W

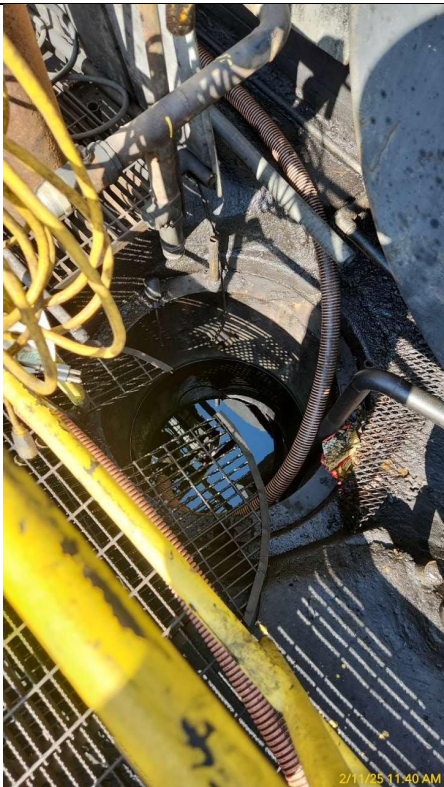


Image #:	52
Photo Description:	Exposed concrete in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.2"N 82°41'32.7"W



## Inspection Photos

Image #:	53
Photo Description:	Exposed concrete and cracks in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.2"N 82°41'32.5"W



Image #:	54
Photo Description:	Exposed concrete and cracks in the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.3"N 82°41'32.5"W



## Inspection Photos


Image #:	55
Photo Description:	Absorbent material the secondary containment area of the used oil processing plant
Photo Location:	27°45'41.5"N 82°41'32.5"W



Image #:	56
Photo Description:	Tear observed
Photo Location:	27°45'41.3"N 82°41'32.3"W



## Inspection Photos

<b>Image #:</b>	57
<b>Photo Description:</b>	Tear observed
<b>Photo Location:</b>	27°45'41.3"N 82°41'32.2"W
	
<b>Image #:</b>	58
<b>Photo Description:</b>	Exposed concrete and a release of used oil in the secondary containment area in the used oil processing plant
<b>Photo Location:</b>	27°45'41.5"N 82°41'32.0"W

## Inspection Photos



<b>Image #:</b>	59
<b>Photo Description:</b>	Unlabeled 5-gallon bucket
<b>Photo Location:</b>	27°45'41.4"N 82°41'32.0"W

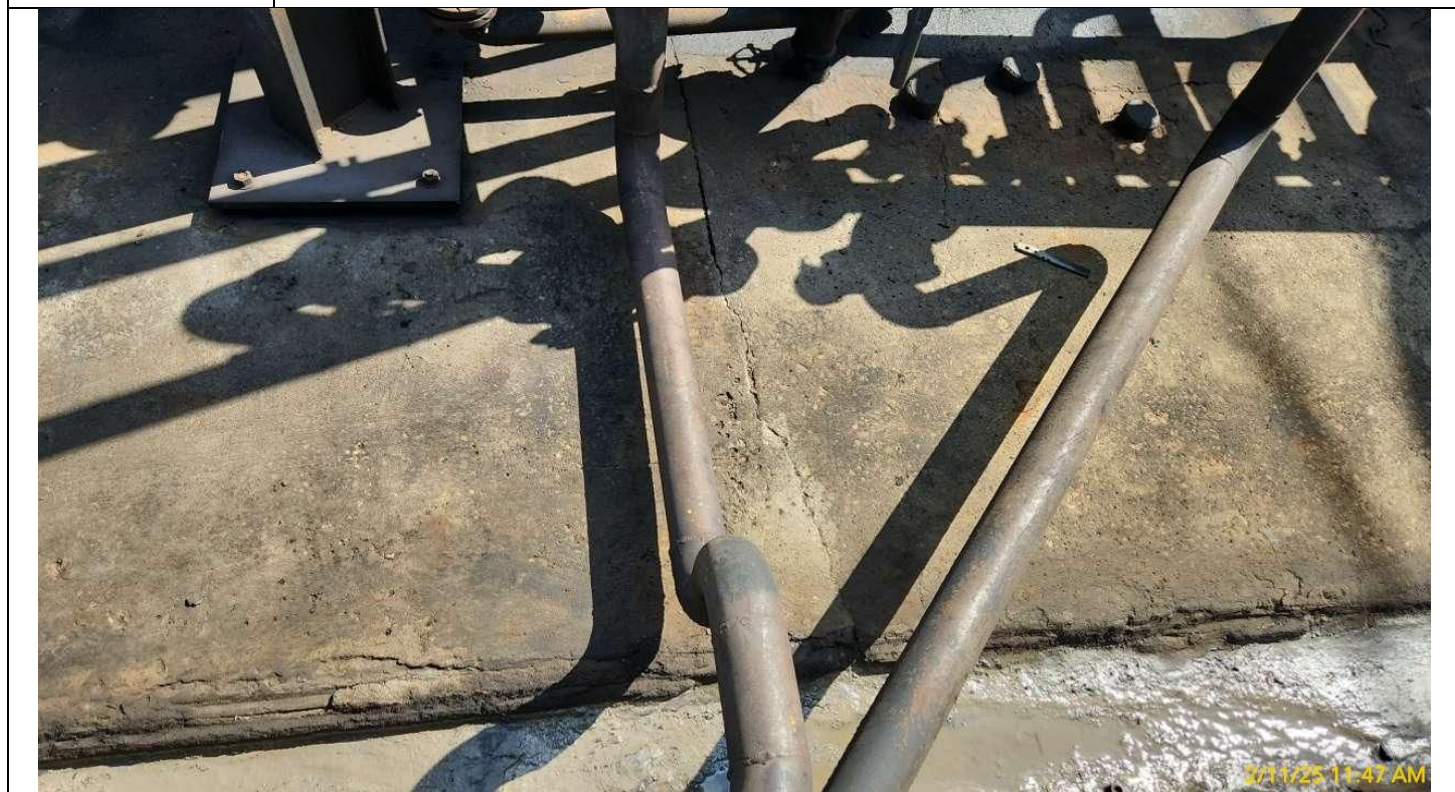


<b>Image #:</b>	60
<b>Photo Description:</b>	Exposed concrete in the secondary containment area of the used oil processing plant
<b>Photo Location:</b>	27°45'41.5"N 82°41'32.0"W

## Inspection Photos



<b>Image #:</b>	61
<b>Photo Description:</b>	Exposed concrete and cracks in the secondary containment area
<b>Photo Location:</b>	27°45'41.2"N 82°41'31.2"W



<b>Image #:</b>	62
<b>Photo Description:</b>	Exposed concrete and cracks in the secondary containment area
<b>Photo Location:</b>	27°45'41.3"N 82°41'31.2"W

## Inspection Photos



<b>Image #:</b>	63
<b>Photo Description:</b>	Exposed concrete and cracks in the secondary containment area
<b>Photo Location:</b>	27°45'41.3"N 82°41'31.2"W



<b>Image #:</b>	64
<b>Photo Description:</b>	Open, unlabeled bulbs not provided with an accumulation start date
<b>Photo Location:</b>	27°45'40.2"N 82°41'30.5"W

Inspection Photos



Image #:	65
Photo Description:	Closed, properly labeled bulbs now provided with a tracking system
Photo Location:	27°45'40.3"N 82°41'30.7"W

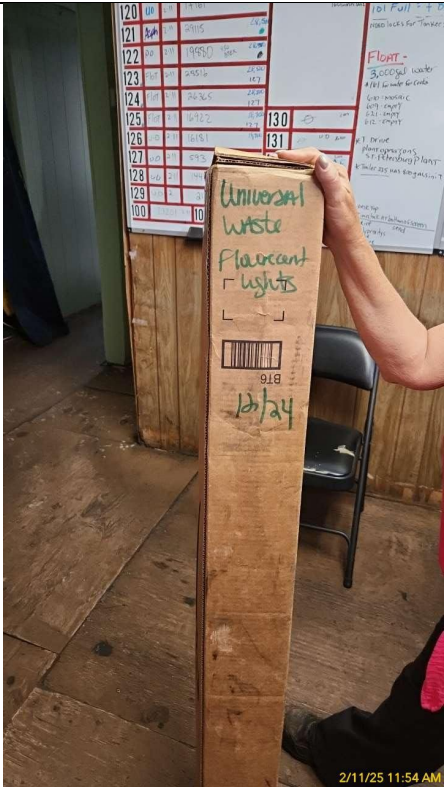


Image #:	66
Photo Description:	Evacuation route guide posted in the office
Photo Location:	27°45'40.4"N 82°41'30.9"W

Inspection Photos

