



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

FACILITY INFORMATION:

Facility Name: Hulls Environmental Services

On-Site Inspection Start Date: 10/29/2014

On-Site Inspection End Date: 10/29/2014

ME ID#: 113521

EPA ID#: FLR000211102

Facility Street Address: 7930 US 301 N, Tampa, Florida 33637

Contact Mailing Address: 7930 US 301 N, Tampa, Florida 33637

County Name: Hillsborough

Contact Phone: (813) 985-1247

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Routine Inspection for Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, EC

Other Participants: Rebecca Nipper, ES II; Michael Bevacqua, Manager

LATITUDE / LONGITUDE: Lat 28° 1' 16.7263" / Long 82° 21' 6.0721"

SIC CODE: 1799 - Construction - special trade contractors, nec

TYPE OF OWNERSHIP: Private

Introduction:

A routine hazardous waste and used oil inspection was conducted at Hull's Environmental Services new Tampa branch office. The company is based out of Oklahoma, and has operated branches in Jacksonville and Panama City since 2012. The Tampa branch opened this year, and filed a notification of hazardous waste activity form in July for its transportation operation. Mike Bevacqua, the facility manager, provided information during this inspection. The facility specializes in emergency response activities and is a Department cleanup contractor. The company's major customer is CSX Corporation, and it arranges for disposal of abandoned material from CSX rights-of-way, in addition to responding to incidents involving CSX trains or facility maintenance. The company does not solicit used oil from typical generators, and does not conduct milk-run type pickups. At this time, this branch has less than ten employees, including four drivers. The facility has a private well and is on a septic system.

Process Description:

The facility consists of an office building that includes a warehouse for storage of emergency response equipment. Equipment includes consumable items such as absorbents, booms, pads, drums and protective gear in addition to the company's boats, trailers, hoses, generators, pumps and other response gear. Secondary containment was provided for a drum of used oil, and a bucket of used oil filters generated from on site maintenance. The containers were closed, labeled and in good condition. A container of used absorbent was also within containment. A closed and labeled drum of oily rags was in a separate area. A drum of fuel and an IBC that also contained fuel were in the warehouse as well. Several red painted drums labeled "hazardous waste" were staged adjacent to the waste containment area. These were empty, and will be supplied to CSX to replace containers used for aerosol can consolidation, as needed.

Hull's operates one vacuum truck and a vacuum tanker out of this location. Three pickup trucks and a truck to transport roll off containers are also based at this location. Frac tanks, roll offs and

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other items are leased as necessary, depending on response activities. The company does not have any stationary waste storage tanks. There are three water storage tanks on site, which are used to hold fire suppression water. They were installed for a previous occupant of the property. A second building and an office trailer on site are not used by Hull's.

In most cases, Hull's transports any waste directly to the disposal facility. Used oil is not stored more than 24 hours on site. If it is necessary to store used oil on site in the future, the company is prepared to supply containment. The company does not have a contract with any one local disposal company, but will use Clark Environmental, Aqua Clean, FCC, HOWCO and DES, depending on the job. Used oil and oil filter records included all information required by rule.

As of the date of this inspection, no hazardous waste had been transported by this Hull's location, and therefore no hazardous waste manifests were available for review. The company does offer services to broker waste, and in those cases the transporter picks the waste up at the customer's location. After the inspection, a manifest for transport of two containers of used acetone was submitted. The shipment was transferred to another transporter the same day as it was picked up at the generator, and the manifest complied with transporter requirements.

The company has a used oil training program, and driver training records were current. The company also has extensive OSHA training records for emergency response related activities. The drivers have Hazardous Materials endorsements on their commercial licenses, however it was not clear that USDOT Hazmat training records were on file. It was recommended that this documentation be added to staff training records. The company screens used oil and oily water by Dexsil Q-1000 or Q-4000 kits, and oily waste water is screened with Hydro-Chlor kits. Screening results were recorded on the shipping papers observed. The company does not use "sniffers" for oil screening.

At the time of this inspection, the company had recently completed a cleanup of abandoned tires from CSX right of way. Three roll offs were on site awaiting disposal, as well as a small pile of tires waiting for disposal. The facility is a registered tire collector, and had it's decal properly displayed. No other off site waste was stored at the facility.

Conclusion:

Based on the result of this inspection, Hull's Environmental Services was in compliance with used oil and hazardous waste transportation requirements.

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Signed:

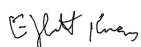
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection 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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Elizabeth Knauss

PRINCIPAL INSPECTOR NAME

EC

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

ORGANIZATION

11/6/2014

DATE**Supervisor:** Sean McGinnis

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.