



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

September 29, 2021

Mr. Larry Hall, Operations Manager  
Hull's Environmental Services, Inc.  
4850 Collins Rd.  
Jacksonville, FL 32244

*Sent Electronically:* [lhall@hullsenvironmental.com](mailto:lhall@hullsenvironmental.com)

Re: Hull's Environmental Services, Inc.  
EPA/DEP ID: FLR 000 243 501  
**Duval County – Hazardous Waste**

Dear Mr. Hall:

Department personnel conducted a compliance inspection of the above-referenced facility on August 19, 2021. Based on the information provided during and following the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your compliance efforts. Should you have any questions or comments, please contact Bonnie Bradshaw at 904-256-1638 or via e-mail at [bonnie.bradshaw@FloridaDEP.gov](mailto:bonnie.bradshaw@FloridaDEP.gov).

Sincerely,

A handwritten signature in blue ink that reads "Joni Petry".

Joni Petry  
Environmental Administrator

Enclosure: Inspection Report

cc: Bonnie Bradshaw, Cheryl Mitchell, DEP\_NED



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

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**FACILITY INFORMATION:**

**Facility Name:** Hulls Environmental Services Inc  
**On-Site Inspection Start Date:** 08/19/2021 **On-Site Inspection End Date:** 08/19/2021  
**ME ID#:** 105212 **EPA ID#:** FLR000243501  
**Facility Street Address:** 4850 Collins Rd, Jacksonville, Florida 32244-9539  
**Contact Mailing Address:** 4850 Collins Rd, Jacksonville, Florida 32244  
**County Name:** Duval **Contact Phone:** (904) 379-3465

**NOTIFIED AS:**

Non-Handler, Transporter, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Transporter:** Commercial Waste **Used Oil:** Transporter **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter Facility  
Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Universal Waste Transporter Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Bonnie M Bradshaw, Inspector  
**Other Participants:** Larry Hall, Operations Manager

**LATITUDE / LONGITUDE:** Lat 30° 11' 32.6796" / Long 81° 42' 43.4268"

**NAIC:** 562910 - Remediation Services

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Hull's Environmental Services, Inc. (Hull's, the facility) was inspected on August 19, 2021. Hull's was last inspected by the Department's Hazardous Waste Program on August 1, 2018, at their previous location at 10145 103rd St., Jacksonville (FLR 000 195 826). This location has never been inspected by the Department's Hazardous Waste Program. Mr. Larry Hall (Operations Manager) was present throughout the inspection.

Hull's is a registered Used Oil Transporter, Used Oil Filter Transporter and Hazardous Waste Transporter. Hull's is also a Petroleum Contact Water (PCW) Transporter, a Universal Waste Transporter and a Non-Handler of hazardous waste.

Hull's has been at this location since March 2021. Hull's leases the parcel and the building. The facility is connected to city water and city sewer, but has a well for irrigation. It operates two 3,000-gallon vacuum trucks, one 7,500-gallon tanker truck, one 2,500-gallon industrial loader / air mover, three roll-off trucks, three emergency response trailers, one 48-foot containment boom trailer and one lift gate stakebed truck. The facility's vehicle fleet is maintained off-site by a third-party vendor. Hull's has ten employees and operates Monday through Friday from 8:00 AM to 5:00 PM. Hull's also provides emergency response services after normal working hours. The facility consists of administrative offices, a Warehouse and a Vehicle Parking Lot.

According to Mr. Hall, Hull's primarily provides emergency response clean-up services for vehicle and railway accidents and petroleum spills on water and on soil. Mr. Hall stated that Hull's only provides minimal transportation services for hazardous waste, used oil, used oil filters, PCW and universal waste. All transportation services are described in more detail below.

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### Process Description:

#### USED OIL TRANSPORTER

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Hull's transports used oil in drums, totes and vacuum trucks directly to the processing facility, Liquid Environmental Solutions of Florida, LLC (FLD 981 928 484) or Water Recovery, LLC (FLR 000 069 062). According to Mr. Hall, the facility does not allow trucks with used oil or oily water to be parked at the facility for greater than 24 hours.

Mr. Hall stated that all used oil is screened with Chlor-D-Tect kits prior to pick-up and transport.

#### Used Oil Transporter Records Review:

A review of records indicated that Hull's has not transported used oil under its current EPA ID number. The last transport of used oil was on September 14, 2020, to Water Recovery under the facility's prior EPA ID number. Hull's maintains shipping documents for used oil it accepted for transfer for a period of three years. Records provided under the previous EPA ID indicated Hull's failed to maintain used oil records on FDEP form 62-710.901(2), or on a substantially equivalent form. Hull's also failed to record the results of the halogen screening on shipping records. The facility is reminded that Used Oil Transporters should record the required information and results of the halogen screening and retain these records for at least three years.

Used oil transporter training was last conducted in 2019. Although the facility has not transported any used oil under its current EPA ID number, it is reminded that used oil transporters that transport over public highways more than 500 gallons of used oil annually, not including oily waste, shall become certified pursuant to 62-710.600, FAC, including but not limited to maintaining a record of employee training with regard to used oil transportation.

#### USED OIL FILTER TRANSPORTER

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Hull's is authorized to transport used oil filters, but rarely performs this work for customers. Mr. Hall stated that on occasion, Hull's will respond to clean-up an oil release from a vehicle accident, and a filter may be collected at the same time with the non-hazardous petroleum waste recovered during the clean-up. Non-hazardous petroleum waste is transported to Chesser Island Landfill located in Folkston, Georgia. The facility was reminded that used oil filters are prohibited from disposal in Florida landfills.

#### Used Oil Filter Transporter Records Review:

A review of records indicated that Hull's has not transported any used oil filters under its current EPA ID number or under its previous EPA ID number during the three-year review period.

#### HAZARDOUS WASTE TRANSPORTER

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Hull's infrequently transports hazardous waste in drums in the lift gate truck. Hull's is not a registered hazardous waste transfer facility. Mr. Hall stated that employees do not typically bring hazardous waste back to the facility. If a spill occurs during non-regular business hours, hazardous waste may be stored on the truck in the shop until the morning.

#### Hazardous Waste Transporter Records Review:

A review of Hull's hazardous waste manifests indicated that Hull's transported hazardous waste only one time under its current EPA ID number. On June 28, 2021, eight drums of D001/F003/F005 hazardous waste were transported to Perma-Fix Florida, Inc. (FLD 980 711 071). This and the hazardous waste manifests reviewed under the previous EPA ID appeared to be in order and indicated that the waste was either transferred directly to a second registered Hazardous Waste Transporter or a permitted hazardous waste TSDF within one day of receipt.

#### PETROLEUM CONTACT WATER (PCW) TRANSPORTER

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Hull's transports PCW in totes and vacuum trucks directly to the processing facility, Liquid Environmental Solutions of Florida or Water Recovery. According to Mr. Hall, employees are not allowed to park the trucks at

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the facility for greater than 24 hours.

### PCW Transporter Records Review:

A review of PCW records indicated that Hull's transported PCW only one time under its current EPA ID number. On August 5, 2021, 640 gallons of PCW was transported to Water Recovery. Hull's maintained PCW shipping documents for a period of three years. This record and the records reviewed under the previous EPA ID appeared to be in order.

### UNIVERSAL WASTE TRANSPORTER

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Hull's is authorized to transport universal waste but rarely performs this work for its customers.

### Universal Waste Transporter Records Review:

A review of records indicated that Hull's has not transported universal waste under its current EPA ID number. The last transport of universal waste was on August 19, 2020, under the facility's previous EPA ID number. This record appeared to be in order.

### WAREHOUSE

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The Warehouse is located in the same building and south of the administrative offices. The Warehouse includes the main Warehouse space, as well as a breakroom, mezzanine and several small storage rooms. The Warehouse is used for the storage of parts, materials and equipment (Photo 1). Maintenance is typically not performed on vehicles or equipment on-site. No used oil, used oil filters, or hazardous waste is generated or accumulated by the facility at this location.

There were several shop vacuums stored in the Warehouse. The vacuums are used for vacuuming trucks or removing material from small areas on job sites. Mr. Hall stated that any waste generated would immediately be placed into the associated project waste drum and disposed of accordingly.

There is a flammable locker installed in the Warehouse for storage of flammable chemicals. Mr. Hall stated that, although maintenance is typically not performed on vehicles, Valvoline Carb and Throttle Body Cleaner (flashpoint -4°F), NAPA Battery Terminal Protector (flashpoint <0°F) or Super Tech Engine Degreaser (flashpoint 145°F) are stored in the locker and may rarely be sprayed directly on parts. Mr. Hall stated these products are not used on a wipe. The facility is reminded that unused or excess Valvoline Carb and Throttle Body Cleaner and NAPA Battery Terminal Protector generate a D001 hazardous waste. Several spray paints, coatings and thinners were also stored in the locker. Mr. Hall stated that personnel may perform very minor touch-up painting of customer's equipment at job sites. The facility is reminded that excess or unused paint related products, as well as solid paint/thinner contaminated material may generate a hazardous waste. Mr. Hall stated that Oaty's PVC primer stored in the locker may be used at a job site to conduct repair of PVC. The facility is reminded that excess or unused primer or cement, as well as spill cleanup material may generate a D035 hazardous waste. The facility is reminded that a full hazardous waste determination should be conducted prior to disposal of these materials.

The facility is also reminded that even when spent, aerosol cans may contain liquid product and/or flammable propellants which can cause the aerosol can to be a D001 and/or other hazardous waste. Additionally, aerosol cans with broken or clogged nozzles may be considered a hazardous waste. Unless an aerosol can is completely empty of both liquid and propellant, as defined in 40 CFR 261.7, it should not be thrown into the trash. All unusable and spent aerosol cans should either be safely punctured and properly drained into a closed container which should then be managed as hazardous waste, or be placed unpunctured into a closed container which should then be managed as a hazardous waste. Alternatively, the facility may choose to manage hazardous waste aerosol cans as a universal waste, provided they meet the requirements of 40 CFR 273.

### VEHICLE PARKING LOT

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There are concrete parking areas on the south and east of the Warehouse. The facility parks its vehicles and emergency response supply trailers/equipment on-site while not in use (Photos 2 and 3). Mr. Hall stated that the facility's procedure is to deliver any waste it transports directly to its destination without storing it on-site. Occasionally, Hull's will keep a shipment of non-hazardous waste or used oil on-site overnight if its destination

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facility is already closed for the day. According to Mr. Hall, no used oil is kept on-site for longer than 24-hour.

### RECORDS REVIEW

Records reviewed included hazardous waste manifests, shipping papers, annual registration, insurance liability coverage, personnel training records, and shipping documents and logs. Records reviewed appeared to be in order unless otherwise described above.

### PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



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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

Bonnie M Bradshaw**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**09/16/2021**Date**Larry Hall**Representative Name**Operations Manager**Representative Title**Hull's Environmental Services,  
Inc.**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:**Bonnie M Bradshaw**Inspection Approval Date:**09/16/2021