



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

FACILITY INFORMATION:

Facility Name: Hulls Environmental Services Inc
On-Site Inspection Start Date: 10/25/2021 **On-Site Inspection End Date:** 10/25/2021
ME ID#: 140746 **EPA ID#:** FLR000234492
Facility Street Address: 944-950 W Derby Ave, Auburndale, Florida 33823-4017
Contact Mailing Address: 944 W Derby Ave, Auburndale, Florida 33823
County Name: Polk **Contact Phone:** (863) 585-1478

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste **Used Oil:** Transporter, Oil Filters

INSPECTION TYPE:

Routine Inspection for Transporter Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for VSQG (<100 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Sarah M Green, Inspector
Other Participants: Leslie Pedigo, Environmental Consultant; Ben Skidmore, Area Manager

LATITUDE / LONGITUDE: Lat 28° 3' 19.4112" / Long 81° 47' 45.4668"

NAIC: 562910 - Remediation Services

TYPE OF OWNERSHIP: Private

Introduction:

An inspection was conducted at Hulls Environmental Services Inc ("Hulls") on October 25, 2021 by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with state and federal regulations for very small quantity generators ("VSQG") of hazardous waste and used oil transporters. Hulls initially notified as a VSQG, Hazardous Waste Transporter, Transporter of Universal Waste Lamps and Devices, Used Oil and Used Oil Filter Transporter in April 2020 at this location; their most recent notifications were received on March 1, 2021. Hulls has been inspected by the Department several times in the past, most recently on May 22, 2020. Inspectors were assisted by Ben Skidmore, Area Manager, during the inspection.

Process Description:

Hulls specializes in emergency spill response, site remediation, field and industrial services, hazardous and non-hazardous waste management. In addition, Hulls is a Department cleanup contractor. While this company is based out of Oklahoma, in Florida they have branches in Jacksonville, Tampa, Winter Haven, and Panama City. At this time, this branch has ten employees.

All lighting that was observed has since been switched to LED lamps; if any florescent lamps were left to be switched they would be handled by the property landlord to be properly disposed of.

In the commission of their duties, Hulls transports for both hazardous and non-hazardous waste, although this location transports almost exclusively non-hazardous petroleum waste.

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 or customer preference. Used oil and oil filter records included all information required by rule. Hazardous and non-hazardous transporter shipping manifests

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were reviewed during the inspection and appeared complete. Hazardous waste shipments are infrequent and occur only a few times a year.

The property consists of five areas: an office, three bays, and an outdoor parking lot. The three bays are used for general storage of empty drums, PPE, and other clean-up materials. No waste was being stored in the bays at the time of the inspection. The only waste on site were four 55-gallon drums of non-hazardous waste that were properly labeled and were located on a truck that had picked them up the previous day and were ready to be transported to Clark Environmental.

The company does not solicit used oil from typical generators, and does not conduct milk-run type pickups. This branch operates three vehicles: (1) vacuum truck, (1) guzzler, and (1) combo truck. In most cases, Hull's transports wastes 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.

PHOTO ATTACHMENTS:

Store Front



Bay 1



Bay 2



Bay 3



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Used Oil Containers on Truck



Conclusion:

At the time of the inspection, Hulls Environmental Services Inc was operating in compliance with state and federal regulations for very small quantity generators of hazardous waste and used oil transporters.

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6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓

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6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

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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

Sarah M Green**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**11/10/2021**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Ben Skidmore**Representative Name**Area Manager**Representative Title**Hulls 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:** Shannon Lenhart**Inspection Approval Date:**11/10/2021