



**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:** 03/19/2025

**On-Site Inspection End Date:** 03/19/2025

**ME ID#:** 155759

**EPA ID#:** FLR000260315

**Facility Street Address:** 548 E Bridgers Ave, Auburndale, Florida 33823-3721

**Contact Mailing Address:** 548 E Bridgers Ave, Auburndale, Florida 33823

**County Name:** Polk

**Contact Phone:** (863) 602-5500

**NOTIFIED AS:**

Non-Handler

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Transporter:** Commercial Waste **Used Oil:** Transporter **Universal Waste:**

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: David Petti, Inspector

Other Participants: Coral Evans, Environmental Specialist II, Ben Skidmore, Area Operations Manager

**LATITUDE / LONGITUDE:** Lat 28° 3' 47.2104" / Long 81° 46' 28.1856"

**NAIC:** 562910 - Remediation Services

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Hull's Environmental Services, Inc. (Hull's), was inspected on March 19, 2025, by the Florida Department of Environmental Protection (Department) to determine the facility's compliance with state and federal hazardous waste, used oil, and universal waste transporter regulations. Hull's was previously located at 944-950 West Derby Avenue, Auburndale under facility ID number FLR000234492. The facility initially notified as a transporter of Hg lamps or devices, used oil and hazardous waste at this location in April of 2023. The facility most recently notified the Department in February and March of 2025 as part of their annual transporter renewal process. The Department has not conducted previous hazardous waste inspections of this location. Department inspectors were accompanied during this inspection by Ben Skidmore, Area Operations Manager, for the duration of the inspection.

The facility's notification history is as follows:

- 4/3/23: Notified as transporter of Hg lamps or devices
- 4/24/23: Notified as Used Oil Transporter
- 4/25/23: Notified as Hazardous Waste Transporter
- 2/14/24: Registered as transporter of Hg lamps or devices
- 2/17/25: Renewed registration as transporter of Hg lamps or devices
- 2/19/24: Renewed registration as Used Oil Transporter
- 2/19/24: Renewed registration as a Hazardous Waste Transporter
- 3/3/25: Renewed registration as a Used Oil Transporter
- 3/6/25: Renewed registration as a Hazardous Waste Transporter

**Process Description:**

Hull's specializes in emergency spill response, site remediation, field and industrial services, hazardous and nonhazardous waste management. While this company is based out of Oklahoma, in Florida they have branches in Jacksonville, St. Petersburg, and Panama City, along with this location in Auburndale.

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Hull's has been operating at this address since 2022 and employs 13 people. The Auburndale branch operates from 8:00 AM – 4:00 PM Monday thru Friday and some weekends. The facility uses all LED bulbs for internal lighting. The facility is connected to the City of Auburndale utilities for water and sewer. The facility operates four semi tractor trailers, one rolloff truck, one vacuum truck for the collection of liquid wastes, and one truck, which uses air to collect soils and solid debris. At the time of the inspection none of the vehicles in the facility's fleet were present on the facility property..

This branch only maintains office space and keeps its fleet on-site or in overflow parking located at 502 E. Bridgers Ave., Auburndale, FL 33823. Everything Hull's transports is taken directly to a processing/recycling facility or designated facility for hazardous waste. No waste is brought back to the facility.

The facility utilizes Q-4000 Test Kits for testing used oil in the field for halogen content. This information is displayed on the acceptance records. The facility that accepts the used oil also performs this test.

## **RECORDS REVIEW**

- **Hazardous Waste Manifests**

The facility was unable to produce three years of hazardous waste manifests during the inspection. The facility provided the Department with the manifests, via email, on March 31, 2025. The last shipment of hazardous waste by this facility was for 3 tons of D008 hazardous waste which was transported on July 31, 2024.

- **Designated Facility:**

US Ecology Tampa, Inc. [EPA ID # FLD981932494]

- **Used Oil Acceptance/Delivery Records**

The facility was able to produce three years of records that detail their transportation of used oil and petroleum contact water. Records are kept on all service calls and retained work orders which include used oil generator information, quantity of used oil, and shipment date. The results of the Q-4000 test for halogen content is documented on the used oil acceptance records. Their last transport of used oil occurred on November 19, 2024, for 250 gallons. The facility that accepted the used oil was Aquaclean [EPA ID # FLR000034033].

- **Annual Report**

The facility's annual report was submitted as required.

- **Proof of Liability Insurance**

The facility was unable to provide proof of liability insurance during the inspection. However, they provided the required insurance information to the Department, via email, on March 24, 2025.

- **Registration Displayed**

At the time of the inspection the facility failed to have their transporter registration displayed in a prominent location within their facility. However, the facility provided the Department photo documentation, via email, on March 24, 2025, that the registration is now posted within their facility.

- **Training**

The facility maintains a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. This training includes the Hull's Environmental Services Used Oil Transporter Training Manual and DOT Hazmat & RCRA Hazardous Waste Training,

## **FACILITY STATUS**

Hull's is notified as a transporter of hazardous waste, universal waste, and used oil, and is operating as such.

## **New Potential Violations and Areas of Concern:**

## Violations

Type:	Violation
Rule:	62-710.500(4)
Explanation:	The facility failed to post their used oil transporter registration in a prominent location within the facility.
	62-710.500(4) F.A.C. states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.
Corrective Action:	Corrected: the facility provided the Department photo documentation, via email, on March 24, 2025, that the registration is now posted within their facility.

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## Photo Attachments:

Registration posted



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## Conclusion:

At the time of the inspection, Hull's. was not operating in compliance with state and federal used oil transporter regulations.but has since come back into compliance by performing the required corrective action.

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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			✓

**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

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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)			✓
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

David Petti**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**04/09/2025**Date**Coral Evans**Inspector Name**Environmental Specialist II**Inspector Title**FDEP**Organization**Ben Skidmore**Representative Name**Area Operations Manager**Representative Title**Hulls Environmental Services**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:**04/09/2025