

Florida Department of Environmental Protection

Northwest District 160 Governmental Center Pensacola, Florida 32502-5794 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary- Designee

January 9, 2007

Send via e-mail: JHINSEY@safety-kleen.com

Mr. John Hinsey Branch General Manager Safety-Kleen Systems 4426 Entrepot Boulevard Tallahassee, Florida 32310

Dear Mr. Hinsey:

Enclosed is a copy of the report on the December 7, 2006 compliance inspection that was conducted at your Safety-Kleen Systems facility located at 4426 Entrepot Boulevard, Tallahassee, Leon County, Florida. We found your facility to be in compliance with the Used Oil Management Program and the Resource Conservation and Recovery Act. This inspection did not address other areas of Department jurisdiction.

If you have any questions concerning this program or the enclosed report, please contact Terry Wells at 850/595-8360, extension 1258 or via e-mail at terry.wells@dep.state.fl.us.

Sincerely,

James Byer

Hazardous Waste Section

JCB:twr

Encl: Hazardous waste Inspection Report



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HAZARDOUS WASTE INSPECTION REPORT

L.	INSPECTION TYPE: Koutine Complaint Follow-Up Permitting Pre-arranged		
	FACILITY NAME: Safety-Kleen Systems, Inc. DEP/EPA ID #: FLD 982 133 159		
	STREET ADDRESS: 4426 Entrepot Boulevard, Tallahassee, Florida 32310		
	MAILING ADDRESS: 4426 Entrepot Boulevard, Tallahassee, Florida 32310		
	COUNTY: Leon PHONE: (850) 576-9764 DATE: December 7, 2006 TIME: 1:00 P.M.		
	HW facility status	used oil facility status	Hg facility status
	□ non-handler □ CESQG □ SQG □ LQG □ transporter □ transfer facility □ TSD □ SQH	generator transporter transfer facility marketer processor on-spec. burner off-spec. burner filter generator filter transporter filter transfer facility	exempt generator transporter Hg recovery facility Hg reclamation facility PCW facility status producer
	LQH	filter processor	transporter recovery facility
2.	☑ 40 CFR 265 ☐ 40 CF	FR 262	 □ 1000 Very laterally □ 40 CFR 264 □ 40 CFR 270 □ 62-730, FAC
3.	RESPONSIBLE OFFICIAL: John Hinsey, Tallahassee Branch Manager		
1.	INSPECTION PARTICIPANTS: John Hinsey of S-K. Terry Wells of FDEP		
5.	LATITUDE/LONGITUDE : Lat 30° 24′ 07″/Long 084° 19′ 30″		
ó.	TYPE OF OWNERSHIP: private federal state county municipal		

PERMIT No.:9207-HO-006 DATE ISSUED: October 19, 2005 EXP. DATE: March 14, 2010

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8. Site History and Description:

Safety-Kleen Systems, Inc. (S-K), 4426 Entrepot Boulevard, Tallahassee, Florida is a generator, transporter and permitted storage facility and transfer facility for hazardous waste. S-K has been operating at this location since 1988. This facility is permitted for both a container storage area and a tank storage area with Permit No. 9207-HO-006, which was issued October 19, 2005 to incorporate FDEP issued HSWA Corrective Action Requirements. This facility was last inspected on April 4, 2006 to confirm compliance with the operating permit and state and federal RCRA regulations with no violations cited. The purpose of this inspection is to confirm S-K's status and compliance with the RCRA regulations.

S-K collects hazardous waste from area generators and temporarily stores it on-site prior to shipping off-site for reclamation and/or disposal. S-K conducts leasing and servicing of S-K parts cleaning equipment. Parts washing solvents (Parts Cleaner 105, 150 Premium Solvent, or Actrel) are sent with the equipment. The solvent is exchanged on a periodic basis in accordance with a joint agreement. The used solvent is returned to the storage facility for reclamation. S-K also picks up various drums of hazardous waste, used oil, used oil filters, spent silver recovery cartridges and non-regulated wastes for temporary storage (Transfer Station). This waste is then shipped off-site for reclamation and/or disposal. Facility equipment description and operation is described in previous inspection reports and contained in the operating permit.

9. Site Inspections:

John Hinsey of S-K provided access to the facility, description of operations and access to paper and computer-based records.

Return/Fill Shelter

The area was inspected mid-afternoon when no loading/unloading activity was underway. The loading and unloading area was well maintained, located with easy access to the emergency and safety equipment installed in this area. In this area were twelve 30-gallon empty drums that were waiting to be filled with solvent.

Also in this area were two 250-gallon totes that held product. Mr. Hinsey informed me that the aqueous parts washing solvents are now being mixed in the receiving area. A further inspection revealed (16) 30-gallon drums of aqueous parts washing solvent that were waiting to be vacuumed out. Mr. Hinsey indicated that they were just pulled off the truck and have not been processed. The drums were in good condition, labeled and closed. These drums were non-regulated aqueous parts washer solvent.

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The shelter area held no containers of hazardous waste with the exception of the satellite accumulation 55-gallon drum for hazardous waste solids/sludge from the dumpster/drum washing unit. Sludge from the drum washing unit is removed every shift. This drum was labeled, in good physical condition and closed.







Aqueous parts washer totes Aqueous parts washer drums Load and unload area

10-Day Transfer Station

This area contained nine 55-gallon drums of various waste streams which includes paint waste, acetone, waste fixer solution. The oldest date noted on any container was December 5, 2006. This area was well kept with no discrepancies noted. All containers were in good physical condition, closed, and labeled. The daily inspection record for the 10-Day Transfer Station was reviewed and appropriate documentation was available during the inspection. Adequate aisle space was available to inspect each container.



10-Day Transfer Station

TSD Storage Area

The TSD Storage Area was well organized and aisle space maintained to allow inspection of each container. All containers were in good physical condition, closed, and labeled. Three random containers were selected (Container #'s 125, 826 & 030) and

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a computer and hardcopy records check conducted to verify its origin, transport history and storage inventory. No discrepancies were noted. The containers identified above when referenced against manifest revealed that these containers were identified on manifest #'s 170534, 253522 & 230049 respectively. A visual inventory of drums versus computer record inventory for the TSD Storage Area was conducted by Mr. Hinsey and Terry Wells with no discrepancies noted. Also located in this area was Universal Waste that was being managed properly with no discrepancies identified.







TSD Storage Area

TSD Storage Area

Universal Waste Storage

Tank Storage Area

The area was well maintained with no evidence of tank leakage noted. The load/unload pipe manifold area showed no evidence of leakage or spillage from the piping and equipage in this area. The accumulation drum located in this area was closed, labeled and in good condition.

The facility's 40 CFR 264 Subpart BB compliance procedures for the waste mineral spirits solvent management system were in place and being implemented during this inspection. The waste mineral spirits solvent management system equipage (piping, valves, flanges, pumps, etc) was color coated to distinguish it readily from the other equipage in the facility. Red piping is for dirty solvent, orange piping represents Safety Kleen's 105° solvent and green piping represents 150° solvent. This coloring scheme allows the daily inspector of the system to track the equipage and inspect for liquid leaks. The tank system consists of two 15,000-gallon tanks and one 11,400-gallon tank. All tanks are double-walled. Brass numbering tags are used to identify valves and flanges associated with the waste solvent tank system. The daily inspection logs were reviewed for the previous year with no discrepancies noted. The tanks are in the process of being repainted.

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150 Premium product

Waste solvent tank valve

Waste solvent equipage

External Area

The outside storage/laydown area, driveways, vehicle parking lot, solid waste dumpsters and the perimeter fence/lawn areas were inspected with no discrepancies noted. All other security and safety equipment was installed in accordance with the permit and operational. A tanker trailer had been parked within a temporary secondary containment at the southwest corner of the rear asphalt parking area. This tanker will be used for on-site consolidation of wastes collected daily in the vacuum truck and then transfer and stored on-site in the tank trailer until a full 5,000-gallon load makes it necessary for transport to the follow-on processor. Also in this area were four "Used Oil Filter" dumpsters that were properly labeled and closed. Mr. Hinsey indicated that all collected used oil filters are sent to a processing facility called Oil Filter Recyclers located in Illinois. There were also several empty containers that Safety Kleen utilizes during its daily operations located outside the facility. Mr. Hinsey then informed me that the budget included money for the repaving of the parking and storage area for the upcoming year.



5,000-gallon tank trailer



"Used Oil Filter" dumpsters

Miscellaneous

Emergency fire, first aid, and spill control equipment within the facility was randomly inspected to verify the facility inspection and maintenance program. A review of

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randomly selected training records, daily/weekly inspection logs for the Transfer Area, Storage Containers, Storage Tanks, and safety equipment was conducted with no discrepancies noted. The contingency plan and permit were available and current. Documentation tracking checks on multiple containers from the TSD Storage Area picked at random verified the hardcopy and computer tracking documentation for all containers checked.

This inspection verified S-K is a large quantity generator of hazardous waste; a transporter of hazardous waste and used oil; and an operator of a transfer station and permitted storage facility.

10. Summary of Alleged Violations: None

11. Recommendations: None

Report prepared by

Terry Wells

Date:____December 7, 2006____