



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

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 08/28/2008

On-Site Inspection End Date: 08/28/2008

ME ID#: 1792

EPA ID#: FLD980847271

Facility Street Address: 5309 24th Ave S, Tampa, Florida 33619-5368

Contact Mailing Address: PO Box 368, Neenah, Wisconsin 54957-0368

County Name: Hillsborough

Contact Phone: (800) 558-5011

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

TSD Facility Unit Type(s)

Used Oil

CURRENT STATUS:

LQG (>1000 kg/month)

TSD Facility Unit Type(s)

Hazardous Waste Transporter

Used Oil Transporter

Universal Waste Transporter

Hazardous Waste Transfer Facility

INSPECTION TYPE:

Permitting Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Danielle Nichols, Environmental Specialist III; Dan Wharton, Branch General Manager

LATITUDE / LONGITUDE: Lat 27° 55' 33.9629" / Long 82° 23' 39.6154"

SIC CODE: 5172 - Wholesale trade - petroleum products, nec

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc., (SK) was inspected to determine its compliance with state and federal hazardous waste regulations. SK is a permitted hazardous waste storage and recycling facility and also leases out various parts cleaning machines to its customers. Core business lines include parts cleaners, immersion cleaners and paint gun cleaners, as well as aqueous cleaners (brake and parts cleaners). In addition, SK collects used oil and used oil filters, spent mercury-containing lamps and spent antifreeze (ethylene glycol). The company is also a hazardous waste transfer facility that receives wastes from its customers for consolidation and shipment to other facilities. All hazardous wastes received or generated at the facility are stored in containers or tanks.

Process Description:

The facility has not changed since the previous inspection. Other than materials handling, the major process ongoing at the facility is drum cleaning, which utilizes an enclosed, automated spritzer system. Used solvent is brought back to the facility from designated customers and used to clean drums. After cleaning, the spent solvent is pumped to the facility's hazardous waste storage tank. The cleaning process, as well as the process of emptying drums of customers' spent solvent, generates hazardous waste solids/debris and sludge, which are accumulated in 55-gallon drums located at the facility's wet dumpsters. When full, the drums are moved into storage and managed with the rest of the stored wastes.

Except for QA samples, which are stored in flammables cabinets and retained for only 90 days,

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used oil transported by SK is not brought back to the facility, but is taken to the Trans-Flo Tampa transfer facility and loaded onto a rail car for shipment to another SK facility. Ethylene Glycol is stored on site and shipped for recycling to Georgia Petroleum. Additional details about the facility may be found in Permit #34744-HO-005 and the associated permit application.

POTENTIAL VIOLATIONS AND AREAS OF CONCERN WITH NO ASSIGNED AREA:**Pre-existing Potential Violations and Areas of Concern:****RCRA Compliance Inspection Report - TSD Facilities Checklist**

Type: Violation
Rule: 264.16(d)
Question Number: 11.22
Explanation: The position descriptions and associated training requirements did not include the position of Driver. (corrected)
Corrective Action: Jeff Curtis, EHS Manager for Safety-Kleen Systems, Inc., has added the drivers' position descriptions to the personnel files on site.

Type: Violation
Rule: 264.51(a)
Question Number: 11.34
Explanation: The list of emergency equipment in the permit references 10 fire extinguishers, but only 9 were present. Also, some of the fire extinguishers were not located as indicated in the permit. (corrected)
Corrective Action: The discrepancies were observed and noted by the Branch Manager during the verification of the locations of the emergency equipment. He stated that the discrepancies would be fixed by the following day.

TSD Containers Checklist

Type: Violation
Rule: 264.171
Question Number: 12.2
Explanation: Permit Condition SC II.1: Two 55-gallon drums of ignitable and toxic waste were being stored in the non-flammables storage area. One of the drums is represented in Photo #1 (corrected)

Permit Condition SC I.28: Approximately 3 containers were not marked with the date received, and approximately two containers in storage had the date marked in the space reserved for transfer containers. Refer to Photo #2 for an example. (corrected)
Corrective Action: Permit Condition SC II.1: The drums were relocated to the flammables storage area, and all warehouse personnel have been retrained.

Permit Condition SC I.28: Containers have been marked with the correct date and warehouse employees have been retrained.

Summary of Potential Violations and Areas of Concern:

Inspection Date: 08/28/2008

Potential Violations

Rule Number	Area	Date Cited	Explanation
RCRA Compliance Inspection Report - TSD Facilities Checklist			
264.16(d)		08/28/2008	The position descriptions and associated training requirements did not include the position of Driver. (corrected)
264.51(a)		08/28/2008	The list of emergency equipment in the permit references 10 fire extinguishers, but only 9 were present. Also, some of the fire extinguishers were not located as indicated in the permit. (corrected)
TSD Containers Checklist			
264.171		08/28/2008	Permit Condition SC II.1: Two 55-gallon drums of ignitable and toxic waste were being stored in the non-flammables storage area. One of the drums is represented in Photo #1(corrected) Permit Condition SC I.28: Approximately 3 containers were not marked with the date received, and approximately two containers in storage had the date marked in the space reserved for transfer containers. Refer to Photo #2 for an example. (corrected)

Areas of Concern

No Areas of Concern

Conclusion:

Based on the observations made during the inspections, SK was found to have two paperwork violations. There were also two permit condition deficiencies noted. These violations have been corrected.

History:

Activity Closed Date: 11/17/2008

Inspection Date: 08/28/2008

Signed:

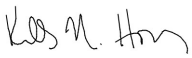
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection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

Kelly M. Honey

PRINCIPAL INSPECTOR NAME

Environmental Specialist III

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

11/12/2008

DATE

Danielle Nichols

INSPECTOR NAME

Environmental Specialist III

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Dan Wharton

REPRESENTATIVE NAME

Branch General Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Safety-Kleen Systems, 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 "Not Ok" or areas of concern.