



# Florida Department of Environmental Protection

Northeast District Office  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7590

File 9/15  
Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

SEP 15 2009

Mr. Kevin Hamilton, Branch General Manager  
Safety - Kleen, Inc.  
161 Industrial Loop South  
Orange Park, Florida 32073

Re: Safety - Kleen, Inc.  
EPA/DEP ID: FLD 980 847 214  
Clay County - Hazardous Waste

Dear Mr. Hamilton:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection (DEP) at your facility on June 25, 2009. Enclosed is the report that documents this inspection.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.807.3381.

Sincerely,

Jabe Breland III  
Environmental Specialist III  
Hazardous Waste Section

1732  
Enclosure



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

Facility Name: Safety - Kleen Systems Inc  
On-Site Inspection Start Date: 06/25/2009 On-Site Inspection End Date: 06/25/2009  
ME ID#: 2319 EPA ID#: FLD980847214  
Facility Street Address: 161 Industrial Loop S, Orange Park, Florida 32073-6259  
Contact Mailing Address: 3003 Breezewood Ln, Neenah, Wisconsin 54956-9611  
County Name: Clay Contact Phone: (800) 558-5011

**NOTIFIED AS:**

LQG (>1000 kg/month)  
Transporter  
Transfer Facility  
TSD Facility Unit Type(s)  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for TSD Facility Unit Type(s)  
Routine Inspection for Used Oil Generator facility  
Routine Inspection for LQG (>1000 kg/month) facility  
Routine Inspection for Hazardous Waste Transporter facility  
Routine Inspection for Hazardous Waste Transfer Facility  
Routine Inspection for Universal Waste Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Jabe Breland III, Environmental Specialist  
Other Participants: Kevin Hamilton, Branch Manager

**LATITUDE / LONGITUDE:** Lat 30° 10' 47.5682" / Long 81° 43' 5.3847"

**SIC CODE:** 4212 - Trans. & utilities - local trucking, without storage

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Safety-Kleen Systems, Inc. (Safety-Kleen) is a hazardous waste management facility. The DEP issued permit number 77130-HO-006 to Safety-Kleen on March 11, 2009. The permitted hazardous waste units include two container storage areas (the main container storage area and the paint waste shelter) and an aboveground storage tank. The facility is also a transporter/transfer facility and a large quantity generator of hazardous waste. Safety-Kleen Systems, Inc. was inspected on June 25, 2009, as an unannounced hazardous waste compliance inspection.

**Process Description:**

**SITE INSPECTION:**

**10-day Transfer Area**

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The 10-day Transfer Area had eight 55-gallon containers that were stacked two high and in one group. All containers were properly labeled, closed, and in good condition. None of the containers exceeded the 10-day storage limit.

Inspection Date: 06/25/2009

### Spent Fluorescent Lamps Storage Area

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The spent fluorescent lamp area is located in the corner of the permitted storage area. Lamps in this area were properly labeled and in secure containers.

### Main Container Storage Area

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The Main Container Storage Area is a permitted hazardous waste container storage area. At the time of the inspection, there were approximately 25 containers of hazardous waste in this area. All containers were closed, labeled, dated, and under the one year time limit for storage.

### The Dock

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Safety-Kleen distributes and services parts washers. Mineral spirits are used as a parts washer solvent. When the mineral spirits are spent, the waste is picked up by Safety-Kleen and replaced with new product. The drums of waste mineral spirits are transported from the customer back to Safety-Kleen and deposited in an automatic barrel washer. The facility operates one barrel washing unit. Solids from this waste stream are accumulated in the barrel washer, while the liquid D001/D018/D039/D040 spent mineral spirits are pumped into a 15,000-gallon aboveground storage tank. The solids (parts washer solvent/dumpster mud) are placed into 55-gallon satellite drums. D039 aqueous brake washer waste sludge is later added to these drums (generated by customers and transported to Safety-Kleen) and disposed of as hazardous waste. Two satellite containers (branch contaminated debris and dumpster mud) were accumulating waste next to the barrel washer. Both were labeled and closed. Brake washer containers are brought in from different customers and emptied and cleaned before they are refilled and returned to customers.

Transfer waste was also located in this area in stacks of eight. Containers are off-loaded at night and any non-transfer waste is moved to the permitted area for storage as soon as it is off-loaded. Any other waste staged in this area is waiting to be moved to the 10-day transfer area. All were properly labeled and in good condition. Adequate aisle space was provided for all containers to ensure complete inspection.

### Tank Farm

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Safety-Kleen's tank farm is located outside, adjacent to the main building. One 15,000-gallon aboveground hazardous waste storage tank contains waste mineral spirits and aqueous brake washer fluid from the operation of the barrel washer. The tank was properly labeled. Another 15,000-gallon tank contains product mineral spirits. The third 15,000-gallon tank contains used oil and was properly labeled. The tank farm is in 110% secondary containment.

### Paint Waste Shelter

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The paint waste shelter is a permitted hazardous waste storage area. This building is located behind the main building. There were approximately 25 containers of hazardous paint waste being stored at the time of inspection. All containers were properly labeled, dated, and closed.

### Other Wastes

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Safety-Kleen has two trucks dedicated to collecting used oil and waste antifreeze from its customers for recycling. Used oil is stored in the 15,000-gallon tank, and it is sent to Georgia Petroleum for recycling. Used antifreeze is stored in a 2,700-gallon aboveground polyethylene storage tank inside the warehouse. The antifreeze is sent to Noble Oil for recycling. Safety-Kleen has three vacuum service trucks dedicated to collecting oily wastewater from its customers. The oily wastewater is off-loaded at Industrial Water Services. Cintas launders the facility's rags.

The facility recently purchased Atlantic Industrial Services, which is a used oil transporter. This has added to Safety Kleen's used oil handling operations, with the addition of more trucks and a larger customer base.

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**RECORDS:**

A review of the facility's manifests, operating records, including the operation log for the stipulated requirements in the permit, biennial reports, annual reports of used oil activities, arrangements with local authorities, training records, and inspection logs (tank and container) revealed no discrepancies. The contingency plan was on-site and up-to-date. Safety Kleen is currently a Large Quantity Generator of hazardous waste and a permitted TSD facility.

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Inspection Date: 06/25/2009

**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.

Jabe Breland III**PRINCIPAL INSPECTOR NAME**Environmental Specialist**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**DEP**ORGANIZATION**9/14/2009**DATE**Kevin Hamilton**REPRESENTATIVE NAME**Branch Manager**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**Safety Kleen**ORGANIZATION****Report Approvers:**Vicky Valade**SUPERVISOR NAME**Environmental Manager**SUPERVISOR TITLE****SUPERVISOR SIGNATURE**DEP**ORGANIZATION**9/14/2009**DATE**

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.