



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

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 08/27/2009

On-Site Inspection End Date: 08/27/2009

ME ID#: 11672

EPA ID#: FLD984171694

Facility Street Address: 8755 NW 95th St, Medley, Florida 33178-1462

Contact Mailing Address: 3003 W Breezewood Lane, Neenah, Wisconsin 54957-0368

County Name: Miami-Dade

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 Transfer Facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Transporter facility

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for Used Oil facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R Winston, Inspector

Other Participants: Todd Klein, General Branch Manager; Chester Wendell, Environmental Specialist

LATITUDE / LONGITUDE: Lat 25° 51' 37.5641" / Long 80° 20' 25.4331"

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

TYPE OF OWNERSHIP: Private

Introduction:

The facility is comprised of one 2.3-acre-sized building situated on a 5.5-acre site in an industrial area, and is connected to city water and sewer. Safety Kleen (SK) has been operating at this location since 1993, and has approximately 12 employees.

Process Description:

SK is a permitted facility authorized to operate drum and tank storage units within a service accumulation center. These units include: (1) solvent return and fill station; (2) container and non-container storage; and (3) tank storage. SK is also a registered Small Quantity Handler of Universal Waste.

Solvent Return and Fill Station: This area of the facility is a warehouse bay with four rollup doors, two each on the north and south sides. A central elevated grating is oriented east-west across the bay, and six sets of short stairs lead to the concrete floor below. This grated dock is accessed from the office and leads into the container storage warehouse in the eastern section of the building.

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Inspectors observed two wet dumpsters on this elevated grating, one of which is equipped with a drum wash. Each wet dumpster is hardpiped (brown pipe) to a designated waste tank in the tank storage containment. Containers of spent parts washer solvent are brought in by field representatives and emptied into the wet dumpsters; the used solvent is used here to wash the containers before the waste solvent is pumped to the storage tank. The washed containers are then replenished with fresh solvent piped from the tank storage area, either the red 105° F solvent or the green 150° F solvent, for delivery to customers at scheduled intervals. Hazardous waste sludge is generated in the wet dumpsters from these activities. On the south side of this elevated grating inspectors observed two pallets that had arrived at the facility earlier in the day. The first had used oil drums on them and the other assorted hazardous containers, all these containers were properly labeled, dated (all the hazardous waste containers were dated 8/26/09), closed and in good condition. Also stored on the elevated grating were drums containing fresh red and green solvent for delivery to customers.

The concrete floor slopes towards the center of the bay to a trench sump. According to SK personnel, the trench sump is managed as less-than-24 hours storage, and would be immediately pumped out upon any collection. On the floor of the bay, inspectors observed several used oil filter drums and two used oil filter storage bins, each labeled, closed, and in good condition. The used oil filters from the drums were awaiting consolidation into the two bins for transport to US Foundry in Medley, Florida. Inspectors noted fire extinguishers (last inspected January 2009), sprinklers, spill kits, and signage in accessible locations throughout the bay.

Container and Non-container Storage: This area of the facility occupies the easternmost warehouse bay of the building, and is the storage location for containerized wastes, as well as, a caged area used for product storage, parts washer equipment, and general facility supplies. Drummed wastes observed included SK-generated personal protective equipment (PPE) solids and branch debris, waste perchloroethylene, waste paint thinner, waste carburetor cleaner, waste fixer and X-ray films, and used oil filters. Several hazardous waste containers in this area had hazardous waste labels that had been placed over used oil labels and the used oil labels were still visible. In the designated 10-day transfer facility area was a 15 gallon drum from a facility named Miami Marine Specialist which was dated 8/13/09. Inspectors observed several drums along the western wall, which according to facility representatives were satellite accumulation drums containing SKs branch debris that had been labeled with accumulation start dates. Spill kits occupied a designated area labeled as 10-day storage (hazardous waste transfer station). Universal waste lamps destined for recycling, as well as spill cabinets with emergency contact information were stored along the caged area. The universal waste was stored in properly labeled boxes in good condition. Inspectors noted that this portion of the facility was equipped with fire suppression foam equipment, sprinklers, fire hoses and extinguishers (last inspected January 2009), and safety showers and eyewashes.

The loading dock to the south is used for the the mixing of aqueous parts washer detergent for distribution to customers, unloading and loading containers, the storage of aqueous part washers and equipment in for repair, and empty parts washer drums.

Tank Storage: The storage tanks are housed under a covered concrete bunker equipped with a sump and high level alarm. SK utilizes one 20,000 gallon storage tank for the management of waste solvent under their permit, and one 15,000 gallon tank containing used oil. Oily water is stored in the 10,000 gallon tank in this area, and two 20,000 gallon tanks each hold bulk solvent product (red and green). All tanks were closed, in good condition, and labeled. The tank area was equipped with secondary containment, fire extinguishers and sprinklers. Outside the south side of the tank storage building is the tanker truck spill containment area, where tanker trucks are loaded/unloaded or tanker to tanker transfer occurs. This area is also equipped with a sump. Spent antifreeze is managed as a used oil transfer facility and SK uses totes for bulking and separation, these totes are stored alongside the tanker truck spill containment area.

Other: Along the northeast periphery of the rear parking lot, inspectors observed the storage of several empty used oil filter bins and spent antifreeze storage tanks. At the time of the inspection, all of the facility's used oil tanker trucks were dispatched, so inspectors were unable to view the halogen screening equipment used in the field. Mr. Klien reported that each tanker is equipped with a TIF and ChlorDetect dextsil kits, and each load is screened for halogens at pick up.

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Record Review: SK's container inspection logs did not contain the legible name of the inspector or the number of containers. Also, at the time of the inspection, SK could not provide the Department with used oil acceptance and delivery logs that met the requirements of 62-710.500(1) F.A.C.

The property is equipped with security fencing and signage.

New Potential Violations and Areas of Concern:**Generator Checklist (LQG)**

Type: Area Of Concern

Rule: 262.34(a)(3)

Question Number: 6.240

Question: Is each container and tank marked with the words "Hazardous Waste"?

Explanation: Several hazardous waste containers had hazardous waste labels applied over used oil filter labels which were still visible.

Corrective Action: The Department ask that employees are reminded that hazardous waste drums should only have hazardous waste labels. Please provide sign in sheet showing all employees have been advised.

Type: Area Of Concern

Rule: 262.34(c)(2)

Question Number: 6.280

Question: If not, is the excess marked with the date the excess waste began accumulating? (The date must be within 3 days of the date of inspection (262.34(c)(2))

Explanation: There were several of SK's branch debris waste satellite drums that had an accumulation start dates.

Corrective Action: The Department would like to remind SK that satellite drums should not be dated until they are filled.

Transporters Checklist

Type: Violation

Rule: 263.12

Question Number: 1.190

Question: Does transporter comply with 10 day storage limit for transfer facilities?

Explanation: A hazardous waste drum stored in the 10 day transfer facility area from the generator Miami Marine Specialist was dated 8/13/09 on the facility acceptance records, as well as, on the drum itself.

Corrective Action: Please provide an explanation of why this drum dated 8/13/09 was over the ten day transfer facility allowable timeframe.

Use and Management of Containers

Type: Violation

Inspection Date: 08/27/2009

Rule: 62-730.160(6)

Question Number: 8.70

Question: Are records kept including:

Explanation: Facility's container inspection log did not include legible printed name of the inspector and the total number of hazardous waste containers.

Corrective Action: Please create a container inspection log that includes the legible printed name of the inspector and the total number of hazardous waste drums. Fill the log out for three weeks and provide a copy to the Department.

Used Oil Transporter

Type: Violation

Rule: 62-710.510(1)

Question Number: 29.330

Question: Does the facility keep records on DEP Form 62-710.901(2) or equivalent?

Explanation: Information for the facility's used oil acceptance and delivery log was located on several different documents.

Corrective Action: Please create a used oil acceptance and delivery log using DEP Form 62-710.901(2) or a substantially equivalent.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 263.12		08/27/2009	A hazardous waste drum stored in the 10 day transfer facility area from the generator Miami Marine Specialist was dated 8/13/09 on the facility acceptance records, as well as, on the drum itself.
Use and Management of Containers 62-730.160(6)		08/27/2009	Facility's container inspection log did not include legible printed name of the inspector and the total number of hazardous waste containers.
Used Oil Transporter 62-710.510(1)		08/27/2009	Information for the facility's used oil acceptance and delivery log was located on several different documents.

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Generator Checklist (LQG) 262.34(a)(3)		08/27/2009	Several hazardous waste containers had hazardous waste labels applied over used oil filter labels which were still visible.
262.34(c)(2)		08/27/2009	There were several of SK's branch debris waste satellite drums that had an

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Rule Number	Area	Date Cited	Explanation
			accumulation start dates.

Conclusion:

The facility was found to be out of compliance at the time of the inspection. The facility was given 21 days to return to compliance.

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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. 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.

Kathy R Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

8/27/2009

DATE

Chester Wendell

INSPECTOR NAME

Environmental Specialist

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Todd Klein

REPRESENTATIVE NAME

General Branch Manager

REPRESENTATIVE TITLE**REPRESENTATIVE SIGNATURE**

Safety Kleen

ORGANIZATION

8/27/2009

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.