



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

Draft

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 03/18/2010

On-Site Inspection End Date: 03/18/2010

ME ID#: 48680

EPA ID#: FLD984167791

Facility Street Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-8329

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

County Name: Palm Beach

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 Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Transporter facility

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

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Hazardous Waste Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: John Gordon, Branch Manager

LATITUDE / LONGITUDE: Lat 26° 32' 24.766" / Long 80° 4' 51.4123"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

New Potential Violations and Areas of Concern:

Generator Checklist (LQG)

Type: Violation

Rule: 262.34(a)(3)

Question Number: 6.240

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

Explanation: There was an unknown drum on a pallet with other drums labeled Hamilton on the north side of the warehouse area without a label.

Corrective Action: Please provide a picture of that drum with a proper label.

Type: Area Of Concern

Rule: 262.34(c)(1)

Question Number: 6.270

Question: Do satellite accumulation points hold 55 gallons of waste or less? Less than one quart of acute toxic (P-listed, 40 CFR 262.33) hazardous waste?

Explanation: There are two satellite drums for the same wastestream in the loading/unloading area.

Corrective Action: The Department wants to remind Safety Kleen that there can be no more than 55 gallons of any one wastestream in any one point of generation area.

Type: Area Of Concern

Rule: 265.52(a)

Question Number: 6.540

Question: Does the plan include:

Explanation: The Contingency Plan needs to be more specific and easier to find when it comes to response to fire, spill, or explosion.

Corrective Action: Please update plan and distribute to local authorities. Provide copy of plan and proof of distribution.

Type: Violation

Rule: 262.34(c)(1)(ii)

Question Number: 6.261

Question: Are satellite containers marked with the words "Hazardous Waste" or other words that describe the contents?

Explanation: Satellite accumulation containers in the loading/unloading area did not have proper labeling.

Corrective Action: Please send pictures showing the two satellite drums in that area are properly labeled.

Transporters Checklist

Type: Area Of Concern

Rule: 263.20

Question Number: 1.40

Question: Do the manifests contain at least:

Explanation: There were drums in the Hazardous Waste transfer facility area which had indicated on the label and the manifest as CESQG that may in fact have EPA ID number.

Corrective Action: Please be aware that there is a website that is available to check whether a facility has an EPA ID number. The inspector will be checking on certain facilities note as CESQG that are believed to have EPA ID numbers and get back with SK.

Type: Violation
 Rule: 265.16(d)(1)
 Question Number: 1.390
 Question: Does the facility have personnel training records including job title, description of position, and description of employee's training?
 Explanation: The training records for Jeffrey LaBelle do not have the correct job title or job description.
 Corrective Action: Please provide copies of the updated training records for Jeffrey LaBelle.

Universal Waste Lamps

Type: Violation
 Rule: 273.13(d)(1)
 Question Number: 39.10
 Question: Are lamps managed in a manner to prevent breakage or the release of universal waste or components of universal waste and are the packages or containers structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps?
 Explanation: Universal Waste lamps stored in the warehouse area were not properly boxed.
 Corrective Action: Please send pictures of Universal Waste lamps properly boxed.

Type: Violation
 Rule: 62-737.400(5)(b)
 Question Number: 39.40
 Question: Is each lamp or container labeled or marked clearly with either "Spent Mercury Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps"?
 Explanation: Universal Waste lamps stored in the transfer facility area were not properly labeled.
 Corrective Action: Please send picture of Universal Waste lamps properly labeled.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Generator Checklist (LQG)			
262.34(a)(3)		03/18/2010	There was an unknown drum on a pallet with other drums labeled Hamilton on the north side of the warehouse area without a label.
262.34(c)(1)(ii)		03/18/2010	Satellite accumulation containers in the loading/unloading area did not have proper labeling.
Transporters Checklist			
265.16(d)(1)		03/18/2010	The training records for Jeffrey LaBelle do not have the correct job title or job description.

Inspection Date: 03/18/2010

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Rule Number	Area	Date Cited	Explanation
Universal Waste Lamps 273.13(d)(1)		03/18/2010	Universal Waste lamps stored in the warehouse area were not properly boxed.
62-737.400(5)(b)		03/18/2010	Universal Waste lamps stored in the transfer facility area were not properly labeled.

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Generator Checklist (LQG) 262.34(c)(1)		03/18/2010	There are two satellite drums for the same wastestream in the loading/unloading area.
265.52(a)		03/18/2010	The Contingency Plan needs to be more specific and easier to find when it comes to response to fire, spill, or explosion.
Transporters Checklist 263.20		03/18/2010	There were drums in the Hazardous Waste transfer facility area which had indicated on the label and the manifest as CESQG that may in fact have EPA ID number.

Conclusion:

The facility was not in compliance at the time of the inspection. The facility was given 30 days to return to compliance.

Signed:

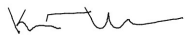
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection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

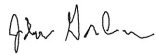
3/17/2010

DATE

John Gordon

REPRESENTATIVE NAME

Branch Manager

REPRESENTATIVE TITLE**REPRESENTATIVE SIGNATURE**

Safety Kleen

ORGANIZATION

3/18/2010

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.