



# Florida Department of Environmental Protection

Northwest District  
160 Governmental Center, Suite 308  
Pensacola, Florida 32502-5794

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

July 19, 2010

Sent via e-mail to:

[Daniel.Wharton@safety-kleen.com](mailto:Daniel.Wharton@safety-kleen.com)

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

Dear Mr. Wharton:

Enclosed is a copy of the report on the hazardous waste compliance inspection that was conducted at your facility on June 7, 2010. 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, please contact Nicole McDonald at (850)595-8360, extension 1252 or by e-mail at [Nicole.McDonald@dep.state.fl.us](mailto:Nicole.McDonald@dep.state.fl.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Byer".

Jim Byer  
Hazardous Waste Supervisor

JCB/nmb

Enclosure: Inspection Report

C: Jeff Curtis, EHS Manager, Safety-Kleen, [Jeff.Curtis@safety-kleen.com](mailto:Jeff.Curtis@safety-kleen.com)  
Daryl Himes, EPA Region IV, [Himes.Daryl@epamail.epa.gov](mailto:Himes.Daryl@epamail.epa.gov)  
Merlin Russell, FDEP, [Merlin.Russell@dep.state.fl.us](mailto:Merlin.Russell@dep.state.fl.us)



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Safety - Kleen Systems Inc  
**On-Site Inspection Start Date:** 06/07/2010 **On-Site Inspection End Date:** 06/07/2010  
**ME ID#:** 20821 **EPA ID#:** FLD982133159  
**Facility Street Address:** 4426 Entrepot Blvd, Tallahassee, Florida 32310-8740  
**Contact Mailing Address:** 3003 W Breezewood Lane, Neenah, Wisconsin 54957-0368  
**County Name:** Leon **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 facility  
Routine Inspection for LQG (>1000 kg/month) facility  
Routine Inspection for TSD Facility Unit Type(s)

**INSPECTION PARTICIPANTS:**

Principal Inspector: Nicole McDonald, Inspector  
Other Participants: Dan Wharton, Manager; Merlin Russell; Daryl Himes, USEPA Inspector

**LATITUDE / LONGITUDE:** Lat 30° 24' 6.3651" / Long 84° 19' 31.045"

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

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Safety-Kleen Systems, Inc. (S-K), 4426 Entrepot Boulevard, Tallahassee, Florida is a generator, transporter and permitted storage 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. 009207-HO-007, which was issued March 3, 2010. This facility was last inspected on February 2, 2009 with no violations cited.

**Process Description:**

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 non-hazardous liquids) are sent with the equipment. S-K also picks up various drums of hazardous waste, used oil, used oil filters, spent silver recovery cartridges, dry cleaning waste and non-regulated wastes for temporary storage (Transfer Station). This waste is then shipped off-site for reclamation and/or disposal. S-K is registered with the Department as a Transporter, Transfer and Small Quantity Handler of Universal Waste Lamps. Used oil and used antifreeze used to be picked up via vacuum truck and then pumped into one of two large tanks. In 2009, S-K purchased Atlantic Industrial, which now handles all used oil and used antifreeze vacuum waste pick up. S-K still picks up used oil and used antifreeze in 55-gallon drums. Drummed used oil and used antifreeze

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are transported off site in their original containers and not pumped into the large outside tanks. Per the facility's daily checklist, at the time of this inspection the used antifreeze tank contained 3,167 gallons and used oil tanked 6,807 gallons.

In the afternoon, Ms. McDonald returned to the facility in order to conduct an inspection of a returning S-K transport truck. One truck was located at the unloading dock. This truck contained 11 drums of oil contaminated dirt and two hazardous waste drums of parts washer solvent. All drums appeared to be properly labeled, closed and associated paperwork was available, accurate and in order.

In a phone conversation with Jeff Curtis (S-K EHS Manager) on June 14, 2010, he stated that the used antifreeze tank had been emptied after this inspection. He stated that in the near future S-K was possible going to re-instate the used oil, used antifreeze vacuum truck waste collection at this location. He was unsure if the company will bring back the non-hazardous waste vacuum tanker located in the rear lot of the facility.

#### **A. Return/Fill Shelter:**

The area was inspected early-morning when no loading/unloading activity was underway. The loading/unloading area was well maintained and located with easy access to emergency and safety equipment installed in this area. Both the hazardous waste drain dumpster and Continued Use Program (CUP) drain dumpster lids were closed. One satellite accumulation area contained a 55-gallon drum for hazardous waste solids/sludge from the dumpster/drum washing unit and CUP drain dumpster. This drum was labeled, in good physical condition and closed. Sludge from the drum washing unit is removed at the end of every day. Several empty drums were being stored in this area for later use.

#### **B. 10 Day Transfer Station:**

One container of hazardous waste was located in this area. It was labeled, dated and within the 10 day time period. Records were pulled for this drum (I.D. 2489813) with no deficiencies noted. This area was well kept and organized. The stripping on the floor to indicated the physical location of the transfer area was highly worn or missing. Emergency equipment has been inspected and is easily accessible.

#### **C. TSD Storage Area:**

The TSD Storage Area was well organized and appropriate aisle space is maintained. A total of 28 drums/containers were in this location. Two containers with manifest number (2409896) paperwork was pulled to review, with no deficiencies noted. All containers were in good physical condition, closed, dated and labeled. Located in this area is the Universal Waste storage area. Seven boxes of waste universal fluorescent lamps and one 5-gallon bucket of waste universal batteries were labeled, dated and closed.

#### **D. Tank Storage:**

The covered and enclosed tank storage area contains a used oil, 105° solvent and permitted hazardous waste storage tank. Outside this area are a 150° solvent tank and a used antifreeze tanks. All tanks and the load/unload pipe manifold area appeared to be in good condition and well maintained with no visible evidence of any tank leakage. 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 hazardous waste solvent, orange for 105° solvent and green piping represents 150° solvent. This coloring scheme along with the valve tagging system, allows the daily inspector of the system to track the equipage and inspect for liquid leaks.

#### **E. External Area:**

The outside storage/laydown area, driveways, vehicle parking lot, solid waste dumpsters and the perimeter fence/lawn areas were inspected with no discrepancy noted. Signs are attached to the perimeter fencing and in good condition. The tanker for non hazardous vacuum waste is no longer on site and the secondary containment for the tanker has been removed. Two S-K transport trucks were located in the back lot, one was empty and the other had a broken lift gate

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and we were unable to inspect inside this truck.

**F. Records Review:**

Emergency fire and spill control equipment within the facility was randomly inspected to verify the facility inspection and maintenance program. A review of randomly selected training records, daily/weekly inspection logs for the Transfer Area, Storage Containers, Storage Tanks, and safety equipment was conducted with no discrepancy noted. The contingency plan and permit were available and current. 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.

**Summary of Potential Violations and Areas of Concern:**

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

**ATTACHMENTS:**

A. Return/Fill Dumpster



B. Transfer Area



C. Storage Area



D. Tank Storage



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**Conclusion:**

S-K needs to ensure that the stripping for the physical location of the Transfer Area is present and in good condition.


If changes are made to this S-K process, S-K needs to ensure that the permit is updated to include those changes at the facility; including the fate of the used oil tank, used antifreeze tank and the outside non-hazardous vacuum waste tanker.

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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.

Nicole McDonald _____ <b>PRINCIPAL INSPECTOR NAME</b>	Inspector _____ <b>PRINCIPAL INSPECTOR TITLE</b>
 _____ <b>PRINCIPAL INSPECTOR SIGNATURE</b>	FDEP _____ <b>ORGANIZATION</b>
	7/19/2010 _____ <b>DATE</b>

Merlin Russell  
\_\_\_\_\_  
**INSPECTOR NAME**

NO SIGNATURE  
\_\_\_\_\_  
**INSPECTOR SIGNATURE**

FDEP  
\_\_\_\_\_  
**ORGANIZATION**

Daryl Himes  
\_\_\_\_\_  
**INSPECTOR NAME**

USEPA Inspector  
\_\_\_\_\_  
**INSPECTOR TITLE**

NO SIGNATURE  
\_\_\_\_\_  
**INSPECTOR SIGNATURE**

EPA Region IV  
\_\_\_\_\_  
**ORGANIZATION**

Dan Wharton  
\_\_\_\_\_  
**REPRESENTATIVE NAME**

Manager  
\_\_\_\_\_  
**REPRESENTATIVE TITLE**

NO SIGNATURE  
\_\_\_\_\_  
**REPRESENTATIVE SIGNATURE**

Safety Kleen  
\_\_\_\_\_  
**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 "Potential Violations" or areas of concern.