



# Florida Department of Environmental Protection

Southeast District Office  
400 N. Congress Avenue, Suite 200  
West Palm Beach, FL 33401

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Mimi A. Drew  
Secretary

January 14, 2011

**VIA ELECTRONIC MAIL:** [Jeff.Curtis@Safety-Kleen.com](mailto:Jeff.Curtis@Safety-Kleen.com)

Larry Rodriquez, General Manager  
Safety-Kleen Systems, Inc.  
8755 NW 95<sup>th</sup> Street  
Medley, Florida 33178-1462

Re: Hazardous Waste Compliance Inspection of Safety-Kleen Systems, Inc. 87550  
NW 95<sup>th</sup> Street, Medley, FL 33178-1462.

Dear Mr. Rodriquez:

On October 14, 2010, the Department conducted a hazardous waste and used oil compliance inspection at your facility. At the time of the inspection, your facility appeared to be a Large Quantity Generator (LQG), a Hazardous Waste Transporter and Transfer Facility, and a Treatment, Storage and Disposal facility. Florida Statutes provide that facilities must comply with Title 40 Code of Federal Regulations (CFR) Parts 260 to 268, Part 273, and Part 279, as adopted in Chapter 62-730, Florida Administrative Code (F.A.C.), Chapter 62-737, F.A.C., and Chapter 62-710, F.A.C.

The facility appeared to be in compliance at the time of the inspection and no items were requested. Please refer to the attached report which documents the inspection of your facility.

This will conclude the Department's investigation into this matter; however, please be advised that the state will continue to conduct random and unannounced compliance evaluation inspections in the future. If you have any questions about the inspection or any other compliance related issues, please contact Kathy Winston at 561/681-6756. Thank you for your cooperation.

Sincerely,

Karen Kantor  
Environmental Manager  
Hazardous Waste Compliance/Enforcement Section

Attachments: Hazardous Waste Inspection Report

Cc: Electronic Archboard/OCULUS  
Karl Markeset, Miami-Dade ERM, [markek@miamidade.gov](mailto:markek@miamidade.gov)



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

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**FACILITY INFORMATION:**

**Facility Name:** Safety - Kleen Systems Inc

**On-Site Inspection Start Date:** 10/14/2010

**On-Site Inspection End Date:** 10/14/2010

**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 LQG (>1000 kg/month) facility

Routine Inspection for Transporter facility

Routine Inspection for Transfer Facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for TSD Facility Unit Type(s)

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kathy R. Winston, Inspector

**Other Participants:** Larry Rodriguez, General Manager; Ben Fisch, 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 14 employees.

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.

**Process Description:**

**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

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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.

Inspectors observed two wet dumpsters on this elevated grating, one of which is equipped with a drum wash. Each wet dumpster is hard piped (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 one 55-gallon satellite drum of branch debris. 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 hour storage, and would be immediately pumped out upon any collection. On the floor of the bay, inspectors observed two used oil filter bins, each labeled, closed, and in good condition. The used oil filters bins were awaiting transport to US Foundry in Medley, Florida. Inspectors noted fire extinguishers (last inspected January 2010), 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. It appeared from the signage that the entire northeast corner of the warehouse was designated as the transfer facility area and non-transfer facility waste was being stored there. However, upon closer examination, it turned out that someone had mistakenly place a sticker on the wall that said "Transfer Facility Area" over a sticker that indicated "Universal Waste" which was still partial visible under the other sign. Therefore, technically, the transfer facility waste and Universal Waste were stored in the proper locations and the inspector just asked that the signage on the walls be corrected. Spill kits, as well as, spill cabinets with posted 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 2010), and safety showers and eyewashes.

The loading dock to the south is used for 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. Facility representatives reported that each tanker is

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equipped with a TIF and ChlorDetect dextsil kits, and each load is screened for halogens at pick up.

Record Review: All of SK's records appeared to be in order. The property is equipped with security fencing and signage.

**New Potential Violations and Areas of Concern:****Transporters Checklist**

Type: Area Of Concern

Rule: 62-730.171(3)

Question Number: 1.840

Question: Has the facility notified the department on Form 62-730.900(6) (Transfer facility notification form)?

Explanation: A shipment was being prepared at the time of the inspection; however, non-transfer facility waste was being stored in the designated transfer facility container storage area.

Corrective Action: Please be sure to only store transfer facility waste in your transfer facility container storage area. Also, remember per the state regulations, if you decide to change your transfer facility storage area you must notify the Department in your required annual notification.

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

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 62-730.171(3)		10/14/2010	A shipment was being prepared at the time of the inspection; however, non-transfer facility waste was being stored in the designated transfer facility container storage area.

**Conclusion:**

The facility was in compliance at the time of the inspection and no items were requested.

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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**

10/14/2010

**DATE**

Ben Fisch

**INSPECTOR NAME**

Environmental Specialist

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

Larry Rodriguez

**REPRESENTATIVE NAME**

General 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.