



Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

September 27, 2011

SENT VIA EMAIL

khamilton@safety-kleen.com

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

Re: Safety-Kleen Systems, 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 at your facility on August 4, 2011. 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 904.256.1671.

Sincerely,

Jabe Breland III
Environmental Specialist III
Hazardous Waste Section

Enclosure(s)



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 08/04/2011

On-Site Inspection End Date: 08/04/2011

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 Used Oil Transfer 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 Hazardous Waste Transporter facility

Routine Inspection for Hazardous Waste Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

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) was inspected on August 4, 2011, as an unannounced hazardous waste compliance inspection. Safety-Kleen is a hazardous waste management facility. The DEP issued permit # 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.

Previous reports contain the facility's process description, which is not included in this inspection report.

Process Description:

10-day Transfer Area

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

Inspection Date: 08/04/2011

Spent Fluorescent Lamps Storage Area

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

The Main Container Storage Area is a permitted hazardous waste container storage area. At the time of the inspection, there were 11 containers of hazardous waste in this area. All containers were closed, labeled, dated, and under the one year time limit for storage.

The Dock

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. At the time of the inspection, three containers were in this area, which were properly labeled and in good condition. Containers are off loaded at night and any non-transfer waste is moved to the permitted area for storage as soon as they are off loaded. Any other waste is 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

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 provides 110% secondary containment. All piping that was inspected leading to and from the tank appeared to be in good condition.

Paint Waste Shelter

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

Other Wastes

Used oil is stored in the 15,000-gallon tank, and sent to Georgia Petroleum for recycling. Used antifreeze is stored in an 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.

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.

Inspection Date: 08/04/2011

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Inspection Date: 08/04/2011

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

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

9/27/2011

DATE

Kevin Hamilton

REPRESENTATIVE NAME

Branch 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.