



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 06/16/2011

On-Site Inspection End Date: 06/16/2011

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 LQG (>1000 kg/month) facility

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Hazardous Waste Transfer Facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Marketer facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Bill Cruz, Branch General Manager; Jerilyn Krug, Environmental Specialist II

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

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

TYPE OF OWNERSHIP: Private

Introduction:

Safety Kleen - Boynton Beach (SK - BB) has been in operation since 1991, and currently operates a Hazardous Waste Storage facility under Department permit # HO50-287405, expiration November 19, 2012. Situated in an industrial park, the facility is approximately 5 acres. The facility has 16 full time employees and is on city water and sewer. The facility has three 4000 gallon used oil collection trucks, two 4000 gallon vacuum trucks, seven box trucks of assorted sizes used for hazardous waste transport and their Fluid Recovery Services (FRS) program, and two vans for their sales people.

SK - BB sells and distributes raw solvents and collects spent solvent through a solvent leasing program with its customers. SK - BB also collects used oil, used oil filters, used antifreeze, waste paint related material, spent fluorescent bulbs and FRS waste for recycling. The facility consists of a container storage area, aboveground storage tank area, and a return/fill area.

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Process Description:

In the return/fill area, inspectors noted that there was a 55 gallon drum next to each of the two wet dumpsters. Facility representatives identified the containers as Satellite Accumulation Area (SAA) containers for branch debris generated from the filter screens on the dumpsters. One of the drums was full but was not dated and the other drum, which was being used for collection at the time, was dated. The inspector explained to their escort that a SAA should only be dated when it becomes full and at that point, the facility has 72 hours to move it to their 90 day storage area. The inspectors also reminded SK - BB that no more than 55 gallons of waste can be accumulated per SAA and that there can be only one SAA associated with each point of generation.

As the inspectors entered the warehouse area, one of them went over and turned on the eye wash to see if it was functional. It did come on; however, the water that came out was brown in color and it appeared that its operation had not recently been inspected. Sitting outside the hazardous waste transfer facility area was a pallet that had two drums sitting on it: one was labeled as hazardous, the other was labeled nonhazardous. When questioned about these containers, the facility representative indicated that these were not wastestreams that SK - BB manifests as their own and therefore should be stored in the hazardous waste transfer facility area.

Another issue that inspectors noted was that many of the drums (transfer facility, non-transfer facility, used oil, and used oil filter) throughout the facility had accumulation start dates that were the same as the transporter pick-up date. It appeared that SK - BB drivers were filling in the accumulation start dates for generators when they arrived on site to take the facility's waste away. Facility representatives were informed that this was not up to them to do but the responsibility of the generator. However, it would be in the best interest of SK - BB to inform their customers of the obligation of Small Quantity and Large Quantity Generators to date their containers when they first add waste to avoid holding on to it past the allowable timeframe for their generation status.

Record Review

In the facility's most recently updated Contingency Plan of 2/2/11, they had not replaced the emergency contact numbers page with the corrected document. The training documentation for the facility's new manager was not on site during the inspection but was forwarded to the Department the next day. The only other recordkeeping issue noted was that the facility's general facility inspection logs didn't include any description of corrective actions performed when deficiencies were noted. All other records appeared to be in order: manifests, acceptance and delivery logs, container inspection logs, closure plan and waste analysis plan.

On August 10, 2011, the inspector received a call from Jeff Curtis, Safety Kleen's Environmental Health and Safety Officer, who indicated that one of their drivers had picked up waste without a manifest. The amount of waste picked up well exceeded the 1000 kg limit acceptable to ship without the use of a manifest. Mr. Curtis was told to get a temporary EPA ID number for this waste before shipping it from their facility. These unmanifested pick-ups have been occurring with more and more frequency at SK - BB and is a situation that needs to be addressed.

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

Type:	Violation
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:	Near the dump and fill area, SK had two satellite drums for branch debris. The drum that was not full and should not have been dated was and the full drum

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wasn't dated, which should have been and would make it impossible to discern when the drum should have been moved to the 90 day storage area.

Corrective Action: First SK must only have one up to 55 gallon container at or near the point of generation acting as a satellite. Please send a picture showing the full drum has been dated and removed to the 90 day storage area and that the satellite container for branch debris is at or the point of generation with either the words "Hazardous Waste" on it or a description of the contents.

RCRA Compliance Inspection Report - TSD Facilities Checklist

Type: Violation

Rule: 264.15(b)(2)

Question Number: 11.130

Question: Does the facility have completed inspection logs?

Explanation: The facility's general inspection log indicated observations which were considered unacceptable; however, did not explain what the issue was or what was done to fix it. Also, the inspector noted that when the eyewash in the warehouse; which is part of the general facility inspection log, was checked the water came out brown.

Corrective Action: Please supply the Department with a copy of the general facility inspection log filled out properly for three weeks, including explanation for any deficiencies and correction made and the testing of the eyewashes throughout the facility.

Type: Area Of Concern

Rule: 264.16(e)

Question Number: 11.180

Question: Does facility have personnel training records?

Explanation: The personnel training records for Bill Cruz, the plant manager, were not available at the time of the inspection.

Corrective Action: Please provide the Department with copies of the personnel training records for Bill Cruz.

Transporters Checklist

Type: Violation

Rule: 263.20

Question Number: 1.30

Question: Does the transporter use manifest system as required by 263.20?

Explanation: The facility had two drums on a pallet (one hazardous, one non-hazardous) stored in the area where the waste that they plan to remanifest is stored. Per their permit, these were not waste they are allowed to remanifest; therefore, these drums should have been in the transfer facility area. The waste had only arrived on site the day before the inspection.

Corrective Action: The Department would like to remind SK that per your permit, waste that you don't remanifest should be stored in your transfer facility area.

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Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Generator Checklist (LQG) 262.34(c)(1)		06/16/2011	Near the dump and fill area, SK had two satellite drums for branch debris. The drum that was not full and should not have been dated was and the full drum wasn't dated, which should have been and would make it impossible to discern when the drum should have been moved to the 90 day storage area.

RCRA Compliance Inspection Report - TSD Facilities Checklist

264.15(b)(2)		06/16/2011	The facility's general inspection log indicated observations which were considered unacceptable; however, did not explain what the issue was or what was done to fix it. Also, the inspector noted that when the eyewash in the warehouse; which is part of the general facility inspection log, was checked the water came out brown.
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Transporters Checklist

263.20		06/16/2011	The facility had two drums on a pallet (one hazardous, one non-hazardous) stored in the area where the waste that they plan to remanifest is stored. Per their permit, these were not waste they are allowed to remanifest; therefore, these drums should have been in the transfer facility area. The waste had only arrived on site the day before the inspection.
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Areas of Concern

Rule Number	Area	Date Cited	Explanation
RCRA Compliance Inspection Report - TSD Facilities Checklist 264.16(e)		06/16/2011	The personnel training records for Bill Cruz, the plant manager, were not available at the time of the inspection.

Conclusion:

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

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Signed:

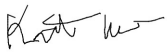
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection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

12/7/2011

DATE

Jerilyn Krug

INSPECTOR NAME

Environmental Specialist II

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Bill Cruz

REPRESENTATIVE NAME

Branch 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.