



**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:** 07/21/2011

**On-Site Inspection End Date:** 07/21/2011

**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 Hazardous Waste 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, Plant Manager; Parvez Mallick, Region IV FL Rep.

**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 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.

Inspection Date: 07/21/2011

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 the designated waste solvent 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 150° F solvent piped from the tank storage area 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 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. Inspectors noted fire extinguishers (last inspected April 2011), 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. 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 April 2011), 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, as well as, one 15,000 gallon tank and one 20,000 gallon tank for used oil. Oily water is stored in the 10,000 gallon tank in this area and one 20,000 gallon tank holds bulk solvent product. 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 also managed in this area and SK uses totes for bulking and separation; these totes are stored alongside the tanker truck spill containment area. The fire extinguisher in the tanker loading area appeared to have lost its' charge.

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 inspect the halogen screening equipment used in the field. Facility representatives reported that each tanker is equipped with a TIF and ChlorDetect dextsil kits, and each load is screened for halogens at pick up.

#### Record Review:

The facility's training records were not on site at the time of the inspection nor was their waste analysis plan. These records were provided to the Department on July 25, 2011. All the rest of SK's records appeared to be in order: i.e. acceptance and delivery logs, container inspection logs, manifests, the permit and closure plan, etc. The property is equipped with security fencing and signage.

Inspection Date: 07/21/2011

**New Potential Violations and Areas of Concern:****RCRA Compliance Inspection Report - TSD Facilities Checklist**

Type: Violation

Rule: 264.13(a)(1)

Question Number: 11.50

Question: Is a copy of the waste analysis plan maintained at the facility?

Explanation: The facility could not produce a copy of the waste analysis plan at the time of the inspection.

Corrective Action: The facility was requested to send a copy of the waste analysis plan submitted and agreed to in their permit.

Type: Violation

Rule: 264.16(e)

Question Number: 11.180

Question: Does facility have personnel training records?

Explanation: The facility didn't have the current year's training records on hand at the time of the inspection.

Corrective Action: The facility was given 14 days to send copies of the current year's training records for the plant manager, the lead materials handler, and several of their drivers. Also, it was requested that the facility send the current 8 hr OSHA refresher certificates for anyone at the facility that receives this training.

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

Rule Number	Area	Date Cited	Explanation
RCRA Compliance Inspection Report - TSD Facilities Checklist			
264.13(a)(1)		07/21/2011	The facility could not produce a copy of the waste analysis plan at the time of the inspection.
264.16(e)		07/21/2011	The facility didn't have the current year's training records on hand at the time of the inspection.

Areas of Concern

No Areas of Concern

**Conclusion:**

The facility was not in compliance at the time of the inspection and was given 14 days to return to compliance.

Inspection Date: 07/21/2011

**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.

Kathy R. Winston

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

1/3/2012

**DATE**

Parvez Mallick

**INSPECTOR NAME**

Region IV FL Rep.

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

EPA

**ORGANIZATION**

Larry Rodriguez

**REPRESENTATIVE NAME**

Plant 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.