



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

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 07/17/2012

On-Site Inspection End Date: 07/17/2012

ME ID#: 1792

EPA ID#: FLD980847271

Facility Street Address: 5309 24th Ave S, Tampa, Florida 33619-5368

Contact Mailing Address: 3003 W Breezewood Lane, Neenah, Wisconsin 54957-0368

County Name: Hillsborough

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 TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Manager

Other Participants: William "Tony" Hill, Customer Service Manager; Jeff Curtis, EHS Manager

LATITUDE / LONGITUDE: Lat 27° 55' 33.9629" / Long 82° 23' 39.6154"

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

TYPE OF OWNERSHIP: Private

Introduction:

Safety Kleen's hazardous waste storage facility was inspected July 17, 2012 in conjunction with a monitoring well installation event. A follow up record review was conducted July 25, 2012. William "Tony" Hill and Jeff Curtis represented the facility during the inspection. The facility's operating permit was renewed on February 21, 2012. Facility operations are essentially the same as during previous inspections, except that a tank trailer is being used for transfer of oily waste water collected under the company's vacuum truck service. The tanker is provided with a pop up secondary containment. Use of the tank trailer is discussed further below.

Process Description:

At the time of the inspection, the container storage areas were almost at capacity due to several large shipments of material that had been accepted for transfer. All the containers were closed, properly labeled and provided with adequate aisle space. Facility employees have improved their waste acceptance procedures and are ensuring that containers are free from residue on the exterior.

The hazardous waste and used oil storage tanks and piping were in good condition. No issues with the supports or with equipment tags required under 40 CFR Subparts AA, BB and CC were observed. The dumpster areas were all clean and free from residue.

Spill response equipment was adequate and in place. The facility has removed the shop sink that was previously an area of concern, and is in the process of ensuring that discharges to the facility septic system are not a source of contamination requiring remedial action. Inspections are logged daily in accordance with the facility's permit, except for non operating days like weekends.

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Waste acceptance and disposal records were on site and available for inspection. Files had been moved because the facility was in the process of updating its record storage room, but the moved files were well organized. Records were also available electronically. The facility contingency plan was posted and up to date. Training records, including job titles and position descriptions were available and up to date.

Safety Kleen waste acceptance procedures were discussed with particular regard to the facility's vacuum service for non hazardous waste waters. The facility's waste analysis plan requires different pre-qualification checks for higher risk customers and industrial users than for routine automotive shops. Industrial users are supposed to provide specific information on the process generating the waste water, along with a sample for analysis before Safety Kleen will accept the waste. The wastes collected by this service center are not treated at a Safety Kleen facility. Aqua Clean Environmental Services in Lakeland accepted most of these wastes for treatment until a recent temporary facility closure. Typically, Safety Kleen would off load their vehicles at Aqua Clean. Currently, the wastes are being consolidated into the tank trailer discussed in the introduction. The trailer is owned by Liquid Environmental Solutions, FLD981928484, and is transferred to the company's Jacksonville facility every few days. An empty trailer is left in its place. Mr. Curtis has said that they are working on a better solution for this material, as he is concerned that the pop up containment may become worn or damaged with continued use.

Waste profiles for specific customers in this program were reviewed with Mr. Curtis. In most cases, the process information indicated the material was used coolant from machine shop operations. However in some cases the process information section did not actually describe the process generating the waste. Waste from Elite CNC Machining was described as "dip tank rinse water" without a process description that would enable a centralized waste water treatment facility to determine if the water was Subcategory A, B or C waste. Profile #40445919 for Dart Container indicated that the waste was "waste water" from a "waste water tank" from "cleaning out process equipment," with no indication of the actual process. Some waste waters that are not characteristically hazardous can generate listed sludges (examples - F006, F019 or K044) when treated. Mr. Curtis indicated that he thought further information on the wastes was available in their service representatives notes. The Department recommended that all relevant process information be maintained on the waste profiles in order to ensure that both hazardous and non hazardous wastes were identified and treated properly.

New Potential Violations and Areas of Concern:

Areas of Concern

Type:	Area Of Concern
Rule:	403.727(1)(c)
Explanation:	General Condition II A 6 of Permit 34733-HO-007 requires Safety Kleen to comply with the waste analysis plan submitted in its permit application. The waste profiling process requires submittal and documentation of specific information on the process generating the wastes being considered for acceptance. Safety Kleen was not always recording this information on waste profile forms for non hazardous vacuum service waste water.
Corrective Action:	Ensure that process information is recorded for all wastes being considered for acceptance. Some waste waters that are not characteristically hazardous may generate listed hazardous waste sludges when treated. In addition, some designated centralized waste treatment facilities are not authorized to manage all types of categorical waste water discharges.

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Conclusion:

Based on the results of this inspection, Safety-Kleen was in compliance with hazardous waste regulations, although one area of concern was noted with regard to management of non hazardous waste waters. Mr. Curtis will review this issue with facility staff, to ensure that accurate process information is recorded on all waste profiles.

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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.

Elizabeth Knauss

PRINCIPAL INSPECTOR NAME

Environmental Manager

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

ORGANIZATION

7/27/2012

DATE**Supervisor:** Beth Knauss**Inspection Approval Date:** 07/27/2012

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.