



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 06/14/2012

On-Site Inspection End Date: 06/14/2012

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 Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Bridgette Bucell, Environmental Specialist; Bill Cruz, General Manager; Jeff Curtis, EHS officer

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 19 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.

Inspection Date: 06/14/2012

Process Description:

In the warehouse area, the inspectors observed a pallet of Universal Waste batteries stored outside the designated area. The facility was told if they wanted to relocate their Universal Waste then appropriate notification needs to be made before the permit is finalized or they need to move this pallet into the currently designated area. The pallet was moved while the inspectors were still onsite.

The only other issue that was noted during the facility walk through was in the transfer facility area and concerned a 16 gallon container from a company named Varcom Inc. (FLD984225615). The Safety Kleen pickup date and that of the accumulation start date were one and the same and it appeared the dates had been written in the same handwriting with the same pen. This issue had been noted at the facility before; therefore, the inspectors made a point of having the facility find out which of their drivers had picked up this waste and that they empathize to this person that it is not his responsibility to mark accumulation start dates for the generator. Instead; he should be reminding these generators of their obligation to mark their containers when the first drop of waste is added to a drum. Besides this being a rule that applies to all SQGs and LQGs, it is helpful to the generating facility as it helps avoid exceedances of their allowable timeframes for shipping their waste offsite per their generation status.

Record Review

The facility had submitted an updated Contingency Plan as part of its permit renewal and was awaiting approval before sending any updated pages out to local authorities. The other issue that was noted during the record review was a mistaken date on manifest # 003352498SKS; the incoming date was 5/23/2012; however, the outgoing date on the manifest indicated it was shipped out on 5/13/2012. After reviewing the transfer facility acceptance and delivery logs it was established that the waste actually went out on the same day it came into the facility (5/23/2012). The facility was reminded to be very careful when filling out manifest related to the transfer facility as dates in and out are especially important when it involves a ten-day transfer facility. All other records that were reviewed at the time of the inspection appeared to be in order: training records, weekly container inspection logs, operating records, acceptance and delivery records for both used oil and hazardous waste, manifests, and the permit which included the waste analysis plan and the closure plan.

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

| | |
|--------------------|--|
| Type: | Violation |
| Rule: | 62-730.171(2)(e) |
| Question Number: | 1.830 |
| Question: | Does the log contain: |
| Explanation: | There was a 16 gal. drum in the transfer facility area from Varcom Inc. that had a transporter pick up date of 6/12/12 and a accumulation start date of 6/12/12. These dates were obviously written in the same pen and it appears that the driver is dating the drums for the generators. |
| Corrective Action: | Please have the driver sign a statement on letterhead that he understands the issue and it will not happen again, as this is the second time the inspector has seen this issue at this facility. |

| | |
|-------|-----------|
| Type: | Violation |
|-------|-----------|

Inspection Date: 06/14/2012

Rule: 62-730.171(2)(e)

Question Number: 1.830

Question: Does the log contain:

Explanation: The facility had a manifest (#003352498SKS) which indicated it had been picked up by the transporter on 5/23/2012. However; the outgoing date on the manifest was 5/13/2012.

Corrective Action: Please make sure and be more careful with dating the manifest for your transfer facility waste. The acceptance and delivery log indicates that the waste was shipped out the same day it came in (5/23/2012). Also, please reissue the manifest to the generator with the corrected information.

Areas of Concern

Type: Area Of Concern

Rule: 264.53(b)

Question Number: 11.330

Question: Were the plan revisions submitted to all authorities?

Explanation: Facility has a permit renewal pending and is waiting on approval of the 2012 revisions of their Contingency Plan.

Corrective Action: Facility needs to remember that once the approval comes from the Department then all pages that have been revised need to be distributed to local authorities.

Type: Area Of Concern

Rule: 273.13(a)(2)

Question Number: 36.30

Question: Are batteries managed in such a way that ensures the casing is not breached and remains intact and closed?

Explanation: The facility had a pallet of Universal Waste batteries stored in the transfer facility area.

Corrective Action: Please move the pallet to your UW storage area. Corrective action was performed on-site.

Conclusion:

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

Inspection Date: 06/14/2012

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**

8/14/2012

DATE**Supervisor:** Karen Kantor

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.