Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 08/16/2012 **On-Site Inspection End Date:** 08/16/2012

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 TSD Facility Unit Type(s)

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Transfer Facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Used Oil Marketer facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Larry Rodriguez, General Manager

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. The property is equipped with security fencing and signage.

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.

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 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 solvent prepared 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 Aug 2012), 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 Aug 2012), 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. Spent antifreeze is also managed in this area. A tanker is parked on one side of the loading dock and when it is full, a trailer rig is brought in to exchange that tanker out for an empty. At that point, the full tanker is sent for recycling. The sloped area adjacent to the loading dock acts as containment should there be an issues with the tanker leaking. In the sloped area, at the end nearest to the building, there is also a below grade drain that allows for extra containment space.

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. 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 dexsil kits, and each load is screened for halogens at pick up.

Record Review:

At the time of the inspection, the facility was not able to locate the HAZWOPER certifications for several of the employees. The facility representative indicated that they were scheduled to have

annual HAZWOPER training on Aug. 21, 2012. The only other paperwork issue observed was that the documentation to show that the Contingency Plan had been distributed to local authorities was not available. These records were provided to the Department on September 5, 2012. All the rest of SK's records appeared to be in order: i.e. acceptance and delivery logs, facility inspection logs, container inspection logs, manifests, the permit and closure plan, etc.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	264.16(e)
Question Number:	11.180
Question:	Does facility have personnel training records?
Explanation:	At the time of the inspection, the facility could not locate the HAZWOPER certificates for several of their employees. They are scheduled for their HAZWOPER training on 8/21/2012.
Corrective Action:	Please provide HAZWOPER certificates for Larry Rodriguez, Bokara Adams, and Lazaro Mendez from 2011.

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:	Proof of distribution of the Contingency Plan to local authorities was not onsite at the time of the inspection.
Corrective Action:	Please provide proof of distribution of the facility's Contingency Plan to local authorities.

Conclusion:

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

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	Inspector
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
	8/16/2012
PRINCIPAL INSPECTOR SIGNATURE	**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.