



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

November 6, 2013

Mr. Don Zielinski
Acting General Manager
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

Re: Safety-Kleen Systems, Inc.
EPA/DEP ID: FLD 980 847 214
Clay County – Hazardous Waste

Dear Mr. Zielinski:

Department personnel conducted a Compliance Evaluation Inspection (CEI) of the above-referenced facility on September 24, 2013. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's Hazardous Waste rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Pamela Fellabaum at (904) 256-1670 or via e-mail at Pamela.Fellabaum@dep.state.fl.us.

Sincerely,

Michael J. Fitzsimmons
Environmental Administrator
Compliance Assurance Program

Enclosures: Inspection Report



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

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 09/24/2013

On-Site Inspection End Date: 09/24/2013

ME ID#: 2319

EPA ID#: FLD980847214

Facility Street Address: 161 Industrial Loop S, Orange Park, Florida 32073-6259

Contact Mailing Address: 42 Longwater Dr, Norwell, Massachusetts 02061

County Name: Clay

Contact Phone: (781) 792-5760

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)

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pam Fellabaum, Inspector

Other Participants: Jacob Gerke, Inspector; Don Zielinski, Manager of Regional Operations; Jeff Duncan, Customer Service Manager

LATITUDE / LONGITUDE: Lat 30° 10' 47.5682" / Long 81° 43' 5.3847"

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

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc. (Safety-Kleen) was inspected on September 24, 2013, as an unannounced hazardous waste compliance inspection. Safety-Kleen is a hazardous waste management facility. The Department issued permit # 77130-HO-006 to Safety-Kleen on March 11, 2009. The permitted hazardous waste units include two container storage areas (the main container storage area and the paint waste shelter) and an aboveground storage tank. The facility is also a transporter/transfer facility and a large quantity generator of hazardous waste. The facility's hazardous waste storage renewal permit is currently under Department review.

Inspection Date: 09/24/2013

Process Description:

The facility recycles, transfers, transports, and disposes of hazardous waste, used oil, used oil filters, parts washer solvent, antifreeze, and paint wastes. The facility uses a computerized inventory system to manage waste received from customers. The computerized system indicates how the waste should be managed, where in the facility it should be handled, and how long the waste has been accumulating in each respective area within the facility.

10-day Transfer Area

The 10-day Transfer Area had 55-gallon containers that were stacked two high. All containers were properly labeled, closed, and in good condition. None of the containers exceeded the 10-day storage limit.

Spent Fluorescent Lamp Storage Area

The spent fluorescent lamp storage area is located in the corner of the permitted storage area. Lamp containers in this area were properly labeled, dated, and all containers were closed.

Main Container Storage Area

The main container storage area is a permitted hazardous waste container storage area. At the time of the inspection, all hazardous waste containers were closed, labeled, dated, and under the one year time limit for storage.

The Dock

Safety-Kleen distributes and services parts washers. Mineral spirits are used as a parts washer solvent. When the mineral spirits are spent, the waste is picked up by Safety-Kleen and replaced with new product. The drums of waste mineral spirits are transported from the customer back to Safety-Kleen and deposited in an automatic barrel washer (Photo 1). The facility operates two wet dumpsters/barrel washing units. Solids from this waste stream are accumulated in the barrel washer while the liquid D001/D018/D039/D040 spent mineral spirits are pumped into a 15,000-gallon aboveground hazardous waste storage tank described below. The solids (parts washer solvent/dumpster mud) are placed into 55-gallon satellite drums. Two satellite containers (branch contaminated debris and dumpster mud) were accumulating waste next to the barrel washers. Both were labeled and closed.

The facility also provides a brake washer service to customers. The facility recently updated its profile for this waste stream, and this waste stream is now considered to be non-hazardous. Brake washer containers are returned from customers and sent to the Safety Kleen facility in Dalton for liquid removal and refilling. The brake washers are then returned to this facility to be sent back out to customers.

Transfer waste was also located in this area. At the time of the inspection, the containers in this area were properly labeled and in good condition. Containers are off loaded at night and any non-transfer waste is moved to the permitted area for storage as soon as they are off loaded. Any other waste staged in this area is waiting to be moved to the 10-day transfer area. All were properly labeled and in good condition. Adequate aisle space was provided for all containers to ensure complete inspection.

Inspection Date: 09/24/2013

Tank Farm

The facility has three aboveground tanks in a tank farm (Photo 2). Two 15,000-gallon tanks contain used oil. Both were properly labeled (Photo 3). The third tank is a 15,000-gallon hazardous waste storage tank that contains waste mineral spirits (Photo 4). The tank was properly labeled. The tank farm provides 110% secondary containment. All piping that was inspected leading to and from the tank appeared to be in good condition.

Adjacent to the tank farm, but not within the secondary containment, is a 10,000-gallon tank (Photo 5). This tank contains product solvent 150. The tank is double-walled.

Paint Waste Shelter

The paint waste shelter is a permitted hazardous waste storage area. This building is located behind the main building. There were six containers of hazardous paint waste being stored at the time of inspection. All containers were properly labeled, dated, and closed.

Other Wastes

Used antifreeze is stored in drums at the current time and then sent to the Safety Kleen facility in Ocala for recycling. Aerosol cans are punctured and spent fluid is stored in one 16-gallon satellite accumulation drum inside the warehouse. Safety-Kleen has three vacuum service trucks dedicated to collecting oily wastewater from its customers. The oily wastewater is off-loaded at Liquid Environmental Solutions. Cintas launders the facility's rags.

Record Review

A review of the facility's manifests, operating records, including the operation log for the stipulated requirements in the permit, biennial reports, annual reports of used oil activities, arrangements with local authorities, training records, and inspection logs (tank and container) revealed no discrepancies. The Contingency Plan was on-site and up-to-date. Safety Kleen is currently a Large Quantity Generator of hazardous waste and a permitted container storage facility. No violations were noted in the areas inspected.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Inspection Date: 09/24/2013

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.

Pam Fellabaum**PRINCIPAL INSPECTOR NAME**Inspector**PRINCIPAL INSPECTOR TITLE***Pam Fellabaum***PRINCIPAL INSPECTOR SIGNATURE**FDEP**ORGANIZATION**11/5/2013**DATE****Supervisor:** Pam Fellabaum**Inspection Approval Date:** 11/05/2013

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.