Winston, Kathy

To: Cruz, Bill; Curtis, Jeff
Subject: Return to compliance fro inspection at Safety Kleen on 07/31/2014
Attachments: final inspection_report7312014.pdf

The purpose of this email is to acknowledge return to compliance from the Department's inspection on July 31, 2014 at the above mentioned facility. Attached please find the final report for the inspection on July 31, 2014. Please feel free to contact me if you have any questions concerning this inspection or any other compliance issue. Thank you for your cooperation in this matter.

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We're moving! Effective October 31, 2014, the Southeast District Offices will be located at
Florida Department of Environmental Protection
3301 Gun Club Road
MSC 7210-1
West Palm Beach, FL 33406

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 07/31/2014 **On-Site Inspection End Date:** 07/31/2014

ME ID#: 48680 **EPA ID#:** FLD984167791

Facility Street Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-8329

Contact Mailing Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-8329

County Name: Palm Beach **Contact Phone:** (561) 738-3026

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 Transfer Facility

Routine Inspection for Hazardous Waste 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: Norva Blandin, Environmental Specialist; Canaan Hagin, Material Handler

LATITUDE / LONGITUDE: Lat 26° 32' 24.766" / Long 80° 4' 51.4123"

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

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 # HO50-49625, expiration November 19, 2017. 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.

Process Description:

One big change that has been made in SK - BB's operations involves certain wastestreams that under the facility's permit used to terminated here and were then re-manifested with SK - BB as generator and then the wastes were sent on to one of their TSD facilities. Now all hazardous waste that is received on site is handled as transfer facility waste.

The warehouse area was in order with all waste in its' designated area. However, in the return and fill area, there were multiple drums and containers of all sizes that had arrived at the facility on the day before this inspection and hadn't been sorted yet for storage in the warehouse. The inspector reminded the facility that all arriving waste must be sorted and stored in its' designated area within 24 hours of arrival at the facility.

There was only one other issue that was noted during the facility walk-through. There were substantial deficiencies in the portable secondary containment that surrounded the frac tank in the rear of the facility. This frac tank holds sludgy waste from the vaccum trucks; which can't be transferred through hoses to the tanks inside the tank farm building.

Record Review

The inspector couldn't review training records or the facility's acceptance and delivery logs for both used oil and hazardous waste because the facility personnel familiar with these documents were not available. The plant manager was out running one of the driver's routes; due to the driver being ill, and the main warehouse person was out on vacation. All other records that were reviewed at the time of the inspection appeared to be in order: the facility operating log, weekly container inspection logs, manifests, and the permit which includes the waste analysis plan and closure plan.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	263.12
Question Number:	1.190
Question:	Does transporter comply with 10 day storage limit for transfer facilities?
Explanation:	The hazardous waste transfer facility acceptance and delivery logs were not available at the time of the inspection.
Corrective Action:	Please provide the Department with the acceptance and delivery logs for the hazardous waste transfer facility for the months of June 2013, Nov. 2013, and June 2014. Also, supply at least two manifests from each of the corresponding months mentioned above.

Type:	Violation
Rule:	264.16(e)
Question Number:	11.180
Question:	Does facility have personnel training records?
Explanation:	At the time of the inspection, training records were not available for review.
Corrective Action:	Please provide the most recent HAZWOPER refresher certificates for the plant manager, the hazardous waste material handler, and one of the drivers. Also, please provide the most recent DOT training certificate for the driver discussed above.

Type:	Violation
Rule:	279.45(e)
Question Number:	29.530
Question:	Is secondary containment provided and adequate?
Explanation:	The portable secondary containment for the frac tank that receives wastes from the vacuum trucks has deficiencies that need to be addressed.
Corrective Action:	Please send pictures demonstrating that the issues with the portable secondary containment for the frac tank that receives wastes from the vacuum trucks have been addressed.

Type:	Violation
Rule:	62-710.510(1)
Question Number:	29.330
Question:	Does the facility keep records on DEP Form 62-710.901(2) or equivalent?
Explanation:	The acceptance and delivery logs for used oil transporting were not available for review at the time of the inspection.
Corrective Action:	Please supply the acceptance and delivery logs for the used oil operations for the months of June 2013, Nov. 2013 and June 2014. Also, please supply at least two BOLs or manifests for each of the corresponding months mentioned above.

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**
	9/10/2014
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.