



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 03 2014

FDEP 2014 NOV 6 AM 11:49

Mr. Glen Perrigan, Environmental Manager
Hazardous Waste Regulation Section
Bureau of Solid and Hazardous Waste
Division of Waste Management, Mail Stop #4500
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: RCRA Compliance Evaluation Inspection
Safety-Kleen Systems, Inc. (Orange Park)
EPA ID No: FLD 980 847 214

Dear Mr. Perrigan:

On June 4, 2014, a RCRA Compliance Evaluation Inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the Florida Department of Environmental Protection at Safety-Kleen Systems, Inc., located in Orange Park, Florida, to determine the facility's compliance status with RCRA. FDEP 2014 NOV 6 AM 11:48

Enclosed is the EPA RCRA CEI Report. The EPA considers this facility to be a Secondary Violator (SV). If you have any questions, please contact Stanley Tam of my staff, by telephone at (404) 562-8577 or by email at tam.stanley@epa.gov.

Sincerely,

Larry L. Lamberth, Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement and
Compliance Branch

Enclosure

cc: Jabe Breland, FDEP NE District



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOV 03 2014

Mr. Scott Thompson
Branch General Manager
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

SUBJ: RCRA Compliance Evaluation Inspection
Safety-Kleen Systems, Inc. (Orange Park)
EPA ID No: FLD 980 847 214

Dear Mr. Thompson:

On June 4, 2014, the U.S. Environmental Protection Agency, along with the Florida Department of Environmental Protection (FDEP), conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection at your facility located in Orange Park, Florida, in order to determine its compliance status with RCRA.

Enclosed is the EPA RCRA Site Inspection Report. A copy of this report has also been forwarded to FDEP.

Apparent violations of RCRA were discovered during the inspection and are detailed in the inspection report. Safety-Kleen Systems, Inc. must correct the cited violations and submit documentation that the violations have been corrected in accordance with the regulations within thirty (30) days of receipt of this letter. If you have any questions, please contact Stanley Tam of my staff, by telephone at (404) 562-8577 or by email at tam.stanley@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry L. Lamberth".

Larry L. Lamberth, Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement and
Compliance Branch

Enclosure

RCRA INSPECTION REPORT

1) Inspector and Author of Report

Stanley Tam
Environmental Engineer

2) Facility Information

Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, FL 32073
Clay County
EPA ID Number: FLD 980 847 214

3) Responsible Official

Mr. Scott Thompson
Branch General Manager
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, FL 32073

4) Inspection Participants

Stanley Tam, U.S. Environmental Protection Agency (EPA), Region 4
Jabe Breland, Florida Department of Environmental Protection (FDEP), Northeast District
Stuart Bartlett, FDEP, Northeast District
Scott Thompson, Safety-Kleen Systems, Inc.
Jeff Duncan, Safety-Kleen Systems, Inc.
Gerry Friede, Safety-Kleen Systems, Inc.
Mike Greenwood, Safety-Kleen Systems, Inc.

5) Date and Time of Inspection

June 4, 2014
9:20 a.m.

6) Applicable Statutes and Regulations

Resource Conservation and Recovery Act (RCRA), 42 United States Code §§ 6901 *et. seq.*,
and 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, 279
Sections 403.702 *et. seq.*, Florida Statutes (F.S.)
and Chapters 62-710 and 62-730, Florida Administrative Code (FAC)

7) Purpose of Inspection

The purpose of the site visit was to conduct an unannounced EPA RCRA Compliance Evaluation Inspection (CEI) to assess the facility's compliance with applicable regulations. Prior to the entry briefing, the EPA inspector presented enforcement credentials to Scott Thompson.

8) Facility Description

Safety-Kleen Systems, Inc. (Safety-Kleen or facility) is a commercial treatment, storage and disposal facility (TSDF) of hazardous waste (HW). Safety-Kleen supplies clean solvent and receives waste solvent for parts washers and also provides a variety of other waste management services. The facility is located in Orange Park, Florida.

Safety-Kleen is operating under hazardous waste facility permit number 0077130-HO-009 issued by FDEP. The permit addresses the storage of HW in a tank system and in containers.

Safety-Kleen also notified as a large quantity generator (LQG), a transporter, and a transfer facility of HW. In addition, Safety-Kleen notified as a large quantity handler of universal wastes (UW). The facility is also a used oil transporter, transfer facility, and marketer.

9) Findings

Return and Fill Area

This area is used for the handling of spent parts washer solvent containers and for filling clean solvent into cleaned containers. When spent solvent containers are returned to the facility, the spent solvent is pumped from the container to the spent solvent tank. The container is then inverted and placed on to one of two "drum washers", which sprays solvent around the interior of the container to clean out any remaining solids/sludges. The cleaned container is then readied for use as a container for clean parts washer solvent. Alternatively, Safety-Kleen's "Continued Use" solvent may be used to clean out the containers.

At the time of inspection, two 55-gallon HW satellite accumulation containers holding dumpster mud and debris (one for each drum washer) were present. Both containers were closed and labeled.

The entire return and fill area is situated on grating about three feet off the ground. Secondary containment is provided underneath the area. The secondary containment is inspected daily and is cleaned up approximately once per week. The containment area appeared to be in good condition.

Several empty drums were stored near the return and fill area. These drums were stored upside down. A small pool of clear liquid was present next to one of these drums. Upon examination, the liquid does not appear to be water and is most likely some type of solvent.

Safety-Kleen appears to be in violation of 62-730.180(1), FAC [40 C.F.R. § 264.31]. This regulation requires facilities to be maintained and operated to minimize the possibility of any release of hazardous waste or hazardous waste constituents.

Records Review

The following records were reviewed:

Select HW manifests were reviewed. The manifests and associated Land Disposal Restriction documents were signed, dated, and otherwise properly completed. In addition, the facility's operating log was reviewed and was found to be satisfactory.

The contingency plan was reviewed. The primary emergency coordinator should be the current Branch General Manager (Scott Thompson). The contingency plan had not been updated to reflect this.

Safety-Kleen appears to be in violation of 62-730.180(1), FAC [40 C.F.R. § 264.54(d)]. This regulation requires the contingency plan be amended when the list of emergency coordinators change.

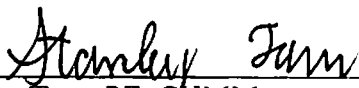
Personnel training was reviewed. Documentation of annual refresher training was available for 2012 but not for 2013.

Safety-Kleen appears to be in violation of 62-730.180(1), FAC [40 C.F.R. § 264.16(c)]. This regulation requires facility personnel to review HW management training annually.

This violation was documented and corrected via email correspondence from Safety-Kleen to EPA and FDEP, dated June 9, 2014.

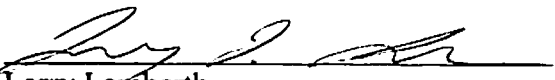
Other documentation required by the facility's permit were reviewed, including the following: a copy of the permit, closure plan, various inspection logs (containers, tanks, Subpart BB equipment, safety and emergency equipment), and financial assurance were satisfactory.

10) Signature


Stanley Tam, PE, CHMM
Environmental Engineer

10/28/14
Date

11) Concurrence


Larry Lamberth
Chief, South Section
RCRA and OPA Enforcement and Compliance Branch

10/31/14
Date

Warehouse Container Storage Area

This area is located within the warehouse that also house the facility's office spaces. It is one of two permitted HW container storage areas at the facility, with a maximum permitted capacity of 2,553 gallons. At the time of inspection, there were 19 closed, labeled, and dated HW containers stored in the area. There were also six closed, labeled, and dated UW containers (spent lamps of various types) stored here. The container storage area appeared to be in good condition.

Other areas of the warehouse are designated for the accumulation of HW that are in the midst of transportation; i.e., transfer facility waste. At the time of inspection, there were about 33 HW containers of various sizes being accumulated in these areas. In addition, there were three HW satellite accumulation containers scattered throughout the warehouse. Two of these satellite containers held debris and were closed and labeled. The third satellite container held aerosol cans. This labeled container had an aerosol can puncture device loosely attached to the top of the container and was therefore not considered to be closed.

Safety-Kleen appears to be in violation of 62-730.160(1), FAC [40 C.F.R. § 265.173(a) as incorporated by 40 CFR § 262.34(c)(1)(i)]. This regulation requires that a HW satellite accumulation container must be closed except when adding or removing waste.

This violation was corrected before the end of the inspection.

Paint Waste Storage Shelter

This storage shelter is divided into a paint waste storage area and a products storage area. Flammable materials, whether product or waste, are stored in this shelter. The paint waste storage area is the other permitted HW container storage area at the facility, with a maximum permitted capacity of 1,222 gallons. At the time of inspection, there were one 30-gallon and seven 5-gallon closed, labeled, and dated HW containers stored in the area.

Tank Farm

The tank farm is situated northwest of the return and fill area. It has three above ground storage tanks; one 15,000-gallon HW tank and two 15,000-gallon tanks containing used oil. The HW tank is the permitted HW tank system. It is used to store spent parts washer solvent and was properly labeled. The used oil tanks were labeled with the words "used oil". The tank system, including associated ancillary equipment and the secondary containment, appeared to be in good condition.

There was one 55-gallon container of used oil situated inside the tank farm's secondary containment. This container was not labeled.

Safety-Kleen appears to be in violation of 62-710.210(2), FAC [40 C.F.R. § 279.22(c)(1)]. This regulation requires used oil generators to label or mark containers of used oil with the words "used oil".