

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 06/01/2015 On-Site Inspection End Date: 06/01/2015

ME ID#: 20821 **EPA ID#**: FLD982133159

Facility Street Address: 4426 Entrepot Blvd, Tallahassee, Florida 32310-8740

Contact Mailing Address: 5610 Alpha Drive, Boynton Beach, Florida 33426

County Name: Leon Contact Phone: (561) 523-4719

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 Transporter facility

Routine Inspection for Transfer Facility

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for Used Oil facility

INSPECTION PARTICIPANTS:

Principal Inspector: Aaron Mitchell, Inspector

Other Participants: Bobby Mitchell, Customer Service Manager

LATITUDE / LONGITUDE: Lat 30° 24′ 6.3651″ / Long 84° 19′ 31.045″

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

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc. (S-K), 4426 Entrepot Boulevard, Tallahassee, Florida is a generator, transporter and permitted storage and transfer facility for hazardous waste. This facility is permitted for both a container storage area and a tank storage area with Permit No. 009207-HO-010, which was renewed March 4, 2015. S-K was purchased by Clean Harbors, and has recently undergone a managerial staff change. This facility was last inspected on February 15, 2013, with no violations noted.

Process Description:

A. Return/Fill Shelter:

The area was inspected when no loading/unloading activity was underway. Both the drain dumpsters lids were closed. One Satellite Accumulation Area (SAA) contained a closed, labeled 55-gallon drum for hazardous waste solids/sludge from the dumpster/drum washing unit.

B. 10 Day Transfer Station Area:

This area contained 13 pallets of mixed hazardous and non-hazardous drums awaiting shipment. All drums were labeled, dated and within the 10-day transfer date (oldest date May 26, 2015). Documentation for containers was checked and found to be in order.

Inspection Date: 06/01/2015

The safety equipment locker was fully equipped and in order. A SAA has been established in this area for expired used oil vacuum samples. This SAA was labeled and in good condition.

C: TSD Storage Area:

This area contained 26 containers of hazardous waste awaiting shipment. The oldest date observed was April 11, 2015. All containers were labeled dated and in good condition. Approximately 23 boxes of universal waste lamps were present in closed, labeled, and dated boxes. Oldest universal waste date observed was May 19, 2015.

D. Tank Storage:

The covered and enclosed tank storage area contains a 150° solvent, used oil tank and permitted hazardous waste storage tank. Outside this area are a 150° solvent tank and a used antifreeze tank. All tanks and the load/unload pipe manifold area appeared to be in good condition. The hazardous waste solvent tank contents are transported by Safety Kleen Systems, Inc. (TXR000050930) to destination facility Safety Kleen Systems, Inc (SCD077995488) as waste combustible liquids (D001, D018, D039 & D040) approximately once a month.

E. External Area:

The outside storage/laydown area, driveways, vehicle parking lot, solid waste dumpsters and the perimeter fence/lawn areas were inspected with no violations noted. Signs are attached to the perimeter fencing and in good condition. At the time of inspection the used oil wastewater tank was being removed and replaced with an empty tank. Secondary containment for this tanker was closed and in good condition.

F. Records Review:

Emergency fire and spill control equipment within the facility was randomly inspected and appeared to be in good condition. A review of randomly selected training records, 10-day Transfer Area, Storage Tanks, and safety equipment were reviewed with no discrepancies noted. The daily inspection of the difficult to monitor values and fitting have been conducted per permit requirements with no deficiencies noted. The weekly inspection checklists for the hazardous waste storage area were reviewed and a deficiency noted. The Weekly Inspection Checklist for the hazardous waste storage area was not completed during the dates of July 28, 2014 through September 29, 2014.

This inspection verified S-K is a large quantity generator of hazardous waste; a transporter and transfer facility of hazardous waste and used oil; and a permitted hazardous waste storage facility.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 265.174

Explanation: Safety Kleen Systems during the time period July 28, 2014 through September 29,

2014, did not conduct the Weekly Inspection Checklists for the HW storage area were not filled out by facility staff. This is a possible violation of 40 CFR 265.174, which requires and dictates the parameters in which TSD facilities must conduct weekly

inspections of their hazardous waste storage areas.

Corrective Action: The facility needs to ensure that in the event of an employee change that a plan is in

place to conduct the routine weekly inspection checklists for the facility hazardous waste

storage area.

Inspection Date: 06/01/2015

PHOTO ATTACHMENTS:

HW Storage Area



Tank loading and unloadding piping



Used antifreeze tank



Facility grounds and signage



Conclusion:

SKS needs to ensure that the weekly inspection checklist is completed as required by permit conditions and TSD requirements.

Inspection Date: 06/01/2015

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.

Aaron Mitchell	itchell Inspector	
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE	
doron Mitchell	FDEP	6/26/2015
PRINCIPAL INSPECTOR SIGNATURE	ORGANIZATION	DATE
Supervisor: <u>Brad Hartshorn</u>		

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.