

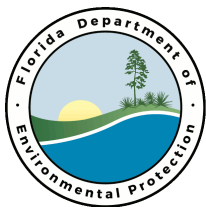
Winston, Kathy

To: Curtis, Jeffery S; Cruz, Bill
Subject: Inspection on 11/05/2015

The purpose of this email is to acknowledge return to compliance from the Department's inspection on November 5, 2015 at the above mentioned facility. Attached please find the final report for that inspection. 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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**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 11/05/2015

On-Site Inspection End Date: 11/05/2015

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) 736-1339

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 Hazardous Waste Transfer Facility

Routine Inspection for Used Oil 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: Jay Choi, Environmental Specialist; Bill Cruz, Plant Manager; Jeff Curtis, EHS officer

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 15 full time employees and is connected to 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 three 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.

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One big change that has been made in SK - BB's operations involves certain wastestreams that under the facility's permit used to be 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. Antifreeze is no longer collected separately from used oil, instead, it is commingled with the used oil and sent to SK-BB East Chicago Illinois facility for processing. Also, used oil filter are now sent for processing to Clean Harbor's Ocala facility. The changes noted here and in the paragraph below are a result of Clean Harbors Environmental Services, Inc., headquartered in Norwell, MA, buying out SK. However; at this point, SK - BB it is still being operated as a separate entity.

Under a minor modification that was approved by the Department, the loading dock area that used to be where the antifreeze tanker was parked, is now being operated as a hazardous waste ten day transfer facility by Clean Harbors Florida, LLC. An empty trailer is parked there weekly, which is then filled up by their local drivers with hazardous waste drums. The following week this trailer is picked up by a tractor and an empty trailer is left behind to start the cycle again.

Process Description:

The warehouse area was in order with all waste in its' designated area.

Record Review –

The facility's personnel were scheduled to complete their eight hour OSHA refresher the Monday following the inspection. The date of the last refresher was October 6, 2014; therefore, the facility had until the end of the calendar year to complete this training. Upon reviewing the weekly container inspection logs, it was noted that the number of hazardous waste containers had been excluded from the documentation. It appeared from the records that this error occurred beginning in June of 2015. This lapse was a result of a change in the database use to record this information; this item will be reinserted per the State's rule requirement. The hazardous waste acceptance and delivery review revealed that seven drums from a company known as GA Telesis, EPA ID number FLR000127381, had been held one day over the transfer facility acceptable timeframe of ten days. All other records that were reviewed at the time of the inspection appeared to be in order: the facility operating log, the remainder of the hazardous waste and used oil acceptance and delivery logs, manifests, the contingency plan, and the permit which included 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:	<p>The transfer facility logs and the manifest indicates that 7 drums of flammable waste from GA Telesis was held on-site for one day over the 10 day storage limit.</p> <p>This incidence was related to Safety Kleen's and Clean Harbor's databases being incompatible; this was the first time the Department has ever observed this violation during an inspection of this facility.</p>
Corrective Action:	Since the drums already reached their destination, the Department reminded Safety Kleen of their obligation to get all transfer facility off-site in 10 days.

Inspection Date: 11/05/2015

Type:	Violation
Rule:	62-730.160(5)
Explanation:	As of June 2015, the facility was not including the number of hazardous waste containers on their hazardous waste inspection logs.
Corrective Action:	Please provide the Department with documentation that the number of hazardous waste containers is being noted on the weekly container inspection logs.

Conclusion:

The facility was not in compliance at the time of the inspection and was given 14 days to return to compliance. At the close of business, on the Monday after the inspection, documentation of refresher training was provide to the Department. Included in the email with the training records, the facility indicated that in two weeks they would supply documentation demonstrating that the number of hazardous waste containers will be included on the weekly container inspections logs from the time of this inspection and going forward.

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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

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

11/10/2015

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.