RCRA COMPLIANCE INSPECTION REPORT

1) INSPECTOR AND AUTHOR OF REPORT

Daryl R. Himes, Environmental Engineer
RCRA Enforcement and Compliance Section
Enforcement and Compliance Branch
U.S. Environmental Protection Agency
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Phone: (404) 562-8614
Fax: (404) 562-8566
E-mail: himes.daryl@epa.gov

2) FACILITY INFORMATION

Safety-Kleen Systems, Inc. (Safety-Kleen)
5309 24th Avenue S.
Tampa, Florida 33619-5368
Hillsborough County
EPA ID No.: FLD 980 847 271
Permit / Certification Number: 34744-HO -007
Date of Issue: February 21, 2012
Expiration Date: November 23, 2016
Latitude / Longitude: 27°55'33"N / 82°23'69"W
NAICS No.: 562111 – Hazardous Waste Treatment and Disposal
SIC No.: 4953 – Refuse System (Hazardous Waste Treatment and Disposal)

3) RESPONSIBLE OFFICIAL

Steve Gugino
Branch General Manager

4) INSPECTION PARTICIPANTS

Daryl R. Himes, U.S. Environmental Protection Agency, Region 4
Elizabeth Knauss, Florida Department of Environmental Protection (FDEP)
Steve Gugino, Branch General Manager, Safety Kleen

5) DATE OF INSPECTION

December 9, 2015
9:10 a.m.

6) APPLICABLE REGULATIONS

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005, and 3007 (42 U.S.C. §§ 6922, 6925, and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710 and 62-730.

7) PURPOSE OF COMPLIANCE EVALUATION INSPECTION

To conduct an unannounced EPA lead compliance evaluation inspection (CEI) to determine the facility's compliance with applicable regulations of RCRA and the corresponding FDEP regulations.

8) FACILITY DESCRIPTION

Prior to the entry briefing, the EPA inspector presented enforcement credentials to Mr. Steve Gugino of Safety-Kleen. Safety-Kleen is a fully permitted Part B Treatment, Storage and Disposal Facility (TSDF) for hazardous waste containers and tank storage. Safety-Kleen offers drum pickup and disposal, emergency response, lab packing, and transportation services. In addition, Safety-Kleen is also a registered hazardous waste, used oil, used oil filter and universal waste transfer facility.

The facility is located within an industrial area of the City of Tampa, Florida in Hillsborough County. The Safety-Kleen facility is surrounded by a chain link fence. Safety-Kleen is on the City of Tampa water and sewer. There are no drinking water withdrawal wells located within at least quarter mile of the facility. The facility area includes four areas for permitted container and tank storage of hazardous waste including the following: North Storage Building (non-flammables), South Storage Area (flammables), South Storage Building (Non-Flammable Terminated) and the Solvent Return/Fill Station Area. Hazardous Waste solvents from the facility's use and reuse parts washer solvent program is also stored within a 15,000 gallon storage tank.

The owner or operator of a TSDF is subject to all applicable requirements of 40 C.F.R. Parts 264, 265, 266, 268, 270 and 124, and the notification requirement under Section 3010 of RCRA. Safety-Kleen manages D, F, K, P, and U listed hazardous wastes at the facility.

The permit, Permit/Certification Number 34744-HO -007, to operate a storage facility, was re-issued on February 21, 2012, and expires on November 23, 2016. The permit was issued under the provisions of Section 403.722, Florida Statutes (F.S.) and Chapters 62-4, 61-160, 62-730-, 62-777, 62-780, Florida Administrative Code (F.A.C.).

Part I, General and Standard Conditions, paragraph 14(e), of the permit requires the facility to keep a written operating record at the facility, which includes: results of any waste analysis; copies of manifests for three years; results of inspections; closure plan; inspections of emergency and safety equipment; biennial reports; personnel training records; the Waste Minimization

Program Plan (62-730.160(l), F.A.C.); biennial certification of waste minimization; the description and quantity of each hazardous waste (received/generated); the location of each hazardous waste within the facility and the quantity at each location; a log of dates of operations and unusual events; and a summary report and details of incidents that require implementation of the contingency plan. Part 1, General and Standard Conditions, paragraph 26(d), requires the facility to maintain arrangements with State and local authorities per 40 C.F.R. § 264.37. Paragraph 26(c) requires the facility to maintain aisle space as required by 40 C.F.R. § 264.35. Part I, General and Standard Conditions, paragraph 34, requires the facility to maintain compliance with 40 C.F.R. Part 264, Subpart H – Financial Requirements and Rule 62-730.180(6), F.A.C.

Part II, Subpart A – General Operating Conditions, of the permit, includes: paragraph 3, the requirement to maintain training records at the facility (training received annually, maintain updated list of personnel handling hazardous waste and their job titles per 40 C.F.R. § 264.16); Paragraph 5, the requirement to comply with the manifest requirements of 40 C.F.R. §§ 264.71 and 264.72; paragraph 6e, the requirement to amend the contingency plan if any condition in 40 C.F.R. § 264.54 is met (amendment must be approved in writing by FDEP); paragraph 8, the requirement to certify annually that the facility has a program in place to reduce the volume and toxicity of hazardous waste and maintain the certification in the operating record; paragraph 12, the requirement to keep complete and current the facility Air Emission Monitoring/Equipment Log as per 40 C.F.R. § 264.1064(b)(1); paragraph 14, the requirement to keep operating records, results of inspections, monitoring reports, repairs as per 40 C.F.R. 264 Subparts AA, BB, and CC.

Part II, Subpart B – Specific Operating Conditions – Container Storage, paragraph 1, requires the facility's container storage not exceed 59,169 gallons of hazardous waste.

Part II, Subpart C – Specific Operating Conditions – Tank System states that the facility's tank storage be limited to 15,000 gallons of spent parts washer solvent.

9) INSPECTON FINDINGS

A walk-through inspection of the facility was conducted. The findings of the walk-through inspection are documented below.

Solvent Return/Fill Station Area

This area of the facility (Photo 1) is designated as a 10 day transfer area for incoming hazardous wastes. Various sizes and types of hazardous waste from incoming vehicles were observed in this area as they waiting on characterization test results before being placed into the permitted storage areas discussed below. One satellite accumulation container of gloves and hazardous containment equipment was observed in this area. The container was labeled with the words "Hazardous Waste" and closed at the time of the inspection.

The facility's dirty solvent reception basin was observed in this area as was the secondary containment area beneath the unit. No spills of hazardous waste were observed on the exterior of the unit or within the secondary containment area.

Tank Storage Area

The facility operates a permitted hazardous waste storage tank with a volume of 15,000 gallons. The tank is used to store the facility's hazardous waste flammable solvent generated as part of the facility's recyclable solvent wash recovery program.

The tank is one of three tanks located within a tank farm (Photo 2) consisting of three 15,000 gallon tanks. Each of the tanks is located within a concrete secondary containment system capable of managing the contents of the 15,000 gallon tank. The tanks was labeled with the words "Hazardous Waste" and closed at the time of the inspection. All equipment associated with the 15,000 gallon hazardous waste tank were appropriately labeled with tags for the required air monitoring regulations. The pipe and equipment responsible for the transfer of the hazardous waste solvent from the loading dock to the storage tank (Photo 3) were properly marked.

Nonflammable Storage Area

All hazardous wastes within this area were properly labeled, dated and closed.

Flammable Storage Area

All hazardous and universal hazardous wastes within this area were properly labeled, dated and closed.

Records Review

The facility's contingency plan, personnel training, weekly container, daily tank and as required air monitoring inspections, and manifests were reviewed and appeared to be in order.

10) SIGNED

Daryl R. Hmes

Daryl R. Hmes
Inspector and Author of Report

2-12-16
Date

11) CONCURRENCE AND APPROVAL

Héctor M. Danois

Héctor M. Danois
Acting Chief, Hazardous Waste Enforcement
and Compliance Section
Enforcement and Compliance Branch

2.16.16
Date

Photographs

Photo 1 – Solvent recovery reception bin located on the facility's unloading dock.

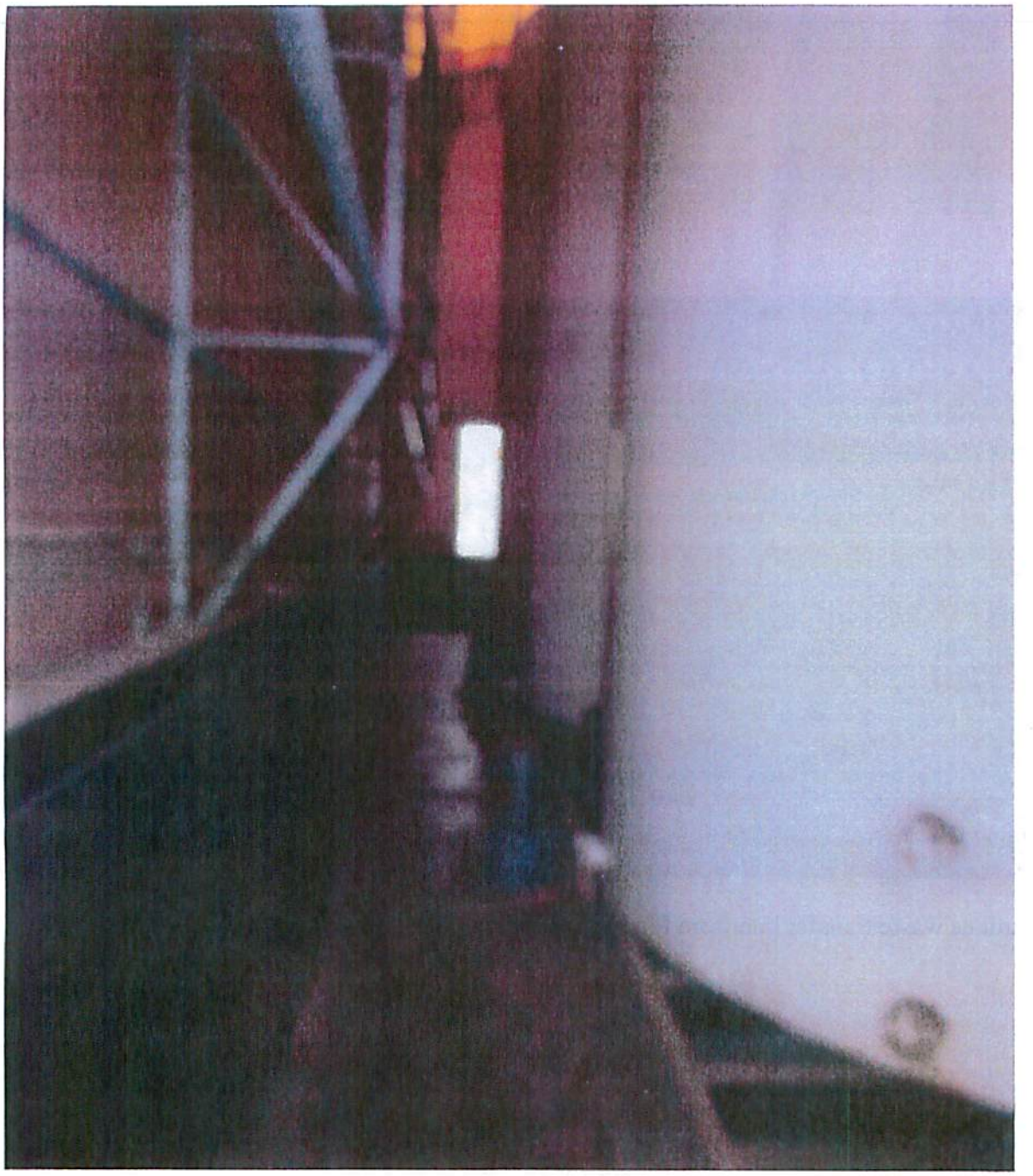

Photo 2 – Hazardous waste tank storage area

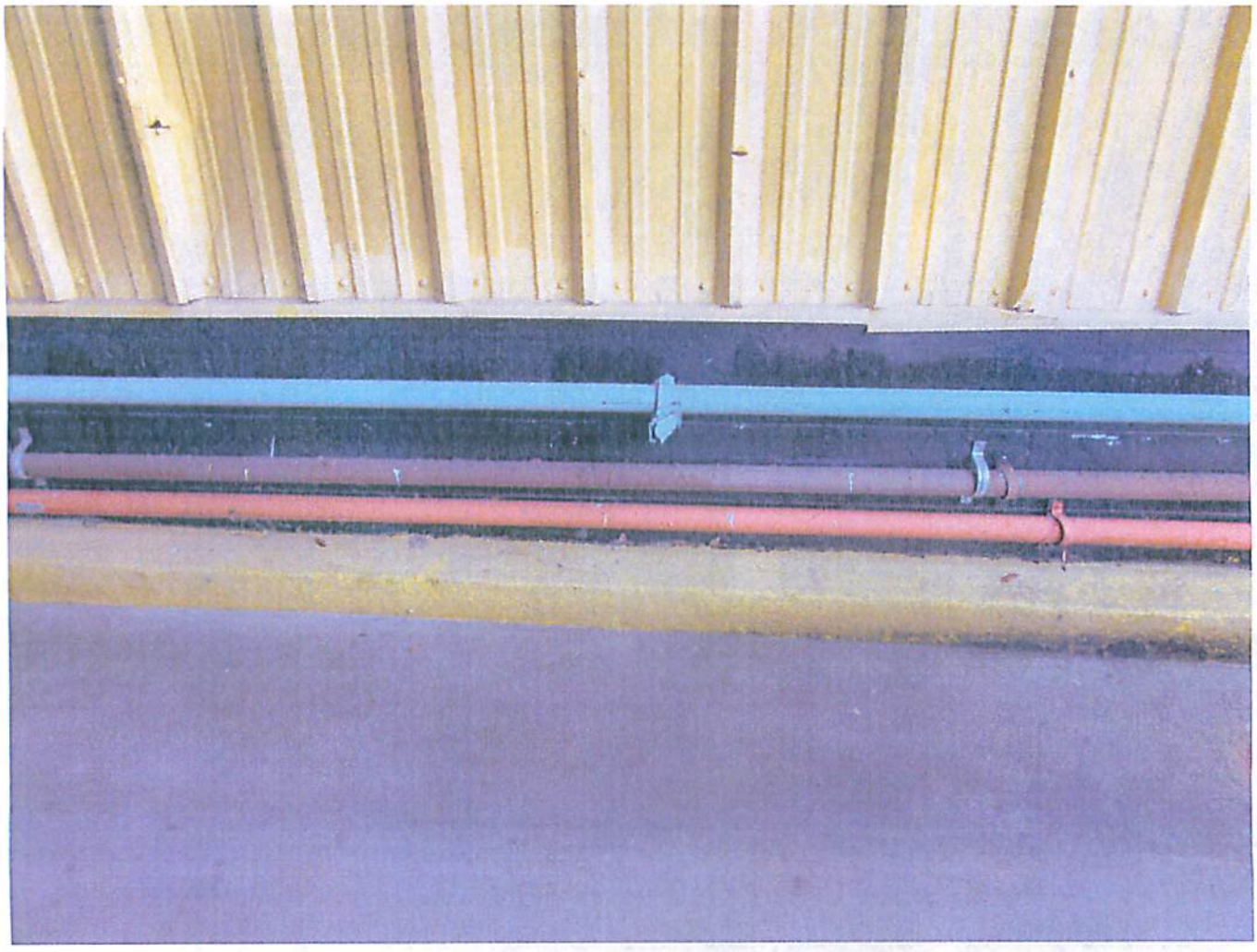

Photo 3 – Hazardous waste transfer line from loading dock to storage tank