

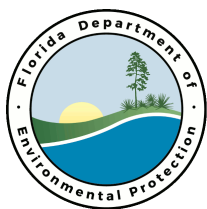
Winston, Kathy

From: Winston, Kathy
Sent: Wednesday, April 13, 2016 11:51 AM
To: 'Curtis, Jeffery S'
Subject: Inspection at Safety-Kleen's Medley facility
Attachments: finalinspection_report.pdf

The purpose of this email is to acknowledge return to compliance from the Department's inspection on March 31, 2016 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: 03/31/2016

On-Site Inspection End Date: 03/31/2016

ME ID#: 11672

EPA ID#: FLD984171694

Facility Street Address: 8755 NW 95th St, Medley, Florida 33178-1462

Contact Mailing Address: 8755 NW 95th St, Medley, Florida 33178-1462

County Name: Miami-Dade

Contact Phone:

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 Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Lary Rodriquez, Branch Manger; Jay Choi, Environmental Specialist

LATITUDE / LONGITUDE: Lat 25° 51' 37.5641" / Long 80° 20' 25.4331"

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

TYPE OF OWNERSHIP: Private

Introduction:

The facility is comprised of one 2.3-acre-sized building situated on a 5.5 acre site in an industrial area, and is connected to city water and sewer. Safety Kleen (SK) has been operating at this location since 1993, and has approximately 12 employees. SK is a permitted facility authorized to operate drum and tank storage units within a service accumulation center. These units include: (1) solvent return and fill station; (2) container and non-container storage; and (3) tank storage. SK is also a registered Small Quantity Handler of Universal Waste. The property is equipped with security fencing and signage. Note - the inspector spoke to the facility manager about the placement of the perimeter signs required due to the facility's Treatment, Storage and Disposal designation and ongoing cleanup issues and he agreed to place the sign such that it would be visible from 25 feet, as per the requirement.

Compliance History:

The last inspection at this facility was performed on April 23, 2015. There were no issue found and

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the facility was considered to be in compliance at the time of the inspection.

Process Description:

Solvent Return and Fill Station:

This area of the facility is a warehouse bay with four rollup doors two each on the north and south sides. A central elevated grating is oriented east-west across the bay, and six sets of short stairs lead to the concrete floor below. This grated dock is accessed from the office and leads into the container storage warehouse in the eastern section of the building.

The inspector observed two wet dumpsters on this elevated grating, one of which is equipped with a drum wash. Each wet dumpster is hard piped (brown pipe) to the waste solvent tank in the tank storage containment. Containers of spent parts washer solvent are brought in by field representatives and emptied into the wet dumpsters; the used solvent is used here to wash the containers before the waste solvent is pumped to the storage tank. The washed containers are then replenished with fresh 150° F solvent piped from the tank storage area for delivery to customers at scheduled intervals. Hazardous waste sludge is generated in the wet dumpsters from these activities. On the south side of this elevated grating inspectors observed one labeled 55-gallon satellite drum of branch debris. Also stored on the elevated grating were drums containing fresh solvent prepared for delivery to customers.

The concrete floor slopes towards the center of the bay to a trench sump. According to SK personnel, the trench sump is managed as less-than-24 hour storage, and would be immediately pumped out upon any collection. The inspector noted fire extinguishers, sprinklers, spill kits, and signage in accessible locations throughout the bay.

The loading dock to the south is used for the mixing of aqueous parts washer detergent for distribution to customers, unloading and loading containers, the storage of aqueous part washers and equipment in for repair, and empty parts washer drums. Spent antifreeze used to be managed in this area but is now commingled with the used oil on the collection trucks, as it is all shipped out of state to a Clean Harbors Environmental Services, Inc. facility.

Tank Storage:

The storage tanks are housed under a covered concrete bunker equipped with a sump and high level alarm. SK utilizes one 20,000 gallon storage tank for the management of waste solvent under their permit, as well as, one 15,000 gallon tank and one 20,000 gallon tank for used oil. Oily water is stored in the 10,000 gallon tank in this area and one 20,000 gallon tank holds bulk solvent product. All tanks were closed, in good condition, and labeled. The tank area was equipped with secondary containment, fire extinguishers and sprinklers. Outside the south side of the tank storage building is the tanker truck spill containment area, where tanker trucks are loaded/unloaded or tanker to tanker transfer occurs. This area is also equipped with a sump. At the time of the inspection, all of the facility's used oil tanker trucks were dispatched, so the inspector were unable to inspect the halogen screening equipment used in the field. Facility representatives reported that each tanker is equipped with a TIF and ChlorDetect dextsil kits, and each load is screened for halogens at pick up.

Record Review:

All of SK's records appeared to be in order: i.e. acceptance and delivery logs, facility inspection logs, container inspection logs, manifests, training records, the permit and closure plan, etc.

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Conclusion:

The facility was in compliance at the time of the inspection.

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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**

4/11/2016

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.