

Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

July 1, 2016

Mr. Scott Thompson, Branch General Manager
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073.
scott.thompson@safety-kleen.com

Re: Safety-Kleen Systems, Inc.
EPA/DEP ID: FLD 980 847 214
Clay County – Hazardous Waste

Dear Mr. Thompson:

Department personnel conducted a compliance inspection of the above-referenced facility on June 7, 2016. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records. Non-compliance identified in the inspection report has been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Tami Applebee at (904) 256-1571 or via e-mail at Tami.Applebee@dep.state.fl.us.

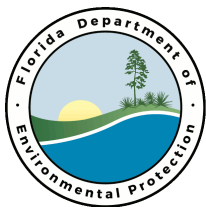
Sincerely,

A handwritten signature in black ink, appearing to read "Vincent Clark", is written over a horizontal line.

Vincent Clark
Environmental Manager

Enclosure(s)

ecc: jeff.curtis@safety-kleen.com;
tami.applebee@dep.state.fl.us; cheryl.l.mitchell@dep.state.fl.us; vincent.clark@dep.state.fl.us;
alisha.simson@dep.state.fl.us



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 06/07/2016

On-Site Inspection End Date: 06/07/2016

ME ID#: 2319

EPA ID#: FLD980847214

Facility Street Address: 161 Industrial Loop S, Orange Park, Florida 32073-6259

Contact Mailing Address: 161 Industrial Loop S, Orange Park, Florida 32073-6259

County Name: Clay

Contact Phone:

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

Transfer Facility

TSD Facility Unit Type(s)

Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Hazardous Waste Transfer Facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Tami A Applebee, Inspector

Other Participants: Cheryl Mitchell, Inspector; David Carter, Customer Service Manager

LATITUDE / LONGITUDE: Lat 30° 10' 47.5682" / Long 81° 43' 5.3847"

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

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc. (Safety-Kleen) was inspected on June 7, 2016, as an unannounced hazardous waste compliance inspection. A follow-up site visit was conducted on June 20, 2016. Safety-Kleen is a commercial treatment, storage, and disposal facility (TSDF) of hazardous waste. The Department issued permit #0077130-HO-009 on January 8, 2014. Permitted hazardous waste units include two container storage areas (the Warehouse Container Storage Area and the Paint Waste Shelter) and an aboveground hazardous waste storage tank. The facility is also notified as a hazardous waste transporter/transfer facility, a used oil transporter/transfer facility, a universal waste transporter, and a Large Quantity Generator (LQG) of hazardous waste.

Safety-Kleen has been at this location for approximately 25 years. It operates a fleet of 6 box trucks for hazardous waste, 7 used oil pump trucks, 2 vans, 1 vacuum truck for industrial wastewater, and 2 forklifts for onsite materials management. The facility's vehicle fleet is maintained off-site. Safety-Kleen employs 17 employees, including 6 drivers.

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Process Description:

The facility stores, processes, transfers, and transports hazardous waste, used oil, used oil filters, new and spent parts washer solvent, and used antifreeze. Safety-Kleen distributes parts washer equipment and maintains the equipment in the field, including emptying the parts washer solvent and refilling. The facility uses a computerized inventory system to manage waste received from customers. The computerized system indicates how the waste should be managed based on waste profiles associated with each customer, where in the facility it should be handled, and how long the waste has been accumulating in each respective area within the facility. Customers are responsible for making the hazardous waste determination and establishing waste profiles but may choose to use generic profiles based on Safety-Kleen's annual waste characterization of common waste streams (this includes immersion cleaner, paint gun cleaner, paint waste, and dry cleaner bottoms) if they are consistent with the customer's waste streams.

The facility is fenced with required signage and adequate security.

Receiving Dock

All waste and Continued-Use Program (CUP) solvent arrives through the Receiving Dock. This area is a designated 10-day Transfer Area. Hazardous waste is logged in and may remain in this area waiting to be packaged or bulked for shipment. At the time of the inspection, the Transfer Area contained one 16-gallon drum of hazardous waste spent immersion cleaner, one 30-gallon drum of hazardous waste spent solvent, four 16-gallon drums of hazardous waste spent solvent, two 30-gallon drums of Continuous Use Program parts washer solvent for reuse, drums of used oil filters, and numerous drums of product solvent. All hazardous waste had been on-site for less than 10 days. All containers were closed and properly labeled. Parts washer solvent is logged in and managed in the return/refill area adjacent to the Receiving Dock. The facility receives three types of parts washer solvent from facilities: spent petroleum distillates parts washer solvent profiled as hazardous waste, spent petroleum distillates parts washer solvent profiled as non-hazardous waste, and solvent that will be reused under the CUP.

Drums containing hazardous waste or non-hazardous waste spent petroleum distillates are poured into one of two automatic drum washers (Photo 1). The liquid is directed to a permitted 15,000-gallon aboveground storage tank. The spent solvent is manifested as D001/D018/D039/D040 hazardous waste approximately every two weeks for reclamation at Safety-Kleen in Lexington, South Carolina (SCD 077 995 488). Sludge is removed from the hazardous waste tanks, as needed, and characterized approximately every three years. Solids and wipes from drum washing are placed into a closed and labeled 55-gallon satellite drum (Photo 2). This satellite drum is used to accumulate "branch waste." Branch waste is a mixed solid and liquid waste stream used for wipes, absorbents, PPE, sludge, and similar items generated by Safety-Kleen in the course of managing, packaging, and bulking hazardous waste. This waste stream is disposed of as D001/D004/D005/D006/D007/D008/D009/D010/D011/D018/D019/D021/D022/D023/D024/D025/D026/D027/D028/D029/D030/D032/D033/D034/D035/D036/D037/D038/D039/D040/D041/D042/D043/F002/F003/F005 hazardous waste.

Safety-Kleen screens customers to ensure they are eligible to participate in the CUP consistent with an October 25, 1999 letter from the Department. Solvent returned from customers in the CUP is poured into a separate drum washer designated for the program. This drum washer re-uses the solvent to wash the drums. The solvent is reused for that day. At the end of the day, the solvent is considered spent and it is directed to the permitted 15,000-gallon aboveground storage tank. Solids, wipes, and sludge from drum washing are handled as described above.

Safety-Kleen also maintains aqueous brake washers for customers. The spent brake washer fluid is managed as non-hazardous waste unless the customer's hazardous waste determination indicates otherwise.

Warehouse Container Storage Area

The Warehouse Container Storage Area is a permitted hazardous waste storage area with a

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maximum capacity of 2,553 gallons of hazardous waste allowed. At the time of the inspection, no hazardous waste was being stored in this area. This area had appropriate safety equipment, decontamination equipment, and spill kits. This area includes a storage area for spent mercury-containing lamps and this is addressed in the permit. At the time of the inspection, no spent mercury-containing lamps were being stored on-site.

Paint Waste Shelter

The Paint Waste Shelter is a permitted hazardous waste storage area with a maximum capacity of 1,222 gallons of flammable hazardous paint waste allowed. At the time of the inspection, no hazardous waste was being stored in this area. This area had appropriate safety equipment and spill kits.

10-day Transfer Areas

The Receiving Dock includes one 10-day Transfer Area and it is described above. Across from the Warehouse Container Storage Area is a second 10-day Transfer Area (Photo 3) at the loading dock. Both 10-day Transfer Areas are marked by yellow paint and signage. Both had appropriate safety equipment, decontamination equipment, and spill kits. At the time of the inspection, no hazardous waste was being stored in the second 10-day Transfer Area across from the Warehouse Container Storage Area.

Across from the loading dock was one closed and labeled satellite container for branch waste. Nearby, there was a closed and labeled satellite container for spent aerosols accumulating in a separate area.

Tank Farm

The Tank Farm contains three above-ground storage tanks; one permitted 15,000-gallon hazardous waste storage tank, one 15,000-gallon used antifreeze tank, and one empty 15,000-gallon tank labeled for used oil (Photo 4). The hazardous waste tank is used to store D001/D018/D039/D040 spent parts washer solvent/mineral spirits and it was labeled, "Hazardous Waste." The tank system, including associated ancillary equipment and secondary containment, appeared to be in good condition.

The facility no longer uses the used oil tank since used oil is delivered directly to CSX Transflo for shipment by rail to Safety-Kleen's refinery (IND 077 042 034).

Adjacent to the Tank Farm, but not within secondary containment, is a 10,000-gallon tank. This tank contains product Solvent 150.

Records Review

Safety-Kleen has submitted an annual Certificate of Liability Insurance with evidence of insurance (expires November 1, 2016). Training records, Contingency Plan (11/10/15), arrangements with local authorities, inspection logs, the operations log, manifests, and used oil records were reviewed. The only discrepancy noted, was that inspectors identified incoming manifests for spent solvent that included D001/D006 hazardous waste codes. This waste is bulked with other spent solvents and newly generated waste solvent from the CUP program and manifested off as D001/D018/D039/D040 prior to being transported to the recycling facility. Since D001/D006 waste is being placed into the tank, the D006 waste code should be included on the manifest [40 CFR 262.20(a)(1)].

Along with used oil, glycol from spent antifreeze combined with the used oil is also recovered at Safety-Kleen's refinery. Used oil filters are transported to Safety-Kleen in Ocala, Florida for recycling. Spent mercury-containing lamps are recycled through Clean Harbors (FLD 980 729 610) and Lighting Resources LLC (FLR 000 070 565). Non-hazardous industrial waste water is managed at Liquid Environmental Solutions (LES).

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New Potential Violations and Areas of Concern:**Violations**

Type: Violation

Rule: 262.20(a)(1)

Explanation: The facility failed to include the D006 waste code on appropriate manifests for the transportation of spent parts washer solvent.

Corrective Action: The facility has returned to compliance. In a June 28, 2016 e-mail, Jeff Curtis, EHS Manager for Safety-Kleen, stated the facility would begin carrying over all applicable waste codes when manifesting the spent parts washer solvent transported from the hazardous waste tank to the recycling facility.

PHOTO ATTACHMENTS:

Photo 1. Drum washer



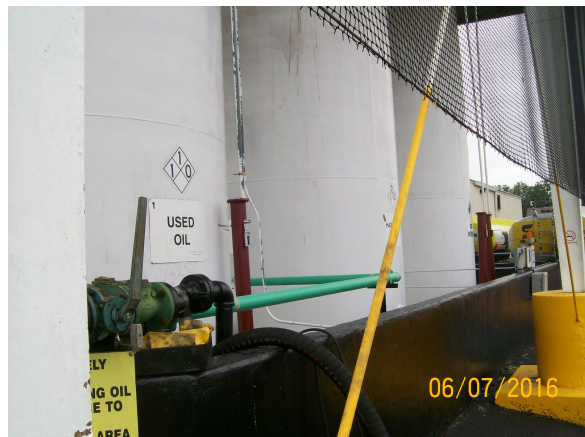
Photo 2. Satellite drum for "Branch Waste"



Photo 3. 10-day transfer area



Photo 4. Tank farm w/ permitted hazardous waste tank



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Signed:

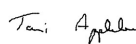
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection 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.

Tami A Applebee

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

7/1/2016

DATE

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.