



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 01/31/2017

On-Site Inspection End Date: 01/31/2017

ME ID#: 11672

EPA ID#: FLD984171694

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

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

County Name: MIAMI-DADE

NOTIFIED AS:

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transfer Facility facility

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for TSD Facility facility

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

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Larry Rodriquez, Branch Manager

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 13 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 perimeter sign required due to the facility's designation as a Treatment, Storage and Disposal must be visible from 25 feet. Due to some work performed on the fence by a contractor, the sign was not on the gate opening; however, it was to the north of the opening and still attached to the fence. The facility manager immediately sent an employee to address the issue.

Compliance History:

Inspection Date: 01/31/2017

The last inspection at this facility was performed on March 31, 2016. There were no issues found and the facility appeared to be in compliance at the time of the inspection.

Process Description:

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 the facility's used oil tanker trucks were dispatched, so the inspector was 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.

To the west of the main building is a portable secondary containment for a vacuum trucks to use to collect solids that can't be easily transferred to the oily water tank. This containment was questionable as the sides were sagging at points and there was a stop were grass had grown through the side of the containment wall. This situation doesn't meet the requirements of secondary containment and the facility was told to order a new one. The facility manager could show the inspector a purchase order documenting the company's actions prior to the inspection to remediate the issue.

The inspectors took this PPE with them for the inspection: hard hats, hard toed shoes, safety glasses, and safety vest. The facility required all visitors to wear hard hats, hard toed shoes and safety glasses. The facilities fire equipment had annual servicing the same month as the inspection. The two main storage areas in the facility have fire suppression systems. There are eye washes and safety showers in several areas of the facility.

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.

Inspection Date: 01/31/2017

Conclusion:

The facility was in compliance at the time of the inspection. The facility did provide the Department a picture on febraury 3, 2017 demonstrating that the signage had been place back in its' appropriate position.

Inspection Date: 01/31/2017

1.0 - Pre-Inspection Checklist**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 01/31/2017

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.

Kathy R. Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

04/18/2017

DATE

Larry Rodriquez

Representative NAME

Branch Manager

Representative TITLE

Saftey Kleen

ORGANIZATION

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.

Report Approvers:**Approver:**

Kathy R. Winston

Inspection Approval Date:

04/18/2017