



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

October 10, 2017

Mr. Scott Thompson, Branch General Manager
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, FL 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 August 17, 2017. 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. Any non-compliance items which may have been identified at the time of the inspection have 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 Cheryl Mitchell at (904) 256-1620 or via e-mail at cheryl.l.mitchell@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "Heather Webber".

Heather Webber
Environmental Administrator

Enclosure: Inspection Report



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 08/17/2017

On-Site Inspection End Date: 08/17/2017

ME ID#: 2319

EPA ID#: FLD980847214

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

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

County Name: CLAY

NOTIFIED AS:

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Hazardous Waste Transporter Facility

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

Routine Inspection for TSD Facility

Routine Inspection for Hazardous Waste Transfer Facility

Routine Inspection for Universal Waste Transporter Facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Scott Mahler, Waste Profile Coordinator

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 August 17, 2017. A visit to the facility was also conducted on September 7, 2017, for a records review. Safety-Kleen was last inspected by the Department's Hazardous Waste Program on June 7, 2016. Scott Mahler, Safety-Kleen Waste Profile Coordinator, was present during the inspection on August 17. Jeff Curtis, Safety-Kleen Regional ESH Manager, and Scott Thompson, Safety-Kleen Branch Manager, were present during the September 7 visit. 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, and it expires December 20, 2018. 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 registered as a Hazardous Waste Transporter/Transfer Facility, a Used Oil-Used Oil Filter Transporter/Transfer facility, a Universal Waste Transporter and Storage Facility and a Large Quantity Generator (LQG) of hazardous waste.

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Safety-Kleen has been at this location for approximately 26 years. It operates a fleet of four box trucks for hazardous waste, seven used oil pump trucks and one vacuum truck. The facility's vehicle fleet is maintained off-site. Safety-Kleen has 17 employees, including six drivers. The facility is connected to city water and sewer. The facility consists of administrative offices, a Warehouse, Receiving Dock, Tank Farm, Paint Waste Shelter and vehicle parking lot.

Process Description:

The facility stores, processes, transfers, and transports hazardous waste, universal 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.

Warehouse Container Storage Area and 10-Day Transfer Area

The Warehouse Container Storage Area is a permitted hazardous waste storage area with a maximum capacity of 2,553 gallons of hazardous waste allowed. This area had appropriate safety equipment, decontamination equipment and spill kits. At the time of the inspection, this storage area was within its permitted volume capacity and all containers had been accumulating for less than one year. At the time of the inspection, three 55-gallon containers of D008/D018/D039/D040 hazardous waste "retain/oil samples" were being stored in this area (Photo 1). This is hazardous waste that the facility generates from disposal of used oil samples from the pump trucks. Before used oil is pumped into a pump truck, the driver screens the used oil using a hand-held PID device. The results of the screening are recorded on the manifest and/or receipt. Individual samples from each pump truck are collected prior to transfer to railcar and held at the Safety-Kleen facility until the used oil has been received and processed by the Safety-Kleen refinery in Indiana. After confirmation that the used oil was processed by the refinery, the samples are purged and disposed of as hazardous waste.

The Container Storage Area is also used to accumulate universal wastes. At the time of the inspection, there were five boxes of universal waste mercury-containing lamps stored in this area. The boxes were properly closed, dated and labeled and had been stored less than 180-days.

The Warehouse 10-Day Transfer Area is located adjacent to the Container Storage Area and is one of two 10-Day Transfer Areas at the facility (Photo 2). This area had appropriate safety equipment, decontamination equipment and spill kits. All hazardous waste containers were closed, dated, labeled and had been in the Transfer Area for less than 10 days.

Receiving Dock and 10-Day Transfer Area

All waste and Continued-Use Program (CUP) solvent arrives through the Receiving Dock. This area is the second designated 10-day Transfer Area at the facility (Photo 3). This area had appropriate safety equipment, decontamination equipment and spill kits. All hazardous waste containers were closed, dated, labeled and had been in the Transfer Area for less than 10 days. One 55-gallon satellite drum was located in the Receiving Dock 10-Day Transfer Area and is used for accumulating spent aerosol cans. The drum was properly closed and labeled.

The facility receives three types of parts washer solvent from customers: 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 for rinsing solvent containers for re-use. The permitted Solvent Return/Fill Station is located adjacent to the Receiving Dock and contains two wet dumpsters for processing these solvents. Drums containing hazardous waste or non-hazardous waste spent petroleum distillates are emptied into the drain of one wet dumpster that houses automatic drum rinsing equipment (Photo 4). This drain empties into the permitted 15,000-gallon aboveground storage tank. The spent solvent is manifested as D001/D018/D039/D040 hazardous waste approximately every two weeks for

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reclamation at Safety-Kleen in Lexington, South Carolina (SCD 077 995 488). Solvent returned from customers in the CUP is poured into a separate wet dumpster specifically labeled for the CUP that is located adjacent to the drum rinsing wet dumpster (Photo 5). The CUP solvent is pumped from this wet dumpster to the drum rinsing equipment for use during the day. At the end of the day, any remaining solvent is considered spent and is discharged to the permitted 15,000-gallon aboveground storage tank.

"Branch Debris" waste includes solid and liquid waste streams such as 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. One 55-gallon satellite drum of "Branch Debris" was located in the drum rinse area and one 55-gallon satellite drum was located in the Warehouse Container Storage Area. Both satellite containers were closed and properly labeled.

Tank Farm

The Tank Farm contains three above-ground storage tanks as follows: 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 6). The hazardous waste tank is used to store D001/D018/D039/D040 spent parts washer solvent/mineral spirits and 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 product tank that contains virgin Solvent 150.

Paint Waste Shelter

The Paint Waste Shelter is a permitted hazardous waste storage area with an allowed maximum capacity of 1,222 gallons of flammable hazardous paint waste. At the time of the inspection, the shelter was being used to store product and empty containers only; no hazardous waste was being stored in this area.

Security

The facility is surrounded by a chain link fence with barbed wire on top and appeared to be in good condition. The facility is accessed through a main entrance gate that is kept closed and electronically locked at all times. Access is controlled via key pad. At the time of inspection, the gate was closed and adequate warning signage was posted.

Records Review

Records reviewed included insurance records, Transporter registration records, personnel training records, Contingency Plan, arrangements with local authorities, waste inspection logs, the operating log, manifests and used oil logs. All records reviewed appeared to be in order.

PHOTO ATTACHMENTS:

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Photo 1 - Container Storage Area Drums

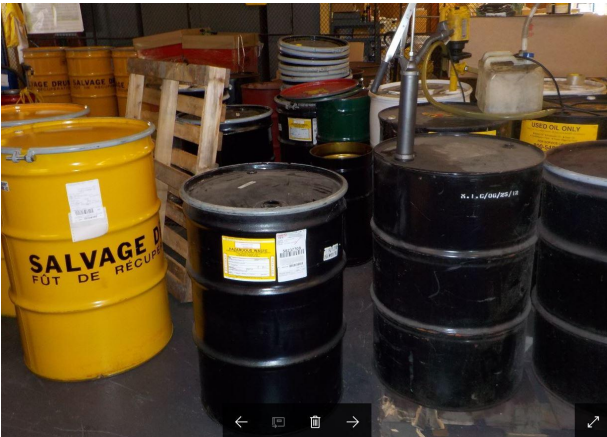


Photo 2 - Warehouse 10-Day Transfer Area



Photo 3 - Receiving Dock 10-Day Transfer Area

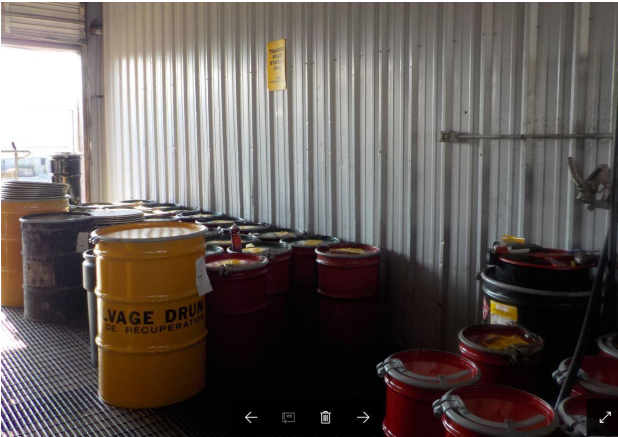


Photo 4 - CUP Rinse Station



Photo 5 - CUP Collection Wet Dumpster

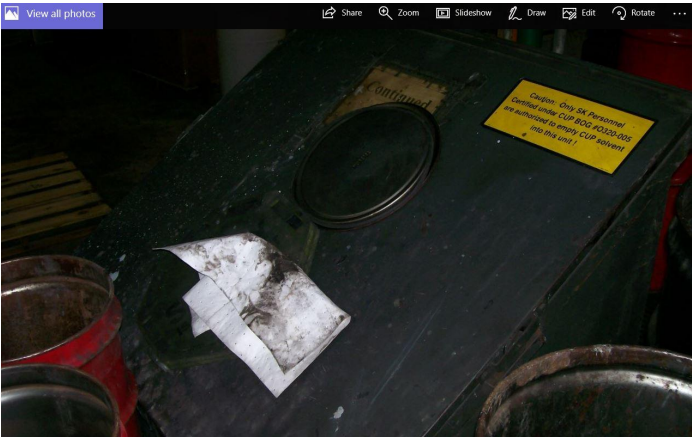


Photo 6 - Tank Farm



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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	✓		

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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.

Cheryl L Mitchell

Inspector

PRINCIPAL INSPECTOR NAME**PRINCIPAL INSPECTOR TITLE**

DEP

09/25/2017

PRINCIPAL INSPECTOR SIGNATURE**ORGANIZATION****DATE**

Scott Mahler

Waste Profile Coordinator

Representative NAME**Representative TITLE**

Safety-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:**

Cheryl L Mitchell

Inspection Approval Date:

09/25/2017