



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 03/22/2018 **On-Site Inspection End Date:** 03/22/2018
ME ID#: 48680 **EPA ID#:** FLD984167791
Facility Street Address: 5610 Alpha Dr, Boynton Beach, FL 33426-8329
Contact Mailing Address: 5610 Alpha Dr, Boynton Beach, FL 33426-8329
County Name: Palm Beach **Contact Phone:** (561) 523-4719

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 Universal Waste Transporter facility
Routine Inspection for TSD Facility facility
Routine Inspection for LQG (>1000 kg/month) facility
Routine Inspection for Used Oil Transfer Facility facility
Routine Inspection for Hazardous Waste Transporter facility
Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Norva Blandin, Inspector
Other Participants: Kayla Acosta, Environmental Specialist I; Bill Cruz, Plant Manager; Jeff Curtis, EHS Officer

LATITUDE / LONGITUDE: Lat 26° 32' 24.766" / Long 80° 4' 51.4123"

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

TYPE OF OWNERSHIP: Private

Introduction:

On March 22, 2018, a representative of the Florida Department of Environmental Protection (FDEP) conducted an used oil and hazardous waste compliance inspection at Safety Kleen Systems Inc. (SK). SK currently operates as a permitted facility (Permit #49625-010-HO) for the operation of a hazardous waste transporter and transfer facility as well for used oil activities. This permit was recently renewed and expires on November 19, 2022.

Safety Kleen - Boynton Beach (SK - BB) has been in operation since 1991. Situated in an industrial park, the facility is approximately 5 acres. The facility has 17 full-time employees and is connected to city water and sewer. The facility has four- 4000 gallon used oil collection trucks, two 4000 gallon vacuum trucks, seven box trucks of assorted sizes used for hazardous waste transport and their Fluid Recovery Services (FRS) program, and three vans for their sales people. SK - BB sells and distributes raw solvents and collects spent solvent through a solvent leasing program with its' customers. SK - BB also collects used oil, used oil filters, used antifreeze, waste paint-related material, spent fluorescent bulbs and FRS waste for recycling. The facility consists of a container storage area, a aboveground storage tank area, and a return/fill area.

Inspection Date: 03/22/2018

During the inspection, SK was represented by Mr. Bill Cruz, Site Manager of the facility and Jeff Curtis, EHS Officer. The DEP was represented by Norva Blandin, Environmental Manager and Kayla Acosta, Environmental Specialist I.

PPE was required to entry the facility. Safety boots, hard hat, and a safety vest were used during the inspection.

Process Description:

Since the last inspection conducted on 11/05/2015, mostly all operations remained the same. SK - BB's operations involves certain waste streams (paint waste related, dry cleaning wastes, paint gun cleaners) that terminated here and then re-manifested with SK as a generator. Therefore all the wastes were sent on to Clean Harbors - Bartow, Florida. Now all hazardous waste that is received on site is handled as transfer facility waste (no more than 10 days). Antifreeze is no longer collected separately from used oil, instead, it is commingled with the used oil and sent to SK-BB East Chicago Illinois facility for processing. Continued Use Program (CUP) is not in operation and not permitted at this time (per permit condition Part II Subpart B.3)

Also, used oil filters are now sent for processing to Clean Harbor's Ocala facility. The changes noted here and in the paragraph below are a result of Clean Harbors Environmental Services, Inc., headquartered in Norwell, MA, buying out SK. However; at this point, SK - BB it is still being operated as a separate entity. Under a minor modification that was approved by the Department, the loading dock area that used to be where the antifreeze tanker was parked, is now being operated as a hazardous waste ten-day transfer facility by Clean Harbors Florida, LLC. An empty trailer is parked there weekly, which is then filled up by their local drivers with hazardous waste drums. The following week this trailer is picked up by a tractor and an empty trailer is left behind to start the cycle again.

The inspectors had a brief meeting with Mr. Cruz and Mr. Curtis to discuss if since 2015 the facility had not change any processes or any structure in the building. No changes were noted. The inspectors also went thru the permit conditions and verified if the facility is complying with the permit requirements for a transfer facility for used oil and hazardous waste among other requirements.

The inspectors toured the facility and the facility did not make any changes in the last three (3) years. Our findings are described below:

Above Storage Tanks (AST's) located in their property

The inspectors confirmed that the quantities described in their permit are exactly located in the site. The following four (4) above storage tanks were observed:

- > one (1) 15,000-gallon storage tank for waste solvent
- > one (1) 20,000 gallon storage tank for used oil
- > one (1) 15,000 gallon storage tank for used oil
- > one (1) 5,000 gallon storage tank for oily water
- > one (1) 20,000 gallon storage tank for product (solvent- fresh)

All these tanks are currently registered with the State of Florida. No major repairs were conducted recently. If any, SK will inform and notify our offices in Tallahassee. The inspectors observed an adequate secondary containment for these tanks. An SPCC/Contingency Plan was provided at the time of inspection. Daily and weekly inspections are conducted by SK and records are kept for at least three years. All records are available in the SK database system.

Solvent return/fill stations - appeared to be in order. Universal wastes were not observed on site.

10- days container storage area for hazardous waste and used oil activities

The inspectors observed that the area was two separate areas for used oil activities and hazardous wastes. Only parts washer wastes -cradle to grave process- ended at this location for recycling. For the hazardous waste containers, the facility complied with adequate aisle space, weekly inspection logs, closed and labeled. All of these wastes were no longer stored for more than seven (7) days. The facility provided a copy of their weekly inspections logs (last inspection 3/21/18) and also, SK scanned each container received and kept record when the container was received and when is need to be shipped out (prior to day 10). Also, the inspectors observed at least 40- 55 gallon drums of hazardous wastes waiting to be transferred to Clean

Inspection Date: 03/22/2018

Harbors, located in Bartow, Florida. All containers were properly labeled, closed and inside the building.

For the used oil activities, the inspectors observed 250 gallons tank of used oil filters properly closed and labeled, inside the building. The facility did not crush them on site. Used Oil filters are shipped out to U.S Foundry (a registered used oil filter handler). The facility provided to the inspectors all the documentation related to the used oil transfer facility standards including acceptance and delivery records, halogen screening results,

At this location, the facility did not conduct any used oil processing activities.

In the back of the property, the inspectors observed a trailer (capacity of 20,000 gallons) designated to accumulate oily water named Frac Tank. This Frac Tank is used for receiving oily water from our Vacuum Truck Services program. Our Vacuum Services program services customer oil/water separators and other non-hazardous waste streams. The material is picked up weekly and sent to Liquid Environmental Solutions in Jacksonville, FL.

The inspectors did not observe any release of contaminants to the environment or any recent spill were noted in their records.

Preparedness and prevention measures were observed throughout the facility: spill kits, fire extinguishers, internal communication system, fire prevention measurements, among others. The property is secure with fences, security codes for entry are required and also, labeled as a hazardous waste storage area in both languages: spanish and english.

Record Review:

All permits and documentation required by the inspectors were available for review on site. The inspectors reviewed the following:

- > Acceptance and delivery records for used oil activities
- > Hazardous waste manifests
- > SK facility operation logs (for the 10-day limit)
- > SK facility operation logs (for used oil <35 days)
- > Weekly inspection logs for hazardous waste containers (last inspection 3/21/18)
- > Full Contingency Plan (last revision 5/23/17) including their proof of notification to the local authorities.
- > Employee Training Plan (last training was conducted 12/19/17)
- > Permits and registrations
- > Waste Analysis Plan
- > Closure Plan and Cost closure estimates (last submitted on 1/15/18)
- > Liability insurance policies (expired on 11/1/18 Policy # HDOG27872189 \$4M)
- > Biennial Report (last submitted on March 2018)

All documentation appeared in order and in compliance with the RCRA regulations.

PHOTO ATTACHMENTS:

Inspection Date: 03/22/2018

Shower area



Loading and unloading HW area



Used Oil activities designated area



scanned system for HW containers



10-days HW Transfer Area



AST for waste solvent



Inspection Date: 03/22/2018

secure area - gate for entry



Conclusion:

The facility was in compliance at the time of inspection.

Inspection Date: 03/22/2018

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.

Note: Checklist items with shaded boxes are for informational purposes only.

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: 03/22/2018

4.0 - Large Quantity Generator 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.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	40 CFR 262 Subpart A - General Standards	Yes	No	N/A
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.12(a)	✓		
4.3	Are any hazardous wastes treated or disposed of on site? 268.7(a)(5), 62-730.240(1)			
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)	✓		
Item No.	40 CFR Part 268 -- Land Disposal Restrictions	Yes	No	N/A
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.6	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)			
4.7	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)	✓		
4.8	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)	✓		
4.9	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)	✓		
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)	✓		
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)	✓		
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
4.13	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)	✓		
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)	✓		
4.15	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)	✓		
4.16	If the generator chooses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)	✓		
4.17	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)	✓		
4.18	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)	✓		
4.19	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
4.20	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)	✓		
Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A

Inspection Date: 03/22/2018

Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
4.21	Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are not in compliance) 262.20(a)(1) <ul style="list-style-type: none"> <input type="checkbox"/> Item 1. Generator's U.S. EPA Identification Number <input type="checkbox"/> Item 2. Page 1 of "X" (total number of pages used to complete the manifest) <input type="checkbox"/> Item 3. Emergency Response Phone Number <input type="checkbox"/> Item 4. Manifest Tracking Number <input type="checkbox"/> Item 5. Generator's Mailing Address, Phone Number and Site Address <input type="checkbox"/> Item 6. Transporter 1 Company Name & U.S. EPA ID Number <input type="checkbox"/> Item 7. Transporter 2 Company Name & U.S. EPA ID Number <input type="checkbox"/> Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number <input type="checkbox"/> Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group. <input type="checkbox"/> Item 10. Containers (Number and Type) <input type="checkbox"/> Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates) <input type="checkbox"/> Item 12. Units of Measure (Weight/Volume) <input type="checkbox"/> Item 13. Waste Codes. Enter up to 6 of the most representative waste codes. <input type="checkbox"/> Item 14. Special Handling Instructions and Additional Information <input type="checkbox"/> Item 15. Generator's / Offeror's Certifications <input type="checkbox"/> Item 16. International Shipments (Import or Export must be noted) <input type="checkbox"/> Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt) <input type="checkbox"/> Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility) <input type="checkbox"/> Item 19. Hazardous Waste Report Management Codes (On returned copies only) <input type="checkbox"/> Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt) 	✓		
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✓		
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23.(c)	✓		
4.27	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) <ul style="list-style-type: none"> <input type="checkbox"/> The next non-rail transporter? <input type="checkbox"/> The Designated Facility if transported solely by rail? <input type="checkbox"/> The last rail transporter to handle the waste in the U.S. if exported by rail? 	✓		
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)	✓		
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)	✓		
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)	✓		
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)	✓		
4.32	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
4.33	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
4.34	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)	✓		

Inspection Date: 03/22/2018

Item No.	40 CFR 262 Subpart C -- Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30	✓		
4.36	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31	✓		
4.37	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)	✓		
4.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are not in compliance) 262.32(b) <input type="checkbox"/> Generator's Name and Address? <input type="checkbox"/> Generator's EPA ID Number? <input type="checkbox"/> Manifest Tracking Number?	✓		
4.39	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33	✓		
Item No.	40 CFR 262 Subpart C -- Accumulation Requirements	Yes	No	N/A
4.40	Does the facility accumulate hazardous waste on-site prior to treatment or disposal?			
4.41	If YES identify applicable accumulation units: <input type="checkbox"/> Containers - Complete Container Checklist below <input type="checkbox"/> Tanks - Complete 40 CFR 265 Subpart J Tanks Checklist and meet 265 Subparts AA, BB, and CC, as applicable <input type="checkbox"/> Drip Pads - Complete 40 CFR 265 Subpart W Checklist <input type="checkbox"/> Containment Buildings - Complete 40 CFR 265 Subpart DD Checklist			
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.34(b)	✓		
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 265.111? 265.111	✓		
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 265.114? 265.114	✓		
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.34(a)(2)	✓		
4.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.34(a)(2)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.34(a)(3)	✓		
4.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.34(c)(1)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.34(c)(1)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.34(c)(1)(i), 265.171	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.34(c)(1)(i), 265.172	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.34(c)(1)(i), 265.173(a)	✓		
4.54	Has the generator marked satellite containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers? 262.34(c)(1)(ii)	✓		
4.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point? (If No, mark all items below as N/A.)			
4.56	If YES, within 3 days did the generator mark an accumulation start date on the excess waste container? 262.34(a)(2)	✓		
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.34(a)(3)	✓		
Item No.	40 CFR 265 Subpart I -- Use and Management of Containers	Yes	No	N/A
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 265.171	✓		
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 265.172	✓		
4.60	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 265.173(a)	✓		
4.61	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 265.173(b)	✓		

Inspection Date: 03/22/2018

Item No.	40 CFR 265 Subpart I -- Use and Management of Containers	Yes	No	N/A
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 265.174	✓		
4.63	Does the generator properly document the weekly inspections? 62-730.160(5)	✓		
4.64	This should include at a minimum: (Check items below that are not in compliance) <input type="checkbox"/> Date and Time of inspection <input type="checkbox"/> Legibly printed name of inspector <input type="checkbox"/> Number of hazardous waste containers <input type="checkbox"/> Condition of containers <input type="checkbox"/> Notation of observations made <input type="checkbox"/> Date and nature of any repairs or remedial actions			
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 265.176	✓		
4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 265.177(a), 265.17(b)	✓		
4.67	If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 265.177(b), 265.17(b)	✓		
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 265.177(c)	✓		
Item No.	40 CFR 265.16 -- Personnel Training	Yes	No	N/A
4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 265.16(a)(1)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 265.16(a)(2)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 265.16(a)(2)	✓		
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 265.16(a)(3)	✓		
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 265.16(b)	✓		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 265.16(b)	✓		
4.75	Does the generator review training annually, at least once each calendar year? 265.16(c)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 265.16(d)(1)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 265.16(d)(2)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 265.16(d)(3)	✓		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 265.16(d)(4)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 265.16(e)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 265.16(e)	✓		
Item No.	40 CFR 265 Subpart C -- Preparedness and Prevention	Yes	No	N/A
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 265.31	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 265.32(a)	✓		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 265.32(b)	✓		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 265.32(c)	✓		
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 265.32(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 265.33	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 265.34(a)	✓		

Inspection Date: 03/22/2018

Item No.	40 CFR 265 Subpart C -- Preparedness and Prevention	Yes	No	N/A
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 265.34(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 265.35	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 265.37(a)(1)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a primary emergency police and/or fire authority? 265.37(a)(2)	✓		
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 265.37(a)(3)	✓		
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 265.37(a)(4)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 265.37(b)	✓		
Item No.	40 CFR 265 Subpart D -- Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 265.51(a)	✓		
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 265.51(b)	✓		
4.98	Does the contingency plan describe actions to be taken in response to the following:			
4.99	Fires? 265.52(a)	✓		
4.100	Explosions? 265.52(a)	✓		
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 265.52(a)	✓		
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 265.52(b)	✓		
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 265.52(c)	✓		
4.104	Does the plan list names, addresses (office & home), and phone numbers (office & home) of emergency coordinator(s)? 265.52(d)	✓		
4.105	Does the plan identify the primary emergency coordinator and list alternates in order they will assume responsibility? 265.52(d)	✓		
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 265.52(e)	✓		
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 265.52(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 265.53(a)	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 265.53(b)	✓		
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 265.54	✓		
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 265.55	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 265.56? 265.56	✓		
Item No.	Record Keeping and Reporting	Yes	No	N/A
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 265.56(i)	✓		
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.40(c)	✓		
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)	✓		
4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)	✓		
4.117	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
4.118	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was intended to be shipped off-site? 262.53(a)	✓		
4.119	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.60? 262.60	✓		

Inspection Date: 03/22/2018

6.0 - Transporters 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.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Transporter Requirements (62-730.170 & 40 CFR 263)	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - CESQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)(1)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)(2)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓

Inspection Date: 03/22/2018

Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)	✓		
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)	✓		
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)? 62-730.150(2)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

Inspection Date: 03/22/2018

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.

Norva Blandin _____ Inspector _____
Principal Inspector Name **Principal Inspector Title**

Principal Inspector Signature DEP _____ 05/22/2018
Organization **Date**

Kayla Acosta _____ Environmental Specialist I _____
Inspector Name **Inspector Title**

DEP _____
Organization

Bill Cruz _____ Plant Manager _____
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.

Jeff Curtis _____ EHS Officer _____
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: Norva Blandin **Inspection Approval Date:** 05/22/2018