

JAN 15 1992

4WD-RCRA&FF

Mr. Satish Kastury
Environmental Administrator
Hazardous Waste Regulation
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Safety-Kleen
Boynton Beach, Florida
FLD 984 167 791

RECEIVED
JAN 21 1992
DEPT. OF ENVIRONMENTAL REG.
WEST PALM BEACH

Dear Mr. Kastury:

Enclosed is the report for the RCRA Compliance Evaluation Inspection conducted at Safety-Kleen in Boynton Beach, Florida on November 5, 1991. This inspection was conducted by personnel from the Southeast District of the Florida Department of Environmental Regulation (FDER), accompanied by Mr. Javier Garcia from the U.S. Environmental Protection Agency (EPA). In accordance with the Memorandum of Agreement (MOA) between EPA and FDER, FDER will have the lead on any enforcement action for violations to the base RCRA program.

If you should have any questions concerning this report, please contact Mr. Garcia of my staff at (404) 347-7603.

Sincerely yours,

John E. Dickinson, P.E., Chief
RCRA Compliance Section
RCRA Permitting and Compliance Branch

Enclosure

cc: Scott Benyon (w/enclosure)
Deputy Assistant Secretary
FDER Southeast District

GARCIA: DOC. SKBtraFl: NCR DISK #2

GARCIA PALLAS DICKINSON



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JAN 15 1992

4WD-RCRA&FF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas H. Sand, Branch Manager
Safety-Kleen Corporation
5610 Alpha Drive
Boynton Beach Florida 33426

RE: Compliance Evaluation Inspection
Safety-Kleen Boynton Beach
FLD 984 167 791

Dear Mr. Sand:

Enclosed is the report for the RCRA Compliance Evaluation Inspection which was conducted at the referenced facility located in Boynton Beach, Florida on November 5, 1991. As indicated in the report some violations of the Resource Conservation and Recovery Act regulations were discovered during this visit. In accordance with the Memorandum of Agreement (MOA) between the Environmental Protection Agency (EPA) and the Florida Department of Environmental Regulation (FDER), EPA will refer this violation to FDER for proper enforcement action. If you have any questions or comments, please contact Mr. Javier Garcia of my staff at (404) 347-7603.

Sincerely yours,

A handwritten signature in cursive script that reads "John E. Dickinson".

John E. Dickinson, P.E., Chief
RCRA Compliance Section
RCRA Permitting and Compliance Branch

Enclosure

cc: Mr. Scott Benyon
Deputy Assistant Secretary
FDER Southeast District

RCRA INSPECTION REPORT

1. Inspector and Author of Report

Javier E. Garcia
Environmental Engineer
(404)347-7603

2. Lead Inspector

Tim Gray, Environmental Specialist
Florida Department of Environmental Regulations (FDER)
(407)433-2650

3. Facility Information

Safety-Kleen Corporation (SKC)
FLD 984 167 791

Location & Mailing Address:

46 B Quantum Industrial Park
5610 Alpha Drive
Boynton Beach, Florida 33426

4. Contact Person

Thomas Sands
Branch Manager
Tel. (407)736-1339

5. Inspection Participants

Tom Larsen	SKC
Tim Gray	FDER
Jeff Smith	FDER
Knox McKee	FDER
Javier Garcia	EPA

6. Date and Time of Inspection

November 5, 1991
9:45 a.m.

7. Applicable Regulations

Title 40 Parts 260 through 270 of the Code of Federal Regulations and the facility's RCRA permit.

8. Purpose of Inspection

This inspection was conducted to determine the facility's compliance status with its RCRA permit and to determine the effectiveness of FDER's hazardous waste management program.

9. Facility Description

SKC operates as a storage and transfer facility for both virgin solvents and spent solvents. This is a new facility and began operation on September 23, 1991. The facility consists of a main building, a warehouse and a tank farm. The main building is where the administrative offices are located. Contiguous to the building is the warehouse which includes the loading/unloading dock for virgin and spent materials and the container storage area. The tank farm is located to the west of the main building. The tank farm consists of a steel building, with a concrete dike and four above ground steel tanks.

SKC leases virgin products to different types of industries to be used for parts washing, dry cleaning and paint refinishing. As part of the service provided to costumers, SKC collects the spent product from the costumers and replaces it with new product. The spent product is taken to this facility for accumulation and bulking prior to shipment to various Safety-Kleen facilities for recycling. In addition, SKC stores used oil in one of the tanks. The used oil is transported to a refinery in Ontario, Canada where it is refined into light lubricating oil.

This facility has a RCRA permit for storage of hazardous waste in containers and a tank. The tank has a volume of 15,000 gallons and it is permitted for 14,250 gallons of spent mineral spirits. The container storage area is permitted for 6,912 gallons of spent dry cleaning products, immersion cleaner, dumpster mud and paint wastes.

Spent mineral spirits are brought to the facility in 30 gallon (gal) and 16 gal containers. These containers are taken to the loading/unloading dock where their contents are drained into one of two dumpsters which are connected to the storage tank. The solids accumulated in the dumpsters, referred to as "dumpster mud", are removed periodically and accumulated in 30 gal containers. The spent mineral spirits are sent to SKC's recycling center in Lexington, South Carolina .

Dry-cleaning wastes include filter cartridges and still bottoms. The dry-cleaning wastes are stored in 16 gal polyethylene drums and 30 gal steel drums. These drums are stored in the container storage area prior to shipment to the Tampa accumulation center or to South Carolina.

The other wastes handled at this facility are paint wastes and waste from SKC's Fluid Recovery Service (FRS). Paint wastes are received in 5 gal pails and 16 gal drums. The wastes from the FRS program are handled at this location as a transfer

facility for their transportation to the Safety-Kleen facility in Tampa. The wastes collected under the FRS are not part of Safety-Kleen's normal leasing program.

10. Findings

The first area inspected was the loading/unloading dock which is referred in the permit as the return/fill area. This area has a roof and a concrete floor. The floor is sloped toward a concrete collection trench, which is connected to the storage tank. At the time of the inspection this area was being pressure washed. The floor in this area appeared to be in good condition. At the time of the inspection no waste was being transferred in this station. There were three containers adjacent to each of the two dumpsters where the spent mineral spirits are poured to be pumped to the storage tank. These containers are used to accumulate the solids ("dumpster mud") that are removed from the dumpsters. The state permit prohibits the staging of containers in this area except when dumpster mud is being added to the containers.

The second area inspected was the container storage area. This area is within the same structure that encloses the loading/unloading dock. This area is used for storage of paint related waste, dumpster mud, carburetor cleaner and dry cleaning waste. There were six (6) - 30 gal containers with "off-spec" perchloroethylene. This material is going to be reprocessed into a new product at a South Carolina facility. In addition there was one container with immersion cleaner solvent (carburetor cleaner F002, D006, D007 and D022). Also SKC had four (4) - 30 gal containers with drained oil filters. These were handled as non-hazardous waste.

Next we went to the tank farm. On our way to the tank farm we observed a discolored area in the pavement in the east parking area at the facility. According to Mr. Larsen, this was product from a leaking drum inside one of the trucks. Mr. Larsen stated that the spilled material was properly contained and collected. At the tank farm we observed that the sealant applied to the dike was deteriorating in some areas. Mr. Larsen expressed that a solution for this was already being evaluated. The tanks are used for virgin mineral spirits, spent mineral spirits, used oil and one to be used for coolant. All tanks were properly identified and appeared to be in good condition.

In October 1991, there was a release of spent mineral spirits from the storage tank into the dike. This spill was caused by electrical problems in the overflow alarm system. This problem has been corrected. According to Mr. Larsen, there were no releases and all spilled material was contained in the dike and properly removed.

After visual inspection of the facility we proceeded with a review of SKC's files. SKC training program satisfies the requirements of its permit. A copy of the contingency plan has been provided to all responding authorities. The inspection log was found to be complete and up to date. At least one facility was found to be sending their hazardous waste under a contractual agreement as a conditionally exempt generator, when the state's records shows that this facility is a regulated generator. When asked about this Mr. Larsen responded that SKC depends on the information submitted by their clients and that they do not have an specific mechanism to verify the information submitted by their clients.

11. Violations

The following violations were observed:

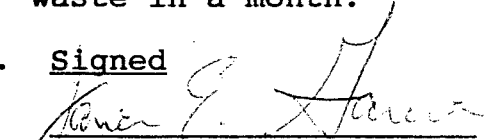
Permit condition number 36 establishes that containers holding dumpster sediment must be removed from the loading/unloading dock and stored in the container storage area. At the time of the inspection SKC had six containers with dumpster mud in this dock.

40 CFR 264.15(c) requires owners and operators of hazardous waste management facilities to remedy any deterioration or malfunction of equipment or structures observed during the inspections of the regulated areas. The sealant of the tank farm dike is deteriorated in some areas.

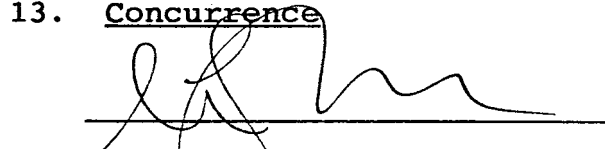
12. Recommendation

SKC should find a way to verify the information submitted by clients claiming to generate less than 1,000 Kg of hazardous waste in a month.

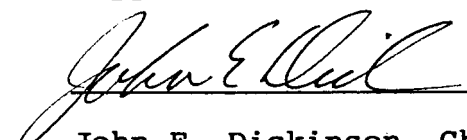
12. Signed


Javier E. Garcia
Inspector and Author of Report

13. Concurrence


Jeffrey T. Pallas, Chief
South Compliance Unit
01/10/92
Date

Approval


John E. Dickinson, Chief
RCRA Compliance Section
1/13/92
Date