



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 06/14/2018

On-Site Inspection End Date: 06/14/2018

ME ID#: 11672

EPA ID#: FLD984171694

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

Contact Mailing Address: 5610 Alpha Dr, Boynton Beach, FL 33426-1462

County Name: Miami-Dade

Contact Phone: (561) 523-4719

NOTIFIED AS:

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility facility

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

Routine Inspection for Transfer Facility facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Norva Blandin, Inspector

Other Participants: Kayla Acosta, ESI; Jeff Curtis, EHS Safety Manager; Rick Divuittono, 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:

On June 14, 2018, representatives 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 an active hazardous waste transporter and transfer facility under Permit #56019-011-HO. The facility also conducts used oil activities. This permit was renewed on September 2017, approved by the Department on May 21, 2018 and expires on March 19, 2023.

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. SK has been operating at this location since 1993, and has approximately 9 employees. The facility is authorized to operate drum and tank storage units within a service accumulation center under the current operating permit.

During the inspection, SK was represented by Mr. Rick Divuittono, Branch 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.

Inspection Date: 06/14/2018

Notification History:

Last notification was received to the Department - 6/14/18. Safety Kleen is currently registered as the following: Large Quantity Generator, UW Lamp Transporter, HW transporter, transfer facility, Used Oil (Transfer, Transporter, for both used oil and used oil filter. Also, this site is currently permitted as Operating Commercial TSD (expired on 5/21/2023).

Inspection History:

In the last five (5) years, the Department inspected this facility:

Last inspection 1/31/2017 - the facility was in compliance; no issues were described.

3/31/16 - The facility was in compliance; no issues were described.

4/23/215 - The facility was in compliance; no issues were described.

6/24/2013- the facility was in compliance; no issues were described.

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 1/31/2017, operations at this facility have not significantly changed.

SK - Medley's operation involves certain waste streams (pain waste related, dry cleaning wastes, paint gun cleaners) that, under the facility's permit, terminated here and were then re-manifested with SK as the generator. These re-manifested wastes were then sent to Clean Harbors in Bartow, Florida. Now all hazardous waste that is received on site is handled as transfer facility waste, meaning it does not stay on-site for longer than 10 days. Additionally, antifreeze is no longer collected separately from used oil; instead, it is commingled with used oil and sent to SK in East Chicago, Illinois, for processing.

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.

The perimeter sign required due to the facility's designation as a Treatment, Storage and Disposal was visible from 25 feet and it was in compliance.

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

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. 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.

Solvent Return and Fill Station:

This area of the facility is a warehouse bay with four roll-up 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 inspectors 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.

Inspection Date: 06/14/2018

Hazardous waste sludge is generated in the wet dumpsters from these activities. The inspectors observed one labeled 55-gallon satellite drum of hazardous wastes and 2- 250 gallon tanks of used oil filters and 3- 250 gallon tanks of used absorbent pads; all closed and labeled.

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 was 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.

Inside the warehouse, the inspectors observed areas designated for products and other area for hazardous wastes completely separated. The inspectors observed the following containers (for branch generation of HW)

- one (1) closed 55 gallon drum of hazardous waste, labeled and dated.
- one (1) closed 5 gallon drum of non hazardous waste, labeled and dated.
- one (1) closed 5 gallon drum of hazardous waste, labeled and dated.

The inspectors did not observe any releases of contaminants into the environment of any spills during the inspection.

Preparedness and prevention measures were observed throughout the facility: spill kits, eye/shower area, fire extinguishers, internal communication system, fire prevention measurements, among others.

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 (used oil, used oil filters, oily rags, oily water).
 - Based on the file review, the inspectors observed that SK did not have a secondary transporter.
 - SK is the only transporter for their used oil activities and did not offers their used oil to an used oil burner.
 - No used oil processing activities are conducted in this location.
 - Records were kept on site and also, electronically. The inspectors
 - Halogen screening has been conducted by SK and confirmed on their manifests/bill of lading.
 - Specifically, Chlor D Teck and Halogen Sniffer tools are used by their drivers.
 - Designated facility - SK Medley transports all used oil to their location in SK Pompano Beach (FLD984247882) and send via rail cars to Chicago.
 - SK facility operation logs (for used oil <35 days) were reviewed and did not exceeded 35 days.

> Hazardous waste manifests

- SK maintain all records for at least three years in files and also, electronically. The inspectors were able to verify if SK was in compliance with all requirements pertaining manifests and record keeping included but not limited to name of the generators, EPA ID, description, EPA waste codes and waste profiles and analysis.
- Records demonstrated during the inspection, that SK was conducting waste analysis for their customers and appropriately described in their contracts.
- Waste Analysis Plan (for the last three years) was available for review. For core waste streams, SK conduct TCLP analysis.
- No rejected waste manifest or manifest discrepancy reports have been filed during this period of time.

> SK facility operation logs (for the 10-day limit)

- Inbound and Outbound logs were reviewed and copies were provided during the inspection. No discrepancies or exceedance were observed during the inspection of the logs.

Inspection Date: 06/14/2018

- > Weekly inspection logs for hazardous waste containers (last inspection 6/14/18).
- Daily inspection logs for tanks, containers and/or secondary containment were reviewed as well. During the inspection, three years records were available for review and appeared to be in order.
- > Full Contingency Plan and SPCC Plan was available for review (last revision 3/19/18, 3/23/18) including their proof of notification to the local authorities.
- > Employee Training Plan (last training was conducted 4/2/18)
 - All employees receive initial and annual hazardous waste and used oil training, including training concerning the facility's proper hazardous waste and used oil handling, storage, and spill cleanup procedures. The facility maintains and has records for Used Oil Transporter certification for their employees and also for the hazardous waste transporter training (RCRA). The last employee training was conducted on 4/2/18; records for the last three years were reviewed during the inspection.
- > Permits and registrations were on site and displayed in a visible area.
- > Closure Plan and Cost closure estimates (last submitted on 1/15/18). Records of the facility's yearly financial reports (specifically its Used Oil Processing Facility Closing Cost Estimate Forms) from the last three years were also available for review. According to the observations of the inspector, these Closing Cost Estimate forms appeared to be complete and in-order. Closure Plan and Cost closure estimates (update information was submitted and approved by the Department for all SK facilities in Florida).
- > Liability insurance policies: (expired on 11/1/18 Policy # HDOG27872189 \$4M)
- > Biennial Report (last submitted on March 2018)

All documentation required by the inspectors appeared in order and in compliance with the RCRA regulations and Permit conditions issued by the Department.

PHOTO ATTACHMENTS:

Tank farms for solvent and hazardous waste



Front view of the facility



Inspection Date: 06/14/2018

Area of the tanks



Samples area



shower area



Conclusion:

Based on the inspector observations, the facility operates a Large Quantity Generator, UW Lamp Transporter, HW transporter, transfer facility, Used Oil (Transfer, Transporter, for both used oil and used oil filter. Also, this site is currently permitted as Operating Commercial TSD (expired on 5/21/2023). The Department did not found any non compliance issues during the time of inspection, therefore the facility was in compliance.

Inspection Date: 06/14/2018

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: 06/14/2018

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: 06/14/2018

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: 06/14/2018

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

Principal Inspector Name

Inspector

Principal Inspector Title**Principal Inspector Signature**

DEP

Organization

08/24/2018

Date

Kayla Acosta

Inspector Name

ESI

Inspector Title

DEP

Organization

Jeff Curtis

Representative Name

EHS Safety Manager

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.

Rick Divuittono

Representative Name

Branch Manager

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:

08/24/2018