



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

December 17, 2019

Mr. Scott Thompson
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073-6259
Scott.Thompson@safety-kleen.com

Re: Safety-Kleen Systems, Inc.
EPA/DEP ID: FLD 980 847 214
Clay County – Hazardous Waste

Dear Mr. Thompson:

A compliance inspection was conducted at your facility on August 20, 2019, under the authority of Section 403.091, Florida Statutes. 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 and 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 L. Mitchell of the Northeast District Office at 904-256-1620 or via e-mail at cheryl.l.mitchell@FloridaDEP.gov.

Sincerely,

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

Heather Webber
Environmental Administrator

Enclosure: Inspection Report

Ec: Jeff Curtis, Safety-Kleen (Jeff.Curtis@safety-kleen.com)
FDEP internal: Cheryl Mitchell, Pam Cosgrove, Heather Webber, Merlin Russell



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 08/20/2019 **On-Site Inspection End Date:** 08/20/2019
ME ID#: 2319 **EPA ID#:** FLD980847214
Facility Street Address: 161 Industrial Loop S , Orange Park , Florida 32073-6259
Contact Mailing Address: 161 Industrial Loop S, Orange Park, Florida 32073-6259
County Name: Clay **Contact Phone:** (561) 523-4719

NOTIFIED AS:

LQG (>1000 kg/month)
TSD Facility
Transfer Facility
Transporter
Used Oil

Generator:

LQG, None, Offsite Waste Received

Transporter:

Own Waste, Commercial Waste, Highway

TSD:

Treater, Disposer

Used Oil:

Generator : Oil Filters

HW Fuel:

None

Recycler:

None, None

Other:

Universal Waste:

Generate/Accumulate : Transport : Mercury Containing Lamps, Mercury Containing Devices, Transfer Facility : Mercury Containing Lamps, Mercury Containing Devices, Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

Academic Lab/HSM:

Closure:

None

INSPECTION TYPE:

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

INSPECTION PARTICIPANTS:

Safety-Kleen Systems Inc Inspection Report

Inspection Date: 08/20/2019

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Bill Cruz, Branch Manager

LATITUDE / LONGITUDE: Lat 30° 10' 47.5682" / Long 81° 43' 5.3847"

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc. (Safety-Kleen, the facility) was inspected on August 20, 2019. Safety-Kleen was last inspected by the Department's Hazardous Waste Program on August 17, 2017. The facility is currently registered as a Hazardous Waste Transporter/Transfer Facility, a Used Oil-Used Oil Filter Transporter/Transfer Facility, a Universal Waste Lamps and Devices Transporter and Storage Facility, and a Large Quantity Generator (LQG) of hazardous waste. Bill Cruz, Branch Manager, and Jonathan Tullous, Warehouse Manager, were present throughout the inspection.

Safety-Kleen is also a permitted commercial Treatment, Storage and Disposal Facility (TSDF) of hazardous waste. The Department issued permit #0077130-010-HO on November 28, 2018, and it expires December 20, 2023. Permitted hazardous waste units at the facility include two Hazardous Waste Transfer Facility areas, two Container Storage Areas, the Solvent Return/Fill Station, and the Aboveground Tank Storage Area.

Safety-Kleen has been at this location for approximately 28 years. It operates a fleet of five box trucks for hazardous waste, four used oil pump trucks and one vacuum truck. The facility's vehicle fleet is maintained off-site. Safety-Kleen has 16 employees, including seven drivers, and normally operates Monday through Friday from 7:00 AM to 4:00 PM but also responds to emergency calls after normal operating hours. The facility is connected to city water and sewer.

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 provides customers with new motor oil, parts washer solvent, parts washer equipment and also maintains the equipment in the field including emptying and replacing the waste solvent. 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 10-Day Transfer Area and Container Storage Area

The Warehouse 10-Day Transfer Area is located inside the warehouse adjacent to the Container Storage Area and is one of two 10-Day Transfer Areas at the facility (Photo 1). This area had appropriate safety equipment, decontamination equipment and spill kits. At the time of the inspection, this area contained 18 pallets of hazardous waste and non-hazardous waste containers. All hazardous waste containers were closed, dated, labeled and had been in the Transfer Area for less than 10 days.

The Container Storage Area, located across from the 10-Day Transfer 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, no hazardous waste was stored in this area. The Container Storage Area is also used to accumulate universal wastes. At the time of the inspection, there were four boxes of universal waste lamps in this area (Photo 2). The boxes were properly closed, dated, properly labeled, and had been stored less than 180-days.

Across from 10-Day Transfer Area and the Container Storage Area is a two-story, fenced-in compound that is used to store materials, small equipment and products. Located within this compound on the first floor are flammable lockers that are used to store used oil samples pending receipt of the used oil by the Safety-Kleen refinery. Before used oil is pumped into a pump truck, the driver screens the used oil using a hand-held PID

Safety-Kleen Systems Inc Inspection Report

Inspection Date: 08/20/2019

device, and Chlor-D-Tect kits are used as a secondary screening method if needed. 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 the railcar and held in these flammable lockers 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 D008/D018/D039/D040 hazardous waste "retain/oil samples." At the time of the inspection, there was one 55-gallon satellite drum for "retain/oil samples" located adjacent to the lockers. The drum was closed and properly labeled. Outside the fenced area there was one 55-gallon satellite drum for spent aerosols. The drum was closed and properly labeled.

Receiving Dock and 10-Day Transfer Area

All hazardous waste, universal waste and waste 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. At the time of the inspection, this area contained five pallets of hazardous waste and non-hazardous waste containers. All hazardous waste containers were closed, dated, labeled and had been in the Transfer Area for less than 10 days.

The facility receives two types of waste parts washer solvent from customers: spent petroleum distillates parts washer solvent that is profiled as hazardous waste, and spent petroleum distillates parts washer solvent that is profiled as non-hazardous waste. Safety-Kleen no longer processes waste parts washer solvent at this facility under the Continuous Use Program (CUP). 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 only into the wet dumpster that houses automatic drum rinsing equipment according to Mr. Tullous. The drain in this wet dumpster empties into the permitted 15,000-gallon aboveground storage tank located outside the warehouse in the Aboveground Tank Farm Storage Area described below. Mr. Tullous stated that the second wet dumpster's drain valve had been closed and the dumpster was not used to receive the waste solvent. Spent solvent collected from the aboveground tank is manifested as D001/D018/D039/D040 hazardous waste approximately every two weeks and transported for reclamation to the Safety-Kleen facility in Lexington, South Carolina (SCD 077 995 488).

Safety-Kleen generates a solid and liquid wastestream during the course of managing, packaging and bulking hazardous waste referred to as "Branch Debris." This wastestream includes wipes, absorbents, PPE, sludge, and similar items, and 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 adjacent to the wet dumpster in the Solvent Return/Fill Station area. The drum was closed and properly labeled.

Tank Farm

The Tank Farm contains three aboveground 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 4). 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 Norfolk Southern Railway (VAD 000 650 309) in Jacksonville for shipment by rail to Safety-Kleen's refinery (IND 077 042 034).

Adjacent to the Tank Farm, and located outside that containment area, is a 12,000-gallon horizontal double-walled tank that contains virgin Solvent 150 product.

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.

Safety-Kleen Systems Inc Inspection Report

Inspection Date: 08/20/2019

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, Hazardous Waste Transporter and Used oil Transporter registration records, personnel training records, Contingency Plan, arrangements with local authorities, waste inspection logs, the operating log, manifests, shipping records and used oil log. While reviewing the used oil log and shipping documents, the inspector noted that at least one shipping document for a Very Small Quantity Generator (VSQG) customer, that had an EPA ID number, was identified only by "CESQG" on the shipping document. As a result, Safety-Kleen failed to document the EPA ID number of the generator on the used oil record [40 CFR 279.46(a)(2), 62-710.510(1)(b), FAC]. Additionally, while reviewing the hazardous waste log, the inspector noted that at least two VSQG customers, that had EPA ID numbers, were identified only by "CESQG" on the shipping papers. As a result, Safety-Kleen failed to enter all data required in the hazardous waste record log [62-730.171(6)(c), FAC]. All other records reviewed appeared to be in order.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.46(a)(2) , 62-710.510(1)(b)
Explanation:	The facility failed to document the EPA ID number of the generator in the used oil record.
Corrective Action:	No further action is required. The facility returned to compliance per a November 1, 2019, email.

Type:	Violation
Rule:	62-730.171(6)(c)
Explanation:	The facility failed to enter all data required in the hazardous waste record log.
Corrective Action:	No further action is required. The facility returned to compliance per a November 1, 2019, email.

PHOTO ATTACHMENTS:

Photo 1 - Warehouse 10-Day Transfer Area



Photo 2 - UW in Container Storage Area



Inspection Date: 08/20/2019

Photo 3 - Receiving Dock 10-Day Transfer Area



Photo 4 - Tank Farm



Inspection Date: 08/20/2019

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.

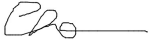
Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
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: 08/20/2019

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 Investigator Name	Principal Investigator Title	
	DEP	11/03/2019
Principal Investigator Signature	Organization	Date
Bill Cruz	Branch 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.

Report Approvers:

Approver:	Cheryl L Mitchell	Inspection Approval Date:	11/03/2019
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