



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 12/11/2019 **On-Site Inspection End Date:** 12/11/2019
ME ID#: 48680 **EPA ID#:** FLD984167791
Facility Street Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-8329
Contact Mailing Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-8329
County Name: Palm Beach **Contact Phone:** (561) 523-4719

NOTIFIED AS:

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

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Offsite Waste Received **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Alannah Irwin, Inspector
Jared Heyns, Environmental Specialist II; Carlos Grajeda, Environmental Specialist II;
Other Participants: Scott Murphy, Branch General Manager; Jeff Curtis, EHS Manager

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

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On December 11, 2019 (12/11/2019), Alannah Irwin with the Florida Department of Environmental Protection (DEP or the Department) conducted a Compliance Evaluation Inspection (CEI) at Safety-Kleen Systems, Inc., Boynton Beach (SKS-BB), located at 5610 Alpha Drive, Boynton Beach, Florida 33426-8329. SKS-BB was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, adopted and incorporated by reference in Rule 62-730, Florida Administrative Code (F.A.C.). The inspector was accompanied by Carlos Grajeda, Environmental Specialist II, and Jared Heyns, Environmental Specialist II, from DEP.

The inspectors were escorted around the facility by Scott Murphy, Branch General Manager, and Jeff Curtis, Environmental Health and Safety (EHS) Manager. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection.

SKS-BB occupies 16,400 square feet and is connected to City of Boynton Beach water and sewer services. SKS-BB has been operating at its current location since 1988 and employs 15 staff. The facility operates Monday through Friday, from 7:00am to 5:00pm.

Notification History:

SKS-BB currently operates as a permitted Treatment, Storage, or Disposal Facility (TSDF) under Permit No. 49625-010-HO. The term of the permit is effective from 11/17/2017 to 11/19/2022. SKS-BB has also notified the Department of its status as a generator, transporter, and transfer facility of hazardous waste and used oil.

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SKS-BB initially notified with the Department as a Large Quantity Generator (LQG) and transporter of hazardous waste on 10/15/1988. The facility was assigned the EPA Identification (EPAID) Number FLD984167791. The facility most recently notified on 02/27/2019 as an LQG of hazardous waste and a transporter and transfer facility of both hazardous waste and used oil. The facility's transporter registration expires on 06/30/2020.

Inspection History:

The facility was most recently inspected by the Department on 03/22/2018 as an LQG of hazardous waste and a transporter and transfer facility of both hazardous waste and used oil. SKS-BB was in compliance at the time of inspection.

Steel-toed boots, safety glasses, hard hats, and safety vests were the only Personal Protective Equipment (PPE) required to enter the facility.

Process Description:

SKS-BB provides parts washing solvent and equipment leasing, product servicing, new oil sales, and hazardous/non-hazardous waste transport and storage services. Hazardous waste from parts washers is received and processed through a solvent return station prior to storage in a permitted 15,000-gallon hazardous waste storage tank. Previously, parts washer solvent transported by the facility was treated as product and was used for drum washing as part of the Continued Use Program (CUP). The facility has since phased out and no longer uses the CUP, as described in Part II, Subpart B.3 of Permit No. 49625-010-HO. The facility owns four 4,000-gallon used oil collection trucks, two 4,000-gallon vacuum trucks for used oil and solvent waste pickup from various customers, and seven box trucks for hazardous waste transport from generators.

The facility has the following RCRA-regulated Units: Tank Storage, Solvent Return/Fill Station, Hazardous Waste Container Storage, and Non-Hazardous Waste (Non-HW) Container Storage. The facility stores and transports waste that exhibit hazardous waste characteristics described in 40 CFR 261, Subpart C, and listed hazardous wastes described in 40 CFR 261, Subpart D.

Tank Storage:

The Tank Storage area is located on the northern side of the property. According to the permit, the facility is authorized to operate the following storage tanks:

- One 15,000-gallon Aboveground Storage Tank (AST) for waste solvent management
- One 20,000-gallon AST for used oil storage
- One 15,000-gallon AST for used oil storage
- One 5000-gallon AST for oily water
- One 20,000-gallon AST for fresh solvent storage

All tanks are underlain by a 71 foot (71') by 32' 4 inches (4") by 6" deep concrete slab and surrounded by a 36" high concrete wall. SKS-BB operates and inspects spill and overfill prevention controls [40 CFR 264.195(a)] and conducts daily inspections of all monitoring and leak detection equipment [40 CFR 264.195(b)]. The daily inspections are conducted at 7:00am and include review of the cathodic protection systems, pressure and temperature gauges, monitoring wells, an all ancillary equipment associated with the ASTs. It was confirmed during the inspection that the secondary containment within the storage building was free of cracks.

During the inspection, the 15,000-gallon AST for parts waster solvent was observed to be labeled with the words "Hazardous Waste" and a National Fire Protection Association (NFPA) diamond, indicating that the waste is a mild irritant and moderate heat is required for ignition. The used oil ASTs were observed to be labeled with the words "Used Oil" and an NFPA diamond. The Tank Storage building has "No Smoking" signs conspicuously placed inside and outside [40 CFR 264.17(a)]. Waste solvent stored in the 15,000-gallon AST is periodically shipped for reclamation.

No changes have occurred to the tank system since the last inspection [40 CFR 264.196(e)]. The facility conducts daily checks on the valves and caps and quarterly inspections. If any repairs are required, a work order will be generated and completed within 5 days. No major repairs have occurred since the last inspection. No deficiencies were observed during the inspection.

Solvent Return/Fill Station:

The Solvent Return/Fill Station is located within the main warehouse at the southern side of the property. This area is used to return spent solvents into the 15,000-gallon AST located in the Tank Storage area. The Solvent

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Return/Fill Station is equipped with two wet sumps (dumpsters) that are pumped daily to the storage tanks. Solvent from the wet dumpster is directed to a drum washer where chemical and mechanical means are used to clean the inside and outside of drums. The spent solvent is then pumped to the 15,000-gallon waste solvent storage tank. The dumpsters do not store liquid hazardous waste.

The facility ensures that the two wet dumpsters in the Solvent Return/Fill Station are free of liquids and sludge at least once in each 24-hour period, in accordance with Part II, Subpart B.2, Specific Condition 15 of Permit No. 49625-010-HO. All off-loaded drums are moved to their proper storage location within 24 hours, as required by Part II, Subpart B.2., Specific Condition 16 of Permit No. 49625-010-HO.

The facility has two 55-gallon metal Satellite Accumulation Area (SAA) containers within the Solvent Return/Fill Station for two separate waste streams within this area. SAA #1 is used for debris that is cleared out daily from the sumps. SAA #2 is reserved for disposable PPE and other materials (i.e., gloves, rags, etc.) that have been contaminated with solvents or waste materials. Both SAA containers were observed to be closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents (toxic/flammable), in accordance with 40 CFR 262.15(a)(5). No deficiencies were observed.

Hazardous Waste Container Storage:

The Hazardous Waste Container Storage area is located within the main warehouse, adjacent to the Solvent Return/Fill Area. This area serves as the 10-day storage area for hazardous waste and used oil transport activities. The area is 48' by 78' and is equipped with a collection sump in case of spills or releases. According to Part II, Subpart B.1, Specific Condition 1., the facility is authorized to store a maximum capacity of 6,912 gallons of hazardous waste, equivalent to 126 55-gallon drums.

During the inspection, the following containers were observed:

- 36 55-gallon metal drums of hazardous waste
- 7 55-gallon poly drums of hazardous waste
- 15 15-gallon metal drums of hazardous waste
- 25 5-gallon containers of hazardous waste pharmaceuticals

Additionally, 31 55-gallon containers (1,705 gallons) were staged and in the process of pickup by Clean Harbors Environmental Services, Inc. (EPA ID MAD03922250). The facility indicated that containers staged in this area are picked up by Clean Harbors daily.

Based on the amount of waste stored in the 10-day area, the facility complies with the 29,720-gallon limit, including the 6,912-gallon limit of hazardous waste, set forth in Permit No. 49625-010-HO. 4,420 total gallons of hazardous waste were on-site during the inspection.

All hazardous waste containers were observed to be closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents. The facility palletizes all containers and ensures containers are stacked only one pallet high, in accordance with Part II, Subpart B.1., Specific Condition 1.b., of Permit No. 49625-010-HO. Each label was observed to have the generator's EPAID number and the manifest tracking numbers. The facility maintains adequate aisle space in the 10-day storage area [40 CFR 264.35].

The facility conducts daily inspections of the container and containment integrity to ensure containers are free of leaks, gaps, or cracks [40 CFR 264.174 and 40 CFR 264.175]. To comply with the 10-day storage limits, SKS-BB scans incoming containers and keeps records of when the containers were received and when containers are shipped out.

At the back of the warehouse, a box truck was parked near the loading area. This box truck was filled with containers ready for transport to Clean Harbors Florida, LLC. (EPAID FLD980729610) in Bartow. The containers observed in the box truck were closed, labeled, and compliant with the waste compatibility requirements established in the current operating permit. The box truck was situated over a manmade surface, as required by Part II, Subpart B.1., Specific Condition 12 of Permit No. 49625-010-HO.

Non-HW Container Storage:

This area is located adjacent to the HW Container Storage Area within the main warehouse. The facility will transport used oil and used oil filters from customers to either the Clean Harbors Bartow facility or U.S. Foundry and Manufacturing Corporation (EPAID FLD004128336). Both facilities are authorized to receive used oil filters, while Clean Harbors Bartow is authorized to receive both used oil and used oil filters. The secondary containment in the loading and unloading areas are cleared of any rain water or debris within 24-hours of

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discovery.

During the inspection, three 55-gallon containers of used oil were observed in storage. The facility also stores several 30-gallon red metal containers holding solvent product in this area. SKS-BB sells this solvent product as part of the Fluid Recovery Services (FRS) offered by the company for parts washers and solvent pickup. Several empty 55-gallon drums were observed in this area. After wastes are picked up from the client, SKS-BB will provide these containers to clients as part of the FRS contracts.

During the inspection, two 55-gallon SAA containers were observed in the Container Storage area. Each satellite is associated with a different waste stream. One container is designated for oil shreddable debris and one container is designated for oil samples from purges of materials. The shreddable debris is generated from the used oil transport trucks, while the oil sample debris is generated from materials stored in the flammable cabinets found in this area. All SAA containers were observed to be closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents [40 CFR 262.15(a)(5)]. No deficiencies were observed in this area.

Records Review:

General Facility Standards:

The facility maintains a copy of the permit on-site. All monitoring and test data for the tank system and containers were available on-site during the inspection. SKS-BB is operated in a manner that prevents unknowing or unauthorized entry [40 CFR 264.14(a)]. The inspectors observed fence-line and gates around the facility to control entry [40 CFR 264.14(b)(2)]. SKS-BB maintains a 24-hour surveillance system that continuously monitors and controls entry and conducts weekly safety and security checks of the premises. No deficiencies were observed.

Manifest Records:

Manifests are available on-site for at least three years [40 CFR 264.71]. The facility uses the Hazardous Waste Electronic Manifest (E-Manifest) System and maintains all final signed copies of the manifests. The facility maintains all documentation of reconciliation or noncompliance with the RCRA requirements. The facility ensures that proper waste analyses are conducted prior to disposal [40 CFR 264.13].

The facility submitted an unmanifest waste report on 04/23/2019 to the Department for a 1,000-gallon load of vacuum services waste that was shipped to SKS-BB [40 CFR 264.76]. SKS-BB ensured that the waste was analyzed and properly disposed following rejection from a third-party wastewater treatment disposal vendor, Liquid Environmental Solutions (LES). The report included the following: the EPA ID Number, name, and address of the facility, the date the waste was received, the name and number of the generator and transporter, the description and quantity of each unmanifested hazardous waste received, the method of treatment, storage, or disposal, a certification signed by the SKS-BB authorized representative, and a brief explanation of why the waste was unmanifested [40 CFR 264.76(a)(1)-(7)].

Waste Analysis Plan:

The facility's Waste Analysis Plan was available on-site during the inspection. The most recent revision occurred on 9/26/2019. The facility maintains a Waste Minimization Program Plan, as required in Part II, Subpart A, Specific Condition 12 of Permit No. 49625-010-HO. The facility certified the plan in 2019. No deficiencies were observed.

Contingency Plan and Emergency Procedures:

SKS-BB maintains a full contingency plan on-site [40 CFR 264.53(a)]. The plan describes the actions that facility personnel must take in order to respond to an emergency, the arrangements made with the local emergency response organizations, lists the names, addresses, and phone numbers of the emergency coordinators, lists all emergency equipment at the facility and the physical location, and includes an evacuation plan [40 CFR 264.52]. The primary emergency coordinator is Scott Murphy, Branch General Manager [40 CFR 264.55]. The annual review of the contingency plan occurred on 09/16/2019. The facility has never been required to implement the contingency plan.

Preparedness and Prevention:

SKS-BB maintains external and internal alarm systems, fire control, spill control, and decontamination equipment, and automatic sprinkler systems throughout the facility [40 CFR 264.32]. All alarms and equipment are inspected weekly, tested quarterly, and maintained to ensure proper operation in time of an emergency [40

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CFR 264.33]. All personnel have immediate access to communications and alarm systems in the event of an emergency [40 CFR 264.34]. SKS-BB has made arrangements with the local authorities [40 CFR 264.37]. The arrangements were made on 02/06/2018.

Training:

All employees receive an initial and annual review of the hazardous waste management procedures relevant to the positions in which they are employed [40 CFR 264.16(a)]. The most recent training occurred on 12/10/2019. The facility maintains the required job descriptions and list of personnel that are handling hazardous waste [40 CFR 264.16(d)(2)].

Inspections:

SKS-BB maintains records of all daily inspections for the last three years. The records include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions [40 CFR 264.15(d)]. The most recent inspection had occurred on 12/11/2019 at 7:00am.

Acceptance and Delivery Records:

Records of incoming and outgoing wastes for the last three years were available for review. The facility keeps a written operating record that includes the description and quantity of each hazardous waste received or generated [40 CFR 264.73(b)(1)]. The operating record also includes the location of each hazardous waste within the facility and the quantity at each location [40 CFR 264.73(b)(2)]. The facility provided records of notices to generators, as specified in 40 CFR 264.12(b) [40 CFR 264.73(b)(7)].

The facility maintains the 10-day transfer facility logs electronically. Based on the records, SKS-BB operates as a transfer facility and does not exceed the 10-day storage limits described in 40 CFR 263.12(a). SKS-BB uses the internal code "INHS" to identify in-house generated containers. Antifreeze is commingled with the used oil and sent to SK-BB East Chicago Illinois facility for processing.

Biennial Report:

The Biennial Report for 2017 was available on-site. The report was submitted on time and completely to the Department [40 CFR 264.75]. The 2019 Biennial Report is due by 03/01/2020.

PHOTO ATTACHMENTS:

HW Container Storage



Security and Signage



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15,000-gallon HW AST

SKS Container Guidance

A manifest record form for hazardous waste. The form includes fields for "WASTE INFORMATION", "RECEIVING FACILITY INFORMATION", and "TRANSPORTER INFORMATION". It also contains a section for "WASTE DESCRIPTION" and "WASTE QUANTITY". The form is signed by "Charles Davis" and "Sue Davis" on 12/11/19. The form is titled "MANIFEST RECORD" and "DESIGNATED FACILITY TO EPA'S e-MANIFEST SYSTEM".

Manifest Record

Conclusion:

SKS-BB was inspected as a RCRA-permitted hazardous waste storage facility and was found to be in compliance at the time of inspection. Compliance assistance pertaining to the Management Standards for Hazardous Waste Pharmaceuticals outlined in 40 CFR 266, Subpart P, adopted and incorporated by reference in Rule 62-730.181(1), F.A.C. was provided during the inspection.

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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.

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	✓		

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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

Alannah Irwin

Principal Investigator Name**Principal Investigator Signature**

Inspector

Principal Investigator Title

DEP

Organization

01/02/2020

Date

Jared Heyns

Inspector Name

Environmental Specialist II

Inspector Title

DEP

Organization

Carlos Grajeda

Inspector Name

Environmental Specialist II

Inspector Title

DEP

Organization

Scott Murphy

Representative Name

Branch General Manager

Representative Title

Safety-Kleen Systems, Inc.

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

Representative Name

EHS Manager

Representative Title

Safety-Kleen Systems, Inc.

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:

01/03/2020