Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 02/25/2020 **On-Site Inspection End Date:** 02/25/2020

ME ID#: 1792 **EPA ID#:** FLD980847271

Facility Street Address: 5309 24th Ave S, Tampa, Florida 33619-5368

Contact Mailing Address: 5309 24th Ave S, Tampa, Florida 33619-5368

County Name: Hillsborough **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 Contaning Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Contaning Lamps, Mercury Containing Devices

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector

Other Participants: Kiana Sladicki, Environmental Specisalist I; Steve Gugino, Branch General Manager

LATITUDE / LONGITUDE: Lat 27° 55' 33.9629" / Long 82° 23' 39.6154"

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc., (SK) was inspected on February 25, 2020, to determine the facility's compliance with state and federal hazardous waste regulations. The Department has conducted Hazardous Waste inspections at this facility for many years, most recently on February 23, 2018. The inspectors were accompanied during the inspection by Steve Gugino, Branch General Manager.

Process Description:

General Facility Information:

SK is a permitted hazardous waste storage and recycling facility (Permit number 34744-009-HO, issued June 12, 2017, expires November 23, 2021). The company operates a hazardous waste transfer facility at this location that receives wastes from its customers for consolidation and shipment to other facilities. All hazardous wastes received or generated at the facility are stored in containers or tanks. The facility has not changed operations since the previous inspection.

The facility also sells and leases out various parts cleaning machines to its customers and provides servicing of these machines. Core business lines include parts cleaners, immersion cleaners and paint gun cleaners, as well as aqueous cleaners (brake and parts cleaners).

In addition, SK collects used oil and used oil filters, spent mercury-containing lamps and spent antifreeze (ethylene glycol) from its customers. According to Mr. Gugino, a halogen meter is used by the drivers to test used oil collected from their customers prior to pick-up. Seventy-five to eighty percent of SK's used oil

customers are automotive repair facilities, the remainder are manufacturing accounts. Other than material handling, the major process taking place at the facility is drum cleaning.

The facility operates from 7:00 a.m. to 5:00 p.m., Monday through Friday. Water and sewer services are provided by the City of Tampa.

Five used oil pump trucks, one vacuum truck and six box trucks work out of this location. The facility currently employs twenty-one people including two that manage the warehouse and tank farm operations and thirteen drivers which operate the facilities vehicles and handle used oil, non-hazardous and hazardous waste transfers and transportation. A fourteenth driver is scheduled to start within the next few weeks. Used oil picked up in SK's used oil pump trucks is typically transported directly to the CSX yard in Tampa where the used oil is loaded on to railcars for shipment to an out-of-state SK facility for re-refining. If needed, used oil can be off-loaded into the used oil aboveground storage tank (AST) at the facility.

In addition to this location, the facility has an annex located in Port Charlotte, Charlotte County, Florida, for the past twenty years. One box truck and one used oil pump truck, along with two of the facility's drivers, operate out of the Port Charlette facility. Waste is not stored at this location, only the empty trucks following delivery of the waste to either the Tampa facility (typically just the box truck) or directly to the CSX Tampa rail yard (used pump oil truck).

Spill response equipment is staged throughout the facility. Eyewash and shower stations were operational. Fire extinguishers were charged and are pressure tested annually. Additionally, the facility staff visually checks the fire extinguishers and safety equipment monthly.

The facility utilizes two forklifts which are powered by propane. A third party, Florida Lift, maintains the forklifts.

North Storage Building (Non-Flammable Storage Area):

The Non-Flammable Storage Area, located on the west wall, is being used for empty drum inventory (both metal and polypropylene). A caged area for the storage of re-refined motor and hydraulic oil is located on the east wall of the building. This oil is sold in quart size containers, 5-gallon buckets, and 55-gallon drums. Samples from each truck load of used oil are retained for 90-days in several closed cabinets in this area. At the end of the 90-days, these samples are sent for recycling with the regular used oil.

Return/Fill Station Area:

Located between the North and South buildings, the return and fill area is where the drivers of the service (box) trucks pick up the clean solvents in the morning for delivery to customers and drop off spent solvent picked up from the customers at the end of the day. Warehouse staff off-load the box trucks and move waste containers (other than spent parts washer fluids) into the warehouse for storage.

Spent parts washer solvent from drums is deposited into one of the two metal spent parts washer vats. The spent parts washer vats are approximately 540 gallons in size (6 foot by 3 foot by 4 foot) and are plumbed with fixed metal piping to the Dirty Parts Washer Solvent AST. Solid waste generated from the dumping and washing of spent parts washer solvent drums is placed in to a satellite container; liquid waste is routed through the spent parts washer vats to the Dirty Parts Washer Solvent AST. At the time of the inspection, there was one satellite 55-gallon metal drum accumulating facility derived debris (solids). The drum was closed and labeled as a hazardous waste and with an indication of the hazard (flammable).

Two 6-yard containers containing aqueous parts washer waste (from the soap and water machines) are located on the west side of the loading dock. Containers of aqueous parts washer waste are transferred to the 6-yard containers and aqueous parts washer waste is pumped into one of SK's two vacuum trucks as needed and transported to Clarke Environmental or Aqua Clean for processing approximately every other day. At the time of the inspection, one of the 6-yard container was full and the other -yard container was empty. SK conducts periodic testing of their aqueous parts washer waste stream to verify that is in non-hazardous.

The secondary containment on both sides of the return/fill station loading dock appeared to be clean, dry and intact. Twelve bins containing drained used oil filters were being staged within the containment at the time of the inspection. As SK no longer offers the Continued Use Program (CUP), the CUP vat (the same size as the spent parts washer vats) has been placed out of service and is closed and locked. SK has no current plans for reuse

of this system.

South Storage Building (Non-Flammable Terminated and Transfer Waste Storage Area):

The Non-Flammable Terminated and Transfer Waste Storage Area, on the north side of the south storage building, was being used to store parts washer machines/equipment from SK customers. SK ships these used machines/equipment to the SK distribution center to be either re-furbished or disposed of.

At the time of the inspection, three containers of hazardous waste were located in this area: one 16-gallon drum dated February 20, 2020, and one 16-gallon drum dated February 21, 2020, and one 55-gallon drum dated February 21, 2020. All well within this area were within the 10-day transfer limit and properly labeled. Aisle space between palleted waste drums were maintained. The remainder of the transfer waste was non-hazardous.

Used oil filters are also managed in this area. The drums of used oil filters are consolidated on-site into used oil filter bins (each bin holds the contents of approximately six 55-gallon drums of filters). The filters are sent for processing at Oil Filter Recovery (OFR) in Ocala, Florida. At the time of the inspection, four used oil filter bins were present: two were empty and were being stored pending delivery to customers and two were in the process of being filled. 45 empty used oil filter drums were located in this area along with 4 drums containing used oil filter that had yet to be consolidated into the used oil filter bins. The maximum storage volume of 41,220 gallons (equivalent to 750 55-gallon drums) for this area was not exceeded. No container leaks or spills were observed. Secondary containment trenches were all clean and dry.

South Storage Building (Flammable and Transfer Waste Storage Area):

Flammable materials are stored in a separate room in the southern storage building. This area includes both waste and new product storage. New products were stored against the north and south sides of the room, waste containers are housed in the center of the building. All transfer waste containers in this area were in storage for less than 10-days. The maximum storage volume of 12,749 gallons (equivalent to 232 55-gallon drums) for this area was not exceeded. The proper aisle space between pallets containing waste containers was being maintained. The secondary containment trench was clean and dry.

The waste containers observed in this area were properly labeled and dated. At the time of the inspection the following hazardous waste containers were present in this area: twenty-five 55-gallon drums; four 30-gallon drums, 2 16-gallon drums, twelve 5-gallon buckets and one cubic yard box. All containers were closed and properly labeled; and the oldest container date was February 19, 2020.

Approximately 52 properly labeled and closed boxes of spent 4-foot fluorescent lamps and 8-foot fluorescent lamps were present in this area at the time of the site visit. No container leaks or spills were observed.

Tank Farm:

There are three 15,000-gallon aboveground storage tanks (ASTs) located within the tank farm area: A Clean 150 Mineral Spirits AST, a Used Oil AST, and a Dirty Parts Washer Solvent (hazardous waste) AST. The contents of the spent vat in the Return/Fill Station Area is pumped to the facility's Dirty Parts Washer Solvent AST. If needed the on-site Used Oil AST is used for temporary storage of used oil. All three tanks appear to be in good working condition and all were properly labeled. The tank farm is enclosed to minimize rain water in the secondary containment area. The secondary containment area was void of any liquid except for a small amount of liquid observed in the sump located at the northwest corner. There is an alarm sensor within the secondary containment area for alerting personnel if liquid is accumulating in the tank farm containment; the sensor is tested annually.

Records Review:

In accordance with the facility's permit, facility inspections are conducted and logged daily, except for non-operating days such as weekends and national holidays. Records included daily inspections of the Storage Tank System/Containment Area (Tank Dike), Container Storage Areas, Container Storage Areas Totals, Inspection of Continued Use, Forklift and Powered Industrial Truck Inspection, Safety & Emergency Equipment, Security Devices and miscellaneous equipment. Records were reviewed between February 16, 2018, and February 21, 2020, and were found to be in order.

The facility's contingency plan was last revised on May 28, 2016, and was most recently reviewed on January 2, 2018, by Steve Gugino. Arrangements to familiarize the local emergency response authorities (fire department, police, and local hospital) were sent on June 21, 2017. The emergency contact list was posted near the phones within the facility.

Please note: a quick reference guide is required when Contingency Plans are updated on or after May 30,2017. The Quick Reference Guide must include eight elements that are critical to local responders when an emergency is occurring at a facility. These include:
¿ The types and names of the hazardous wastes on site and their hazard in layman's terms (e.g., toxic paint wastes, spent ignitable solvents);
¿ An estimated maximum amount of each hazardous waste on site at any one time;
¿ The identification of any hazardous waste that would require unique or special treatment by medical staff in the event of exposure;
¿ A map of the facility identifying where hazardous waste may be located;
¿ A street map of the facility in relation to surrounding businesses, residences, and schools;
¿ The location of the water supply;
¿ Information about any on-site notification systems to communicate with people at the facility; and
¿ The name of an emergency coordinator available at any time.

Training records, including position descriptions and job titles were available and up to date. Records indicate the last the 8-Hr Annual HazWoper Refresher was conducted on October 24, 2019, the last the Hazardous Communications was conducted on January 6, 2020, and that site-specific training was conducted monthly in one-hour modules for a total of 12 modules/12 hours.

A random sample of inbound and outbound manifests were reviewed. All records reviewed were properly completed and readily available. Chris Abel of SK is signing the used oil shipping records on behalf of CSX. Documentation from CSX stating that Mr. Abel is authorized to sign on their behalf has been submitted to the Department.

The 2019 annual report, dated February 10, 2020, was submitted to the Department on February 12, 2020. The Certificate of Insurance documents that the facility's current policy was effective on November 1, 2019 and expires on July 31, 2020. The Waste Minimization Plan was signed on March 21, 2017, by Steve Gugino.

PHOTO ATTACHMENTS:

Retained Sample Storage Cabinets

Drum Wash Unit

Used oil filter management area

Spent fluorescent lamps storage

Conclusion:

At the time of the inspection, Safety-Kleen Tampa, Inc., was operating in compliance with state and federal hazardous waste regulations governing treatment, storage, and disposal facilities.

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	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) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - VSQG 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)	✓		
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)	✓		
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)			✓

Safety-Kleen Systems Inc Inspection Report

Inspection Date: 02/25/2020

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)			✓
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 recalmation (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) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ 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)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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

Leslie Pedigo	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
Leslie Pedigo	DEP	04/01/2020
Principal Investigator Signature	**Organization**	**Date**

Kiana Sladicki	Environmental Specisalist I
Inspector Name	**Inspector Title**
	FDEP/SWD
	Organization

Steve Gugino	Branch General Manager
Representative Name	**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: Shannon Kennedy **Inspection Approval Date:** 04/01/2020