



FLORIDA DEPARTMENT OF Environmental Protection

Southeast District Office
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
561-681-6600

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

September 2, 2020

Jeff Curtis, EHS Manager
Safety-Kleen Systems Inc.
8755 NW 95th St
Medley, FL 33178
Jeff.curtis@safety-kleen.com

Re: Safety-Kleen Systems Inc.
Facility ID #FLD984171694
Miami-Dade County

Dear Mr. Curtis:

Department personnel conducted an inspection of the above-referenced facility on June 25, 2020. Based on the information provided during and following the inspection, the facility was determined to be in-compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

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 Jared Heyns at 561-681-6616 or via e-mail at jared.heyns@floridadep.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alannah Irwin".

Alannah Irwin, Interim Environmental Manager
Southeast District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Alannah Irwin, Jared Heyns – FDEP SED



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 06/25/2020 **On-Site Inspection End Date:** 06/25/2020
ME ID#: 11672 **EPA ID#:** FLD984171694
Facility Street Address: 8755 NW 95th St, Medley, Florida 33178-1462
Contact Mailing Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-1462
County Name: Miami-Dade **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
Routine Inspection for Transfer Facility Facility
Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Universal Waste Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jared T Heyns, Inspector
Other Participants: Jeff Curtis, EHS Manager; Rick Divuittono, Branch General Manager

LATITUDE / LONGITUDE: Lat 25° 51' 37.5641" / Long 80° 20' 25.4331"

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On June 25, 2020 (06/25/2020), Jared Heyns with the Florida Department of Environmental Protection (DEP) conducted a routine compliance evaluation inspection at Safety Kleen Systems, Inc. (SK), located at 8755 NW 95th St in Medley. SK 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 escorted around the facility by Rick Divuittono, Branch General Manager and Jeff Curtis, EHS Manager. Upon arrival at the facility the inspector presented their credentials and explained the purpose of the inspection.

SK currently operates as an active hazardous waste (HW) transporter and transfer facility under Permit #56019-011-HO. The facility also conducts used oil activities. This permit was renewed in 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

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

Notification History:

Last notification was received by the Department on 02/27/2019. SK is currently registered as the following: Large Quantity Generator (LQG), UW Lamp Transporter, UW Device Transporter, UW Lamp SQH, UW Device SQH, HW Transporter, Transfer facility, and Used Oil (Transfer and Transporter for both used oil and used oil filters). Also, this site is currently permitted as an Operating Commercial TSD (expiring on 05/21/2023).

Inspection History:

In the last five years, the Department inspected this facility on the following dates:

06/14/2018 - The facility was in-compliance; no issues were described.

01/31/2017 - The facility was in-compliance; no issues were described.

03/31/2016 - The facility was in-compliance; no issues were described.

PPE was required to enter the facility. Safety boots, safety glasses, a hard hat, a safety vest, and a face mask were used during the inspection. Due to COVID-19, the record review portion of the inspection was conducted via electronic submittal to limit the amount of time and exposure on-site.

Process Description:

Since the last inspection conducted on 06/14/2018, operations at this facility have not significantly changed. 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 does 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 observed to be closed, in good condition, and properly labeled. The tank area was equipped with secondary containment, fire extinguishers, and a sprinkler system. Outside the south side of the tank storage building is the tanker truck spill containment area. This is where tanker trucks are loaded/unloaded, or tanker-to-tanker transfer occurs. This area is also equipped with a sump. Facility representatives indicated that each tanker is equipped with a TIF and ChlorDetect dextsil kits, and each load is screened for halogens at the pick-up location.

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 to 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 inspector 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. Hazardous waste sludge is generated in the wet dumpsters from these activities. The Department inspector observed:

- One 55-gallon steel drum containing hazardous waste (absorbent material) observed to be closed, properly

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labeled, and placed over the secondary containment.

Also stored on the elevated grating were drums containing fresh solvent prepared for delivery to customers. The concrete floor slopes toward 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, a sprinkler system, 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 of containers, the storage of aqueous parts washers, 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 inspector observed areas designated for products and another area for hazardous wastes completely separated. The Department inspector observed the following containers (for branch generation of HW):

- One 55-gallon steel drum containing hazardous waste (absorbent material).
- One 55-gallon steel drum containing non-hazardous waste (used oil).
- One 55-gallon steel drum containing hazardous waste (waste methanol).
- Four 55-gallon steel drums containing hazardous waste (paint-related waste).

All drums were observed to be closed, properly labeled, placed over the secondary containment, and in-compliance with the 10-day storage limit.

The Department inspector did not observe any releases of contaminants into the environment or any spills during the inspection.

The following preparedness and prevention measures were observed throughout the facility: spill kits, eye wash/shower areas, fire extinguishers, internal communication system, and fire prevention methods.

Records Review:

All permits and documentation required by the inspector were submitted via email on 07/16/2020. The inspector 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 does not have a secondary transporter. SK is the only transporter for their used oil activities and did not offer 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. Regular halogen screening is conducted by SK and confirmed on their manifests/bill of lading. Specifically, Chlor D Teck and Halogen Sniffer tools are used by their drivers. The designated facility for all used oil is their SK location in Pompano Beach (FLD984247882) and is then sent via rail cars to Chicago. SK facility operation logs (for used oil <35 days) were reviewed and no exceedances were observed.

> Hazardous waste manifests: SK maintains all records for at least three years in hard copies and electronically. The inspector was able to verify if SK was in-compliance with all requirements pertaining to manifests and record keeping. Records demonstrated that SK is conducting waste analysis for their customers and all wastes are appropriately described in their contracts. The Waste Analysis Plan (for the last three years) was submitted for review. No rejected waste manifests 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. No discrepancies or exceedances were observed during the inspection of the logs.

> Weekly inspection logs for hazardous waste containers: (prior to inspection, last weekly inspection was conducted on 06/17/2020). Daily inspection logs for tanks, containers, and/or secondary containment were reviewed as well. Three years of records were available for review.

> Full Contingency Plan and SPCC Plan were submitted for review (last revision 04/15/2020) and included their proof of notification to the local authorities.

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> Employee Training Plan (last training was conducted 03/10/2020): All employees receive initial and annual hazardous waste and used oil training which includes 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 for the hazardous waste transporter training (RCRA). Records for the last three years were available for inspection.

> Permits and registrations were on site and displayed in a visible area.

> Closure Plan and Closure Cost estimates (last submitted on 01/15/2020): 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.

> Liability insurance policies: Policy #PEC004203906 held by Indian Harbor Insurance Company in the amount of \$2,000,000 expires on November 1, 2020 (11/01/2020).

> Biennial Report was last submitted on February 14, 2020 (02/14/2020) with all required elements.

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

PHOTO ATTACHMENTS:

Front of facility



Preparedness and prevention measures



Storage tank area



Secondary containment



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All drums were properly labeled and closed



Conclusion:

SK was inspected as a Commercial Operating TSD facility of hazardous waste, Used Oil Transporter/Transfer facility, and SQH of UW and was found to be in-compliance at the time of the inspection and during the record review.

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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) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> 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)	✓		

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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 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)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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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

Jared T Heyns**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**08/07/2020**Date**Jeff Curtis**Representative Name**EHS 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 General 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:**Alannah B Irwin**Inspection Approval Date:**08/07/2020