



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 03/24/2021 **On-Site Inspection End Date:** 03/24/2021
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) 738-3026

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

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector
Other Participants: Scott Thompson, Branch Manager; Jeff Curtis, Regional Compliance Manager

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

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On March 24, 2021, Cheryl Mitchell and Carrie Kruchell, Florida Department of Environmental Protection (FDEP), and Daryl Himes, EPA, conducted a routine compliance evaluation inspection of Safety-Kleen Systems, Inc. in Orange Park, Florida (Safety-Kleen or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Safety-Kleen was represented by Scott Thompson and Jeff Curtis. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

Safety-Kleen is a commercial treatment, storage, and disposal facility (TSDF) of hazardous waste (HW). The facility stores, processes, transfers, and transports hazardous waste, universal wastes, used oil and used oil filters, new and spent parts washer solvents, and used antifreeze. Safety-Kleen provides its customers with parts washing equipment, clean parts washer solvent and motor oil. Safety-Kleen also maintains their parts washers at their customers' facilities.

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Safety-Kleen's customers provide Safety-Kleen with information on how their machines will be used. This information is used to determine which solvent will be provided to the company and what hazardous waste characteristics the spent solvent generated at their facility will have. The customers also can rely on annual analysis and characterizations performed on spent solvent picked up from their facility.

Safety-Kleen is operating under hazardous waste facility permit number 0077130-HO-010 issued by FDEP. The permit addresses the storage of HW in a tank system and in containers.

Safety-Kleen also notified as a large quantity generator (LQG), a transporter, and a transfer facility of HW. In addition, Safety-Kleen notified as a large quantity handler and transporter of universal wastes (UW). The facility is also a used oil and used oil filter transporter and transfer facility.

Safety-Kleen's most recent hazardous waste generator notification (EPA form 8700-12) submitted on February 14, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste, generating D001-D011, D0018-D019, D021-D030 and D032-D043 and F001-F005.

Process Description:

A walk-through inspection of the facility was performed with the Safety-Kleen representatives. Below is a description of the observations made in the various areas of the facility inspected.

Hazardous Waste Transfer Area

The first of two Hazardous Waste Transfer Areas was located within the warehouse of the facility directly behind the office area. Incoming hazardous wastes are placed and can be maintained in this area for up to 10 days while any waste characterizations are made. Once waste determinations are made, wastes are moved into the container storage area within the warehouse or placed into the solvent return dumpster which sends solvent wastes to the facility's permitted storage tank. At the time of the inspection, four 55-gallon containers of hazardous waste were observed in this area. Each of the containers were closed, labeled with the words "Hazardous Waste," marked with an indication of the hazard associated with the waste and an accumulation start date. Four 55-gallon containers of nonhazardous wastes were also observed in this area.

Hazardous Waste Container Storage Area

This area is located in the warehouse area of the facility adjacent to one of Hazardous Waste Transfer Areas. At the time of the inspection one 55-gallon container of hazardous waste solvent was observed in this area. The container was closed, labeled with the words "Hazardous Waste," marked with an indication of the hazard associated with the waste and an accumulation start date of less than one year. Additional 55-gallon containers of product solvents were observed on pallet racks on the perimeter of this area.

Retained Sample Lockers

Two metal lockers were observed in a separate caged area in the warehouse behind the office which are used to store waste samples taken from incoming used oil wastes. The samples are stored in the lockers for a short period of time until adequate analysis on each waste is determined. One 55-gallon drum of hazardous waste aerosol cans was also observed in this caged area within a satellite accumulation area. The drum was closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard associated with the waste.

Receiving Dock, Return and Fill and Transfer Area

All hazardous waste, universal waste and waste solvent arrive on trucks onto the Receiving Dock. This area is the second designated 10-Day Transfer Area at the facility. This area had appropriate safety equipment, decontamination equipment and spill kits. 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. The drain in

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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. 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 waste stream during the course of managing, packaging, and bulking hazardous waste referred to as "Branch Debris. This waste stream 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 and dated.

Additional wastes observed in the transfer area included one 55-gallon container of hazardous waste gasoline and one 20-gallon container of hazardous waste solvent. The drums were closed and properly labeled and dated. One 55-gallon container and several smaller ones containing used oil filters were also observed.

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 15,000-gallon tank labeled for used oil. 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. The hazardous waste storage tank contained 7 inches of hazardous waste solvent at the time of the inspection. The tank was labeled with the words "Hazardous Waste" and marked with an indication of the hazards associated with the wastes within the tank.

Paint Waste Shelter and Allied Product Storage

The Paint Waste Shelter is a metal storage building which is permitted to store hazardous waste with an allowed maximum capacity of 1,222 gallons of ignitable 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.

Record Review

A review of the facility's electronic contingency plan dated 3/22/2021 did not find any discrepancies. The plan was checked specifically for its evacuation routes and current emergency coordinators.

A review of the facility's hazardous waste training requirements did not find any discrepancies.

A review of the facility's hazardous waste manifests since the last inspection did not find any discrepancies.

A review of the facility's inspection logs since the last inspection did not find any discrepancies.

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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.

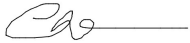
Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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

Cheryl L Mitchell

Principal Investigator Name**Principal Investigator Signature**

Inspector

Principal Investigator Title

DEP

Organization

05/17/2021

Date

Scott Thompson

Representative Name

Branch 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

Regional Compliance Manager

Representative Title

Safety-Kleen Systems, Inc.

Organization

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Report Approvers:**Approver:** Cheryl L Mitchell**Inspection Approval Date:**

05/17/2021