

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety - Kleen Systems Inc

On-Site Inspection Start Date: 06/24/2022 On-Site Inspection End Date: 06/24/2022

ME ID#: 20821 EPA ID#: FLD982133159
Facility Street Address: 4426 Entrepot Blvd , Tallahassee, Florida 32310-8740

Contact Mailing Address: 5610 Alpha Drive, Boynton Beach, Florida 33426

County Name: Leon 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:

File Review Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Monica Hardin, Inspector

Other Participants: Jeff Curtis, Sr. Environmental Compliance Manager

LATITUDE / LONGITUDE: Lat 30° 24′ 6.3651″ / Long 84° 19′ 31.045″

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc. (SK-Tallahassee), located at 4426 Entrepot Blvd. in Tallahassee, Florida is a generator, transporter, and permitted storage and transfer facility for hazardous waste. The facility is permitted for the operation of a hazardous waste container storage unit and area and hazardous waste tank storage unit under Permit No. 009207-011-HO; the current permit was renewed February 26, 2020 and expires March 14, 2025. Tom Youngman, Branch Environmental Compliance Manager and Jeff Curtis, Regional Environmental Compliance Manager are the primary contacts for this location.

This follow-up inspection report serves as a file review conducted by the Florida Department of Environmental Protection (DEP or Department) to address the potential violation cited in the March 24, 2022 file review inspection report related to an unmanifested waste report. The Department issued a compliance assistance offer (CAO) to SK-Tallahassee on April 4, 2022; responses to the CAO were received on April 15 and June 14, 2022.

Process Description:

403.727(1)(c), F.S.

On February 22, 2022, SK-Tallahassee submitted, to the Department, an unmanifested waste report. This report stated SK-Tallahassee accepted hazardous waste from a large quantity generator on eleven occasions from January 1, 2019 through February 15, 2022 without a manifest. The waste was described as spent parts washer solvent with the transactions completed on shipping documents that include the proper waste description and waste codes; copies of these documents were included.

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Per permit conditions, the permittee is required to submit an unmanifested waste report within 15 days of receipt of unmanifested waste. The permittee provided documentation (shipping receipts) indicating waste was transported on eleven occasions: February 15, 2022, September 15, 2021, June 25, 2021, January 6, 2021, October 2, 2020, July 13, 2020, April 16, 2020, February 25, 2020, November 12, 2019, July 16, 2019, and April 24, 2019. An unmanifested waste report was received within 15 days of February 15, 2022 (February 22, 2022), but not within any of the other dates.

At the request of the Department, SK-Tallahassee conducted an internal audit of their customer database to verify generator statuses in their account management system. This audit allowed SK-Tallahassee to identify additional generators/circumstances where hazardous waste may have been shipped without being manifested. SK-Tallahassee has updated the generator statuses of their customers as appropriate to ensure hazardous waste is manifested when required. SK-Tallahassee also stated their intent to notify some customers and recommend they review their current waste generation and generator status to prevent future occurrences.

Conclusion:

At the close of this file review, it appears SK-Tallahassee (and SK-Denton) has returned to compliance with the applicable state and federal hazardous wastes regulations.

Inspection Date: 06/24/2022

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		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	1		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	1		

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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

Monica Hardin		Inspector			
Principal Investigator Name Principal Investigator Signature		Principal Investigator Title			
		DEP	06/24/2022 Date		
		Organization			
Jeff Curtis		Sr. Environmental Compliance Manager			
Representative Name		Representative Title			
		Safety-Kleen Systems, Inc.			
		Organization			
	nitting to the accuracy of any o	epresentative only acknowledges receipt of this fitness that the stems identified by the Department as "Po			
Report Appro	overs:				
Approver:	Cliff Richardson	Inspection Approval Date:	06/24/2022		