



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#:** 106079 **EPA ID#:** TXR000081205  
**Facility Street Address:** 1722 Cooper Creek Road , Denton, Texas 76207  
**Contact Mailing Address:** 1722 Cooper Creek Rd, Denton, Texas 76208-1000  
**County Name:** All FL Cntys **Contact Phone:** (905) 315-5602

**NOTIFIED AS:**

Non-Handler, Transporter, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Transporter:** Own Waste, Commercial Waste **Used Oil:** Transporter, Oil Filters  
**Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Transport:** Mercury Containing Lamps, Mercury Containing Devices

**INSPECTION TYPE:**

File Review Inspection for Hazardous Waste Transporter Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Monica Hardin, Inspector  
**Other Participants:** Jeff Curtis, Sr. Environmental Compliance Manager

**LATITUDE / LONGITUDE:** Data is missing from FIESTA

**NAIC:** Data is missing from FIESTA

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Safety-Kleen Systems, Inc. (SK-Denton), located at 1722 Cooper Creek Road in Denton, Texas is a registered transporter of hazardous waste with the Florida Department of Environmental Protection (DEP or Department). SK-Denton is registered to transport their own waste and commercial waste over highways in Florida.

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 the transport of unmanifested hazardous waste. The Department issued a compliance assistance offer (CAO) to SK-Denton on April 4, 2022; responses to the CAO were received on April 15 and June 14, 2022.

**Process Description:**

40 CFR 263.20(a)(1)

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, the transporter removed hazardous waste from a large quantity generator under the presumption the generator was a very small quantity generator (exempt from manifest requirements per 40 CFR 262.14(a)).

At the request of the Department, Safety-Kleen Systems, Inc. conducted an internal audit of their customer database to verify generator statuses in their account management system. This audit allowed Safety-Kleen Systems, Inc. to identify additional generators/circumstances where hazardous waste may have been shipped without being manifested. Safety-Kleen Systems, Inc. has updated the generator statuses of their customers as appropriate to ensure hazardous waste is manifested when required. Customers are also required to confirm

## Safety-Kleen Systems Inc Inspection Report

Inspection Date: 06/24/2022

and certify their generator status each time a driver visits a facility; SK-Denton intends to continue this practice.

### **Conclusion:**

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

\*Checklist items marked as N/A were not reviewed during this file review.

## Safety-Kleen Systems Inc Inspection Report

Inspection Date: 06/24/2022

**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)			✓

## Safety-Kleen Systems Inc Inspection Report

Inspection Date: 06/24/2022

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)			✓
<b>Item No.</b>	<b>Water (Bulk) Transporters</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
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)			✓
<b>Item No.</b>	<b>SQG Waste</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
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)			✓

Inspection Date: 06/24/2022

**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

<u>Monica Hardin</u>	<u>Inspector</u>
<b>Principal Investigator Name</b>	<b>Principal Investigator Title</b>
<u><i>M. Hardin</i></u>	<u>DEP</u>
<b>Principal Investigator Signature</b>	<b>Organization</b>
	<u>06/24/2022</u>
	<b>Date</b>
<hr/>	
<u>Jeff Curtis</u>	<u>Sr. Environmental Compliance Manager</u>
<b>Representative Name</b>	<b>Representative Title</b>
	<u>Safety-Kleen Systems, Inc.</u>
	<b>Organization</b>

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:**

<b>Approver:</b> <u>Cliff Richardson</u>	<b>Inspection Approval Date:</b> <u>06/24/2022</u>
--	--