

## Department of Environmental Protection

Jeb Bush Governor Northwest District 160 Governmental Center Pensacola, Florida 32502-5794

Colleen Castille Secretary

May 8, 2006

Send Via E-mail: JHINSEY@safety-kleen.com

Mr. John Hinsey Branch General Manager Safety-Kleen Systems 4426 Entrepot Boulevard Tallahassee, Florida 32310

Dear Mr. Hinsey:

Enclosed is a copy of the report on the April 4, 2006 compliance inspection that was conducted at your Safety-Kleen Systems facility located at 4426 Entrepot Boulevard, Tallahassee, Leon County, Florida. We found your facility to be in compliance with the Used Oil Management Program and the Resource Conservation and Recovery Act. This inspection did not address other areas of Department jurisdiction.

If you have any questions concerning this program or the enclosed report, please contact Terry Wells at 850/595-8360, extension 1258 or via e-mail at <a href="mailto:terry.wells@dep.state.fl.us">terry.wells@dep.state.fl.us</a>.

Sincerely,

James Byer

Hazardous Waste Section

JCB:tew

Encl: Hazardous waste Inspection Report



# Department of Environmental Protection

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#### HAZARDOUS WASTE INSPECTION REPORT

1.	INSPECTION TYPE: ⊠Routine □Complaint □Follow-Up □Permitting □Pre-arranged		
	FACILITY NAME: Safety-Kleen Systems, Inc. DEP/EPA ID #: FLD 982 133 159		
	STREET ADDRESS: 4426 Entrepot Boulevard, Tallahassee, Florida 32310  MAILING ADDRESS: 4426 Entrepot Boulevard, Tallahassee, Florida 32310  COUNTY: Leon PHONE: (850) 576-9764 DATE: April 4, 2006 TIME: 1:00 P.M.		
	HW facility status	used oil facility status	Hg facility status
	☐ non-handler ☐ CESQG ☐ SQG ☑ LQG	<ul><li>☐ generator</li><li>☒ transporter</li><li>☒ transfer facility</li><li>☐ marketer</li></ul>	☐ exempt ☐ generator ☐ transporter
		<ul><li>□ processor</li><li>□ on-spec. burner</li><li>□ off-spec. burner</li></ul>	☐ Hg recovery facility ☐ Hg reclamation facility
	⊠ TSD	filter generator	PCW facility status
	☐ SQH ☐ LQH	<ul><li></li></ul>	☐ producer☐ transporter☐ recovery facility
2.	APPLICABLE REGULATIONS:		
	_	FR 262	<ul><li></li></ul>
3.	RESPONSIBLE OFFICIAL: John Hinsey, Tallahassee Branch Manager		
4.	INSPECTION PARTICIPANTS: John Hinsey of S-K. Terry Wells and John Johnson of FDEP		
5.	<b>LATITUDE/LONGITUDE:</b> Lat 30° 24′ 07"/Long 084° 19′ 30"		
6.	TYPE OF OWNERSHIP: private federal state county municipal		
7.	<b>PERMIT No.</b> :9207-HO-006 <b>DATE ISSUED</b> : October 19, 2005 <b>EXP. DATE</b> : March 14, 2010		

Safety-Kleen Systems, Inc. Hazardous Waste Inspection May 8, 2006 Page 2 of 5

#### 8. Site History and Description:

Safety-Kleen Systems, Inc. (S-K), 4426 Entrepot Boulevard, Tallahassee, Florida is a generator, transporter and permitted storage facility and transfer facility for hazardous waste. S-K has been operating at this location since 1988. This facility is permitted for both a container storage area and a tank storage area with Permit No. 9207-HO-006, which was issued October 19, 2005 to incorporate FDEP issued HSWA Corrective Action Requirements. This facility was last inspected on May 27, 2004 to confirm compliance with the operating permit and state and federal RCRA regulations with no violations cited. The purpose of this inspection is to confirm S-K's status and compliance with the RCRA regulations.

S-K collects hazardous waste from area generators and temporarily stores it on-site prior to shipping off-site for reclamation and/or disposal. S-K conducts leasing and servicing of S-K parts cleaning equipment. Parts washing solvents (Parts Cleaner 105, 150 Premium Solvent, or Actrel are sent with the equipment. The solvent is exchanged on a periodic basis in accordance with a joint agreement. The used solvent is returned to the storage facility for reclamation. S-K also picks up various drums of hazardous waste, used oil, used oil filters, spent silver recovery cartridges and non-regulated wastes for temporary storage (Transfer Station). This waste is then shipped off-site for reclamation and/or disposal. Facility equipment description and operation is described in previous inspection reports and contained in the operating permit.

#### 9. Site Inspections:

John Hinsey of S-K provided access to the facility, description of operations and access to paper and computer-based records.

#### Return/Fill Shelter

The area was inspected mid-afternoon when no loading/unloading activity was underway. The loading and unloading area was well maintained, located with easy access to the emergency and safety equipment installed in this area. In this area were eight 30-gallon empty drums that were waiting to be filled with solvent.

The shelter area held no containers of hazardous waste with the exception of the satellite accumulation 55-gallon drum for hazardous waste solids/sludge from the dumpster/drum washing unit. Sludge from the drum washing unit is removed every shift. This drum was labeled, in good physical condition and closed.







Safety-Kleen Systems, Inc. Hazardous Waste Inspection May 8, 2006 Page 3 of 5



#### **10-day Transfer Station**

This area contained two 5-gallon drums of imaging waste and three 55-gallon drums of universal waste awaiting follow-on transport to final TSD Facilities or destinations. The oldest date noted on any container was April 3, 2006, which matched the wallboard for this area noting the oldest date container as April 3, 2006. All containers were in good physical condition, closed, and labeled. The daily inspection record for the 10-day Transfer Station was reviewed and appropriate documentation was available during the inspection. Adequate aisle space was available to inspect each container.





#### Non-Hazardous Waste Storage Area

Based on a recommendation from the 2003 calendar year inspection, non-hazardous waste containers were segregated for storage in a designated area adjacent to the 10-day Transfer Station. In this area were three 55-gallon drums that was closed and labeled with the words "Used Oil Absorbent Pads". All containers were in good condition.

### **TSD Storage Area**

The TSD Storage Area was well organized and aisle space maintained to allow inspection of each container. All containers were in good physical condition, closed, and labeled. Two random containers were selected (Container #'s 06030402037 & 060120004074) and a computer and hardcopy records check conducted to verify its origin, transport history and storage inventory. No

Safety-Kleen Systems, Inc. Hazardous Waste Inspection May 8, 2006 Page 4 of 5

discrepancies were noted. The containers Identified above when referenced against manifest revealed that these containers were identified on manifest #'s 10117 & 11740 respectively. A visual inventory of drums versus computer record inventory for the TSD Storage Area was conducted by Mr. Hinsey and the Department Inspectors with no discrepancies identified. Also located in this area was Universal Waste that was being managed properly with no discrepancies identified.







#### **Tank Storage Area**

The area was well maintained with no evidence of tank leakage noted. The load/unload pipe manifold area showed no evidence of leakage or spillage from the piping and equipage in this area. The accumulation drum located in this area was closed, labeled and in good condition.

The facility's 40 CFR 264 Subpart BB compliance procedures for the waste mineral spirits solvent management system were in place and being implemented during this inspection. The waste mineral spirits solvent management system equipage (piping, valves, flanges, pumps, etc) was color coated to distinguish it readily from the other equipage in the facility. Red piping is for dirty solvent, orange piping represents Safety Kleen's 105° solvent and green piping represents 150° solvent. This coloring scheme allows the daily inspector of the system to track the equipage and inspect for liquid leaks. The tank system consists of two 15,000-gallon tanks and one 11,400-gallon tank. All tanks are double-walled. Brass numbering tags are used to identify valves and flanges associated with the tank system. The daily inspection logs were reviewed for the previous year with no discrepancies noted.







Safety-Kleen Systems, Inc. Hazardous Waste Inspection May 8, 2006 Page 5 of 5

#### **External Area**

The outside storage/laydown area, driveways, vehicle parking lot, solid waste dumpsters and the perimeter fence/lawn areas were inspected with no discrepancies noted. All other security and safety equipment was installed in accordance with the permit and operational. A tanker trailer had been parked within a temporary secondary containment at the southwest corner of the rear asphalt parking area. This tanker will be used for on-site consolidation of wastes collected daily in the vacuum truck and then transfer and stored on-site in the tank trailer until a full 5,000-gallon load makes it necessary for transport to the follow-on processor. Also in this area were seven "Used Oil Filter" dumpsters that were properly labeled and closed. Mr. Hinsey indicated that all collected used oil filters are sent to a processing facility called Oil Filter Recyclers located in Illinois. There were also several empty containers that Safety Kleen utilizes during its daily operations located outside the facility.







#### **Miscellaneous**

Emergency fire, first aid, and spill control equipment within the facility was randomly inspected to verify the facility inspection and maintenance program. A review of randomly selected training records, daily/weekly inspection logs for the Transfer Area, Storage Containers, Storage Tanks, and safety equipment was conducted with no discrepancies noted. The contingency plan and permit were available and current. Documentation tracking checks on multiple containers from the TSD Storage Area picked at random verified the hardcopy and computer tracking documentation for all containers checked.

This inspection verified S-K is a large quantity generator of hazardous waste; a transporter of hazardous waste and used oil; and an operator of a transfer station and permitted storage facility.

10. Summary of Alleged Violations: None

11. Recommendations: None

Report prepared by\_

Date: May 5, 2006