



# Florida Department of Environmental Protection

Northwest District  
 160 Governmental Center  
 Pensacola, Florida 32502-5794

Charlie Crist  
 Governor

Jeff Kottkamp  
 Lt. Governor

Michael W. Sole  
 Secretary

## 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 23, 2008 **TIME:** 12:45 P.M.

HW facility status

- non-handler
- CESQG
- SQG
- LQG
- transporter
- transfer facility
- TSD
- SQH
- LQH

used oil facility status

- generator
- transporter
- transfer facility
- marketer
- processor
- on-spec. burner
- off-spec. burner
- filter generator
- filter transporter
- filter transfer facility
- filter processor

Hg facility status

- exempt
- generator
- transporter
- Hg recovery facility
- Hg reclamation facility

PCW facility status

- producer
- transporter
- recovery facility

2. **APPLICABLE REGULATIONS:**

- |  |  |   |   |
|--|--|---|---|
| <input checked="" type="checkbox"/> 40 CFR 261 | <input checked="" type="checkbox"/> 40 CFR 262 | <input checked="" type="checkbox"/> 40 CFR 263  | <input checked="" type="checkbox"/> 40 CFR 264  |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266            | <input checked="" type="checkbox"/> 40 CFR 268  | <input checked="" type="checkbox"/> 40 CFR 270  |
| <input checked="" type="checkbox"/> 40 CFR 273 | <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC |

3. **RESPONSIBLE OFFICIAL:** John Hinsey, Tallahassee Branch Manager

4. **INSPECTION PARTICIPANTS:** John Hinsey of S-K. Daniel Kuncicky, Nicole McDonald, and Jim Byer of FDEP

5. **LATITUDE/LONGITUDE:** Lat 30° 24' 07" / Long 084° 19' 30"

6. **TYPE OF OWNERSHIP:** private ~~federal~~ ~~state~~ ~~county~~ ~~municipal~~

7. **PERMIT No.:** 9207-HO-006 **DATE ISSUED:** October 19, 2005 **EXP. DATE:** March 14, 2010

#### 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 December 7, 2006 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 non-hazardous liquids) 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. As of February 29, 2008 S-K is registered with the Department as a Transporter, Transfer and Small Quantity Handler of Universal Waste Lamps

#### 9. Site Inspections:

On April 23, 2008, Department Personnel, Daniel Kuncicky, Nicole McDonald and Jim Byer conducted a hazardous waste inspection of S-K to ensure compliance with the Resource Conservation and Recovery Act (RCRA) and State hazardous waste regulations. 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 early-afternoon when no loading/unloading activity was underway. The loading/ unloading area was well maintained and located with easy access to the emergency and safety equipment installed in this area. Both the HW drain dumpster and Continued Use Program (CUP) drain dumpster lids were closed. Located in this area were numerous 30-gallon empty drums that were waiting to be filled with product solvent. Also in this area were two 250-gallon totes that held aqueous parts washer product and a labeled accumulation container for used oil filters.

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 Equipment



SAA drum -Return/Fill Area



Aqueous Parts-washing



HW drain dumpster



CUP drain dumpster



UOF Accumulation

### 10-Day Transfer Station

This area contained no containers as the weekly S-K transport vehicle was loaded and departed with all containers in this area just prior to this inspection. This area was well kept with no discrepancies noted. The daily inspection record for the 10-Day Transfer Station was reviewed and appropriate documentation was available during the inspection. Adequate aisle space is available to inspect each container.



10-Day Transfer Station

### 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, dated and labeled. Two random containers were selected (Container #'s 16766 and 6512) and a computer and hardcopy records check was conducted to verify its origin, transport history and storage inventory. No discrepancies were noted. A visual inventory of drums versus computer record inventory for the TSD Storage Area was

conducted with no discrepancies noted. Also located in this immediate area was Universal Waste that was being managed properly with no discrepancies identified.



TSD Storage Area



TSD Storage Area



Universal Waste Storage

### Tank Storage Area

All tanks appeared to be in good condition and well maintained with no visual evidence of any tank leakage noted. The load/unload pipe manifold area showed no evidence of leakage or spillage from the piping and equipage in this area.



East end of Tank Farm



Tank Load/Unload valves



West end of tank Farm

The tank farm consists of two 15,000-gallon tanks and one 11,400-gallon tank. All tanks are double-walled. 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 (waste 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. Brass numbering tags are used to identify valves and flanges associated with the waste solvent tank system.

**External Area**

The outside storage/laydown area, driveways, vehicle parking lot, solid waste dumpsters and the perimeter fence/lawn areas were inspected with one discrepancy noted. Signs which should be attached to the perimeter fencing per permit requirements were missing from areas on the west side and east side of the perimeter. All other security and safety equipment was installed in accordance with the permit. Both the regular solid waste dumpster and cardboard recycling dumpster were empty at the time of this inspection. 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 processing.



Empty dumpsters



5,000-gallon tank trailer

At the rear of the build were numerous “Used Oil Filter” dumpsters, only three dumpsters (properly labeled and closed) contained filters and were surrounded by spill containment “pigs”. Mr. Hinsey indicated that all collected UO filters are sent to a processing facility called Oil Filter Recyclers. There were also several other empty containers that Safety Kleen utilizes during its daily operations located in this area.



“Used Oil Filter” dumpsters



Empty Containers

### Route Truck Review

Two returning route trucks were inspected upon their arrival at the facilities loading/unloading area. A review of each driver's shipping records and actual contents of their trucks was conducted for verification of DOT transport regulations. Nicole McDonald performed an inventory of the waste on the first truck with driver Duane Elkins. Mr. Elkins pulled the manifest and shipping documents for all waste on the load to begin inventory. Upon first count of the drums, there was one paint waste, eight HW, five CUP, one Used Oil drum. When Mr. Elkins began matching up paperwork to drums, he informed me that some were mislabeled. He explained that he did not have the correct labels and labeled three drums (two 30-gallon drums and one 16-gallon drum) with the company "Man Trans" as "CUP solvent". These drums were from three different businesses (Honest Engines, Rahall Chevrolet, and NF Performance). Only one drum from Rahall Chevrolet (30 gal) was CUP solvent, the other two drums should have been labeled as a hazardous waste. One 30-gallon drum from Tallahassee Powersport was on this truck but the paperwork was in with the prior day's, March 22, 2008, shipping papers. Mr. Elkins explained that the waste was picked up on March 22, 2008 and was still on the truck because he had to return to the facility on March 23, 2008. Another truck was inspected with driver William Edmund. All drums on Mr. Edmunds truck were labeled appropriately and paperwork was in order and correct for each drum.



David off loading drums



Incorrect labels



### Miscellaneous and Records Review

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 one discrepancy noted. The facility's 40 CFR 264 Subpart BB compliance procedures for the waste mineral spirits solvent management system was in place. The daily inspection

logs were reviewed for the previous two years with no discrepancies. However, the last annual inspection of “non-accessible” equipage points had occurred in December of 2006. On May 8, 2008, Mr. Hinsey located and faxed documentation confirming “Subpart BB Difficult to Monitor Equipment” had been checked by the EHS Manager on April 8, 2008. This inspection documentation noted “numerous subpart BB tags are worn and need to be replaced”.

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:**

**a) 49 CFR 171.2(e) & 40 CFR 263 Part B                      Incorrect/missing shipping papers**

*No person may offer or accept a hazardous material for transportation in commerce unless the hazardous material is properly classed, described, packaged, marked, labeled, and in condition for shipment as required or authorized by applicable requirements of this subchapter or an exemption or special permit, approval, or registration issued under this subchapter or subchapter A of this chapter.*

- 1) One 30-gallon drum of hazardous waste solvent did not have the appropriated shipping papers with the driver while the drum was being transported over the road.
- 2) Three (two 30-gallon & one 16-gallon) drums were not labeled with the correct generator name or contents.

**b) 40 CFR 264.15(b) General Inspection Requirements**

*The owner operator must develop and follow a written schedule for inspection of monitoring equipment, safety and emergency equipment, security devices and operating structural equipment that are important to preventing detecting, or responding to environmental or human health hazards.*

**C) 40 CFR 264.14 & Permit Specific Condition 12 in Part 1**

*The Permittee shall comply with the security provisions of 40 CFR 264.14 and the site security provision of the permit application.*

*a. Warning signs shall be at least 2 feet by 2 feet, made of durable weather resistant material, with a light background and lettering in a highly contrasting color. All lettering must be at least 1 inch high.*

*b. Warning signs shall be unobstructed and mounted in such a manner that the center of the sign is approximately 56 inches above ground surface and is capable of being seen from at least 75 feet away.*

*c. Warning sign text shall warn of danger, prohibit the entry of unauthorized persons, convey other information appropriate to site conditions, and include a telephone number to call for more information.*

*d. The permittee is responsible for supplying, installing and maintaining the warning signs.*

Two signs were found on the ground and signage is not in accordance with the permit.

11. Recommendations:

- a) S-K needs to ensure that drums are labeled with appropriate contents during transport to ensure that solvents are emptied into the appropriate bins.
- b) S-K needs to ensure that all waste containers on a truck are accompanied with the appropriate shipping papers for each drum.
- c) S-K needs to ensure that "non-accessible equipage points are inspected annually per the permit.
- d) S-K needs to ensure that signage is placed along the perimeter of the facilities fencing in accordance with Specific Condition 12 in Part 1 of the permit.

Report prepared by:   
Nicole McDonald and James Byer

Date: May 7, 2008