



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 16 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dan Wharton
Branch General Manager
Safety-Kleen Systems, Inc.
4426 Entrepot Boulevard
Tallahassee, Florida 32310

SUBJ: RCRA Inspection
Safety-Kleen Systems, Inc.
Tallahassee, Florida
EPA ID. No.: FLD 982 133 159

Dear Mr. Wharton:

On June 7, 2010, the U.S. Environmental Protection Agency (EPA) conducted an EPA Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at the Safety-Kleen Systems, Inc. facility located in Tallahassee, Florida. The purpose of the inspection was to determine the facility's compliance status with the RCRA regulations. Enclosed is a copy of EPA's report documenting the results of the CEI.

If you questions regarding this report, please contact Daryl Himes, of my staff, at (404) 562-8614.

Sincerely,

Larry Lamberth, Chief
South Section
RCRA and OPA Enforcement and Compliance
Branch

Enclosure

cc: Tim Bahr, FDEP – Tallahassee
• Jim Byer, FDEP – NW District •

RECEIVED

JUL 19 2010

**NORTHWEST FLORIDA
DEP**

RCRA COMPLIANCE INSPECTION REPORT

1) Inspector and Author of Report

Daryl R. Himes
Environmental Engineer

2) Facility Information

Safety-Kleen Systems, Inc.
4426 Entrepot Boulevard
Tallahassee, Florida 32310

EPA I.D. Number FLD 982 133 159

3) Responsible Official

Dan Wharton, Branch General Manager

4) Inspection Participants

Dan Wharton, Safety-Kleen
Daryl R. Himes, EPA
Nicole McDonald, FDEP
Merlin Russell, FDEP

5) Date and Time of Inspection

June 7, 2010

6) Applicable Regulations

Title 40 Code of Federal Regulations (C.F.R.) Parts 260 through 270 as adopted and incorporated by reference in the Florida Administrative Code (FAC) at 62.730.140-62.730.183 and Permit Certification Number: 009207-HO-007

7) Purpose of Inspection

To conduct an unannounced compliance evaluation inspection (CEI) to determine the facility's compliance status with the applicable RCRA regulations.

8) Facility Description

Safety-Kleen operates a permitted hazardous waste storage facility (Permit Certification Number: 009207-HO-007) at the above location. The permitted hazardous waste storage areas include a 6,912 gallon container storage and one 15,000 gallon tank. The permitted container storage area is located within the warehouse area of the facility's building. The 15,000 gallon tank is located within a tank-farm just outside facility's building.

Five above ground storage tanks, which include the 15,000 gallon hazardous waste tank discussed above, are also maintained within the tank farm area. In addition to the 15,000 gallon permitted hazardous waste storage tank, the tank farm includes one 15,000 gallon tank for used oil, two 15,000 gallon tanks for fresh parts washer solvents, and one 8,000 gallon tank for used anti-freeze. The hazardous waste solvent stored in the permitted tank consists of hazardous waste solvents which are generated in parts washers Safety-Kleen leases to local facilities.

This Safety-Kleen facility operates in a manner similar to other Safety-Kleen facilities. Clean solvents, which include mineral spirits and dry cleaning solvent, are provided to Safety-Kleen's customers for use. The mineral spirits provided to its customers are placed in parts washers leased to Safety-Kleen's customers for use. Upon becoming spent, the spent solvents (D001 characteristic hazardous waste) is picked up and replaced with a clean reclaimed solvent.

Upon returning to the Safety-Kleen facility with spent solvents in drums from its customers, the drivers and employees working at the Safety-Kleen facility empty the spent mineral spirit solvents into one of two solvent return vessels. One vessel is a continued use washing vessel. Mineral spirits placed into this dumpster are not spent and are used by Safety-Kleen to clean drums which will be reused by the facility. The other vessel is also a dumpster receiving unit for spent mineral spirits. The solvents which are poured into this unit are then pumped to the 15,000 gallon hazardous waste storage tank for storage before being manifested to an off-site facility for treatment. Both vessels are located within a concrete secondary containment structure. Other hazardous waste solvents generated by Safety-Kleen's customers are managed in containers within the facility's permitted container storage area.

9) Findings

Upon arriving at the facility, credentials were presented to Mr. Wharton. A brief discussion of the facility's operations, discussed above, was then performed. Following this discussion, a walkthrough inspection of the facility was then performed. The findings of the walk-through inspection are listed below.

Loading Dock/Solvent Return/Fill Station

This area was comprised of a dumpster/barrel washer and a dumpster barrel spent solvent reception unit, described above, which holds the spent solvents before the solvent is pumped to the facility's 15,000 hazardous waste storage tank. At the time of the inspection, the dumpster was opened and found to be empty. The screen within the dumpster was also observed and found to be clean. One 55-gallon satellite drum was observed in this area for the collection of hazardous waste solids removed from the screen in the dumpster. The container was labeled with the words "Hazardous Waste" and closed at the time of the inspection.

Permitted Hazardous Waste Container Storage Area

The containers observed in this area were on pallets and in three rows (See Photo 1). The first row consisted of three 55-gallon drums, two 15-gallon drums, and one 40-gallon drum. The second row consisted of six 55-gallon drums, seven 15-gallon drums, and three 5-gallon containers. The third row consisted of three 55-gallon drums, two 15-gallon drums and one 20-gallon drum. All of the drums and containers were closed and labeled with the words "Hazardous Waste" and accumulation start dates. Proper aisle space and spill equipment were observed for this area.

Universal Waste Accumulation Area

Universal wastes observed in this area included two boxes of eight foot tubes, four boxes of four foot tubes, and one five gallon container of batteries (See Photo 2). All of the containers were labeled with the correct universal waste language and marked with accumulation start dates.

Permitted Hazardous Waste Tank

Used solvent, returned from Safety-Kleen's customers, is pumped from the loading dock solvent return station to the facility's 15,000 gallon hazardous waste storage tank. The tank was located within a concrete secondary containment system which was coated and free of cracks at the time of the inspection. The tanks within the secondary containment system were all covered with a canvas structure (See Photos 3 and 4) to almost eliminate rain water falling within the secondary containment system. At the time of the inspection, the tank was labeled with the words "Hazardous Waste." The secondary containment for the tank was found to be structurally sound and coated to prevent a release. The tank was observed to be closed at the time of the inspection and all pumps and ancillary equipment

to the tanks were tagged in accordance with the 40 C.F.R. Part 264 Subpart CC requirements referenced in the facility's March 11, 2010, Hazardous Waste Permit (Permit Number: 009207-HO-007) (See Photo 5).


Truckyard/Parking Area

The area within the facility's fence used to house their vehicles when they are not servicing customers was observed and found to have only two vehicles within this area. One of the trucks on the lot at the time of the inspection had been purchased from another Safety-Kleen facility. The license plate (Michigan) corroborated that the truck had come from an out of state Safety-Kleen facility. This truck had a broken gate and could not be opened at the time of the inspection. The other truck was opened and found to be empty.

Record Review

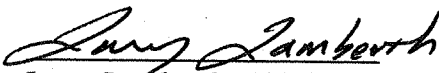
A review of the facility's manifests, inspection records, operating records, and training records was then performed. No violations were observed during the record review.

10) Signed


Daryl R. Himes
Inspector and Author of Report

6/29/10
Date

11) Concurrence and Approval


Larry Lamberth, Chief
South Section
RCRA and OPA Enforcement
and Compliance Branch

07/15/10
Date

**IMAGE QUALITY
AS YOU REVIEW THE
NEXT GROUP OF
IMAGES, PLEASE
NOTE THAT THE
ORIGINAL
DOCUMENTS WERE
OF POOR QUALITY.**



Photo 1 – Permitted Container Storage Area

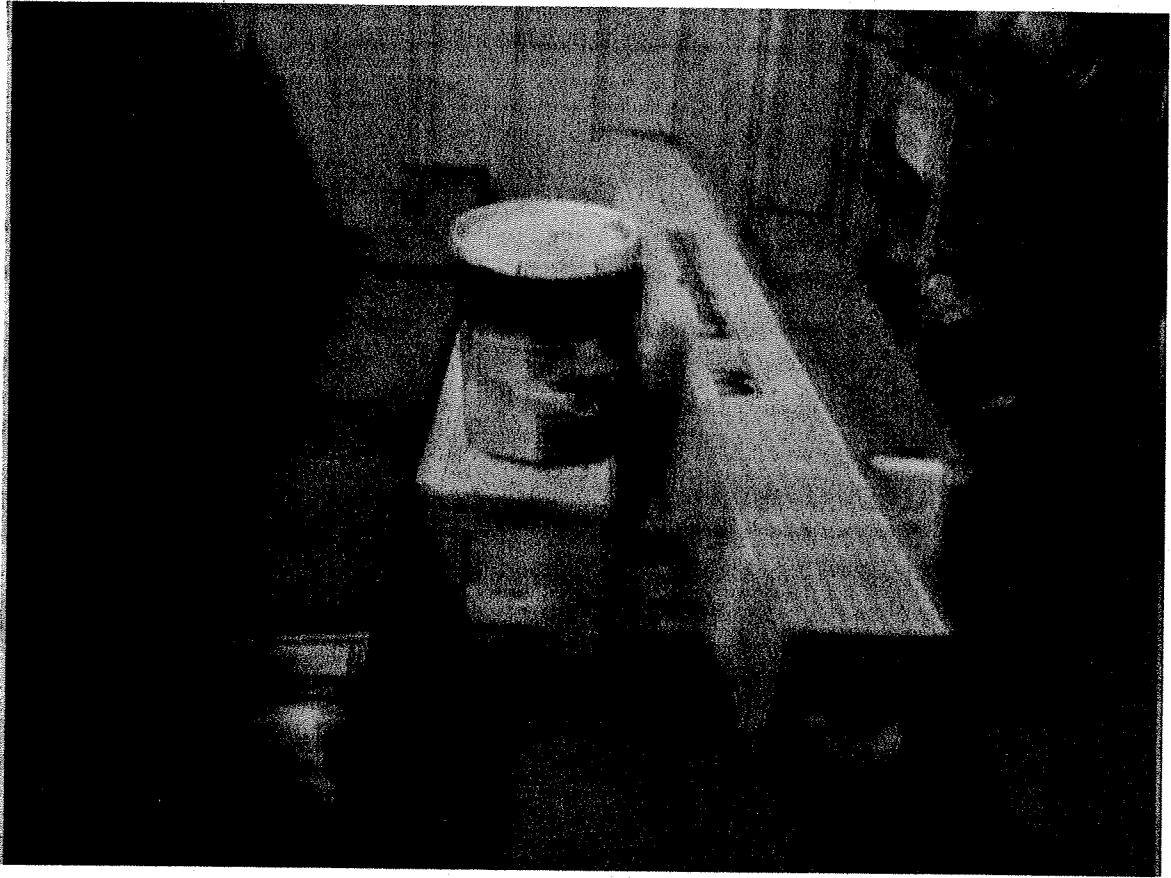


Photo 2 – Universal Waste Storage Area

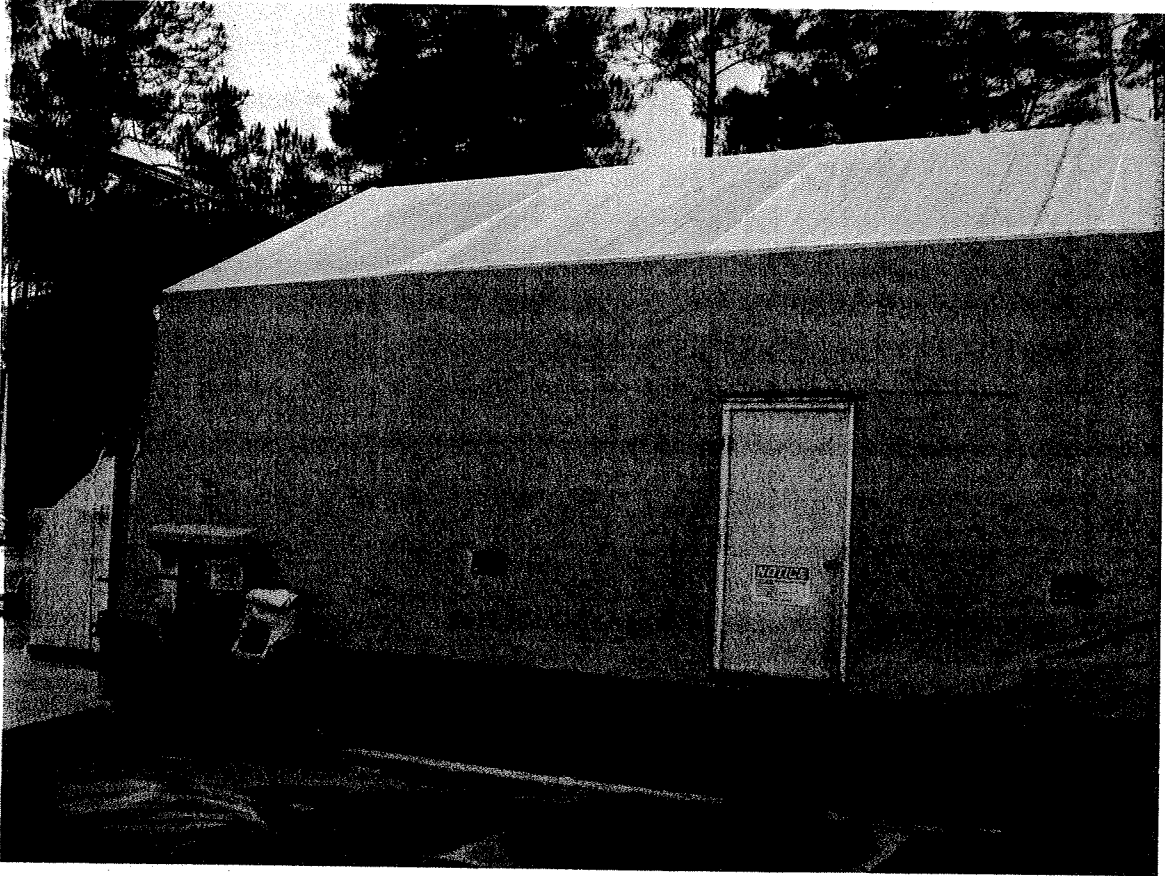


Photo 3 – Canvas covered tank farm.

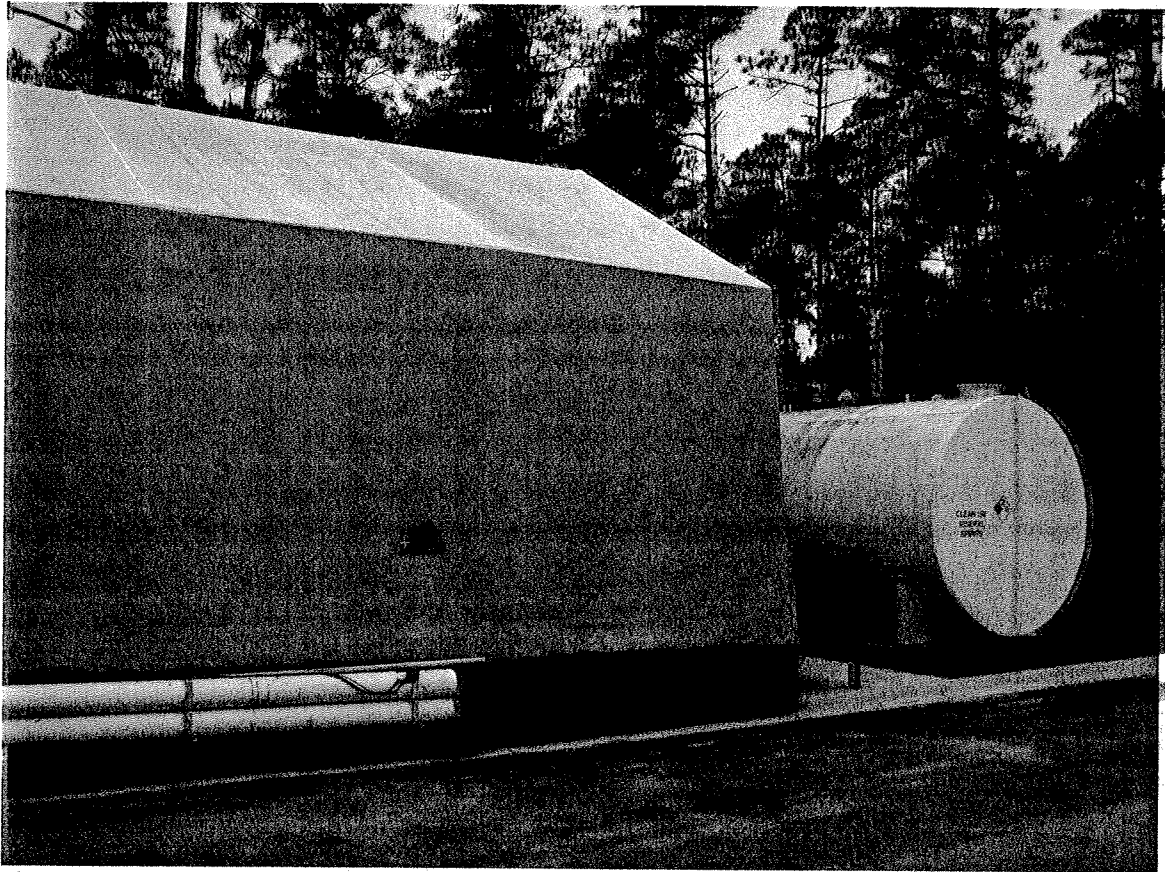


Photo 4 – Canvas covered tank farm.

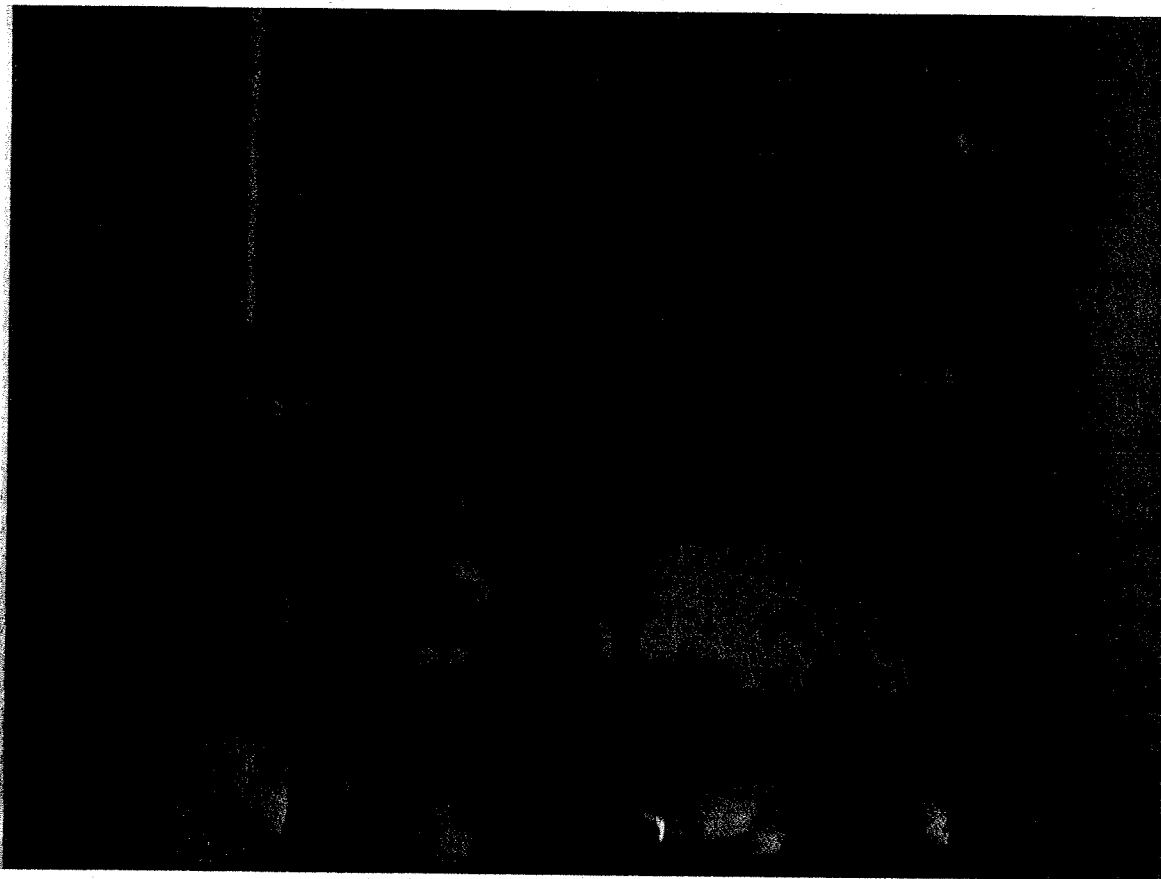


Photo 5 – Tags on ancillary piping for facility's permitted tank.