



# Florida Department of Environmental Protection

Northwest District  
160 W. Government Street, Suite 308  
Pensacola, Florida 32502-5740

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard, Jr.  
Secretary

March 9, 2011

Sent via e-mail to:

[Daniel.Wharton@safety-kleen.com](mailto:Daniel.Wharton@safety-kleen.com)

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

Dear Mr. Wharton:

Enclosed is a copy of the report on the hazardous waste compliance inspection that was conducted at your facility on February 23, 2011. We found one Potential Violation at your facility with regard to the Resource Conservation and Recovery Act. The Potential Violation has been addressed by your Facility and no further action is required at this time. This inspection did not address other areas of Department jurisdiction.

If you have any questions concerning this program or the enclosed report, please contact Nicole McDonald at (850)595-0611 or by e-mail at [Nicole.McDonald@dep.state.fl.us](mailto:Nicole.McDonald@dep.state.fl.us).

Sincerely,

Jim Byer  
Hazardous Waste Section Supervisor

JCB/nmb

Enclosure: Inspection Report

C: Merlin Russell, FDEP, [Merlin.Russell@dep.state.fl.us](mailto:Merlin.Russell@dep.state.fl.us)



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Safety - Kleen Systems Inc

**On-Site Inspection Start Date:** 02/23/2011

**On-Site Inspection End Date:** 02/23/2011

**ME ID#:** 20821

**EPA ID#:** FLD982133159

**Facility Street Address:** 4426 Entrepot Blvd, Tallahassee, Florida 32310-8740

**Contact Mailing Address:** 3003 W Breezewood Lane, Neenah, Wisconsin 54957-0368

**County Name:** Leon

**Contact Phone:** (800) 558-5011

**NOTIFIED AS:**

LQG (>1000 kg/month)

Transporter

Transfer Facility

TSD Facility Unit Type(s)

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Transfer Facility

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for Used Oil facility

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Nicole McDonald, Inspector

Other Participants: Sherri McPhaul, Lead Materials Manager; Dan Wharton, Branch General Manager

**LATITUDE / LONGITUDE:** Lat 30° 24' 6.3651" / Long 84° 19' 31.045"

**SIC CODE:** 4212 - Trans. & utilities - local trucking, without storage

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Safety-Kleen Systems, Inc. (S-K), 4426 Entrepot Boulevard, Tallahassee, Florida is a generator, transporter and permitted storage and transfer facility for hazardous waste. This facility is permitted for both a container storage area and a tank storage area with Permit No. 009207-HO-007, which was renewed March 3, 2010. This facility was last inspected on June 7, 2010, with no violations cited.

**Process Description:**

As of Aug/Sept 2010 S-K has stopped using 105° solvent and switched solely to 150° solvent. All facilities that are serviced by S-K with 105° solvent have been replaced with 150° solvent. The 105° solvent (product) tank currently has 119 gallons (approximately 4 inches) of solvent. Mr. Wharton stated that this tank is slated to be cleaned out in the coming months with the goal of using it as a product tank for 150° solvent. Due to the change in solvents, CUP is being phased out. This S-K location receives used oil and used oil filters in 55-gallon drums or large totes.

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 also picks up various drums of hazardous waste, used oil, used oil filters, spent silver recovery cartridges, dry cleaning waste and non-

Inspection Date: 02/23/2011

regulated wastes for temporary storage (Transfer Station). This waste is then shipped off-site for reclamation and/or disposal.

#### **A. Return/Fill Shelter:**

The area was inspected mid afternoon when no loading/unloading activity was underway. Both the hazardous waste drain dumpster and CUP drain dumpster lids were closed. One satellite accumulation area contained a closed, labeled 55-gallon drum for hazardous waste solids/sludge from the dumpster/drum washing unit and CUP drain dumpster.

#### **B. 10 Day Transfer Station:**

Twenty-two containers of hazardous waste were located in this area, all were labeled, dated and within the 10 day time period (oldest date 2/16/20110). Records were pulled for drum I.D. 110208404084 with no deficiencies noted. Four 55-gallon drums labeled hazardous waste also had non-hazardous waste labels. These drums were confirmed to be hazardous waste and the non-hazardous labels were blacked out. S-K personnel stated that they try to remove any other additional labels when containers come into the transfer area. The striping on the floor to indicate the physical location of the transfer area was missing at the South end. Several pallets of non hazardous waste (used oil, used oil filters and oily rags) were stored in the transfer area, all dated and labeled accordingly. Emergency equipment has been inspected and is easily accessible.

#### **C. TSD Storage Area:**

The TSD Storage Area was well organized and appropriate aisle space is maintained. Records were pulled for drum I.D. #101227332345, with no deficiencies noted. All containers in storage were in good physical condition, closed, dated and labeled. Five boxes of waste universal fluorescent lamps were labeled, dated and closed.

#### **D. Tank Storage:**

The covered and enclosed tank storage area contains a used oil, 105° solvent and permitted hazardous waste storage tank. Outside this area are a 150° solvent tank and a used antifreeze tanks. All tanks and the load/unload pipe manifold area appeared to be in good condition and well maintained with no visible evidence of any tank leakage. The waste mineral spirits solvent management system equipment (piping, valves, flanges, pumps, etc) was color coded to distinguish it readily from the other equipment in the facility. Red piping is for dirty hazardous waste solvent, orange for 105° solvent and green piping represents 150° solvent. This coloring scheme along with the valve tagging system, allows the daily inspector of the system to track the equipment and inspect for liquid leaks. The 105° product solvent tank at the time of inspection held 119 gallons and is slated to be cleaned out. The hazardous waste solvent tank contents are transported by Safety Kleen Systems, Inc. (TXR000050930) to destination facility Safety Kleen Systems, Inc (SCD077995488) as waste combustible liquids (D001, D018, D039 & D040) approximately once a month.

#### **E. External Area:**

The outside storage/laydown area, driveways, vehicle parking lot, solid waste dumpsters and the perimeter fence/lawn areas were inspected with no violations noted. Signs are attached to the perimeter fencing and in good condition.

#### **F. Records Review:**

Emergency fire 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 discrepancy noted. The contingency plan and permit were available and current. This inspection verified S-K is a large quantity generator of hazardous waste; a transporter and transfer facility of hazardous waste and used oil; and a permitted hazardous waste storage facility.

#### **New Potential Violations and Areas of Concern:**

Inspection Date: 02/23/2011

**Checklist Independent Potential Violations and Areas of Concern**

Type: Violation

Rule: 62-730.171(2)

Explanation: Portions of the floor markings for the transfer area were missing. At the time of inspection no hazardous waste was stored outside the permitted transfer area.

Corrective Action: Within S-K's Permit, Part II Subpart B.1 #7 states "The accumulation areas containing transfer facility waste shall be clearly marked with signage and floor markings." Post inspection the floor was remarked with yellow paint.

**Summary of Potential Violations and Areas of Concern:**

Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 62-730.171(2)		02/23/2011	Portions of the floor markings for the transfer area were missing. At the time of inspection no hazardous waste was stored outside the permitted transfer area.

Areas of Concern

No Areas of Concern

**ATTACHMENTS:**

Transfer Area



**Conclusion:**

S-K was in compliance at the conclusion of the inspection.

S-K needs to ensure that any non-hazardous labels are removed/marked out from hazardous waste drums to prevent a possible mis-management of the contents.


S-K needs to ensure their permit is updated with any changes made at the facility that could affect the conditions of their permit including process and/or tank changes.

Inspection Date: 02/23/2011

**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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Nicole McDonald _____ <b>PRINCIPAL INSPECTOR NAME</b>	Inspector _____ <b>PRINCIPAL INSPECTOR TITLE</b>
 _____ <b>PRINCIPAL INSPECTOR SIGNATURE</b>	FDEP _____ <b>ORGANIZATION</b>
	3/7/2011 _____ <b>DATE</b>

Sherri McPhaul _____ <b>REPRESENTATIVE NAME</b>	Lead Materials Manager _____ <b>REPRESENTATIVE TITLE</b>
NO SIGNATURE _____ <b>REPRESENTATIVE SIGNATURE</b>	Safety-Kleen Systems, Inc. _____ <b>ORGANIZATION</b>

Dan Wharton _____ <b>REPRESENTATIVE NAME</b>	Branch General Manager _____ <b>REPRESENTATIVE TITLE</b>
NO SIGNATURE _____ <b>REPRESENTATIVE SIGNATURE</b>	Safety-Kleen Systems, Inc. _____ <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.