



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 11/10/2011

On-Site Inspection End Date: 11/10/2011

ME ID#: 1538

EPA ID#: FLR000060301

Facility Street Address: 359 Cypress Rd, Ocala, Florida 34472-3101

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

County Name: Marion

Contact Phone: (800) 558-5011

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

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

Routine Inspection for Transporter facility

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Danielle M. Bentzen, Environmental Specialist

Other Participants: Joseph Ventry, Senior Oil Terminal Operator; Justin Christensen, Intern; Janine Kraemer, Environmental Manager

LATITUDE / LONGITUDE: Lat 29° 4' 54.72" / Long 81° 59' 28.96"

SIC CODE: 5172 - Wholesale trade - petroleum products, nec

TYPE OF OWNERSHIP: Private

Introduction:

On November 10, 2011, Danielle Bentzen, Janine Kraemer, and Justin Christensen, Florida Department of Environmental Protection (DEP), inspected Safety-Kleen Systems, Inc (SK-Ocala) for compliance with state and federal hazardous waste and used oil regulations. Mr. Joseph Ventry accompanied inspectors throughout the facility. This facility began operations in 2000 as Atlantic Industrial Services. Safety-Kleen took over operations in 2009 and is operating under DEP permit number 161967-HO-004, which expires on April 22, 2012.

The facility operates Monday through Friday. Security cameras monitor the facility on weekends.

INSPECTION HISTORY

On July 1, 2009, the Department inspected SK-Ocala as a used oil processor and conditionally exempt small quantity generator of hazardous waste. The inspector noted that the facility failed to consistently include the generator's EPA identification number, if applicable, on incoming used oil shipments. The facility was otherwise in compliance.

Process Description:

SK-Ocala consists of a main office, containing offices and laboratories, a tank farm, and a building that contains the used oil processing area, control room, and used oil filter drum storage area.

The tank farm consists of thirty-three above ground storage tanks ranging from 200 to 160,000 gallons in secondary containment units. Twenty-five of these tanks are used oil tanks, with a total capacity of 880,000 gallons.

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SK-Ocala uses three rail cars to transport used oil. Each car has a 25,000 gallon capacity.

The used oil processing area is situated within an enclosed building, constructed of 6-inch reinforced, sealed concrete slab. The area occupied by the processing facility is approximately 13,000 square feet. Used oil is processed by heating the oil to drive off the water and shaking to settle out the solids.

The warehouse/drum storage and filter processing area is situated within another section of the enclosed building, constructed on an 8-inch reinforced, sealed concrete slab that occupies approximately 13,000 square feet. At the time of the inspection, there were one hundred and one 55-gallon drums and five 30-gallon drums of used oil filters in the building. SK-Ocala will clean out the drums, remove any labels and send back out to customers. Also in this area, were six 55-gallon drums of hazardous waste. The waste is generated from customer sample jars. Prior to August 2011, this waste was being disposed of as a non-hazardous waste. A proper waste determination needs to be made on the sample jars [40 CFR 262.11].

The materials processing facility is authorized under Solid Waste Permit No. 0189210-002-SO to consolidate and process non-hazardous petroleum-contaminated solid wastes and other solid wastes not constituting used oil subject to permit conditions. Solid waste is managed in a solidification pit where waste is mixed with clay. The resultant mixture is shipped to Valdosta, Georgia. See attached Solid Waste inspection report and permit for more information on the solid waste processing.

The laboratory has two satellite containers for xylene/used oil mixture. Both containers were properly labeled.

Records Review

Tank registrations for all storage tanks on-site are up to date.

Daily tank inspection logs and monthly tank farm inspection logs were reviewed and in compliance. Weekly inspection logs for hazardous waste containers were reviewed and found to be incomplete for the number of containers [62-730.030(6)].

Training is performed on-line and a copy of the certificate of completion is placed in the employee's file.

The shipping documents reviewed indicated SK-Ocala has failed to include a generator's EPA identification number on incoming loads of used oil, when available [40 CFR 279.56(a)(4)] for example, the UPS facility in Leesburg.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type:	Violation
Rule:	262.11
Explanation:	Hazardous waste determination. A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste. Specifically, SK-Ocala needs to perform a waste determination on the customer sample bottles.
Corrective Action:	Within 30 days of receipt of this letter, provide the Department with the waste determination results of these samples.

Type:	Violation
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Inspection Date: 11/10/2011

Rule: 279.56(a)(4)

Explanation: Records for each shipment must include the EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining. Specifically, SK-Ocala failed to consistently include the EPA identification number of generators on shipping papers.

Corrective Action: SK-Ocala must include the generator's EPA identification number of used oil generators on shipping papers documenting receipt of used oil. Within 30 days of receipt of this letter, provide the Department with documentation outlining the procedure for ensuring EPA identification numbers on disposal manifests.

Type: Violation

Rule: 62-730.160(6)

Explanation: Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34, shall maintain written documentation of the inspections required under 40 CFR Part 265. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions. Specifically, SK-Ocala did not completely fill out the weekly inspection logs.

Corrective Action: SK-Ocala needs to complete weekly inspections consistently. Within 30 days of receipt of this letter, provide the Department with documentation that weekly inspection logs are being conducted correctly.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
262.11		11/10/2011	Hazardous waste determination. A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste. Specifically, SK-Ocala needs to perform a waste determination on the customer sample bottles.
279.56(a)(4)		11/10/2011	Records for each shipment must include the EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining. Specifically, SK-Ocala failed to consistently include the EPA identification number of generators on shipping papers.
62-730.160(6)		11/10/2011	Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34, shall maintain written documentation of the inspections

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Rule Number	Area	Date Cited	Explanation
			required under 40 CFR Part 265. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions. Specifically, SK-Ocala did not completely fill out the weekly inspection logs.

Areas of Concern

No Areas of Concern

Conclusion:

SK-Ocala was inspected as a Used Oil Processor and Large Quantity Generator of hazardous waste and was not in compliance at the time of the inspection.

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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.

Danielle M. Bentzen

PRINCIPAL INSPECTOR NAME

Environmental Specialist

PRINCIPAL INSPECTOR TITLE

NO SIGNATURE

PRINCIPAL INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Justin Christensen

INSPECTOR NAME

Intern

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Janine Kraemer

INSPECTOR NAME

Environmental Manager

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Joseph Ventry

REPRESENTATIVE NAME

Senior Oil Terminal Operator

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Safety-Kleen

ORGANIZATION

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.