



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 04/01/2013

On-Site Inspection End Date: 04/01/2013

ME ID#: 1538

EPA ID#: FLR000060301

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

Contact Mailing Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-8329

County Name: Marion

Contact Phone: (561) 523-4719

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Transporter facility

Routine Inspection for Used Oil facility

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Danielle Owens, Environmental Specialist

Other Participants: John White, Environmental Specialist; Joe Ventry, Operator; Darwin Robinson, Oil Terminal Manager

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

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

TYPE OF OWNERSHIP: Private

Introduction:

On April 1, 2013, Danielle Owens and John White, Florida Department of Environmental Protection (FDEP), inspected Safety-Kleen Ocala (S-K Ocala) for compliance with state and federal hazardous waste and used oil regulations. Joe Ventry, Operator, accompanied the inspectors.

Safety-Kleen Ocala (S-K Ocala), located at 359 Cypress Road, Ocala, Marion County, Florida, was formerly known as Atlantic Industrial Services. The facility, which began operations on this site in 2000, is a used oil and material processing facility authorized under FDEP Operating Permit 161967-HO-006, with an expiration date of April 22, 2017.

INSPECTION HISTORY

On July 1, 2009, the Department inspected S-K 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.

S-K Ocala was inspected on November 15, 2005, and was not in compliance at that time. Violations cited were: Specific Condition 2(b) of Part V, Preparedness and Prevention / Contingency Plan Requirements - failure to update list of emergency coordinators; and 40 CFR 262.11 - failure to make a proper waste determination on shaker sludge. Violations were resolved through execution of a Consent Order, OGC case number 06-0986, on May 17, 2006, requiring payment of \$330.00 in penalties.

S-K Ocala was inspected on May 3, 2004, prior to issuance of the permit to verify information

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contained in the permit application. No violations were noted at this time.

S-K Ocala was inspected on September 25, 2002, and was not in compliance at that time. Violations cited included: 40 CFR 279.52(a)(1) - releases of used oil near the rail car unloading area; 40 CFR 279.22(c) - labeling containers with the words "Used Oil"; and 40 CFR 279.44(a) - rebuttable presumption for used oil containing greater than 1,000 parts per million of total halogens. The violations were resolved through execution of a Consent Order, OGC case number 03-1309, on July 29, 2003, requiring payment of \$2,000.00 in penalties.

Process Description:

S-K 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. The tank farm secondary containment area was clean and free of water. The coating on the walls was in good condition. Tanks #38, #40, #44, and #49 are used to store Petroleum Contact Water, but were not labeled as such [62-740.100(2)(c), F.A.C/ Specific Condition, Part IV, Number 2]. On April 11, 2013, SK-Ocala submitted documentation showing the tanks had been properly labeled.

Tank #54 has been removed from service and dismantled.

The facility also receives used oil by rail car. A transfer area is located on the north side of the property. Used oil is transferred from the rail cars to storage tanks. A transfer area with secondary containment is used to prevent releases to the environment.

In the Control Room, electronic controls are used to monitor the volume of used oil in the tanks.

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.

Used oil filters are kept in the drums, staged in the warehouse, and then shipped off site for processing.

Empty drums are crushed and then recycled.

Oily rags are collected in a 40-gallon trash can and are taken to the solidification area to be solidified.

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 sludge that collects in the shaker is pumped out every couple of weeks and taken to the solidification pit where it is solidified and shipped for disposal.

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. The Solid Waste Processing Area (solidification area) consists of a covered concrete pad that slopes towards the rear of the pad. The area contained some oily water from the cleaning of the rail car transfer area. The facility indicated the oily water would be removed by the end of the day.

Records Review

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

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Daily tank inspection logs and monthly tank farm inspection logs were reviewed and in compliance.

Records documenting personnel received training were reviewed at the time of the inspection and were in compliance

Records documenting acceptance of used oil shipments were available for review at the time of the inspection

Shipping documents were reviewed at the time of the inspection, however, S-K Ocala was requested to submit shipment records for 1/3/13, 1/4/13, 3/1/13, and 3/13/13. These records were not available at the facility due to the driver on those days being from the Sanford facility. S-K Ocala submitted the requested documents to the Department on April 11, 2013. The reviewed documents were in compliance.

A copy of the validated registration form was displayed in a prominent place at the facility.

A copy of the permit was available for review at the time of the inspection.

The contingency plan was available for review at the time of the inspection. Review of the contingency plan found the telephone number for the Department of Environmental Protection's Central District Office must be updated.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-740.100(2)(c)
Explanation:	Label or mark the container or tank clearly with the words "Petroleum Contact Water." Specifically, SK-Ocala failed to properly mark several above ground storage tanks used to store petroleum contact water.
Corrective Action:	SK-Ocala shall properly label all containers used to store petroleum contact water with the words "Petroleum Contact Water."
	On April 11, 2013, SK-Ocala submitted documentation showing the storage tanks have been properly labeled and no further action is necessary for this violation.

Conclusion:

S-K Ocala was inspected as a used oil processor and as a conditionally exempt small quantity generator of hazardous waste. The facility was not in compliance at the time of the inspection. The corrective actions required for the facility to be in compliance were discussed with Darwin Robinson, Oil Terminal Manager, and Joe Ventry, Operator prior to leaving the facility.

On April 11, 2013, the Department received documentation of the required corrective actions being completed. S-K Ocala returned to compliance prior to the issuance of this report.

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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 Owens**PRINCIPAL INSPECTOR NAME**Environmental Specialist**PRINCIPAL INSPECTOR TITLE**FDEP**ORGANIZATION****Supervisor:**Aaron Watkins

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.