

To: Curtis, Jeff

Subject: Inspection of Pompano Beach facility on 10/10/13

The purpose of this email is to acknowledge return to compliance from the Department's inspection on October 10, 2013 at the above mentioned facility. Attached please find the final report for that inspection. Please feel free to contact me if you have any questions concerning this matter or any other compliance issue. Thank you for your cooperation in this matter.

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Work Hours - 7 am to 5 pm Monday to Thursday
I am not in the office on FRIDAYS

Florida's Water - Ours to Protect: Check out the latest information on Florida Water Issues at <http://www.protectingourwater.org/> presented by the Florida Department of Environmental Protection.



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 10/10/2013

On-Site Inspection End Date: 10/10/2013

ME ID#: 60958

EPA ID#: FLD984247882

Facility Street Address: 1400 NW 13th Ave, Pompano Beach, Florida 33069-1906

Contact Mailing Address: 42 Longwater Dr, Norwell, Massachusetts 02061

County Name: Broward

Contact Phone: (781) 792-5760

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Lebert Halliman, Terminal Operator

LATITUDE / LONGITUDE: Lat 26° 14' 41.6198" / Long 80° 8' 28.385"

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

TYPE OF OWNERSHIP: Private

Introduction:

Safety Kleen Systems, Inc. (SKS) of Pompano Beach, Florida is a railcar terminal used to transport used oil from the two Safety Kleen branch facilities in Southeast Florida to their main reprocessing plant in East Chicago, IL. This facility is also a registered used oil transporter. This registration is required because there are two tanker trucks that are stationed at the facility, which make runs two to three times a week to the branch facilities to bring back used oil to the terminal for shipment out on the rail cars. There is also a 4000 gallon used oil/oily water collection truck that is based here, as well as, a box truck for used oil filters. However; the box trucker goes directly to US Foundry with its' load before returning here each day. The oily water held onsite is transferred to the empty tankers for delivery to another Safety Kleen facility in Florida for treatment.

There is only one full time onsite employee at the facility, who is the designated terminal manager. He is responsible for all paperwork involved in the transfers, as well as, all physical operations performed at the site. Inside the rather large building is a small office and the rest of the building is one big open space. However; inside this space is a secondary containment that has three vertical 10,000 gallon tanks for used oil and two vertical 2500 gallon poly tanks for the storage of oily water. There are also two frac tanks on site for any overflow storage, if need be, as each railcar holds 24,000 gallons and CSX only comes once a week. The only other large storage container onsite is a rolloff for solid waste.

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Process Description:

Due to processes performed onsite these wastestreams are generated: branch debris (used oil rags, pads, boom and PPE) and used oil filters.

At the time of the inspection, there was only one actual violation and that was that one of the two frac tanks onsite, which had used oil in it, was not properly labeled. This was corrected during the inspection. The only other issues noted by the inspector were considered areas of concern as they reflected a lack of best management practices. The branch debris drum was mislabeled was open, and the only used oil filter drum onsite was also open.

Record Review - Three years of records are not maintained onsite but were readily available if requested. The terminal manager explained the tracking system used at the facility and the inspector reviewed approximately one and a half month's worth of paperwork. All such records appeared to be in order. The training records for the terminal manager and the two drivers based here were available for review and appeared to be adequate.

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

Type: Violation
Rule: 279.22(c)(1)
Question Number: 5.40
Question: Are containers/tanks storing used oil marked with the words "Used Oil"?
Explanation: There was a frac tank onsite, which contained used oil, that was not properly labeled.
Corrective Action: This violation was corrected while the inspector was still onsite.

Areas of Concern

Type: Area Of Concern
Rule: 62-710.850(5)(a)
Question Number: 5.140
Question: Are used oil filter containers labeled "Used Oil Filters"?
Explanation: The facility had a drum full of branch debris (absorbents & PPE) that was labeled "Used Oil Filters" and was not properly closed. Also, the actual used oil filter drum was not closed.
Corrective Action: Please send picture of both of these drums properly labeled and closed.

Conclusion:

The facility appears to be a Conditionally Exempt Generator of hazardous waste and was in compliance at the end of the inspection. The facility forwarded pictures to the Department, on the same day as the inspection, addressing the areas of concern that were observed during 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.

Kathy R. Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

10/15/2013

DATE**Supervisor:** Karen Kantor

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.