



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

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**FACILITY INFORMATION:**

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

**On-Site Inspection Start Date:** 09/04/2014

**On-Site Inspection End Date:** 09/04/2014

**ME ID#:** 1538

**EPA ID#:** FLR000060301

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

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

**County Name:** Marion

**Contact Phone:** (781) 792-5760

**NOTIFIED AS:**

CESQG (<100 kg/month)

Transporter

Transfer Facility

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: John E. White, Inspector

Other Participants: Corina Lee, Environmental Specialist; 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 September 4, 2014, John White and Corina Lee, 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. Darwin Robinson, Manager, accompanied the inspectors.

S-K Ocala, located at 359 Cypress Road, Ocala, Marion County, Florida, was formerly known as Atlantic Industrial Services. The facility, operating on land owned by Safety-Kleen Systems, Inc. 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. A permit modification was issued November 14, 2014.

S-K Ocala, which employs ten people, operates Monday through Wednesday 24 hours per day, Thursday and Friday 8:00 AM to 5:00 PM, and is closed on Saturday and Sunday.

**INSPECTION HISTORY**

On April 1, 2013, the Department inspected S-K Ocala as a used oil processor and conditionally exempt small quantity generator of hazardous waste. At the time of inspection above ground storage tanks were not properly labeled "Petroleum Contact Water." The violation was corrected and no further action was required.

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.

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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 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. Tank #54 has been removed from service and dismantled. The Tank Farm was being repainted at the time of the inspection. Also, the containment area was being resealed.

No industrial waste processing is done on site. Processing of used oil on site consists of dehydration and processing in two shakers. Used oil received on site comes from Safety-Kleen Branch facilities in Florida. Oil arrives on site and, once the percent water and halogen content is verified, the oil is pumped from tanker trucks to the appropriate storage tank. Used oil is tested by the Safety-Kleen Branch facilities to ensure it is on-specification before being shipped to this facility.

Once a tank is full the tank is locked out and no more used oil can be placed into the tank. The tank is sampled and the sample sent to an outside laboratory for testing. Oil shipped to Safety-Kleen located in East Chicago, Indiana is only tested for PCB's and Silicone. Oil shipped to ARC Terminals in Mobile, Alabama, is tested for all required parameters identified in 40 CFR 279.11 Table 1 to ensure it is on-specification. Once the analytical results have been received, the oil is loaded onto rail cars and shipped to Safety-Kleen's East Chicago facility or into tanker trucks for transport to burners.

The bulk of processed oil is shipped to a Safety-Kleen processing facility in East Chicago, Indiana. Some on-specification oil is shipped to ARC Terminals in Mobile, Alabama.

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.

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. A used oil filter crusher area was under construction at the time of inspection. The filters will be crushed on site and shipped for metals recovery. The November 14, 2014, permit modification allowed on increase in used oil filter processing from 96,000 gallons per year to 3 million gallons per year.

In the Control Room, electronic controls are used to monitor the volume of used oil in the tanks and the dehydration process removing water from used oil. Dehydration of used oil is done each

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Monday, Tuesday, and Wednesday.

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. Four 55-gallon drums were found in the warehouse for oily wastes generated by cleaning the dehydrator.

Solid waste generated by on-site cleaning of equipment, railcars, tankers, and trucks are taken to the materials processing facility solidification area to be solidified. The Solid Waste Processing Area (solidification area) consists of a covered concrete pad that slopes towards the rear of the pad. S-K Ocala tests the solid waste every three months to verify the non-hazardous waste profile has not changed.

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.

Adjacent to the materials processing facility was a roll-off container for scrap metal for recycling and a roll-off container for mixed solid waste. No issues were found with either container.

#### 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. Daily inspections are done Monday through Friday. Daily inspection logs for 4/28/2014, 4/29/2014, and 4/30/2014 were incomplete. Only the first page of the two page form had been completed. Mr. Robinson was informed of the issue.

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

A review of used oil and antifreeze shipping papers received from S-K Branch locations found the original generators of the waste is documented in the records.

Review of outbound shipments of oil found shipments to: DuPont Chemical, Lawtey, Florida 32058; Vertex Refining, Marrero, LA 70072; Vertex Energy, Marrero, LA 70072; ARC Terminals, Mobile, AL 36602; and Safety-Kleen Systems, East Chicago, IN 46312.

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.

#### Conclusion:

Safety-Kleen Systems, Inc. was inspected as a Permitted Used Oil Processor, used oil transporter, and a conditionally exempt small quantity generator of hazardous waste. During the inspection it was noted that, at least, three daily inspection logs were incomplete; however, no violations were cited as a result of this 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.

John E. White

**PRINCIPAL INSPECTOR NAME**

Inspector

**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.