



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 06/15/2016

On-Site Inspection End Date: 06/15/2016

ME ID#: 1538

EPA ID#: FLR000060301

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

Contact Mailing Address: 359 Cypress Road, Ocala, FL 34472

County Name: MARION

Contact Phone: (617) 721-7315

NOTIFIED AS:

Used Oil Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: 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 June 15, 2016 John White, Florida Department of Environmental Protection (FDEP), inspected Safety-Kleen Systems, Inc. (Safety-Kleen Ocala), for compliance with state and federal hazardous waste and used oil regulations. Safety-Kleen Ocala, located at 359 Cypress Road, Ocala, Florida, was represented by Darwin Robinson, Oil Terminal Manager. The facility was inspected as a permitted used oil processor, permitted solid waste management facility, used oil transporter, and a conditionally exempt small quantity generator of hazardous waste.

Safety-Kleen Ocala was formerly known as Atlantic Industrial Services. The facility is operating on land owned by Safety-Kleen Systems, Inc. and began operations in 2000. The facility is a used oil and material processing facility authorized under FDEP Operating Permit 161967-HO-006, with an expiration date of April 22, 2017. The facility is authorized to process used oil and non-hazardous, non-biological industrial wastewater. However, the facility is not currently accepting industrial wastewater. A permit modification to increase used oil filter processing from 96,000 gallons per year per year to 3 million gallons per year was issued November 14, 2014. Safety-Kleen Ocala, which employs twelve people, operates Monday through Friday 8:00 AM to 5:00 PM and is closed on Saturday and Sunday.

INSPECTION HISTORY (Past 5 Years)

On September 4, 2014, the Department inspected Safety-Kleen Ocala as a used oil processor and conditionally exempt small quantity generator of hazardous waste. No violations were cited as a result of this inspection.

On April 1, 2013, the Department inspected Safety-Kleen 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.

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Process Description:

Safety-Kleen 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 facility maintains fifty-six above ground storage tanks ranging in size from 100 to 159,000-gallons. All tanks are staged in secondary containment units. The tanks are specifically identified in Attachment B to the permit. Twenty-four of these tanks are 30,000-gallon used oil tanks located in the main and south tank farm containment areas. One 159,000-gallon used oil tank is located in the southeast containment area. Eighteen tanks, ranging in size from 110-gallons to 13,000-gallons are located in the warehouse. These tanks consist of fuel oil tanks and processing, low flash solvent/oil recovery tanks. One 20,000-gallon spent antifreeze tank is located in the north tank farm containment area and five 20,000-gallon industrial wastewater tanks are located in the south tank farm containment area. Two tanks are designated for stormwater. One 9,400-gallon tank is located in the north tank farm containment area and one 14,100-gallon tank is located in the south tank farm containment area. Tank number 53 is currently out of service and will be removed. Ten tanks have been drained and will be converted to use as new oil storage tanks. There were no visible signs of releases in the containment areas. Safety and spill control equipment was staged adjacent to the main tank containment area [Figures 3-4].

No industrial waste water processing is done on site. Currently, processing of used oil on site consists of dehydration, which can generate waste water. Used oil received on site comes only from Safety-Kleen Branch facilities in Florida. Oil arrives on site by tanker truck, the facility is not currently receiving used oil by rail car. 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. Used oil is currently shipped only to Safety-Kleen's Indiana facility located at 601 Riley Road, East Chicago, Indiana.

While the facility does not currently receive used oil by rail car, a transfer area is located on the north side of the property. Used oil can be transferred from rail cars to storage tanks. The transfer area has been provided with secondary containment to prevent releases to the environment. The area is to be modified with pumps for off-loading new oil for sale to customers.

The warehouse/drum storage and filter processing area is situated within the enclosed building. The area is constructed on an 8-inch reinforced, sealed concrete slab that occupies approximately 13,000 square feet. The used oil filter crusher area is operational. Filters are crushed on site and shipped for metals recovery. Used oil filters come into the facility and the contents of the drums are verified. The oil filters are placed in a hopper for processing. A conveyor moves the filters to a crusher that forms the oil filters into sixty-pound blocks. The blocks accumulate in a roll-off container for shipment off-site. Oil generated by the compactor accumulates in a hopper and is transferred to tank number 12 for storage. The facility was asked to label the tank carrying the used oil to the tank with the words "Used Oil." 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. This area was not operating at the time of this inspection. The floor was being resealed.

Solid waste generated by on-site cleaning of equipment, tankers, and trucks is taken to the materials processing facility solidification area to be solidified [Figure 1]. The Solid Waste Processing Area (solidification area) consists of a covered concrete pad that slopes towards the rear of the pad. 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 left side of the pad contained oily water generated by the discharge of used oil from the oil filter roll-off container. An earthen berm has been created to prevent rainwater from entering the unit. The facility processes approximately 800 pounds of solid waste per week. The Safety-Kleen branch that shipped the waste to this facility maintains the waste profile and waste analysis results.

Adjacent to the materials processing facility were three roll-off containers [Figure2]. One contained scrap metal for recycling and the other two contained mixed solid waste. No issues were found with either container.

An on-site laboratory is only used for testing percent water in the used oil. A red can labeled "Hazardous Waste" is used to collect the used oil after testing. The red can will be removed. The used oil is returned to the tanks after testing. A flip-top can is used to accumulate oily wipes. The wipes are disposed of as solid

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waste.

Records Review

Tank registrations for all storage tanks on-site are up to date and a copy of the validated registration form was displayed in a prominent place at the facility. Records documenting the facility has met the financial assurance requirements have been provided to the Department and are in compliance.

Daily tank inspection logs and monthly tank farm inspection logs for 2015 and 2016 were reviewed. Daily inspections are done Monday through Friday. Joseph Ventry does the inspections. When Mr. Ventry is unavailable Joe Conley completes the inspections. Daily safety logs for equipment dated 11/26/15 and 11/27/15, a Saturday and Sunday, appear to have been filled in then crossed out. Mr. Robinson was informed of the issue.

Records documenting that personnel received training were reviewed after the inspection and were in compliance. 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 and no issues were noted.

PHOTO ATTACHMENTS:

1. Solid waste management area



2. Roll-off containers for solid waste and scrap metal



3. Location of spill response equipment



4. Spill Kit



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 and was in compliance at the time of this inspection.

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1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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.

John E. White

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION

Darwin Robinson

Representative NAME

Oil Terminal Manager

Representative TITLE

Safety-Kleen Systems

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.

Report Approvers:**Approver:**

Christine Daniel

Inspection Approval Date:

08/29/2016