



**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:** 08/30/2018

**On-Site Inspection End Date:** 08/30/2018

**ME ID#:** 60958

**EPA ID#:** FLD984247882

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

**Contact Mailing Address:** 17121 Kenton Terrace, Lakewood Ranch, FL 34202

**County Name:** Broward

**NOTIFIED AS:**

Used Oil

VSQG

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for Used Oil Marketer facility

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

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Robert Berberena, Environmental Specialist III

**Other Participants:** Justin Stark, Environmental Specialist I; Lebert Halliman, Terminal Operator; Norva Blandin, Environmental Manager

**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:**

On August 30, 2018 a used oil and hazardous waste compliance inspection was conducted at Safety-Kleen Systems Inc. (SKS) on Pompano Beach FL. SKS is an Used Oil Transfer Facility, as well as a VSQG hazardous waste generator. SKS is a railcar terminal to transport used oil to their Florida branch facilities and to their main reprocessing plant in East Chicago Illinois. SKS was represented by Lebert Halliman who is the designated terminal manager. Mr. Halliman is responsible for all paperwork involved in the transfers, as well as, all physical operations performed at the site. During this inspection DEP was represented by the following inspectors; Norva Blandin, Justin Stark, and Robert Berberena.

The facility has been in operation at this location as SKS since December of 2009. Before that, they operated as Atlantic Industrial services, Inc. A few years ago they merged with Clean Harbors, as the matrix but they keep operating as Safety Kleen Systems. Currently SKS has seven (7) employees at the facility. Clean Harbors owns the property on this industrial zone that encompasses 2.55 acres and is connected to city water and sewer.

**Notification History:**

SKS's last notification was on March 1st 2018. SKS is currently registered under the State of Florida and their registration expires on June 30th, 2019.

**Inspection History:**

The last time that a routine inspection was conducted at SKS was on October 10th, 2013. A potential violation

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to 279.22 was observed, but they corrected the potential violation during the inspection and hence they technically returned to compliance the same day. No other inspection took place during the past five calendar years.

The facility required to the inspectors to use personal protective equipment (PPE) including hard hat, ANSI approved work shoes, safety glasses during the inspection.

### **Process Description:**

The inspectors toured the facility accompanied by Mr. Lebert Hailman, the facility's manager.

At the moment of the inspection there were no hazardous wastes, oily rags, used oil filters, used antifreeze, or any universal wastes containers in accumulation. The inspectors observed two (2) storage tanks with a capacity of 6,000 gallons each, labeled as oily water.

Near to this area, There are two tank 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 their three 10,000 gallon rail cars. SKS has two (2) 2,500 gallon oily water tanks. Also, there is a 400 gallon used oil/oily water collection truck that is based at this Pompano Beach, FL, as well as, a box truck for used oil filters. Inside the rather large building is a small office and the rest of the building is one big open space. It should be noted, that within this area there is a secondary containment that has two vertical 2,500 gallon tanks for oily water. Secondary containment was observed clean and out of debris.

### **Preparedness and Prevention**

SKS has fire extinguishers, and eye wash stations throughout the facility within a reasonable distance of any area where exposure is likely. Spill kits and absorbents were also observed. The fire extinguishers and the sprinkler system are serviced on an annual basis. Updated tags were observed.

### **Record Review:**

#### **Employee Training**

SKS representatives provided certifications of the different training courses such as DOT and Hazwoper. The certificates showed that the last training took place on August 20, 2018. Other training records demonstrated that SKS has been providing training to their technical personnel for the past three years.

#### **SPCC/Contingency Plan**

SKS provided a SPCC for used oil management. The last revision was on 11/10/2017 it has provisions for diverse contingencies and Mr. Haillman showed proof of notification to the local authorities. The CP had provisions for fire and explosions and is adapted to their actual building. The inspectors observed that SKS has a secondary containment if any spill will occur during the loading of the used oil.

#### **Weekly Inspection Log**

Weekly log inspection and daily inspections logs were provided. The last one was dated August 30, 2018. it had information regarding the storage area and check marks accordingly. The rest of the inspection sheets were put in chronological order and had records for the past three years. The aforementioned documentation has been attached.

#### **Used Oil Handlers requirements**

Based on the documentation provided by Mr. Halliman ,below you will see a summary of SKS information regarding their waste management and documentation:

> SKS receives used oil from their customers and bulked. Invoices and manifests were available for review for the last three years.

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> The facility conducted laboratory tests to confirm that the off specs used oil is non hazardous (Rebuttable Presumption) and are tested to the parameters established on the 279, rules. SKS provided documentation regarding their used oil acceptance and delivery records, and receiving log that has been attached to this report. The records demonstrated that SKS complied with and all requirements described in 62.710.901(2),(3).

> The designated facility is Safety Kleen Systems, Inc (IND077042034).

> SKS has Liability Insurance. The insurance is primary and SKS shall not be liable for amounts of \$5,000,000. The coverage was provided under policy number ISAH2509718A. The expiration day was set for November 1st, 2018.

> SKS's also has the required DOT certification, under USDOT 151288.

> Although they are registered to manage used oil filters, no filters were observed during the inspection.

> After reviewing all documentation, it appears that this facility is not receiving or storing hazardous wastes.

## PHOTO ATTACHMENTS:

SKS Photo2



SKS Photo1



SKS 3



SKS 4



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SKS 5



SKS 6



**Conclusion:**

An exit interview took place at the conclusion of the inspection. After making a walk-through the facility and reviewing the required documentation it appeared that SKS was in compliance, at the moment of the 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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
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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**2.0 - VSQG 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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <ul style="list-style-type: none"> <li><input type="checkbox"/> Is it excluded under 261.4?</li> <li><input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261?</li> <li><input type="checkbox"/> Has the waste been analyzed?</li> <li><input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?</li> </ul>	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <ul style="list-style-type: none"> <li><input type="checkbox"/> Name and address of the generator and TSD/authorized facility.</li> <li><input type="checkbox"/> Type and amount of hazardous waste delivered.</li> <li><input type="checkbox"/> Date of shipment</li> </ul>	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✓		

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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.

Robert Berberena

Environmental Specialist III

**Principal Inspector Name****Principal Inspector Title**

DEP

11/08/2018

**Principal Inspector Signature****Organization****Date**

Justin Stark

Environmental Specialist I

**Inspector Name****Inspector Title**

DEP

**Organization**

Lebert Halliman

Terminal Operator

**Representative Name****Representative Title**

Safety-Kleen Systems Inc.

**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.

Norva Blandin

Environmental Manager

**Supervisor Name****Supervisor Title**

DEP

**Organization****Report Approvers:****Approver:**

Norva Blandin

**Inspection Approval Date:**

11/08/2018