



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
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ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

July 23, 2019

Wanda Hutchinson, Manager Oil Terminal
Safety-Kleen Systems
359 Cypress Road
Ocala, Florida 34472
wanda.hutchinson@safety-kleen.com

Re: Safety-Kleen Systems
HW Facility ID # FLR000060301
Marion County

Dear Ms. Hutchinson:

Department personnel conducted an inspection of the above-referenced facility on May 7, 2019. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact John White at 407-897-4305 or via e-mail at John.White@Floridadep.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel K. Hall".

Daniel K. Hall, Manager
Central District
Florida Department of Environmental Protection

Enclosure: 5-7-2019 RCRA Inspection Report



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 05/07/2019

On-Site Inspection End Date: 05/07/2019

ME ID#: 1538

EPA ID#: FLR000060301

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

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

County Name: Marion

NOTIFIED AS:

Used Oil

VSQG

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Mackenzie Black, Inspector; Wanda Hutchinson, Manager Oil Terminal; Joe Ventry, Operations Manager

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

NAIC 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On May 7, 2019, John White and Mackenzie Black, 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 Wanda Hutchinson, Oil Terminal Manager, and Joe Ventry, Operations Manager. The facility was inspected as a permitted used oil processor, used oil transporter, and a very small quantity generator of hazardous waste.

Safety-Kleen Ocala operates 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 Permits 161967-010-HO and 161967-011-SO, issued May 3, 2017. The facility is authorized to process used oil and nonhazardous, non-biological industrial wastewater.

Safety-Kleen Ocala employs eleven people and operates Monday through Friday 6:00 AM to 5:30 PM. The facility is closed on Saturday and Sunday.

INSPECTION HISTORY (Past 5 Years)

Safety-Kleen Ocala was last inspected on May 12, 2017, as a used oil processor and conditionally exempt small quantity generator of hazardous waste. The facility was in compliance at the time of the inspection.

On June 15, 2016, the Department inspected Safety-Kleen Ocala as a used oil processor and conditionally exempt small quantity generator of hazardous waste. The facility was in compliance at the time of the inspection.

On September 4, 2014, the Department inspected Safety-Kleen Ocala as a used oil processor and conditionally exempt small quantity generator of hazardous waste. The facility was in compliance at the time of the inspection.

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Process Description:

Safety-Kleen Ocala consists of a main building, containing offices and laboratories, a tank farm, and a building that contains the used oil processing area, control room, and used oil filter processing area. The facility maintains fifty-five (55) above ground storage tanks ranging in size from 110 to 159,000-gallons. All tanks are staged in secondary containment units. The tanks are specifically identified in Attachment B to the permit.

The used oil filter processing area is located within the southern half of the warehouse. Used oil, used oil filters, and used absorbent containers are stored in this section of the warehouse. The used oil filter processing operation consists of a used oil filter receiving pit, conveyor, and storing/crushing unit (Figure 1). Under normal conditions used oil filters are processed in the crusher. The metal filters accumulate in a roll-off container stored within the warehouse (Figure 2). Used oil is directed into the storage tanks and the plastic and soft filter waste is transferred to the solid waste processing/solidification area. The filter crusher was not operational at the time of this inspection. Used oil filters were being diverted directly to the solid waste processing area until the equipment could be repaired and returned to service.

The northern half of the warehouse is used as a distribution center. Products for sale are stored in bulk in the former processing plant area (Figure 3). No wastes are stored in this area.

The solid waste processing area is located on the west side of the property. Solid waste received from off-site sources and solid waste generated by on-site cleaning of equipment, tankers, and trucks is taken to the materials processing facility solidification area to be solidified by mixing with lime dust. The Solid Waste Processing Area (solidification area) consists of a covered concrete pad that slopes towards the east wall. The materials processing facility is authorized under Solid Waste Permit No. 161967-011-SO to consolidate and process non-hazardous petroleum-contaminated solid wastes and other solid wastes not constituting used oil subject to permit conditions. The resultant non-hazardous mixture is shipped to an off-site solid waste landfill.

Adjacent to the materials processing facility were three roll-off containers. One contained scrap metal for recycling and the other two contained mixed solid waste. The mixed solid waste containers were labeled "Processed Solid Waste" as required by the permit. All of the containers were covered with tarps.

Inspection of the storage tanks found the secondary containment area to be free of standing water and in good condition. No visible releases of oil were observed either in, or around, the tanks.

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.

Review of weekly tank visual inspection logs, warehouse/safety and emergency equipment, daily inspection logs, and non-hazardous weekly inspection records found no issues.

Review of used oil and industrial wastewater receiving logs noted the facility only receives waste from Safety-Kleen Florida Branch locations; Sanford, Tallahassee, and Orange Park, Florida. It was noted that non-hazardous sludges received are profiled at the Safety-Kleen Branch location(s) prior to shipment to the Ocala facility.

Outgoing shipments of oil are transported by Florida Central Railroad Co., EPA identification number FLD984227462, to destination facilities that include Safety-Kleen Systems, East Chicago, Indiana, and Vertex Oil Swap, Marrero, Louisiana.

Review of the Spill Prevention, Control, and Countermeasure (SPCC) Plan, required due to the volume of oil stored on-site, found one section of the plan, dated February 10, 2017, had been updated with current Emergency Coordinator names and telephone numbers; however, other sections still referenced the old Emergency Coordinator. The SPCC Plan was updated prior to the end of the inspection.

Review of the Contingency Plan stored on-site found the plan, revised May 1, 2012, referenced primary and

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secondary emergency coordinators that no longer worked at the facility [40 CFR 279.52(b)(4)(iv)]. A copy of the current Contingency Plan was located and placed in a location where it could be quickly located prior to the end of the inspection.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 279.52(b)(4), 279.52(b)(4)(iv)

Explanation: The Contingency Plan must be reviewed, and immediately amended, if necessary whenever; the list of emergency coordinators changes.

The Contingency Plan contained references to primary and secondary emergency coordinators that no longer worked at the facility.

Corrective Action: The Contingency Plan was updated prior to the end of the inspection. Safety-Kleen Systems must ensure the Plan is reviewed on a regular basis and updated as necessary.

PHOTO ATTACHMENTS:

1. Oil Filter Processing



2. Crushed Oil Filter Roll-Off



3. Distribution Warehouse



Conclusion:

Safety-Kleen Systems, Inc. was inspected as a permitted used oil processor, used oil transporter, and a very small quantity generator of hazardous waste and was not in compliance at the time of this inspection. The

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facility's SPCC Plan and Contingency Plan were not up to date. Both plans were corrected before the end of the inspection and inspectors were informed the plans would be mailed to local authorities as required. No further action is required in response to 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.

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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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**Principal Inspector Signature**

DEP

Organization

06/26/2019

Date

Mackenzie Black

Inspector Name

Inspector

Inspector Title

FDEP

Organization

Wanda Hutchinson

Representative Name

Manager Oil Terminal

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.

Joe Ventry

Representative Name

Operations 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:**

Daniel K. Hall

Inspection Approval Date:

06/26/2019