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MAR 18 2020

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Mr. Glen Perrigan
Environmental Manager
Waste Compliance Assistance Program
Florida Department of Environmental Protection
2600 Blair Stone Road, MS4560
Tallahassee, Florida 32399-2400

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Safety Kleen Systems, Inc.
EPA ID: FLD982133159

Dear Mr. Perrigan:

On February 12, 2020, the U.S. Environmental Protection Agency, along with the Florida Department of Environmental Protection (FDEP) conducted a CEI at Safety Kleen Systems, Inc., located in Tallahassee, Florida to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report. If you have any questions regarding this matter, please contact William Kappler, of my staff, by phone at (404) 562-8498 or by email at kappler.william@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Alan A. Annicella".

Alan A. Annicella
Chief

Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Enclosure

cc: Ms. Monica Hardin, FDEP (electronic copy)

RCRA Inspection Report

1) Inspector and Author of Report

William Kappler
Physical Scientist
Enforcement Compliance and Assurance Division
Environmental Protection Agency, Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8498

2) Facility Information

Safety Kleen Systems, Inc.
4426 Entrepot Boulevard
Tallahassee, Florida 32310
Leon County

EPA ID No.: FLD982133159

3) Responsible Officials

Mr. Jeff Curtis
Senior Environmental Compliance Manager
Safety Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, Florida 33426
(561) 523-4719

Mr. Thomas Youngman
Branch Manager
Safety Kleen Systems, Inc.
4426 Entrepot Boulevard
Tallahassee, Florida 32310
(850) 567-8762

Inspection Participants

Jeff Curtis, Safety Kleen Systems, Inc.
John Hinsey, Safety Kleen Systems, Inc.
David Harris, Safety Kleen Systems, Inc.
Brenda Parker, Safety Kleen Systems, Inc.
Monica Hardin, Florida Department of Environmental Protection, Northwest District
Letuzia De Oliveira, Florida Department of Environmental Protection, Northwest District
Diego Tolmos, Florida Department of Environmental Protection, Northwest District
William Kappler, Environmental Protection Agency, Region 4

5) **Date and Time of Inspection**

February 13, 2020, at 11:15 a.m. (EST)

6) **Applicable Regulations**

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, [Resource Conservation and Recovery Act Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)], the Florida Hazardous Waste Regulations 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.) [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279], and the Florida Department of Environmental Protection RCRA Permit 009207-HO-010, for the operation of a Hazardous Waste Storage Facility.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) **Purpose of Inspection**

On February 13, 2020, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Florida Department of Environmental Protection (FDEP) conducted an unannounced compliance evaluation inspection (CEI) at Safety Kleen Systems, Inc., (hereinafter, "Safety Kleen" or the "facility") to determine its compliance status with the RCRA and the State of Florida regulations. This was an EPA-lead inspection. Inspectors arrived at Safety Kleen and were greeted by facility representatives. Inspectors were escorted to a conference room for an entrance briefing. Inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit. The entrance briefing included a general facility description, a discussion of the process operations and the locations of the RCRA regulated units, and a discussion of the RCRA records for review. The EPA inspector provided a written list to the facility of the RCRA records needed for review.

Mr. Jeff Curtis and Mr. Thomas Youngman were at offsite locations. Mr Curtis attended the exit briefing by conference call and also attended the record review and provided location of records and record information as needed by conference call.

8) **Facility Description**

Safety Kleen is located at 4426 Entrepot Boulevard, Tallahassee, Leon County, Florida. Safety Kleen has been at this location since 1985, is located on 2.3 acres, employs 14 people, and operates Monday through Friday from 7:00 a.m. to 5:00 p.m. The operations are conducted in one main building divided into several product and waste management storage areas. The City of Tallahassee provides the potable water and domestic waste services. The primary NAICS code for the facility is 502112.

Safety Kleen is RCRA permitted to operate a hazardous waste container storage unit and a hazardous waste tank storage unit. The RCRA permit was issued to Safety Kleen on March 4, 2015, and it expires on March 14, 2020. The facility submitted a RCRA renewal permit application in September 2019.

Safety Kleen's most recent Notification of Regulated Waste Activity (Form 8700-12FL), to FDEP was dated December 14, 2019. Safety Kleen notified as a large quantity generator (LQG) of hazardous waste, an operating commercial treatment, storage or disposal facility, a 10-day hazardous waste transfer facility, a hazardous waste transporter, a used oil handler and transfer facility, a used oil filter transporter and transfer facility and a universal waste lamp and device transporter and transfer facility.

9) **General Process Description**

Safety Kleen is a division of Clean Harbors. Safety Kleen is a distributor of chemical products and equipment. The facility offers four types of services to customers: a parts cleaning service with various capacity part washers containing various chemicals, hazardous and non-hazardous waste container services, a universal waste service, and a used oil service. The facility's operations are conducted in one main building (Warehouse), that receives waste solvents, universal waste, used oil filters, and used oil from its customers in containers. Hazardous waste is managed in a RCRA permitted container storage area and in a designated 10-day container transfer station area. The facility manages hazardous waste in a RCRA permitted aboveground tank. Used oil is managed in two aboveground tanks and used antifreeze is managed in one aboveground tank. Safety Kleen also stores its product 150 premium solvent in one aboveground tank.

Upon pick-up at a generator site, the Safety Kleen driver labels the container(s), records the volume of each container, and prepares the manifest. Containers received at the facility are stored in the 10-day container transfer station area or in the permitted container storage area prior to offsite shipment to a Safety Kleen Systems, Inc. or Clean Harbors destination facility. The facility's hazardous waste tank receives shipments of waste solvent for storage prior to offsite shipment in a tanker truck to a destination facility.

10) **Previous Inspection History**

Safety Kleen was last inspected by the FDEP for compliance with the RCRA and the State of Florida regulations on July 19, 2019. No issues were observed at the time of the inspection.

Safety Kleen was last inspected by the EPA, Region 4 for compliance with the RCRA and the State of Florida regulations on June 7, 2010. No issues were observed at the time of the inspection.

11) **Findings**

The information in this RCRA inspection report is based on the EPA's February 13, 2020, RCRA CEI.

Main Building - Warehouse

Chemical products, aqueous cleaners, lubricants, hydraulic oil and equipment is stored in this area. The Warehouse consists of a receiving and loading area, a 10-day container transfer station area, a hazardous waste permitted container storage area, and a universal waste storage area.

Used oil samples are collected from customers and stored in a secured locker for approximately

90-days or until laboratory analysis detects problems with the used oil sample.

Drum Return and Fill Area

Inspectors did not observe the process operating in this area at the time of inspection. Inspectors observed the drum wash/dumpster unit was closed. Containers of waste solvent are received, off-loaded onto the platform, and processed in the drum washer. The washed containers are filled with new solvent for distribution. The waste solvent is pumped from the wash dumpster, through a hard pipe, to the 15,000-gallon hazardous waste tank located in the tank farm. Inspectors observed one 55-gallon container in this area accumulating waste solids and waste debris generated from the drum wash/dumpster operation. Inspectors observed the 55-gallon container was closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, and marked with waste codes.

10-Day Hazardous Waste Container Transfer Station

This area is located inside the Warehouse and designated with yellow tape on the concrete floor as a 10-day container transfer station area. Inspectors observed a sign on the fence with the words "Transfer Waste Storage Area 10-Day". Inspectors observed six 55-gallon containers on wooden pallets accumulating hazardous waste. Inspectors observed the containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, marked with the dates February 10, 2020, or February 11, 2020, in good condition, and maintained with aisle space. Inspectors observed spill control, personnel protective equipment, and an eye wash and shower station.

Permitted Container Storage Area

This area is identified on the permit site map as FRS 10-day Transfer Waste/Permitted Container Storage Area (Storage Area). This area is located inside the Warehouse. The Storage Area is permitted to hold a maximum of 6,912 gallons of hazardous waste in containers at any one time. Hazardous waste labeled as 10-day transfer facility waste may also be stored within the Storage Area for short periods of time.

Inspectors observed four 55-gallon containers and seven 15-gallon containers accumulating hazardous waste on wooden pallets within the apparent designated area. Some of the containers were stacked two high. The containers were closed, labeled with the words hazardous waste, labeled with an indication of the hazards of the contents, marked with waste codes, and marked with the dates February 4, 2020, February 4, 2020, January 27, 2020, January 31, 2020, February 8, 2020, January 24, 2020, February 11, 2020, February 7, 2020, January 29, 2020, February 5, 2020, and January 31, 2020. The containers were in good condition and maintained with aisle space. Inspectors also observed one 55-gallon container accumulating used oil filters on a wooden pallet. The container was closed and labeled with the words used oil filters. Inspectors observed the coating applied to the floor surface appeared in good condition and cracks or gaps to the floor surface were not observed.

Tank Farm

The Tank Farm is an outdoor complex constructed with a concrete slab, a three to four-foot high concrete wall for secondary containment and enclosed by a rigid canvas liner supported by an internal metal structure. The Tank Farm consists of one 15,000-gallon horizontal hazardous waste tank (Tank) and two 15,000-gallon horizontal used oil tanks. The facility maintains one

outdoor 15,000-gallon double walled tank for storing parts washer solvent product and one outdoor 8,000-gallon double walled tank for storing non-hazardous waste anti-freeze.

The Tank is constructed of steel and supported by two steel mounts positioned on the front and rear of the Tank. The steel mounts are supported by elevated concrete footings above a concrete floor. The Tank is approximately 23 feet and three inches long by 10 feet and three inches in diameter. The Tank stores waste mineral spirits generated by the customer's parts washing operations. Safety Kleen determined the tank operates in heavy liquid service and operates at an average maximum vapor pressure of 0.11 kPa (0.016 psi). Hazardous waste is pumped through a transfer pipe to the Tank from the drum wash/dumpster process area.

The piping from the drum wash/dumpster runs under the platform and leaves the Warehouse on the south side of the return/fill station. Inspectors observed the piping in this area appeared welded with welded connections to the Tank Farm secondary containment system.

Inspectors accessed the Tank Farm and observed one 15,000-gallon Tank. Inspectors observed the piping ran vertical to the top of the tank and connected to the Tank pump and valve system. Inspectors observed the Tank ancillary equipment (couplings, flanges, valves, and pump connections) were identified with numbered tags for Subpart BB requirements. The piping system leaving the Tank was observed inside secondary containment. The Tank is equipped with a top mounted emergency vent and pressure/vacuum vent. Inspectors observed no visible cracks, holes, gaps, or other open spaces with the Tank joints or between the roof edges and the Tank walls. Inspectors observed the Tank was labeled with the words hazardous waste and labeled with an indication of the hazards of the contents (photographs 1, 2, 3, and 4). Inspectors observed the floor surface appeared in good condition and cracks or gaps to the floor surface was not observed. Inspectors observed a sign on the Tank with the words "Dirty Solvent Tank, Max Safe Fill Level 14,250 Gallons".

The Tank is monitored for leaks using an automatic leak detection system. The leak detection system enables the detection of leaks, or releases, using an "Intellipoint" sensor, which is placed beside the Tank at the base of the secondary containment structure, which detects the presence or absence of liquids. The Tank is monitored 24-hours per day, seven days per week, by a third-party monitoring company. If a leak or release is detected the system immediately sends a warning notice to the monitoring company. The monitoring company contacts Safety Kleen's emergency coordinator.

Inspectors observed the two 15,000-gallon horizontal used oil tanks were labeled with the words used oil.

12) Waste Management Practices

Safety Kleen is permitted to store hazardous waste in containers in designated areas of the facility and in a 15,000-gallon horizontal storage tank. Safety Kleen is permitted to store the following hazardous waste listed in the Permit; D001, D004-D011, D018, D019, D021-D030, D032-D043, F001, F002, F003, F004, and F005. The facility stores universal waste and used oil.

The facility prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to an offsite treatment, storage or

disposal facility (TSDF).

Safety Kleen used the following transporters in 2019 and 2020.

Robbie D Wood - ALD067138891

Action Resources - ALR000007237

Safety Kleen Systems, Inc. - TXD000081205

Safety Kleen used the following TSDF in 2019 and 2020.

Clean Harbors Environmental Services - MAD039322250

Safety Kleen Systems, Inc. - SCD077995488

Clean Harbors Deer Park, LLC - TXD055141378

13) Record Review

RCRA Permit and RCRA Permit Application

The documents are maintained at the facility.

Manifests

Inspectors reviewed several hazardous waste manifests for the shipment of hazardous waste from July 2019, to January 2020.

Eight hazardous waste manifests were reviewed using EPA's E-Manifest Record System, for the shipment of hazardous waste from December 19, 2019, to January 16, 2020.

Contingency Plan

Inspectors reviewed the facility's contingency plan (Plan). The Plan's overall revision I was dated November 29, 2019 and specific revisions to the Plan were conducted on January 14, 2020. The Plan lists Thomas Youngman as the primary emergency coordinator and Bobby Mitchell as the alternate emergency coordinator. The contact information was reviewed. The Plan describes the Safety Kleen operations, implementation of the Plan, emergency response procedures, emergency response incidents, an evacuation plan and map, and emergency response authorities. Inspectors reviewed a list describing the location and capabilities of available emergency equipment. The Plan described arrangements with the Tallahassee Memorial Medical Center, the Tallahassee Fire Department, and the Tallahassee Police Department. The Plan include a Quick Reference Guide.

Arrangements with Local Authorities

The arrangements with the local authorities were reviewed. Arrangements were made with the Tallahassee Memorial Medical Center, the Tallahassee Fire Department, and the Tallahassee Police Department on February 12, 2020.

Personnel Training

Inspectors reviewed RCRA annual refresher training given to employees in 2020. The annual RCRA refresher training was given to managers and staff. Mr. Jeff Curtis instructed the RCRA Refresher training given on January 19, 2020. RCRA refresher training records were reviewed for David Harris, Brenda Parks, and Bobby Mitchell. Mr. Thomas Youngman began employment with Safety Kleen in October 2019. Training records documenting job titles and job descriptions were reviewed.

RCRA Permitted Container Inspection Records

Inspections on containers in the RCRA permitted areas are conducted using an electronic device. The completed inspections are downloaded and maintained in a computer system. Inspectors reviewed the inspection records for the RCRA permitted container storage areas for July 31, 2019, and February 12, 2020.

Daily Tank Inspection Records

Inspections on the RCRA permitted tank system are conducted daily using an electronic device. The completed inspections are downloaded and maintained in a computer system. Inspectors reviewed the inspection records for the RCRA permitted tank system for July 31, 2019, and February 12, 2020.

RCRA Tank Assessment for Integrity and Certification

The tank assessment for integrity and certification records are maintained at the facility. Based on the Safety Kleen RCRA operating permit renewal application dated September 2019, an engineering assessment of the tank system was conducted in July 2014.

RCRA Organic Air Emission Records

The leak detection and monitoring program is conducted by the facility. Inspectors reviewed Safety Kleen's leak detection and monitoring program for the RCRA permitted tank. Inspectors reviewed the daily inspection records for the tank system, the secondary containment system, and the Subpart BB inspection records for July 31, 2019, and February 12, 2020. Inspectors reviewed the Piping & Instrumentation Diagram (P & ID) schematic drawings identifying the equipment location and equipment tag numbers for the RCRA permitted tank and its equipment.

Biennial Report

The 2017 biennial report was reviewed. Safety Kleen submitted the report to the FDEP in February 2018.

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

14) Exit-Briefing

Upon conclusion of the inspection, an exit briefing was conducted in the presence of Safety Kleen Systems, Inc., representatives. The facility was informed of the findings at the time of the inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion/Summary of Violations

Based on the CEI conducted on February 13, 2020, Safety Kleen Systems, Inc., was inspected as a large quantity generator of hazardous waste, a permitted commercial storage facility, and a permitted hazardous waste transfer facility.

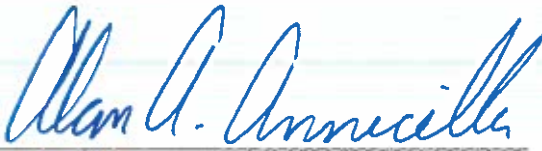
17) **Signed**

for 

William Kappler
Physical Scientist
Enforcement Compliance and Assurance Division

3/18/2020
Date

18) **Concurrence**



Alan A. Annicella
Chief, Land Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

3/18/2020
Date



Safety Kleen Systems, Inc. – Tallahassee FL. RCRA Permitted Tank Farm. Observed two 15,000-gallon used oil tanks and one 15,000-gallon RCRA permitted tank (Tank). The tank farm is constructed with a concrete floor four to five-foot high concrete walls and covered by a rigid canvas material. Photograph 1 taken at 12:22 p.m. WK.



Safety Kleen Systems, Inc. – Tallahassee FL. RCRA Permitted Tank Farm. Inspectors observed one 15,000-gallon Tank marked with the words hazardous waste. Inspectors observed metal numbered tags on each valve, flange, and pipe connection. Photograph 2 taken at 12:22 p.m. WK.



Safety Kleen Systems, Inc. – Tallahassee FL. RCRA Permitted Tank Farm. Inspectors observed one 15,000-gallon Tank marked with the words hazardous waste. Inspectors observed metal numbered tags on each valve, flange, and pipe connection. Photograph 3 taken at 12:22 p.m. WK.



Safety Kleen Systems, Inc. – Tallahassee FL. RCRA Permitted Tank Farm. Inspectors observed one top mounted emergency vent and pressure/vacuum vent on the 15,000-gallon Tank. Photograph 4 taken at 12:22 p.m. WK.



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Region 4
Atlanta Federal Center
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Atlanta, GA 30303-8960

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Mr. Glen Perrigan
Environmental Manager
Waste Compliance Assistance Program
FL Dept of Environmental Protection
2600 Blair Stone Road, MS4560
Tallahassee, Florida 32399-2400



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MAR 18 2020

Mr. Glen Perrigan
Environmental Manager
Waste Compliance Assistance Program
FL Dept of Environmental Protection
2600 Blair Stone Road, MS4560
Tallahassee, Florida 32399-2400

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