



**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:** 05/25/2022 **On-Site Inspection End Date:** 05/25/2022  
**ME ID#:** 11672 **EPA ID#:** FLD984171694  
**Facility Street Address:** 8755 NW 95th St, Medley, Florida 33178-1462  
**Contact Mailing Address:** 5610 Alpha Dr, Boynton Beach, Florida 33426-1462  
**County Name:** Miami-Dade **Contact Phone:** (561) 523-4719

**NOTIFIED AS:**

LQG (>1000 kg/month), TSD Facility, Transfer Facility, Transporter, Used Oil

**WASTE ACTIVITIES:**

**Generator:** LQG **Other Status:** Offsite Waste Received **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Mercury Containing Lamps, Mercury Containing Devices **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

**INSPECTION TYPE:**

Routine Inspection for TSD Facility Facility  
Routine Inspection for Transfer Facility Facility  
Routine Inspection for Hazardous Waste Transporter Facility  
Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Universal Waste Transporter Facility  
Routine Inspection for Used Oil Transfer Facility Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Justin Stark, Inspector  
Tarin Tischler, Environmental Specialist II; Jeff Greg, Environmental Manager; Carrie  
**Other Participants:** Kruchell, Professional Geologist II; Jeff Curtis, EHS Manager

**LATITUDE / LONGITUDE:** Lat 25° 51' 37.5641" / Long 80° 20' 25.4331"

**NAIC:** 562112 - Hazardous Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On May 25, 2022, Justin Stark with the Florida Department of Environmental Protection ("FDEP") conducted a Compliance Evaluation Inspection ("CEI") at Safety Kleen Systems, Inc (hereinafter "SK" or "facility"), located at 8755 NW 95th St, Medley, Florida 33178. SK was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations ("C.F.R.") Parts 260-268, 273, and 279, adopted and incorporated by reference in Rule 62- 710, 62- 730, and Rule 62-737, Florida Administrative Code ("F.A.C.").

The inspector was escorted around the facility by Jeff Curtis, EHS Manager. Upon arrival at the facility the inspector presented their credentials and explained the purpose of the inspection. The inspector was accompanied by Tarin Tischler, Environmental Specialist II with FDEP's Southeast District, and Carrie Kruchell, P.G., Professional Geologist II and Jeff Gregg, Environmental Manager with FDEP's Division of Waste

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### Management.

SK currently operates as an active hazardous waste ("HW") transporter and transfer facility under Permit #56019- 011-HO. The facility also conducts used oil activities. This permit was renewed in September 2017, approved by the Department on May 21, 2018 and expires on March 19, 2023.

The facility is comprised of one 2.3-acre-sized building situated on a 5.5-acre site in an industrial area and is connected to city water and sewer. SK has been operating at this location since 1993 and has 9 employees. The facility is authorized to operate drum and tank storage units within a service accumulation center under the current operating permit.

### Notification History:

Last notification was received by the Department on 02/27/2019. SK is currently registered as the following: Large Quantity Generator (LQG), UW Lamp Transporter, UW Device Transporter, UW Lamp SQH, UW Device SQH, HW Transporter, Transfer facility, and Used Oil (Transfer and Transporter for both used oil and used oil filters). Also, this site is currently permitted as an Operating Commercial TSD (expiring on 05/21/2023).

### Inspection History:

In the last five years, the Department inspected this facility on the following dates:

06/25/2020 - The facility was in-compliance; no issues were described.

06/14/2018 - The facility was in-compliance; no issues were described.

01/31/2017 - The facility was in-compliance; no issues were described.

03/31/2016 - The facility was in-compliance; no issues were described.

PPE was required to enter the facility. Safety boots, safety glasses, a hard hat, a safety vest, and a face mask were used during the inspection.

### Process Description:

Since the last inspection conducted on 06/25/2020, operations at this facility have not significantly changed. All hazardous waste that is received on-site is handled as Transfer facility waste, meaning it does not stay on-site for longer than 10 days.

SK is a permitted facility authorized to operate drum and tank storage units within a service accumulation center. These units include: (1) solvent return and fill station; (2) container and non-container storage; and (3) tank storage. SK is also a registered Small Quantity Handler of Universal Waste. The property is equipped with security fencing and signage.

The perimeter sign required due to the facility's designation as a Treatment, Storage and Disposal was visible from 25 feet and it was in-compliance.

At this location, the facility does not conduct any used oil processing.

### Tank Storage (Picture#1):

The storage tanks are housed under a covered concrete bunker equipped with a sump and high-level alarm. SK utilizes one 20,000-gallon storage tank for the management of waste solvent under their permit as well as one 15,000-gallon tank and one 20,000-gallon tank for used oil. Oily water is stored in the 10,000-gallon tank in this area and one 20,000-gallon tank holds bulk solvent product. All tanks were observed to be closed, in good condition, and properly labeled. The tank area was equipped with secondary containment, fire extinguishers, and a sprinkler system. Additionally, seven containers holding used oil filters were observed, all seven containers were observed to be closed and properly labeled. Outside the south side of the tank storage building is the tanker truck spill containment area. This is where tanker trucks are loaded/unloaded, or tanker-to-tanker transfer occurs. This area is also equipped with a sump. Facility representatives indicated that each tanker is equipped with a TIF and ChlorDetect dextsil kits, and each load is screened for halogens at the pick-up location.

The facility commingles its used oil and spent antifreeze onsite which is later sent to SK in East Chicago, Illinois, for processing. The facility shall ensure a proper waste determination is conducted on all future spent antifreeze loads before its commingled with used oil to ensure potential hazardous waste is not mixed with used oil.

### Solvent Return and Fill Station:

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This area of the facility is a warehouse bay with four roll-up doors; two each on the north and south sides. A central elevated grating is oriented east to west across the bay, and six sets of short stairs lead to the concrete floor below. This grated dock is accessed from the office and leads into the container storage warehouse in the eastern section of the building. The inspector observed two wet dumpsters on this elevated grating, one of which is equipped with a drum wash. Each wet dumpster is hard piped (brown pipe) to the waste solvent tank in the tank storage containment. Containers of spent parts washer solvent are brought in by field representatives and emptied into the wet dumpsters; the used solvent is used here to wash the containers before the waste solvent is pumped to the storage tank. The washed containers are then replenished with fresh 150° F solvent piped from the tank storage area for delivery to customers at scheduled intervals. Hazardous waste sludge is generated in the wet dumpsters from these activities.

Also stored on the elevated grating were drums containing fresh solvent prepared for delivery to customers. The concrete floor slopes toward the center of the bay to a trench sump. According to SK personnel, the trench sump is managed as less-than-24 hour storage and would be immediately pumped out upon any collection. The inspector noted fire extinguishers, a sprinkler system, spill kits, and signage in accessible locations throughout the bay.

The loading dock to the south is used for the mixing of aqueous parts washer detergent for distribution to customers, unloading and loading of containers, the storage of aqueous parts washers, equipment in for repair, and empty parts washer drums.

Inside the warehouse, the inspector observed areas designated for products and another area for hazardous wastes completely separated.

The Department inspector observed the following containers in the area designated for products (Storage Locker):

- > One 30-gallon satellite accumulation drum for spent aerosol cans. The container was observed open.
- > One 15-gallon satellite accumulation drum for spent aerosol cans. The container was observed open and was not properly labeled.

The facility shall ensure satellite accumulation drums are properly closed and labeled as described in 40 CFR 262.15(4) - (5).

The Department inspector observed the following containers in its 10-day area(Picture#2):

- > Six 55-gallon drums holding spent gasoline and diesel.
- > Four 55-gallon drums holding spent flammable liquids.
- > One 5-gallon drum holding waste paint.
- > Six 55-gallon drums holding absorbent contaminated with oil.

All drums were observed to be closed, properly labeled, placed over the secondary containment, and in-compliance with the 10-day storage limit.

The Department inspector did not observe any releases of contaminants into the environment or any spills during the inspection.

The following preparedness and prevention measures were observed throughout the facility: spill kits, eye wash/shower areas, fire extinguishers, internal communication system, and fire prevention methods.

### Records Review:

> Acceptance and delivery records for used oil activities (used oil, used oil filters, oily rags, oily water): Based on the file review, the inspectors observed that SK does not have a secondary transporter. SK is the only transporter for their used oil activities and did not offer their used oil to an used oil burner. No used oil processing activities are conducted in this location. Records were kept on-site and also electronically. Regular halogen screening is conducted by SK and confirmed on their manifests/bill of lading. Specifically, Chlor D Teck and Halogen Sniffer tools are used by their drivers. The designated facility for all used oil is their SK location in Pompano Beach (FLD984247882) and is then sent via rail cars to Chicago. SK facility operation logs (for used oil <35 days) were reviewed and no exceedances were observed.

> Hazardous waste manifests: SK maintains all records for at least three years in hard copies and electronically.

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The inspector was able to verify if SK was in-compliance with all requirements pertaining to manifests and record keeping. Records demonstrated that SK is conducting waste analysis for their customers and all wastes are appropriately described in their contracts. The Waste Analysis Plan (for the last three years) was submitted for review. No rejected waste manifests or manifest discrepancy reports have been filed during this period of time.

> SK facility operation logs (for the 10-day limit): Inbound and Outbound logs were reviewed. No discrepancies or exceedances were observed during the inspection of the logs.

> Weekly inspection logs for hazardous waste containers: (prior to inspection, last weekly inspection was conducted on 05/24/2022). Daily inspection logs for tanks, containers, and/or secondary containment were reviewed as well. Three years of records were available for review.

> Full Contingency Plan and SPCC Plan were submitted for review (last revision 04/15/2020) and included their proof of notification to the local authorities.

> Employee Training Plan: All employees receive initial and annual hazardous waste and used oil training which includes training concerning the facility's proper hazardous waste and used oil handling, storage, and spill cleanup procedures. The facility maintains and has records for Used Oil Transporter certification for their employees and for the hazardous waste transporter training (RCRA). Records for the last three years were available for inspection.

> Permits and registrations were on site and displayed in a visible area.

> Closure Plan and Closure Cost estimates (last submitted on 01/15/2022): Records of the facility's yearly financial reports (specifically its Used Oil Processing Facility Closing Cost Estimate Forms) from the last three years were also available for review.

> Liability insurance policies: Policy #PEC004203906 held by Indian Harbor Insurance Company in the amount of \$2,000,000 expires on November 1, 2020 (11/01/2020).

> Biennial Report ("BR") was last submitted on February 14, 2020 (02/14/2020) with all required elements. However, a BR was not submitted for the 2021 year. An email was sent on 07/18/2022 acquiring about the BR. It's possible the facility did not generate LQG amounts for the 2021 year. Therefore, is not required to submit a BR.

> Annual Report for Used Oil and Used Oil Filter Activities - Annual Report for used oil (last submitted on February 2022) for the last three years were reviewed. Based on the last submitted annual report, SK managed approximately 1,007,507 gallons of used oil and oily wastes, and collected 147,138 used oil filters.

All documentation required by the Department inspector appeared in order and in-compliance with the RCRA regulations and Permit conditions issued by the Department.

### New Potential Violations and Areas of Concern:

#### Violations

Type:	Violation
Rule:	262.15(a)(4) , 62-730.160(1)
Explanation:	Per 40 CFR 262.15(a)(4), a container holding hazardous waste must be closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

During the inspection, the following SAA were observed open:

- > One 30-gallon drum holding aerosol cans.
- > One 15-gallon drum holding aerosol cans.

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Corrective Action: Corrected onsite during the inspection.

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Type: Violation

Rule: 262.15(a)(5) , 62-730.160(1)

Explanation: Per 40 CFR 262.15(a)(5), a generator must mark or label its container with the words "Hazardous Waste" and an indication of the hazards of the contents.

During the inspection, the following SAA was observed not properly labeled:

> One 15-gallon drum holding aerosol cans.

Corrective Action: Corrected onsite during the inspection.

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## PHOTO ATTACHMENTS:

Picture#1



Picture#2

## Conclusion:

SK was inspected as a Commercial Operating TSD facility of hazardous waste, Used Oil Transporter/Transfer facility, and SQH of UW and was found to be out of compliance for failure to keep satellite accumulation containers closed and not properly labeled, this was corrected onsite. Therefore, the facility has returned to compliance.

The facility shall ensure a proper waste determination is conducted on all future spent antifreeze loads before its commingled with used oil to ensure potential hazardous waste is not mixed with used oil.

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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

Justin Stark	Environmental Specialist III	
<b>Principal Investigator Name</b>	<b>Principal Investigator Title</b>	
	FDEP	07/22/2022
<b>Principal Investigator Signature</b>	<b>Organization</b>	<b>Date</b>
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Tarin Tischler	Environmental Specialist II	
<b>Inspector Name</b>	<b>Inspector Title</b>	
	FDEP	
	<b>Organization</b>	
<hr/>		
Jeff Greg	Environmental Manager	
<b>Inspector Name</b>	<b>Inspector Title</b>	
	FDEP	
	<b>Organization</b>	
<hr/>		
Carrie Kruchell	Professional Geologist II	
<b>Inspector Name</b>	<b>Inspector Title</b>	
	FDEP	
	<b>Organization</b>	
<hr/>		
Jeff Curtis	EHS Manager	
<b>Representative Name</b>	<b>Representative Title</b>	
	Safety-Kleen Systems Inc	
	<b>Organization</b>	

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:**

<b>Approver:</b>	<u>Alannah B Irwin</u>	<b>Inspection Approval Date:</b>	<u>07/22/2022</u>
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