



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 05/26/2023

On-Site Inspection End Date: 05/30/2023

ME ID#: 1792

EPA ID#: FLD980847271

Facility Street Address: 5309 24th Ave S, Tampa, Florida 33619-5368

Contact Mailing Address: 5309 24th Ave S, Tampa, Florida 33619-5368

County Name: Hillsborough

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, Operating Commercial TSD **Used Oil:** On-Spec, Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices

INSPECTION TYPE:

Routine Inspection for LQG (>1000 kg/month) Facility
Routine Inspection for Used Oil Transfer Facility Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Hazardous Waste Transfer Facility Facility
Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector

Other Participants: Coral Evans, Environmental Specialist II, Jamie Stanley, Branch Manager, Jose Reyes, Service Delivery Manager, Michelle Musgrave, Lead Branch Administrator

LATITUDE / LONGITUDE: Lat 27° 55' 33.9629" / Long 82° 23' 39.6154"

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

Safety-Kleen Systems, Inc. (Safety-Kleen Tampa), was inspected by the Florida Department of Environmental Protection (Department) on May 31, 2023, to determine the facility's compliance with state and federal regulations for large quantity generators ("LQG") of hazardous waste; hazardous waste and used oil transporters, and hazardous waste transfer facilities. The facility most recently updated their notification on March 1, 2023. Safety-Kleen Tampa has been inspected numerous times, most recently on March 8, 2022. Inspectors were assisted by Jose Reyes, Service Delivery Manager; Michelle Musgrave, Lead Branch Administrator; and Jamie Stanley, Branch Manager, during the inspection.

PERMITS AND REGISTRATIONS

- Hazardous Waste Storage and Recycling Facility Permit: Permit number 34744-010-HO, which was issued on August 18, 2021, and expires on November 23, 2026.
- Hazardous Waste Transporter Registration: the current registration was issued on March 4, 2022, and expires on June 30, 2023. The next year's annual registration was issued on March 13, 2023, and expires on June 30, 2024.
- Used Oil Transporter Registration: the current registration was issued on February 8, 2022, and expires on June 30, 2023. The next year's annual registration was issued on March 9, 2023, and expires on June 30, 2024.

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Process Description:

Safety-Kleen Tampa is a hazardous waste and used oil transporter, and hazardous waste transfer facility. The facility operates from 7:00 a.m. to 5:00 p.m., Monday through Friday. The facility currently employs twenty-one people including two that manage the warehouse and tank farm operations and thirteen drivers which operate the facilities vehicles and handle used oil, non-hazardous and hazardous waste transfers, and transportation. The facility is on City of Tampa water and sewer.

Safety-Kleen operates a hazardous waste transfer facility at this location that receives waste from its customers for consolidation and shipment to other facilities. All hazardous waste received or generated at the facility is stored in containers or tanks.

In addition, Safety-Kleen Tampa collects used oil and used oil filters, spent mercury-containing lamps, and spent antifreeze (ethylene glycol) from its customers. According to Jose Reyes, a halogen meter is used by the drivers to test used oil collected from their customers prior to pick-up. Seventy-five to eighty percent of Safety-Kleen Tampa's used oil customers are automotive repair facilities, the remainder are manufacturing accounts.

Five used oil pump trucks, one vacuum truck and six box trucks work out of this location. Used oil picked up in Safety-Kleen Tampa's used oil pump trucks is typically transported directly to the CSX yard in Tampa where the used oil is loaded on to railcars for shipment to an out-of-state Safety-Kleen facility for re-refining. If needed, used oil can be off-loaded into the used oil aboveground storage tank (AST) at the facility.

In addition to this location, the facility has an annex located in Port Charlotte, Charlotte County, Florida, for the past twenty years. One box truck and one used oil pump truck, along with two of the facility's drivers, operate out of the Port Charlotte facility. Waste is not stored at the Port Charlotte location, only the empty trucks following delivery of the waste to either the Tampa facility (typically just the box truck) or directly to the CSX Tampa rail yard (used pump oil truck).

Spill response equipment is staged throughout the facility. Eyewash and shower stations were operational. Fire extinguishers were charged and are pressure tested annually. Additionally, the facility staff visually checks the fire extinguishers and safety equipment monthly. The facility utilizes two forklifts which are powered by propane. A third party, Toyota Forklift, maintains the forklifts.

Other than material handling, the major process taking place at the facility is drum cleaning. The facility has not changed operations since the previous inspection.

NORTH STORAGE BUILDING (NON-FLAMMABLE STORAGE AREA):

The Non-Flammable Storage Area, located on the west wall, is being used for empty drum inventory (both metal and polypropylene). A caged area for the storage of re-refined motor and hydraulic oil is located on the east wall of the building. This oil is sold in quart size containers, 5-gallon buckets, and 55-gallon drums.

Samples from each truck load of used oil brought to the facility are retained for 90 days in several closed cabinets in this area. At the end of the 90 days, these sample containers are placed into a 55-gallon metal drum. This drum is labeled "Used Oil Retain Sample Jars Only" on the hinged lid; there is also a "Hazardous Waste" label on the side of the drum which identifies the contents as "Combustible Liquid," however, a label with an indication of the hazard was not present. A "Flammable" label was affixed to this drum during the inspection. When full, this drum is moved to the South Building and is disposed of as hazardous waste. Please note: if the facility chooses, the sample jars that have met retention can be emptied into the satellite accumulation drum and this drum can be emptied as needed and the used oil routed to the Used Oil aboveground storage tank (AST) located in the Tank Farm for recycling.

The facility also sells and leases out various parts washer machines to its customers and provides servicing of these machines. Core business lines include parts washers, immersion cleaners and paint gun cleaners, as well

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as aqueous cleaners (brake and parts cleaners). These products are all stored within the incoming storage area.

Two 6-yard containers containing aqueous parts washer waste (from the soap and water machines) are located in the North Building (these were previously located in the Return/Fill Station Area). Containers of aqueous parts washer waste are transferred to the 6-yard containers and aqueous parts washer waste is pumped into one of Safety-Kleen Tampa's two vacuum trucks as needed (approximately every other day) and transported to Clarke Environmental or Aqua Clean for processing. Safety-Kleen Tampa conducts periodic testing of their aqueous parts washer waste stream to verify that this waste stream is non-hazardous.

RETURN AND FILL STATION AREA:

Located between the North and South buildings, the Return and Fill Area is where the drivers of the service (box) trucks pick up the clean solvents in the morning for delivery to customers and drop off spent solvent picked up from the customers at the end of the day. Warehouse staff off-load the box trucks and move waste containers (other than spent parts washer fluids) into the warehouse for storage.

Spent parts washer solvent from drums is deposited into one of the two metal spent parts washer vats. A third vat is present but unusable. The spent parts washer vats are approximately 540 gallons in size (6 foot by 3 foot by 4 foot) and are plumbed with fixed metal piping to the Dirty Parts Washer Solvent AST. Solid waste generated from the dumping and washing of spent parts washer solvent drums is placed into a satellite container; liquid waste is routed through the spent parts washer vats to the Dirty Parts Washer Solvent AST in the Tank Farm.

At the time of the inspection, located in this area were:

- One 35-gallon drum of flammable solids; this container was labeled with both a hazardous waste label and a flammable label.
- One 55-gallon drum of flammable liquids; this container was labeled with both a hazardous waste label and a flammable label.
- Ten 275-gallon totes for used antifreeze; all were empty at the time of the inspection.
- Ten metal bins for used oil filters; two contained filters and the other eight were empty at the time of the inspection; the bins were labeled "Used Oil Filters."

Both hazardous waste containers were properly closed. No container leaks or spills were observed.

The secondary containment on both sides of the Return and Fill Area loading dock appeared to be clean, dry, and intact. The used oil bins and antifreeze totes were all staged within the containment at the time of the inspection.

As Safety-Kleen no longer offers the Continued Use Program (CUP), the CUP vat (the same size as the spent parts washer vats) has been placed out of service and is closed and locked. Safety-Kleen has no current plans to re-offer this service.

SOUTH STORAGE BUILDING - NON-FLAMMABLE TRANSFER WASTE STORAGE AREA AND PARTS WASHER MAINTENANCE AREA

The Non-Flammable Terminated and Transfer Waste Storage Area, located on the north side of the south storage building, is used to house non-hazardous waste and waste from Clean Harbors. While Clean Harbors waste is managed by Safety-Kleen Tampa as their own waste, it is kept separate for storage purposes.

At the time of the inspection, the waste present included:

- Row 1: Parts Washer Maintenance Area contained parts washers brought back from customers that require maintenance or are no longer needed by the customer.
- Row 2: Two drums of non-hazardous waste, eighteen 55-gallon drums of aqueous parts washer fluid; one empty used oil filter bin, two empty used oil tanks; and one 35-gallon drum of hazardous waste that arrived at the facility on May 26, 2023.
- Row 3: Eighteen metal and polypropylene 55-gallon drums of aqueous parts washer fluid.
- Row 4: Nine 55-gallon drums of non-hazardous waste; sixteen drums of used oil filters; eight drums of

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aqueous parts washer fluid, and three totes of aqueous parts washer fluid.

- Row 5: Sixty-four 55-gallon drums of used oil filters.
- Row 6: Fifty-four drums of used oil filters, one 5-gallon bucket of non-hazardous waste; and one 15-gallon drum of waste paint that had been delivered the night before and will be moved to the Flammable Storage Area by the end of the workday.

The used oil filters are sent for processing at Oil Filter Recovery (OFR) in Ocala, Florida.

At the time of the inspection, Clean Harbors waste was segregated at the south end of the building and the following wastes were present: four CleanEarth Lab-Pak cubic yard boxes and two polypropylene containers all containing non-hazardous expired medication.

As needed, outgoing waste from the Non-flammable and Flammable storage areas are staged adjacent to the garage door on the east side of the building prior to being moved onto trucks for transportation.

All containers were labeled as required; all hazardous waste had been on site for less than 10 days. No container leaks or spills were observed. The maximum storage volume of 41,220 gallons (equivalent to seven hundred and fifty 55-gallon drums) for this area was not exceeded. The proper aisle space between rows containing waste containers was being maintained. No container leaks or spills were observed. Secondary containment trenches were all clean and dry.

SOUTH STORAGE BUILDING - FLAMMABLE TRANSFER WASTE STRAGE AREA:

Flammable materials are stored in a separate room in the southern storage building. This area includes both waste and new product storage. New products were stored against the north and south sides of the room, waste containers are housed in the center of the building. All transfer waste containers in this area were in storage for less than 10 days.

At the time of the inspection, the following containers were located in the flammables room:

- Row 1: This row is used to store flammable products.
- Row 2: This row is used to store flammable products.
- Row 3: Three 55-gallon metal drums of flammable liquid waste; four metal drums of non-hazardous waste; one 55-gallon metal drum of non-hazardous waste; seven 55-gallon polypropylene drums of non-hazardous absorbent; three 55-gallon polypropylene drums of non-hazardous; one 55-gallon metal drum of flammable solids; two 30-gallon drums of flammable liquid waste; one 30-gallon drum of flammable liquids; and one 30-gallon drum of non-hazardous waste.
- Row 4: Nine 55-gallon metal drums of flammable liquid and four 55-gallon drums of non-hazardous waste. Flammable Clean Harbors waste was also stored in Row: three 55-gallon polypropylene drums of flammable liquid waste; one 30-gallon drum of flammable liquid waste; one sixteen-gallon container of toxic waste and one small box of flammable gas.
- Row 5: This row contained Clean Harbors waste: five CleanEarth Lab-Pak cubic yard boxes of flammable gases; three metal buckets of flammable gas; one small box (5 gallons) of flammable gases and one pallet containing non-hazardous waste.
- Row 6: Container packing materials

All containers were labeled as required; all hazardous waste had been on site for less than 10 days. No container leaks or spills were observed. The maximum storage volume of 12,749 gallons (equivalent to two hundred and thirty-two 55-gallon drums) for this area was not exceeded. The proper aisle space between rows containing waste containers was being maintained. No container leaks or spills were observed. Secondary containment trenches were all clean and dry.

TANK FARM

There are three 14,250-gallon ASTs located within the tank farm area: A Clean 150 Mineral Spirits AST, a Used Oil AST, and a Dirty Parts Washer Solvent (hazardous waste) AST. The contents of the spent vat in the Return and Fill Area is pumped to the facility's Dirty Parts Washer Solvent AST. If needed the on-site Used Oil AST is

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used for temporary storage of used oil. All three tanks appear to be in good working condition and were properly labeled. The tank farm is enclosed to minimize rainwater in the secondary containment area. The secondary containment area was void of any liquid. There is an alarm sensor within the secondary containment area for alerting personnel if liquid is accumulating in the tank farm containment; the sensor is tested annually. The Mineral Spirits AST and the Used Oil AST are also regulated by the Storage Tank Program and are registered under Facility ID #9300101. The last Storage Tank inspection was conducted by the Hillsborough County Environmental Protection Commission (EPC) Storage Tank Program on April 12, 2023, and was found to be in compliance with the Aboveground Storage Tanks regulations.

RECORDS

Records reviewed during the inspection included:

- Manifests: A random sample of inbound and outbound manifests were reviewed. All records reviewed were properly completed and readily available. Chris Abel of SK is signing the used oil shipping records on behalf of CSX. Documentation from CSX stating that Mr. Abel is authorized to sign on their behalf has been submitted to the Department.
- Daily Inspection Logs: In accordance with the facility's permit, facility inspections are conducted and logged daily, except for nonoperating days such as weekends and national holidays. Records included daily inspections of the Storage Tank System/Containment Area (Tank Dike), Container Storage Areas, Container Storage Areas Totals, Inspection of Continued Use, Forklift and Powered Industrial Truck Inspection, Safety & Emergency Equipment, Security Devices, and miscellaneous equipment. A random sampling of dates between March 1, 2022, and May 30, 2023, were selected for review; all were found to be complete.
- Contingency Plan: The contingency plan was reviewed, and it appeared accurate and up to date. The contingency plan included a quick reference guide. The plan was last updated on May 28, 2021. The Quick Reference Guide was pulled out as a separate stand-alone document and provided to the Department on June 8, 2023.
- The emergency contact list was posted near the phones within the facility.
- Arrangements to familiarize the local emergency response authorities (fire department, police, and local hospital) were sent on June 21, 2017.
- Hazardous Waste Training Records: Training records, including position descriptions and job titles were available and up to date. Records indicate the last annual RCRA Training was conducted on September 19, 2022.
- The Certificate of Insurance documents that the facility's current policy was effective on November 1, 2022, and expires on November 1, 2023.
- The facility's annual report for used oil and used oil filter handlers was submitted on March 1, 2023, and appeared accurate.
- The Waste Minimization Plan was signed on February 14, 2023, by Jamie Stanley, Branch Manager.
- The facility's 2021 biennial report was submitted on time on January 28, 2022, and appeared accurate.

New Potential Violations and Areas of Concern:

Violations

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Type: Violation

Rule: 262.15(a)(5)(ii)

Explanation: The 55-gallon satellite metal drum used to collect used oil samples that had met retention had a "Hazardous Waste" label on the side of the drum which identifies the contents as "Combustible Liquid," however, a label with an indication of the hazard was not present.

40 CFR 262.15(a)(5)(ii) A generator must mark or label its container with the following: An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Corrective Action: CORRECTED: A "Flammable" label was affixed to this drum during the inspection.

Photo Attachments:

Drum with out an Indication of the hazardous label



Drum with an Indication of the hazardous label



PHOTO ATTACHMENTS:

55-gallon drum of flammable liquid - Return/Fill Station



Used Antifreeze Totes & Used Oil Filter Bins - Return/Fill Station



15-gallon drum of waste paint - South Building Non-Flammable Waste



Clean Harbors Waste - South Building Non-Flammable Waste



Drums of Waste - South Building Flammable Waste



Clean Harbors Waste - South Building Flammable Waste



Conclusion:

At the time of the inspection, Safety-Kleen Tampa was not operating in compliance with state and federal regulations for large quantity generators of hazardous waste, hazardous waste and used oil transporters, and transfer facilities; however corrective actions were taken during the inspection and the facility was returned to compliance.

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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

Leslie Pedigo**Principal Investigator Name**Inspector**Principal Investigator Title**Leslie Pedigo**Principal Investigator Signature**DEP**Organization**02/23/2024**Date**Coral Evans**Inspector Name**Environmental Specialist II**Inspector Title**FDEP/SWD**Organization**Jamie Stanley**Representative Name**Branch Manager**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.

Jose Reyes**Representative Name**Service Delivery Manager**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.

Michelle Musgrave
Representative Name

Lead Branch Administrator
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.

Report Approvers:

Approver: Michael Miller

Inspection Approval Date: 02/26/2024