



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 06/05/2024

On-Site Inspection End Date: 06/05/2024

ME ID#: 11672

EPA ID#: FLD984171694

Facility Street Address: 8755 NW 95th St, Medley, Florida 33178-1462

Contact Mailing Address: 8755 NW 95th St, Medley, Florida 33178-1462

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 **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer, Operating Commercial TSD **Used Oil:** 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 **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 LQG (>1000 kg/month) Facility

Routine Inspection for Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kaitlyn Taylor, Environmental Consultant

Other Participants: Jade Knight, Environmental Specialist II, Daniel Vilarchao, Branch Manager

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

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On June 5, 2024 (06/05/2024), Kaitlyn Taylor with the Florida Department of Environmental Protection (FDEP), accompanied by inspector Jade Knight, conducted a compliance evaluation inspection at Safety-Kleen Systems Inc. (hereinafter SKS or Facility) located at 8755 NW 95th St, Medley, FL 33178. SKS was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, 273, and 279 adopted and incorporated by reference in Rule 62-730, 62-737, and 62-710 Florida Administrative Code (F.A.C.).

The inspectors were escorted around the facility by Daniel Vilarchao, Branch Manager. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection.

SKS occupies 5.5-acres and is connected to public water and sewer. The facility has been operating at its current location since 1993. The facility employs 9 staff and operates 7am – 5pm, Monday – Friday.

Notification History:

SKS currently operates as a permitted Treatment, Storage, or Disposal Facility (TSDF) under Permit No. 56019-012-HO. The term of the permit is effective from 01/24/2024 to 03/19/2028.

SKS initially notified with the Department as a Hazardous Waste Generator, Transporter, and TSDF in 1990. The facility was assigned the EPA Identification (EPAID) Number FLD984171694. The facility most recently

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notified as a Universal Waste Transporter, Transfer Facility, and Small Quantity Handler (SQH); a Hazardous Waste Transporter and Transfer Facility; a Used Oil Transporter, Transfer Facility, Filter Transporter, and Filter Transfer Facility; and a Large Quantity Generator (LQG) of hazardous waste in March 2024.

Inspection History:

- On 06/25/2020 the facility was inspected by the Department and was found to be in compliance.
- On 05/25/2022 the facility was inspected by the Department and was found to be out of compliance for failure to close satellite accumulation containers and failure to properly label containers with the words "hazardous waste" and an indication of hazard. A Return to Compliance Letter was sent on 08/01/2022.

Personal Protective Equipment (PPE) was required to enter the facility. Department personnel were equipped with steel-toed boots, safety glasses, safety vest, and hard hat.

Process Description:

SKS provides parts washing solvent and equipment leasing, product servicing, new oil sales, and hazardous /non-hazardous waste transport and storage services. Hazardous waste from parts washers is received and processed through a solvent return station prior to storage in a permitted 20,000-gallon hazardous waste storage tank. The processes conducted at the facility generate hazardous waste branch debris solid/liquid (Toxic /Ignitable) and hazardous waste oil samples (toxic/combustible).

Inspectors toured the following RCRA permitted areas: solvent return/fill shelter, storage warehouse, loading /unloading doc, and hazardous waste tank/tank storage unit.

Solvent Return/Fill Shelter:

SKS provides parts washing solvent product servicing by collecting spent solvent from different companies in 55-gallon drums. These drums of spent solvent are brought back to the facility and dumped into the two drum washing unit(s)/wet dumpsters and then pumped to the hazardous waste tank. The washed drums are replenished with fresh solvent piped from the tank storage area for delivery to customers. Inspectors were informed that the wet dumpsters are pumped to the storage tank daily. This area is located in the warehouse on elevated grating above sloped concrete flooring leading to a sump. The lower level is where the trucks park for loading/unloading and where used oil samples are stored.

The following was observed in this area:

- One 55-gallon drum to collect solvent contaminated branch debris labeled "Hazardous Waste – toxic /ignitable" with accumulation start date 05/08/2024.
- One 55-gallon drum labeled "used oil filters" with TSDf storage date 06/04/2024. Used oil filters are received and shipped daily.
- Two flammable cabinets to store used oil/oily water samples.
- One 55-gallon drum used to collect non-hazardous used oil samples labeled "empty drum". Compliance assistance was provided onsite and in the exit interview to label the drum with the words "Used Oil" (40 CFR 279.22(c)(1)).
- One 55-gallon drum used to collect hazardous used oil samples labeled "Hazardous Waste – combustible liquid (toxic)"
- Used oil filters on the floor beneath the solvent return/fill platform. Compliance assistance was provided onsite and in the exit interview to clean up used oil filters and properly store them in a labeled container (62-710.850(5)(a) F.A.C.).

Storage Warehouse:

The storage warehouse consists of general facility storage, the hazardous waste container storage area, and the 10-day hazardous waste storage area. Inspectors observed one 55-gallon drum labeled "Hazardous Waste – Branch Debris (Solid) toxic/ignitable".

- Hazardous Waste Container Storage Area:

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According to Permit No. 56019-012-HO, the facility is authorized to store a maximum capacity of 29,400-gallons of hazardous and non-hazardous waste. Inspectors were informed that this area includes the Central Accumulation Area for hazardous waste drums that are generated by the facility. At the time of the inspection no hazardous waste was observed in this area.

- 10-day Hazardous Waste Storage:

To comply with the 10-day storage limits, SKS scans incoming containers and keeps records of when the containers were received and when containers are shipped out. The waste information network tracks the manifest numbers, designated facility, number of containers, and receipt date.

All hazardous waste containers observed in this area were closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents. The facility palletizes all containers. Each label was observed to have the generator's EPAID number and the manifest tracking numbers. The facility maintains adequate aisle space in the 10-day storage area [40 CFR 264.35]. The facility conducts daily inspections of the container and containment integrity to ensure containers are free of leaks, gaps, or cracks [40 CFR 264.174 and 40 CFR 264.175].

No deficiencies were observed.

Loading/Unloading Doc:

This area is used to load and unload hazardous and non-hazardous waste on transport trucks. Inspectors observed the secondary containment filled with liquid and solid debris. Compliance assistance was provided onsite and in the exit interview to remove the debris from the secondary containment within 24 hours of detection per permit # 56019-012-HO Part II Subpart B.1 (10) (40 CFR 270.30(a)). No hazardous waste was observed in this area.

Hazardous Waste Tank/Tank Storage Unit:

The Tank Storage area is located outside of the warehouse under a metal roof. The tank storage unit is constructed on a concrete slab and surrounded by a concrete dike. According to the permit, the facility is authorized to operate the following storage tanks which were also observed during the inspection:

- One 20,000-gallon RCRA permitted hazardous waste used solvent above ground storage tank (AST) labeled "Hazardous Waste – combustible liquid".
- One 20,000-gallon AST of clean/fresh solvent.
- One 20,000-gallon AST labeled "Used Oil".
- One 15,000-gallon AST labeled "Used Oil"
- One 10,000-gallon AST of oily water.

Inspectors observed one catch tray beneath the spout of one of the used oil tanks to catch any drippings when adding/removing oil not labeled. Compliance assistance was provided onsite to label the catch tray "Used Oil" per 40 CFR 279.22(c)(1). Corrective actions were completed onsite.

SKS operates and inspects spill and overfill prevention controls [40 CFR 264.195(a)] and conducts daily inspections of all monitoring and leak detection equipment [40 CFR 264.195(b)]. The Tank Storage area has "No Smoking" signs conspicuously placed inside and outside [40 CFR 264.17(a)].

Beside the tank storage area inspectors observed eleven 500-gallon containers labeled "Drained Used Oil Filters Only".

No deficiencies were observed.

Records:

Waste Profiles, Manifests, and LDRs:

Waste profiles were available on-site for review [40 CFR 262.11(f)]. Manifest records are maintained on-site and

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readily available for review. Records for the past three years were available for review. Land Disposal Restriction (LDR) notification forms are up to date for each waste profile [40 CFR 268.9]. The facility keeps a written operating record that includes the description and quantity of each hazardous waste received or generated [40 CFR 264.73(b)(1)].

LQG standards implemented on-site:

Contingency Plan:

The facility has a contingency plan that includes emergency contact information, an evacuation map, and emergency response and preparedness procedures [40 CFR 262.261]. The contingency plan is reviewed annually and was most recently reviewed on 09/30/2023. The plan includes a list of emergency equipment locations and a physical description of each item and its capabilities [40 CFR 262.261(e)]. The facility maintains a quick reference guide [40 CFR 262.262(b)].

The facility could demonstrate that the appropriate arrangements with the local police, fire department, hospital, and local emergency response agencies have been made [40 CFR 265.37].

Preparedness and Prevention:

Spill kits, eye wash and shower stations, fire alarms, and fire extinguishers are available on-site [40 CFR 262.252]. The facility conducts routine inspections, testing, and maintenance of all communications systems, fire protection equipment, spill control equipment, and decontamination equipment [40 CFR 262.253]. The facility uses cell phones and an alarm system for internal communications. An alarm system was observed for external communication [40 CFR 262.252(a)-(b), 40 CFR 262.254]. Adequate aisle space was observed [40 CFR 262.255/ Rule 62-730.160(4), F.A.C.].

Inspections:

SKS maintains records of all inspections for the last three years. The records include date and time of the inspection, name of the inspector, notation of the observations made, and date and nature of any repairs or other remedial actions [40 CFR 264.15(d)].

Training:

The facility conducts annual hazardous waste training for all staff in contact with hazardous materials and hazardous waste. [40 CFR 262.17(a)(7)]. Documentation of job titles and position descriptions for positions involved with hazardous waste management are managed on-site [40 CFR 262.17(a)(7)(iv)]. The facility did not list the names of the employees filling each job title (permit # 56019-012-HO Part II Subpart A (9) and 40 CFR 262.17(a)(7)(iv)(A)). Compliance assistance was provided onsite and in the exit interview to maintain a list of the employee's names.

Biennial and Annual Reports:

Biennial Hazardous Waste and Annual Used Oil reports were available on-site. The biennial report was submitted on time and completed to the Department [40 CFR 262.41].

General Facility Standards:

The facility maintains a copy of the permit on-site. All monitoring and test data for the tank system and containers were available upon request. SKS is operated in a manner that prevents unknowing or unauthorized entry [40 CFR 264.14(a)]. The inspectors observed fence-line and gates around the facility to control entry [40 CFR 264.14(b)(2)].

Waste Minimization Plan:

The facility's Waste Minimization Plan was available on-site for review and is certified annually. The most recent certification was on 04/09/2024.

Acceptance and Delivery Records:

Records of incoming and outgoing used oil for the last three years were available upon request. Regular

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halogen screening is conducted by SK and confirmed on their manifests/bill of lading. Specifically, Chlor-D-Tect and Halogen Sniffer tools are used by their drivers.

The facility provided records of notices to generators, as specified in 40 CFR 264.12(b) [40 CFR 264.73(b)(7)].

Liability Insurance:

SKS provided a Hazardous Waste Facility Certificate of Liability Insurance and Tank Insurance Endorsements issued by Great American Insurance Company under policy number PRE-E603235-03. The Policy period is 11/01/2023 to 11/01/2024. The coverage applies to sudden accidental occurrences and limits of liability are \$1,000,000 for each occurrence and \$2,000,000 annual aggregate.

New Potential Violations and Areas of Concern:**Violations**

Type: Violation
Rule: **262.17(a)(7)(iv)(A)**
Explanation: The facility failed to document the job title for each position related to hazardous waste management and the name of the employee filling each job. This is also required per permit # 56019-012-HO Part II Subpart A (9).
Corrective Action: The facility should maintain documentation of the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job.

Comments:

Corrective actions were completed on 6/21/2024.

Type: Violation
Rule: **270.30(a)**
Explanation: The facilities permit # 56019-012-HO Part II Subpart B.1 (10) states that the secondary containment provided at the container loading/unloading areas shall be clear of any liquids and/or debris at all times and any rainwater or non-hazardous debris shall be removed within 24 hours or in a timely manner.

Inspectors observed liquid and solid debris accumulation in the loading/unloading area secondary containment.
Corrective Action: The facility should clear the secondary containment of all debris.

Comments:

Corrective actions were completed on 6/21/2024.

Type: Violation
Rule: **279.22(c)(1)**
Explanation: Inspectors observed one 55-gallon drum used to collect waste from used oil samples labeled as "Empty Drum".
Corrective Action: The facility should properly label the container with the words "Used Oil".

Comments:

Corrective actions were completed on 6/21/2024.

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Type: Violation
Rule: 62-710.850(5)(a)
Explanation: Inspectors observed used oil filters under the solvent return/fill station.
Corrective Action: The facility should remove the filters and properly store them in a labeled container.

Comments:

Corrective actions were completed on 6/21/2024.

Conclusion:

Safety-Kleen Services Inc. was inspected as TSDF, Universal Waste Transporter, Transfer Facility, and Small Quantity Handler (SQH); a Hazardous Waste Transporter and Transfer Facility; a Used Oil Transporter, Transfer Facility, Filter Transporter, and Filter Transfer Facility; and a Large Quantity Generator (LQG) of hazardous waste, and was found to be out of compliance for the following:

- Failure to properly store used oil filters (62-710.850(5)(a) FAC).
- Failure to label drum with the words "Used Oil" (40 CFR 279.22(c)(1)).
- Failure to clean secondary containment within 24 hours of detection of debris per permit # 56019-012-HO, therefore, failure to comply with permit requirements (40 CFR 270.30(a)).
- Failure to document the name of employee and job title of each position related to hazardous waste (40 CFR 262.17(a)(7)(iv)(A)).

On 06/21/2024, the facility submitted all requested documentation and has since 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

Kaitlyn Taylor
Principal Investigator Name

Environmental Consultant
Principal Investigator Title


Principal Investigator Signature

DEP 07/16/2024
Organization **Date**

Jade Knight
Inspector Name

Environmental Specialist II
Inspector Title

DEP
Organization

Daniel Vilarchao
Representative Name

Branch Manager
Representative Title

Safety-Kleen
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: Todd A Reinhold

Inspection Approval Date: 07/16/2024