



Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Colleen Castille
Secretary

June 21, 2004

Mr. Dan Wharton
Branch General Manager
Safety-Kleen Systems
4426 Entrepot Boulevard
Tallahassee, Florida 32310

Dear Mr. Wharton:

Enclosed is a copy of the report on the May 27, 2004 compliance inspection that was conducted at your Safety-Kleen Systems facility located at 4426 Entrepot Boulevard, Tallahassee, Leon County, Florida. We found your facility to be in compliance with the Used Oil Management Program and the Resource Conservation and Recovery Act. This inspection did not address other areas of Department jurisdiction.

If you have any questions concerning this program or the enclosed report, please call Jim Byer at 850/595-8360, extension 1265.

Sincerely,

James Byer
Hazardous Waste Section

JCB:jb1
Encl: Hazardous waste Inspection Report
Cc: Matt Hedrick, Safety-Kleen Systems



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HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** Routine Complaint Follow-Up Permitting Pre-arranged

FACILITY NAME: Safety-Kleen Systems, Inc. **DEP/EPA ID #:** FLD 982 133 159

STREET ADDRESS: 4426 Entrepot Boulevard, Tallahassee, Florida 32310

MAILING ADDRESS: 4426 Entrepot Boulevard, Tallahassee, Florida 32310

COUNTY: Leon **PHONE:** (850) 576-9764 **DATE:** May 27, 2004 **TIME:** 2:20 P.M.

HW facility status

- non-handler
- CESQG
- SQG
- LQG
- transporter
- transfer facility
- TSD
- SQH
- LQH

used oil facility status

- generator
- transporter
- transfer facility
- marketer
- processor
- on-spec. burner
- off-spec. burner
- filter generator
- filter transporter
- filter transfer facility
- filter processor

Hg facility status

- exempt
- generator
- transporter
- Hg recovery facility
- Hg reclamation facility

PCW facility status

- producer
- transporter
- recovery facility

2. APPLICABLE REGULATIONS:

- | | | | |
|------------------------------------------------|------------------------------------------------|-------------------------------------------------|-------------------------------------------------|
| <input checked="" type="checkbox"/> 40 CFR 261 | <input checked="" type="checkbox"/> 40 CFR 262 | <input checked="" type="checkbox"/> 40 CFR 263 | <input checked="" type="checkbox"/> 40 CFR 264 |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input checked="" type="checkbox"/> 40 CFR 270 |
| <input checked="" type="checkbox"/> 40 CFR 273 | <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC |

3. **RESPONSIBLE OFFICIAL:** Matt Hedrick, S-K EHS Manager and Dan Wharton, Tallahassee Branch Manager

4. **INSPECTION PARTICIPANTS:** John Hinsey and Dan Wharton of S-K. Terry Wells and Jim Byer of FDEP

5. **LATITUDE/LONGITUDE:** Lat 30° 24' 07"/Long 084° 19' 30"

6. **TYPE OF OWNERSHIP:** private federal ~~state~~ ~~county~~ ~~municipal~~

7. **PERMIT No.:** 9207-HO-005 **DATE ISSUED:** May 13, 2003 **EXP. DATE:** March 14, 2005

UU8. Site History and Description:

Safety-Kleen Systems, Inc. (S-K), 4426 Entrepot Boulevard, Tallahassee, Florida is a generator, transporter and permitted storage facility and transfer facility for hazardous waste. S-K has been operating at this location since 1988. This facility is permitted for both a container storage area and a tank storage area with Permit No. 9207-HO-005 which was modified and issued May 13, 2003 to incorporate FDEP issued HSWA Corrective Action Requirements. This facility was last inspected on June 2 and 3, 2003 to confirm compliance with the operating permit and state and federal RCRA regulations with three violations cited. The violations were corrected and Consent Order OGC #03-1443-37-HW executed with civil penalties of \$5,650 paid. The purpose of this inspection is to confirm S-K's status and compliance with the RCRA regulations.

S-K collects hazardous waste from area generators and temporarily stores it on-site prior to shipping off-site for reclamation and/or disposal. S-K conducts leasing and servicing of S-K parts cleaning equipment. Parts washing solvents (Parts Cleaner 105, 150 Premium Solvent, or Actrel) are sent with the equipment. The solvent is exchanged on a periodic basis in accordance with a joint agreement. The used solvent is returned to the storage facility for reclamation. S-K also picks up other drums of hazardous waste, used oil, used oil filters, spent silver recovery cartridges and non-regulated wastes for temporary storage (Transfer Station). This waste is then shipped off-site for reclamation and/or disposal. Facility equipment description and operation is described in previous inspection reports and contained in the operating permit.

9. Site Inspections:

John Hinsey of S-K provided access to the facility, description of operations and access to paper and computer-based records.

Return/Fill Shelter

The area was inspected mid-afternoon when no loading/unloading activity was underway. One route truck was parked in the unload area. A cross-check of the route driver's DOT shipping record and HW manifest record inventory and actual product and waste drums/containers loaded on the truck resulted in no discrepancies. The loading and unloading area was well maintained, with easy access to the emergency and safety equipment installed in this area. **See *Picture A and B.***



Picture A



Picture B

The shelter area held no containers of hazardous waste with the exception of the satellite accumulation 55-gallon drum for hazardous waste solids/sludge from the dumpster/drum washing unit. This drum was labeled, in good physical condition and closed. This satellite accumulation drum had a new type lid installed, which allows the operators an easier method of opening and closing the container. The special lid is constructed with a raised hinged cover, which is held closed by three latch closures. This specially modified lid is moved from a full satellite drum to a new empty drum as needed. Full drums are then closed with a regular lid and moved to the TSD Storage area. **See Pictures C**



Picture C



Picture D

10-day Transfer Station

The area contained 7 drums of HW awaiting follow-on transport to final TSD Facilities or destinations. The oldest date noted on any container was May 26, 2004, which matched the wall-board for this area noting the oldest date container as May 26, 2004. All containers were in good physical condition, closed, and labeled. The daily inspection record for the 10-day Transfer Station was checked. Adequate aisle space was available to inspect each container. **See Picture D.** A visual inventory of drums versus computer record inventory for the 10-day Transfer Station was conducted by Mr. Hinsey and the Department Inspectors with no discrepancies identified:

Non-Hazardous Waste Storage Area

Based on a recommendation from the 2003 calendar year inspection, non-hazardous waste containers were segregated for storage in a designated area adjacent to the 10-day Transfer Station. All containers were labeled and in good condition. **See Picture E.**



Picture E

TSD Storage Area

The TSD Storage Area was well organized and aisle space maintained to allow inspection of each container. All containers were in good physical condition, closed, and labeled. **See Pictures F and G.** Two random containers were selected and a computer and hardcopy records check conducted to verify its origin, transport history and storage inventory. No discrepancies were noted. A visual inventory of drums versus computer record inventory for the TSD Storage Area was conducted by Mr. Hinsey and the Department Inspectors with no discrepancies identified.



Picture F



Picture G

Tank Storage Area

The area was well maintained with no evidence of tank leakage noted. The load/unload pipe manifold area showed no evidence of leakage or spillage from the piping and equipage in this area. The accumulation drum located in this area was closed, labeled and in good condition.

The facility's 40 CFR 264 Subpart BB compliance procedures for the waste mineral spirits solvent management system was modified since the previous inspection. The waste mineral spirits solvent management system equipage (piping, valves, flanges, pumps, etc) was painted red to distinguish it readily from the other equipage in the facility. This allows the daily inspector of the system an easier way to track the equipage and inspect for liquid leaks. **See Picture H.** Duplicate brass numbering tags had been removed from the system in order to eliminate possible confusion with new and current numbering system. The daily inspection logs were reviewed for the previous year with no discrepancies noted.



Picture H

External Area

The outside storage/laydown area, driveways, vehicle parking lot, solid waste dumpsters and the perimeter fence/lawn areas were inspected with no discrepancies noted. All other security and safety equipment was installed in accordance with the permit and operational. A tanker trailer had been parked within a temporary secondary containment at the southwest corner of the rear asphalt parking area. This tanker will be used for on-site consolidation of wastes collected daily in the vacuum truck and then transfer and stored on-site in the tank trailer until a full 5000-gallon load makes it necessary for transport to the follow-on processor.

Miscellaneous

Emergency fire, first aid, and spill control equipment within the facility was randomly inspected to verify the facility inspection and maintenance program. A review of randomly selected training records, daily/weekly inspection logs for the Transfer Area, Storage Containers, Storage Tanks, and safety equipment was conducted with no discrepancies noted. The contingency plan and permit were available and current. Documentation tracking checks on multiple containers from the TSD Storage Area picked at random verified the hardcopy and computer tracking documentation for all containers checked.

This inspection verified S-K is a large quantity generator of hazardous waste; a transporter of hazardous waste and used oil; and an operator of a transfer station and permitted storage facility.

10. Summary of Alleged Violations: None

11. Recommendations: None

Report prepared by  
Terry Wells and James Byer

Date: June 21, 2004