



Jeb Bush  
Governor

# Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32502-5794

Colleen Castille  
Secretary

April 19, 2005

Sent Via Email to:

[d.Wharton@safety-kleen.com](mailto:d.Wharton@safety-kleen.com)

[m.Hedrick@safety-kleen.com](mailto:m.Hedrick@safety-kleen.com)

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 hazardous waste compliance inspection that was conducted at your facility on March 31, 2005. 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 1264.

Sincerely,

Jim Byer  
Hazardous Waste Section  
Supervisor

JCB:jbl  
Encl: Inspection Report



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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:** March 31, 2005 **TIME:** 1:20 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 Tim Crumity of S-K. 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

8. 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. A RCRA Operating Permit Renewal Application was received in September of 2004 for this permit. This facility was last inspected on May 27, 2004 to confirm compliance with the operating permit and state and federal RCRA regulations with no violations cited. 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. Description of additional operations and facility equipment is included in previous inspection reports and contained in the operating permit.

9. Site Inspections:

John Hinsey and Tim Crumity 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. No route truck was parked in the unload area. The loading and unloading area was well maintained, with easy access to the emergency and safety equipment installed in this area. **See Pictures 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.

**10-day Transfer Station**

The Transfer Station area held five containers of HW awaiting follow-on transport to final TSD facilities. See **Picture C**. The oldest date noted on any container was March 29, 2005, which matched the wall-board for this area noting the oldest dated container as March 29, 2005. All containers were in good physical condition, closed, and labeled. Adequate aisle space was available to inspect each container. The daily inspection record for the 10-day Transfer Station was checked. A visual inventory of drums versus computer record inventory for the 10-day Transfer Station was conducted with no discrepancies identified: One random container was selected and a computer and hardcopy records check conducted to verify its origin, transport history and storage inventory. No discrepancies were noted.



**Picture C**

**Non-Hazardous Waste Storage Area**

Non-hazardous waste containers were segregated for storage in separate designated areas. All containers were labeled and in good condition. Immediately adjacent to the Transfer Station (See **Picture D**) was an area which contained fourteen 55-gallon drums of non-hazardous drilling sand. Adjacent to the TSD Storage Area were five one-cubic yard boxes and one 55-gallon drum of used oil absorbent; a pallet of numerous "empty", yellow, 5-gallon, paint cleaning solvent containers; one open top 55-gallon drum of used aluminum plates (from printing processes); and one open top 55-gallon drum of large sheet, used x-ray film (for silver reprocessing). See **Picture E**.



**Picture D**

Open top drums                      "empty" 5-gallon paint solvent



**Picture E**



**TSD Storage Area**

The TSD Storage Area was organized and aisle space maintained to allow inspection of each container. All containers were in good physical condition, closed, and labeled. **See Picture F.** Two random containers were selected and a computer and hardcopy records check conducted to verify their 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 inspector with one discrepancy identified. One yellow, 5-gallon, paint cleaning solvent container (Item #50219024509) was incorrectly placed on the pallet with the numerous empty yellow, 5-gallon, paint cleaning solvent containers. **See Picture G.** Discrepancy corrected at time of discovery.

TSD storage

Empty can storage



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 equipment in this area. The accumulation drum located in this area was closed, labeled and in good condition. The daily inspection logs were reviewed for the previous year with no discrepancies noted. See Pictures H and J.



Picture H



Picture J

**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. A tanker trailer is 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 transferred and stored on-site in the tank trailer until a full 5000-gallon load makes it necessary for transport to the follow-on processor. All other security and safety equipment was installed in accordance with the permit and operational. (See Pictures K and L)



**Picture K**



**Picture L**

**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. Randomly selected shipments of outbound used oil and containers from the FRS were crosschecked with daily inspection logs with no discrepancies noted. The contingency plan and permit were available and current. Document 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:

S-K Tallahassee should review and improve its procedures for the location and handling of non-hazardous containers to ensure that no inadvertent mixed storage of hazardous and non-hazardous containers occurs.

Report prepared by James Byer Date: April 19, 2005