

RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

Daryl R. Himes
Environmental Engineer
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
U.S. Environmental Protection Agency – Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Phone: (404) 562-8614
Fax: (404) 562-8614
E-mail: himes.daryl@epa.gov

2) Facility Information

Safety-Kleen Systems, Inc. (SKS)
161 Industrial Loop South
Orange Park, Florida 32073
Clay County
Latitude: 30.18
Longitude: -81.718160
EPA ID Number: FLD980847214

Primary NAICS - 325998 – All Other Miscellaneous Chemical Product and Preparation Manufacturing

3) Responsible Official

Scott Thompson, Branch General Manager
Jeff Curtis, Regional Environmental Compliance Manager

4) Inspection Participants

Daryl R. Himes U.S. EPA Region 4
Cheryl Mitchell, Florida Department of Environmental Protection (FDEP)
Carrie Kruchell, FDEP
Scott Thompson, SKS
Jeff Curtis, SKS

5) Dates of Inspection

March 24, 2021, 9:00 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710 and 62-730.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Safety-Kleen is also operating under hazardous waste facility permit number 0077130-HO-10 issued by FDEP. The permit addresses the storage of HW in a tank system and in containers.

Safety-Kleen also notified as a large quantity generator (LQG), a transporter, and a transfer facility of HW. In addition, Safety-Kleen notified as a large quantity handler of universal wastes (UW). The facility is also a used oil transporter, transfer facility, and marketer.

7) **Purpose of Compliance Evaluation Inspection**

On March 24, 2021, Cheryl Mitchell and Carrie Kruchell, Florida Department of Environmental Protection (FDEP), and Daryl Himes, EPA, conducted a routine compliance evaluation inspection of Safety-Kleen Systems, Inc. in Orange Park, Florida (SKS or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. SKS was represented by Scott Thompson and Jeff Curtis. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

8) **Facility Description**

Safety-Kleen Systems, Inc. (Safety-Kleen or facility) is a commercial treatment, storage, and disposal facility (TSDF) of hazardous waste (HW). The facility stores, processes, transfers, and transports hazardous waste, universal wastes, used oil and used oil filters, new and spent parts, washer solvents, and used antifreeze. Safety-Kleen provides its customers with parts washing equipment, clean parts washer solvent and motor oil. Safety-Kleen also maintains their parts washers at their customers facilities.

Safety-Kleen's customers provide Safety-Kleen with information on how their machines will be

used. This information is used to determine which solvent will be provided to the company and what hazardous waste characteristics the spent solvent generated at their facility will have. The customers also can rely on annual analysis and characterizations performed on spent solvent picked up from their facility.

Safety-Kleen is operating under hazardous waste facility permit number 0077130-HO-009 issued by FDEP. The permit addresses the storage of HW in a tank system and in containers.

Safety-Kleen also notified as a large quantity generator (LQG), a transporter, and a transfer facility of HW. In addition, Safety-Kleen notified as a large quantity handler of universal wastes (UW). The facility is also a used oil transporter, transfer facility, and marketer.

SKS's most recent hazardous waste generator notification (EPA form 8700-12) submitted on February 14, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste, generating D001-D011, D0018-D019, D021-D030 and D032-D043 and F001-F005.

9) Inspection Findings

A walk-through inspection of the facility was performed with the SKS representatives. Below is a description of the observations made in the various areas of the facility inspected.

Hazardous Waste Transfer Area

The first of two Hazardous Waste Transfer Areas was located within the warehouse of the facility directly behind the office area. Incoming hazardous wastes are placed and can be maintained in this area for up to 10 days while any waste characterizations are made. Once waste determinations are made, wastes are moved into the container storage area within the warehouse or placed into the solvent return dumpster which sends solvent wastes to the facility's permitted storage tank.

At the time of the inspection, four 55-gallon containers of hazardous waste were observed in this area. Each of the containers were closed, labeled with the words "Hazardous Waste," marked with an indication of the hazard associated with the waste and an accumulation start date. Four 55-gallon containers of nonhazardous wastes were also observed in this area.

Hazardous Waste Container Storage Area

This area is located in the warehouse area of the facility directly behind the office area and first of two Hazardous Waste Transfer Areas.

At the time of the inspection one 55-gallon container of hazardous waste solvent was observed in this area. The container was closed, labeled with the words "Hazardous Waste," marked with an indication of the hazard associated with the waste and an accumulation start date of less than one year. Additional 55-gallon containers of product solvents were observed on pallet racks on the perimeter of this area.

Retained Sample Lockers

Two metal lockers were observed in a separate caged area in the warehouse behind the office

which are used to store waste samples taken from incoming wastes. The samples are stored in the lockers for a short period of time until adequate analysis on each waste is determined. One 55-gallon drum of hazardous waste aerosol cans was also observed in this caged area within a satellite accumulation area. The drum was closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard associated with the waste.

Receiving Dock, Return and Fill and Transfer Area

All hazardous waste, universal waste and waste solvent arrive on trucks onto the Receiving Dock. This area is the second designated 10-Day Transfer Area at the facility. This area had appropriate safety equipment, decontamination equipment and spill kits. The facility receives two types of waste parts washer solvent from customers: spent petroleum distillates parts washer solvent that is profiled as hazardous waste and spent petroleum distillates parts washer solvent that is profiled as non-hazardous waste. Safety-Kleen no longer processes waste parts washer solvent at this facility under the Continuous Use Program (CUP). The permitted Solvent Return/Fill Station is located adjacent to the Receiving Dock and contains two wet dumpsters for processing these solvents. Drums containing hazardous waste or non-hazardous waste spent petroleum distillates are emptied only into the wet dumpster that houses automatic drum rinsing equipment. The drain in this wet dumpster empties into the permitted 15,000-gallon aboveground storage tank located outside the warehouse in the Aboveground Tank Farm Storage Area described below. The second wet dumpster's drain valve had been closed and the dumpster was not used to receive the waste solvent. Spent solvent collected from the aboveground tank is manifested as D001/D018/D039/D040 hazardous waste approximately every two weeks and transported for reclamation to the Safety-Kleen facility in Lexington, South Carolina (SCD 077 995 488). Safety-Kleen generates a solid and liquid waste stream during the course of managing, packaging, and bulking hazardous waste referred to as "Branch Debris. This waste stream includes wipes, absorbents, PPE, sludge, and similar items, and is disposed of as D001/D004/D005/D006/D007/D008/D009/D010/D011/D018/D019/D021/D022/D023/D024/D025/D026/D027/D028/D029/D030/D032/D033/D034/D035/D036/D037/D038/D039/D040/D041/D042/D043/F002/F003/F005 hazardous waste. One 55-gallon satellite drum of "Branch Debris" was located adjacent to the wet dumpster in the Solvent Return/Fill Station area. The drum was closed and properly labeled and dated.

Additional wastes observed in the transfer area included one 55-gallon container of hazardous waste gasoline and one 20-gallon container of hazardous waste solvent. The drums were closed and properly labeled and dated. One 55-gallon container and several smaller ones containing used oil filters were also observed.

Tank Farm

The Tank Farm contains three aboveground storage tanks as follows: one permitted 15,000-gallon hazardous waste storage tank, one 15,000-gallon used antifreeze tank and one 15,000-gallon tank labeled for used oil. The hazardous waste tank is used to store D001/D018/D039/D040 spent parts washer solvent/mineral spirits and was labeled "Hazardous Waste." The tank system, including associated ancillary equipment and secondary containment, appeared to be in good condition. The facility no longer uses the used oil tank since used oil is delivered directly to Norfolk Southern Railway (VAD 000 650 309) in Jacksonville for shipment by rail to Safety-Kleen's refinery (IND 077 042 034). Adjacent to the Tank Farm, and located outside that containment area, is a 12,000-gallon horizontal double walled tank that contains

virgin Solvent 150 product. The hazardous waste storage tank contained 7 inches of hazardous waste solvent at the time of the inspection. The tank was labeled with the words hazardous waste and marked with an indication of the hazards associated with the wastes within the tank.

Paint Waste Shelter and Allied Product Storage

The Paint Waste Shelter is a metal storage building which is permitted to store hazardous waste with an allowed maximum capacity of 1,222 gallons of ignitable hazardous paint waste. At the time of the inspection, the shelter was being used to store product and empty containers only; no hazardous waste was being stored in this area.

Record Review

A review of the facility's electronic contingency plan dated 3/22/2021 did not find any discrepancies. The plan was checked specifically for its evacuation routes and current emergency coordinators.

A review of the facility's hazardous waste training requirements did not find any discrepancies.

A review of the facility's hazardous waste manifests since the last inspection did not find any discrepancies.

A review of the facility's inspection logs since the last inspection did not find any discrepancies.

10) **Signed**

DARYL HIMES Digitally signed by DARYL HIMES
Date: 2021.04.22 08:31:17 -04'00'

Signature
Daryl Himes
Inspector and Author of Report

Date

11) **Concurrence and Approval**

ARACELI Digitally signed by ARACELI
CHAVEZ
Date: 2021.04.22 17:07:09
-04'00'
CHAVEZ

Signature
Araceli B. Chavez
Chief
RCRA Enforcement Section

Date