



ENVIRONMENTAL PROTECTION DIVISION

LORI CUNNIFF, MANAGER
800 Mercy Drive, Suite 4
Orlando, Florida 32808
(407) 836-1400 ■ FAX (407) 836-1499
www.ocfl.net/epd

March 31, 2010

VIA ELECTRONIC MAIL
(mark.kreller@fedex.com)

FEDEX Ground
Mark Kreller, Operations Manager
3000 Presidents Dr.
Orlando, FL 32809

RE: Small Quantity Generator Inspection
EPA ID No. FLR000030817
Facility No. 74027

Dear Mr. Kreller:

Orange County Environmental Protection Division conducted an inspection at your facility on March 22, 2010, under authority of Section 403.091 and Chapter 403, Part IV of Florida Statutes. The inspection was designed to ascertain compliance with applicable Florida law regarding solid and hazardous waste management. Relevant provisions of Title 40 Code of Federal Regulations (CFR) 260-271 and 279 have been adopted in Florida Administrative Code (FAC) Chapters 62-710, 62-737 and 62-730. At the time of the inspection, the facility was operating as a Small Quantity Generator (SQG) of hazardous waste.

Any potential non-compliance issues are listed in the attached report. If there are non-compliance items noted, please respond in writing within 14 days of receipt of this letter, no later than **April 16, 2010**, describing what you have done to come into compliance. Address your response to the inspector listed below at the address on the letterhead. A follow-up inspection will be conducted within 45 days to verify compliance. If your facility remains out of compliance, we will forward your information to the Florida Department of Environmental Protection for enforcement action.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard E. Stephens", is written over a horizontal line.

Richard E. Stephens, CHMM
Senior Environment Specialist

RES/VC/AM:sgt

Enclosure

cc: Janine Kraemer, Florida Department of Environmental Protection



Orange County Environmental Protection Division
800 Mercy Drive, Ste. 4
Orlando FL 32808
(407) 836-1400

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☐ ESQG ☐ Follow-Up

FACILITY NAME	FED-EX Ground			Facility ID #	74027	
EPA ID #	FLD000030817					
STREET ADDRESS	3000 Directors Row, Orlando, FL 32809					
MAILING ADDRESS	3000 Directors Row, Orlando, FL 32809					
SIC CODE:3085	PHONE	(407) 850-4534	DATE	March 22, 2010	TIME	1330-1530

2. **NOTIFIED AS:** ☐ N/A

CURRENT STATUS:

<input type="checkbox"/> Non Notifier	<input type="checkbox"/> Non Handler
<input type="checkbox"/> CESQG (<100 kg/mo.)	<input type="checkbox"/> CESQG (<100 kg/mo.)
<input checked="" type="checkbox"/> SQG (100-1000 kg/mo.)	<input checked="" type="checkbox"/> SQG (100-1000 kg/mo.)
<input type="checkbox"/> LQG (>1000 kg/mo.)	<input type="checkbox"/> LQG (>1000 kg/mo.)
<input type="checkbox"/> Transporter	<input type="checkbox"/> Transporter
<input type="checkbox"/> Transfer Facility	<input type="checkbox"/> Transfer Facility
<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Used Oil Generator
<input type="checkbox"/> 8700-12 Notification Form provided (if applicable)	

3. **RESPONSIBLE OFFICIAL(S):**

Mark Kreller, Operations Manager	
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4. **INSPECTION PARTICIPANTS:**

Richard E. Stephens, CHMM, Orange County Environmental Protection Division	Mark Kreller, Operations manager FED-EX Ground
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5. **TYPE OF OWNERSHIP:** Private ☒ Government ☐

6. BACKGROUND INFORMATION

FED-EX Ground is a commercial shipping center. The facility operates 24 hours a day seven days a week with 150 employees and has three shifts. FED-EX Ground has been at this location for approximately 10 years. The building uses the Orange County sewer and water systems. The facility is within unincorporated Orange County and covered under Orange County Sheriff and Fire Rescue services.

This facility was inspected by OCEPD in 2001, 2004, and 2008.

7. BUILDING AND PROPERTY DESCRIPTION

The facility consists of one large building with office and warehouse space and one smaller building for trailer repair:

Office and Warehouse Building

The office areas are used for administrative purposes and only generate waste lamps. The warehouse area has loading/unloading docks throughout and conveyor systems to move product from one place to another. Inbound trucks are unloaded and the product is sent to outbound trucks to continue the delivery process. Items that are received damaged are taken to a specified area where they are catalogued, bagged and placed in lab pack containers. These are picked up for disposal every two months. Spent fluorescent lamps are also generated and stored in this area.

Trailer Repair Building

The trailer repair area has a mineral spirit part washer and generates oily rags as part of the bearing repair process. There are six yard tractors that are maintained here, generating used oil and filters. Major repairs are sent out. Oily rags are stored in containers. Fluorescent lamps are also present.

Spill containment kits are present in the haz-waste storage area and the maintenance area.

8. WASTE STREAM MANAGEMENT

TYPE	MONTHLY AMT.	STORAGE	DISPOSAL	MANIFEST
Oily Sludge from Sump Pump-out of O/W/S	300 gallons	Tank Below Ground (UST)	Safety Kleen	Yes
Used oil	5 gallons	Tank above ground (AST)	Safety Kleen	Yes
Uncrushed used oil filters	3 units	55-gallon drum	Safety Kleen	Yes
Shop Rags (oil)	200 units	5-gallon fire can	Aramark	Yes
Fluorescent Lamps	21 per month	Box	Safety Kleen	Yes
Mineral Spirits	10 gallons	One 30 gallon parts washer	Safety Kleen	Yes
Lab Packed other Waste	300-pounds	Various sized drums	Safety Kleen	Yes

9. RECORD REVIEW

Six hazardous waste manifests and three non-hazardous waste receipts from 2009 and 2010 were reviewed, no discrepancies found. The contingency plan was reviewed and found to be satisfactory. Emergency contact numbers are posted in the break room and throughout the facility. Employees are trained in the response and cleanup of a spill in their yearly Haz-Com training.

The personnel training records were reviewed and found to be adequate. An internal alarm system and announcing system are used in case of an emergency.

10. COMMENTS

FED-EX Ground is a very large facility, moving large quantities of material. Care and training are used to minimize damage as product flows through the plant.

11. SUMMARY OF POTENTIAL NON-COMPLIANCE ITEMS

Found the following potential non-compliance issues:

None	
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12. CONCLUSION

At the time of the inspection, FED-EX Ground was a Small Quantity Generator of hazardous waste and was in compliance.

Report Prepared By: Richard E. Stephens, CHMM, Sr. Environmental Specialist