



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 12/20/2010

On-Site Inspection End Date: 12/20/2010

ME ID#: 40794

EPA ID#: FLD984171165

Facility Street Address: 600 Central Park Dr, Sanford, Florida 32771-6690

Contact Mailing Address: 3003 W Breezewood Lane, Neenah, Wisconsin 54957-0368

County Name: Seminole

Contact Phone: (800) 558-5011

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

Transfer Facility

TSD Facility Unit Type(s)

Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Danielle M. Bentzen, Environmental Specialist

Other Participants: Dwayne Lewis, Branch General Manager; Michael Eckoff, Environmental Specialist

LATITUDE / LONGITUDE: Lat 28° 48' 23.2028" / Long 81° 19' 4.803"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On December 20, 2010, Danielle Bentzen and Michael Eckoff, Florida Department of Environmental Protection (FDEP), accompanied by Dwayne Lewis, Safety-Kleen Systems, Inc (Safety-Kleen), inspected Safety-Kleen for compliance with state and federal hazardous waste and used oil regulations. Safety-Kleen was inspected as a generator, transporter, transfer facility, and hazardous waste storage facility.

The facility has operated at this location since March 15, 1993 and employees approximately 30 people who work Monday through Friday from 6:30 AM to 5:30 PM. The facility is connected to the City of Sanford potable water and sewer systems.

Safety-Kleen is currently operating under hazardous waste operation permit HO01-0022198-004. The permit includes the following areas: a totally enclosed building, approximately 80 feet by 155 feet, having three distinct areas designated as offices, container storage area and return/fill station, and a separate, outdoor aboveground tank storage area with four 20,000 gallon steel tanks. The four 20,000 gallon tanks are each constructed on a concrete base, which is on a concrete pad. The pad is surrounded by a three foot high concrete secondary containment. The floor is covered with an impervious coating of Simstone and protected from the weather by an aluminum roof.

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Stormwater accumulated in the containment area flows by gravity to an in-ground grated sump, from which the water is pumped to an on-site dry retention pond.

INSPECTION HISTORY

On December 16, 2009, the Department inspected Safety-Kleen as a generator and TSD of hazardous waste and found the facility to be in compliance.

On June 26, 2007, the Department inspected Safety-Kleen as a generator and TSD of hazardous waste. The facility was not in compliance at the time and was cited for the following violations: failure to use a manifest for facilities participating in the Continued Use Program. Safety-Kleen completed corrective actions and the case was closed without enforcement.

On January 19, 2005, the Department inspected Safety-Kleen as a generator and TSD of hazardous waste. Safety-Kleen was reminded that all containers of used oil filters must be properly labeled as "used oil filters". The facility was otherwise in compliance.

Process Description:

Safety-Kleen provides equipment leasing, product servicing and hazardous/non-hazardous waste transport, transfer, and/or storage. Some parts washer solvent is returned to the facility to be used for barrel washing and managed according to the Continued Use Program (CUP). Parts washer wastes not included in the CUP is stored in the container storage area, the 10-day transfer area or the hazardous waste storage tank prior to shipment off-site for reclamation. Clean drums are refilled with product mineral spirits for use in the leased parts washers.

CUP parts washers from customers accepted in the program are emptied into a 200-gallon tank labeled "Continued Use Product." A permit modification, dated October 10, 2000, was issued for implementation of the CUP.

The container storage area is used for storing parts washer waste, waste immersion cleaner, waste mineral spirits sludge, waste dry cleaning solvent, waste paint related material, and items to be recycled, such as used oil filters and mercury-containing lamps. The container storage area is located within a totally enclosed building with a concrete floor marked with yellow tape identifying the container storage boundaries. The amount of waste stored in the container storage area at any one time must not exceed 6,912 gallons.

RETURN/FILL AREA

The two drum washers, located in this area, were not in use at the time of the inspection. Sumps beneath the drum washers appeared dry and clean. Sludge from the drum washers is removed once a day and stored in a properly labeled 30-gallon drum. The drum, when full, is staged in the container storage area prior to shipment off-site.

Adjacent to the drum washers is a 200-gallon tank used exclusively for the CUP solvent. The wire screen on top of the tank is used for straining the mineral spirits. The resulting debris is managed as hazardous waste in the same drum used for the drum washers.

Safety-Kleen uses spent mineral spirits to conduct drum washing. Dirty empty drums are placed onto a rotary brush unit within the drum washer, where spent mineral spirits are used to clean both the inside and outside of the drums. A float-actuated pump sends the solvent from the sump through the 504-gallon tank to the hazardous waste tank located outside.

At the time of the inspection, there were three 30-gallon drums of hazardous waste parts washer containers on the dock and destined for the hazardous waste storage tank via the drum washer (Figure 1). Also on the dock, were seven 30-gallon drums and one 5-gallon container destined for the CUP tank (Figure 2).

Safety-Kleen intends to switch all parts washers over to their 150 solvent in the beginning of 2011.

CONTAINER STORAGE AREA AND 10-DAY TRANSFER AREA

The 10-day transfer facility accumulation area is located next to the container storage area. The

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area is identified by a sign, and marked with yellow tape identifying the transfer facility's boundaries.

All containers were organized according to compatibility, and were stored with adequate aisle space at a maximum height of two containers. The containers were managed according to the approved "Container Management Plan", as identified in section 8.4 of the permit. The containers were marked with the date the waste entered the transfer area, labeled hazardous waste (if appropriate) and closed (Figures 3-4). The amount of waste in the storage area was under the allowable storage capacity of the facility.

ABOVE GROUND STORAGE TANK AREA

The tanks are electronically monitored for level and temperature. Each tank is permitted to store 20,000-gallons, but Safety-Kleen considers the tanks full at 19,000-gallons. Tank #1 stores hazardous waste solvent. Tank #2 and #4 currently store product solvent. When 105-solvent is no longer used, that tank will become a used oil tank. Tank #3 stores used oil. Next to the containment area, there is a 17,000 gallon waste antifreeze tank.

At the time of the inspection, all tanks were properly labeled and the containment area was dry and appeared free of cracks. A sign with the words "Danger No Smoking" was located in this area.

Next to the storage tank area were four properly labeled 250-gallon totes for waste antifreeze. The waste antifreeze totes are elevated and are allowed to settle out in order for the oil/water to rise and the antifreeze to settle to the bottom. Through gravity, the antifreeze is drained off the bottom of the totes. The oily waste water is drained into the above ground storage tank.

RECORDS REVIEW

Records were reviewed for 2010. The records included daily and weekly inspection logs for the container and tank storage areas, contingency plan, local authority notification, position descriptions, training records, and manifests all of which were in compliance.

Safety-Kleen must also ensure that used oil manifests contain the EPA identification number, if applicable, of the facility [62-710.510(1)(b) F.A.C.]. During a recent inspection at Core Pipe Products, Safety-Kleen at written "CESQG" instead of Core Pipe Products, EPA identification number. Core Pipe Products notified in 2006 that it was a LQG; therefore, has an EPA identification number.

AREA OF CONCERN

Safety-Kleen provides it's clients with the service of completing the hazardous waste manifest. Safety-Kleen must make sure the information is correct if they plan to continue this service. The Department found several discrepancies on manifests ranging from an incorrect EPA Identification number to putting Conditionally Exempt Small Quantity Generator for the EPA Identification number for facilities that are actually Small Quantity Generators.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type:	Violation
Rule:	62-710.510(1)
Explanation:	Each registered person shall maintain records on DEP Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the Department form. These records shall include the following information: the source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one. Specifically, Safety-Kleen failed to document the EPA identification number for Core Pipe Products on used oil manifests.
Corrective Action:	Safety-Kleen shall document EPA identification numbers of the generator on used oil manifests.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 62-710.510(1)		12/20/2010	Each registered person shall maintain records on DEP Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the Department form. These records shall include the following information: the source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one. Specifically, Safety-Kleen failed to document the EPA identification number for Core Pipe Products on used oil manifests.

Areas of Concern

No Areas of Concern

ATTACHMENTS:

Figure 1: HW Parts washer drums



Figure 2: Parts washer for CUP



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Figure 3: Transfer area



Figure 4: Transfer area



Conclusion:

Safety-Kleen was inspected as a permitted storage facility, generator, and transporter/transfer facility, and appeared to be in compliance at the time of the inspection.

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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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Danielle M. Bentzen

PRINCIPAL INSPECTOR NAME

Environmental Specialist

PRINCIPAL INSPECTOR TITLE

NO SIGNATURE

PRINCIPAL INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Michael Eckoff

INSPECTOR NAME

Environmental Specialist

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Dwayne Lewis

REPRESENTATIVE NAME

Branch General Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

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.