



Florida Department of Environmental Protection

Central District
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Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

May 4, 2012

ELECTRONIC MAIL

gary.howard@safety-kleen.com

Mr. Gary Howard
Safety-Kleen Systems Inc
600 Central Park Drive
Sanford, Florida 32771

OCD-HW-12-143

Seminole County-HW
Safety-Kleen Systems Inc
Compliance Evaluation Inspection

Dear Mr. Howard:

A hazardous waste and used oil compliance inspection was conducted at your facility on March 12, 2012. The inspection was conducted under the authority of Section 403.091, Florida Statutes (Fla. Stat.) and Chapter 403, Part IV, Fla. Stat. and is designed to determine the compliance status of your facility with Title 40 Code of Federal Regulations (CFR) Parts 260 – 268 and 279. The provisions of 40 CFR Parts 260 through 268 and 279 have been adopted by reference as the state hazardous waste and used oil rules in Chapters 62-730 and 62-710, Fla. Admin. Code, respectively.

Your facility was inspected as a permitted storage facility, generator, and transporter/transfer facility. No violations were noted at the time of the inspection and no further action is necessary on your part. An inspection report is attached for your records.

If at some point your process or generator status changes, we offer Compliance Assistance Site Visits to help determine if your facility is in compliance with all applicable federal and state hazardous waste, used oil, and universal waste regulations. If you have any questions, please contact me at 407/897-4307 or electronically at Danielle.D.Owens@dep.state.fl.us.

Sincerely,

Danielle D. Owens
Environmental Specialist
Central District Hazardous Waste
Compliance Enforcement

cc: Tom Waters, ECAP3, twaters@seminolecountyfl.gov



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 03/12/2012

On-Site Inspection End Date: 03/12/2012

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)

INSPECTION PARTICIPANTS:

Principal Inspector: Danielle Owens, Environmental Specialist

Other Participants: Gary Howard, Customer Service Manager; John White, Environmental Specialist;
Travis McGathy, Material Handler

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 March 12, 2012, Danielle Owens and John White, Florida Department of Environmental Protection (FDEP), accompanied by Gary Howard and Travis McGathy, 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. Safety-Kleen notified of its hazardous waste activities at this location in 1990 and received EPA identification number FLD984171165 as a generator and hazardous waste storage facility on February 20, 1990.

INSPECTION HISTORY (Since 2005)

On December 20, 2010, 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 failure to document EPA identification numbers on used oil manifests. Safety-Kleen completed corrective actions and the case was closed without enforcement.

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.

Inspection Date: 03/12/2012

On January 19, 2005, the Department inspected Safety-Kleen as a generator and TSD of hazardous waste. Safety-Kleen was informed 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.

RETURN/FILL AREA

There were two drum washers located in this area. Sumps beneath the drum washers appeared dry and clean.

In the area were several empty containers ready to go out to customers, three 55-gallon drums of non-hazardous material, one 15-gallon satellite drum for Safety-Kleen's aerosol cans, and a 55-gallon drum for debris from trucks and the warehouse (Figure 1). All of the drums were properly labeled and dated (if appropriate).

CONTAINER STORAGE AREA AND 10-DAY TRANSFER AREA

The 10-day transfer facility accumulation area is located next to the container storage area. There were three pallets of waste containers in the area (Figure 2).

There were approximately twenty-two pallets of waste scheduled to be shipped on the day of the inspection.

All containers were organized according to compatibility, and were stored with adequate aisle space at a maximum height of two containers. The containers were marked with the date the waste entered the transfer area, labeled hazardous waste (if appropriate) and closed (Figures 3).

Spent mercury lamps, and electronic waste, and waste batteries stored in the area were properly labeled and containerized (Figures 4 and 5).

ABOVE GROUND STORAGE TANK AREA

There were four above ground storage tanks within secondary containment on-site (Figure 6). Each tank is permitted to store 20,000-gallons, but Safety-Kleen considers the tanks full at 19,000-gallons. One tank is used for hazardous waste solvent, one is used for product solvent, and two are used for used oil. Next to the containment area, there was a 17,000 gallon waste antifreeze tank (Figure 7). 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.

RECORDS REVIEW

Records were reviewed for 2011 and 2012. 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.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Inspection Date: 03/12/2012

ATTACHMENTS:

Fig 1: Aerosol & Debris Drums



Fig 2: 10-Day Area



Fig 3: Storage Area



Fig 4: Spent Mercury Lamps



Fig 5: Lamps/Electronic Waste



Fig 6: Above Ground Storage Tanks



Inspection Date: 03/12/2012

Fig 7: Waste Antifreeze



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.

Inspection Date: 03/12/2012

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 Owens

PRINCIPAL INSPECTOR NAME

Environmental Specialist

PRINCIPAL INSPECTOR TITLE

NO SIGNATURE

PRINCIPAL INSPECTOR SIGNATURE

FDEP

ORGANIZATION

John White

INSPECTOR NAME

Environmental Specialist

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Gary Howard

REPRESENTATIVE NAME

Customer Service Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Safety-Kleen

ORGANIZATION

Travis McGathy

REPRESENTATIVE NAME

Material Handler

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.