



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 11/25/2014

On-Site Inspection End Date: 11/25/2014

ME ID#: 40794

EPA ID#: FLD984171165

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

Contact Mailing Address: 600 Central Park Dr, Sanford, Florida 32771-6690

County Name: Seminole

Contact Phone: (561) 738-3026

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: Corina A Lee, Environmental Specialist

Other Participants: John White, Environmental Consultant; Travis McGathy, Lead Material Handler; Alex Hilley, Branch General Manager

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 November 25th, 2014 Corina Lee and John White with the Florida Department of Environmental Protection (FDEP) inspected Safety-Kleen Systems Inc. for compliance with state and federal hazardous waste regulations. Travis McGathy, Lead Material Handler, and Alex Hilley, Branch General Manager represented the facility. The site is located at 600 Central Park Drive, Sanford, Florida, 32771.

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 March 12, 2012 The Department inspected Safety-Kleen as a TSD of hazardous waste. The facility was found to be in compliance at the time of the inspection.

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

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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 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.

TRAINING:

All employees undergo a 8 hour refresher training every year. The training follows as specified in the permit. Training for new hires or for employees moving into new positions include an 80 hour classroom, computer based, and On-The-Job training program. On 12/2/2014, Jeff Curtis, Safety-Kleen EHS Manager, provided a copy of training records for Sanford Branch personnel documenting RCRA training was completed 9/13/2014.

A copy of the permit and application are on-site along with the contingency plan that was last revised on 11/10/2013. The primary emergency coordinator is Alex Hilley and the secondary contact is Gary Howard. Both live within one half-hour of the facility. The contingency plan also includes a list of emergency contact numbers and emergency teams to be notified.

The following arrangements with local authorities have been made:

- Central Florida Regional Hospital on 4/9/14
- Florida Department of Environmental Protection on 11/16/12
- Central Florida Regional Hospital on 11/16/12
- Sanford Police Department on 11/16/12
- Sanford Fire Department on 11/16/12

In accordance with the RCRA Permit, inspection of safety equipment is conducted weekly, the tank farm is inspected daily, and container counts are done on a daily basis. Both inspections are done by Travis McGathy. The facility had multiple incidents of the secondary containment area needing to be pumped due to rainwater. The issues were corrected either the day of or within a few days of the inspection.

The facility stores hazardous waste on-site for less than ten days. Non-hazardous waste can be stored for up to ninety days, but is usually shipped off-site weekly. Spent solvents stored in the tank farm are shipped off-site for reclamation every two weeks.

WAREHOUSE RETURN-FILL AREA:

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 are emptied into the drum washers and stored in the hazardous waste storage tank prior to shipment off-site for reclamation. Clean drums are refilled with product mineral spirits for use in leased parts washers.

The warehouse is divided into two sections, one contains the CUP tank and spent solvent dump stations and the other half is used for storage of waste containers that will be shipped for management off-site. A 200-gallon tank used exclusively for the CUP solvent is located in the Return-Fill Area. The 200-gallon tank used for the CUP solvent has a wire screen on top of the tank used for straining the

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mineral spirits. The resulting debris removed by the screen is managed as hazardous waste in the same drum used for solids removed from the drum washers. The remaining dirty mineral spirits are pumped into the tank.

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

Located near the drum washers were a total of:

- Forty-five 30-gallon drums of clean mineral spirits
- Two 55-gallon drums used for the CUP program
- One 5-gallon container for the CUP program
- Two 5-gallon containers of clean solvent
- One 55-gallon drum of mixed liquid and solid waste from the dump station
- Fourteen 15-gallon containers of new solvent

All containers were properly labeled and managed.

On the warehouse floor, just off the raised portion, were three 330-gallon containers, small dumpsters. The containers are for accumulation of spent, non-hazardous aqueous based cleaners. Two of the containers were full and one was empty.

Fire extinguishers are checked once a year.

There are two spill kits available stored in a flammable cabinet.

90- DAY CONTAINER STORAGE AREA AND 10-DAY TRANSFER AREA:

This area is used for storage of used oil, used oil filters, oily wastes, hazardous waste generated on-site and placed in less than 90-day storage, and hazardous waste received from off-site and stored for less than 10-days.

There were three rows of containers, double stacked, storing used oil filters to be shipped for reclamation. There was a total of one hundred twenty 55-gallon drums and five 30-gallon drums of used oil filters. There were six 55-gallon drums containing used oil samples that were removed from storage and discarded. The drums were labeled "Hazardous Waste", dated 11/5/14, and marked with EPA Waste Codes D001, D006, D007, D008, D018, D039, and D040.

There were three 55-gallon drums containing sludge debris generated by the dump stations. The drums were labeled "Hazardous Waste" and dated 11/3/14, 11/5/14, and 11/15/14.

Located in the 10-Day Transfer Area were:

- Twenty-six 55-gallon drums
- One 80-gallon drum
- One 30-gallon drum
- Two 15-gallon containers
- Four 5-gallon containers

All contained hazardous waste received from off-site generators were properly labeled and dated.

There was also:

- Nine 55-gallon drums
- Two 30-gallon drums of used oil filters
- Three 15-gallon containers of lead wheel weights for recycling
- Two 5-gallon containers of aqueous waste

A second satellite accumulation drum for hazardous waste debris is located in this section of the

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warehouse. The drum was properly labeled "Hazardous Waste." There was also a 15-gallon container for empty aerosol cans. The container was labeled "Hazardous Waste." There were 10 empty aerosol cans sitting on top of the container. Inspectors verified each of the aerosol cans was empty.

Verification that wastes stay on site less than 10-days is managed by a computer log.

Outgoing manifests are kept both as a hard copy on-site and on a computer log. They were not reviewed on-site but were received by the FDEP via thumb drive on December 3rd, 2014. No issues were noted.

On January 12th, 2015 Corina Lee and John White visited the facility again to review the incoming manifests and inspect the tank farm. No issues were noted with the incoming manifests.

The tank farm consisted of four 19,000 gallon tanks. Two of the tanks were designated for used oil. One tank was designated for clean mineral spirits. One tank was designated for waste mineral spirits. No issues were noted.

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.

Corina A Lee

PRINCIPAL INSPECTOR NAME

Environmental Specialist

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION**Supervisor:**Aaron Watkins

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.