



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

October 23, 2017

Jeff Curtis, EH&S Manager
Safety-Kleen Systems, Inc.
600 Central Park Dr.
Sanford, Florida 32771
Jeff.Curtis@Safety-Kleen.com

Re: Safety-Kleen Systems, Inc.
HW Facility ID # FLD984171165
Seminole County

Dear Mr. Curtis:

Department personnel conducted a routine compliance evaluation inspection of the above-referenced facility on July 7, 2017. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact John White at 407-897-4305 or via e-mail at John.White@dep.state.fl.us.

Sincerely,

A handwritten signature in blue ink that reads "Christine Daniel".

Christine Daniel, Manager
Central District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Alex Hilley, Branch General Manager – john.hilley@safety-kleen.com



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc

On-Site Inspection Start Date: 07/07/2017

On-Site Inspection End Date: 07/07/2017

ME ID#: 40794

EPA ID#: FLD984171165

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

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

County Name: SEMINOLE

NOTIFIED AS:

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Ed Bautista, Inspector; Alex Hilley, Branch General Manager; Travis McGathy, Lead 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 July 7, 2017, John White, Florida Department of Environmental Protection (FDEP), inspected Safety-Kleen Systems, Inc. for compliance with state and federal hazardous waste regulations. Alex Hilley, Branch General Manager, and Travis McGathy, Lead Material Handler, represented the facility. Safety-Kleen Systems, located at 600 Central Park Drive, Sanford, Florida, operates under a hazardous waste storage permit for containers and a tank and has also notified the Department of its status as a large quantity generator, transporter, and transfer facility for hazardous waste and as a used oil transporter and used oil generator. The hazardous waste storage permit, Permit Number 22198-HO-007, was issued on May 13, 2014, and expires on May 10, 2019.

Safety-Kleen Systems initially notified the Department of its hazardous waste activities at this location in 1990 and received EPA identified number FLD984171165 on February 20, 1990. The facility last updated its hazardous waste notification on February 14, 2017, with submittal of information updating the hazardous waste and used oil transporter registration. The facility's transporter registration currently expires June 30, 2018. The facility has approximately eighteen employees and normal operating hours are Monday through Friday 7:00 AM to 4:00 PM.

INSPECTION HISTORY: (Last 5 Years)

Safety-Kleen Systems was last inspected by FDEP on November 25, 2014, and no violations were cited at that time.

Safety-Kleen Systems was inspected by FDEP on March 12, 2012, and no violations were cited at that time.

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Process Description:

Safety-Kleen Systems provides parts washing solvent and equipment leasing, product servicing, new oil sales, and hazardous/non-hazardous waste transport and storage services. Hazardous wastes transported by Safety-Kleen Systems are delivered to the Sanford facility where the waste is either stored in the 20,000-gallon permitted hazardous waste solvent storage tank or temporarily stored in the 10-day transfer facility prior to shipment off-site. Some parts washer solvent transported by the facility is treated as product and is used for drum washing as part of the Continued Use Program (CUP).

The permitted container storage area is located in the northern portion of the warehouse. The container storage area measures 34' 1" x 47' 8" and has a sealed concrete floor sloped to a collection sump. The container storage area is permitted to store a maximum of 6,912 gallons of hazardous waste. Drums are stored on pallets and may be double-stacked. The 10-day transfer area and less than 90-day central accumulation areas are located adjacent to the permitted container storage area.

Located on the south side of the facility is the above ground tank storage area. Five above ground tanks are maintained for storage of new mineral spirits solvent, used mineral spirits solvent, used oil, and antifreeze. Four of the tanks, each with a storage capacity of 20,000-gallons, are located within a containment area equipped with a concrete slab and three-foot concrete walls. The pad is protected from weather by an aluminum roof. One tank is permitted for storage of spent hazardous waste solvent, one tank is for storage of new solvent, and two tanks are for storage of used oil. The fifth tank is a 12,000-gallon above ground, double-walled tank used for storage of spent antifreeze.

In-coming spent mineral spirits parts washer solvent is emptied into a tank referred to as a wet dumpster. The wet dumpster, also known as a solvent return/fill station, has a storage capacity of 108-gallons and is located on a raised deck over secondary containment. Solvent from the wet dumpster is directed to a drum washer where chemical and mechanical means are used to clean the inside and outside of drums. The spent solvent is then pumped to the waste solvent storage tank. Waste solvent stored in the permitted 20,000-gallon storage tank is periodically shipped off-site for reclamation. Sludge from the drum washer is periodically removed and stored in containers. Once full, the containers are stored in the less than 90-day hazardous waste central accumulation area. Clean drums are refilled with product mineral spirits for use in parts washers.

Spent immersion cleaner transported to the facility remains in the container and is stored in the permitted container storage area prior to transport off-site for reclamation. Other wastes managed by Safety-Kleen systems include dry cleaning wastes, paint related wastes, used oil, used oil filters, and mercury containing lamps. These wastes remain in the original container while at the facility and are shipped off-site to a final destination facility for treatment or reclamation.

Located in the return/fill area were eighteen 30-gallon containers of spent aqueous cleaner. The containers will be emptied into four 330-gallon steel bins staged adjacent to the return/fill area. The non-hazardous waste will be shipped to Liquid Environmental Services, Jacksonville, Florida. Also in the area were fifteen containers of clean solvent and sixteen 55-gallon drums of used oil filters. The used oil filters will be emptied into seven 330-gallon steel bins staged adjacent to the return/fill area inside the warehouse. All of the steel bins remain inside the warehouse until shipment of the waste off-site.

Located in the less than 90-day central accumulation area were ten 55-gallon drums of hazardous waste debris, four 55-gallon drums of consolidated used oil samples, three 55-gallon drums of PCB sludge, four 55-gallon drums of PCB debris, and two 15-gallon containers of spent aerosol cans. Five dirty solvent containers had been set aside in one corner of the area for sampling purposes. Once the waste is sampled the container contents will be emptied into the wet dumpster. No issues were noted with the drums in this area.

Located in the 10-day transfer area were four 55-gallon drums, seven 30-gallon drums, one 15-gallon container, seven 5-gallon containers of waste and three boxes of mercury containing lamps. No issues were noted with the drums in this area.

Two shower/eyewash stations, fire extinguishers, spill control materials, and two mercury spill kits are available in the warehouse.

Inspection of the above ground storage tanks found no issues. The containment area was clean and free of

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water and debris.

Record Review:

A copy of the hazardous waste permit and permit application are on-site. The contingency plan is up to date. The primary emergency coordinator is Alex Hilley and the secondary contact is Gary Howard. Both parties live within a short distance of the facility. The facility has not been required to implement the contingency plan in the past two years.

All employees participate in an 8-hour annual refresher training. Training was last conducted on October 3, 2016. New employees, or employees moving into a position requiring hazardous waste training, participate in an 80-hour program of classroom, computer based, and on-the-job training.

Arrangements with local authorities have not changed. Arrangements were made with the Sanford Police department, Sanford Fire Department, and FDEP on November 16, 2012. The local hospital, Central Florida Regional Hospital, was last notified on April 9, 2014.

A review of shipping papers found used oil filters are shipped to Safety-Kleen Systems in Ocala, Florida. A random review of in-bound shipping papers and hazardous waste manifests for 2016 and 2017 found no violations. Used oil is checked for halogen content prior to pick up at the generator location. If the electronic sniffer detects a halogenated compound, a Clor-D-Tect 1000 kit is used to verify the halogen content is above or below 1,000 ppm total halogens.

Destination facilities used by the facility include the following: Safety-Kleen Systems, Lexington, South Carolina; Safety-Kleen Systems, Smithfield, Kentucky; Clean Harbors, Bartow, Florida; and Clean Harbors Deer Park, LaPorte, Texas.

Conclusion:

Safety-Kleen Systems was inspected as a permitted hazardous waste storage facility, hazardous waste transporter and transfer facility, and as a used oil transporter and was in compliance at the time of this inspection.

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1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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.

John E. White

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

07/19/2017

DATE

Ed Bautista

Inspector NAME

Inspector

Inspector TITLE

Seminole County Environmental

ORGANIZATION

Alex Hilley

Representative NAME

Branch General Manager

Representative TITLE

Safety-Kleen Systems

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.

Travis McGathy

Representative NAME

Lead Material Handler

Representative TITLE

Safety-Kleen Systems

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.

Report Approvers:**Approver:** Christine Daniel**Inspection Approval Date:** 07/20/2017