



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 02/04/2021 **On-Site Inspection End Date:** 02/04/2021
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:** Data is missing from FIESTA

NOTIFIED AS:

LQG (>1000 kg/month), TSD Facility, Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Offsite Waste Received **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector
Casey Brock, Inspector; Gary Howard, Branch Manager; Jeff Curtis, Sr. Environmental
Other Participants: Compliance Mgr.

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

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On February 4, 2021, John White and Casey Brock, Florida Department of Environmental Protection (FDEP), inspected Safety-Kleen Systems, Inc. for compliance with state and federal hazardous waste regulations. Gary Howard, Branch General Manager, and Jeff Curtis, Sr. Environmental Compliance Manager, 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 solvent storage tank. The hazardous waste storage permit, Permit Number 22198-HO-008, was issued on April 23, 2019, and expires on April 23, 2024.

Safety-Kleen Systems is currently registered as a hazardous waste transporter and transfer facility in accordance with the provisions of Rules 62-730.170 and 171, F.A.C. and as a used oil transfer and filter transfer facility in accordance with the provisions of Rule 62-710, F.A.C. The facility is also registered as a universal waste lamps and devices transporter, universal waste lamps transfer facility, universal waste devices transfer facility, and universal waste lamps and devices small quantity handler in accordance with the provisions of Chapter 62-737, F.A.C.

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 has approximately twelve employees and normal operating hours are Monday through Friday 7:00 AM to 5:00 PM.

Inspection History – Last 5 Years:

Safety-Kleen Systems was last inspected by FDEP on June 21, 2019, and no violations were cited at that time.

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Safety-Kleen Systems was inspected by FDEP on July 7, 2017, and no violations were cited at that time.

Process Description:

Safety-Kleen Systems operates a hazardous waste container storage unit at the facility. The Container Storage Unit, which is completely enclosed, is located in the northern portion of the warehouse. The Container Storage Unit is approximately 34' 1" x 47' 8" with a sloped floor leading to a collection sump. The Container Storage Unit is permitted to hold a maximum of 6,912 gallons of hazardous waste in containers at any one time. The dimensions of the secondary containment systems are large enough to contain spills up to at least 10% of the maximum permitted storage capacity. The drums are stored on pallets and may be double stacked. A synthetic coating material resistant to the solvents stored at this facility has been applied to the floor surface to protect the floor and reduce its permeability. Only hazardous waste with waste codes shown in Attachment E may be accumulated in the Container Storage Unit.

Five above ground storage tanks are maintained at the facility. Four of the storage tanks are underlain by concrete slab with a three foot high concrete wall for secondary containment. Of these four tanks, one 20,000-gallon tank is permitted for storage of hazardous waste solvent, two of the 20,000-gallon tanks are used for storing used oil, and one 20,000-gallon tank is used for storing fresh parts washer solvent. The used oil storage tanks meet the requirements of 40 CFR 279.54, as well as the tank requirements of Chapter 62-762, F.A.C. An additional 12,000-gallon double-walled tank storing non-hazardous used antifreeze waste is located adjacent to the tank farm.

In-coming spent mineral spirits parts washer solvent is emptied into one of two tanks, referred to as wet dumpsters, located in the Return & Fill area. Only one wet dumpster is in operation during any given day. Each 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 20,000-gallon waste solvent storage tank. Clean drums are refilled with product mineral spirits for use in parts washers.

Sludge and debris from the drum washer is periodically removed and stored in a satellite accumulation drum staged in the area. The drum, which was being filled at the time of the inspection, was labeled "Hazardous Waste" and marked with a flammable label. Once full, the drum will be dated and moved to the central accumulation area.

Located on the north side of the Return & Fill area were ten bulk containers for storage of used oil filters. Drums containing used oil filters are emptied into the bulk containers for shipment off-site to a processing facility.

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

Located just inside the warehouse doorway is a satellite accumulation area. In the area was one 55-gallon drum of hazardous waste aerosols and one 55-gallon drum of hazardous waste solids. Both drums were closed, labeled "Hazardous Waste" and marked with flammable labels. The drums in the satellite accumulation area had been prematurely dated; however, both drums were well within the 90-day accumulation period.

Spent immersion cleaner transported to the facility remains in the container and is stored in the 10-day transfer 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. Safety-Kleen Systems may store up to 11,880 gallons of waste in the transfer facility area at any one time in accordance with the maximum design capacity for storage limit reported on their Transfer Facility Notification Form. The storage amount in the transfer area counts against the total hazardous waste storage capacity of the facility, 6,912 gallons.

Since the last quarter of 2020, Safety-Kleen Systems has operated mainly as a pass through facility, using the 10-day storage area instead of accepting hazardous waste into the storage area. It was noted that hazardous waste manifested to the Safety-Kleen Sanford facility as the destination facility identified on the manifest is not stored in the transfer facility area.

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No hazardous waste was in storage during this inspection. In the 10-day hazardous waste transfer area were seven containers of hazardous waste, two 55-gallon drums of waste gasoline, three 55-gallon drums of non-regulated waste and two 30-gallon drums of non-regulated waste. All the containers were properly labeled and managed. Also, in the area were three drums containing Covid-19 contaminated personal protective equipment (PPE) generated at the facility. This waste will be shipped off-site for proper disposal. All other drums stored in the area were product.

No hazardous waste was in the central accumulation area at the time of this inspection. All wastes had been shipped off-site earlier in the week.

Inspection of the tank farm found the secondary containment area was in good condition and the tanks were all properly labeled. The tank farm itself contains two used oil tanks, one hazardous waste tank for storage of used parts washer solvent, one tank for storing antifreeze, and one tank for storing new mineral spirits. All tanks, except for the one containing antifreeze, are located within concrete secondary containment that is in good condition. The tanks are all labeled with their contents, hazards, and capacities. They are monitored continuously with electronic release detection and equipped with overfill alarms when they reach 95% capacity. Their fill ports are capped, locked, labeled, and located within a spill-box that was relatively clean and free of product.

Records Review:

A copy of the hazardous waste permit and permit application are on-site.

The contingency plan was present and reviewed by Safety-Kleen personnel on 4/19/2019, 10/5/2020, and 01/15/2021. The primary emergency coordinator (EC), Gary Howard, is clearly designated and his primary, office, and cell phone numbers are present. The alternate EC, Tom Bright, and his contact information are also present. The contingency plan is up to date. The facility has not been required to implement the contingency plan in the past two years.

Arrangements with the local police department, fire department, hospital and emergency response personnel have been made. The quick reference guide is present and complete.

All employees participate in an 8-hour annual refresher training. Training was last conducted on October 5, 2020. New employees, or employees moving into a position requiring hazardous waste training, participate in an 80-hour program of computer based, Webex (virtual), and on-the-job training. Position descriptions were available for review and no issues were noted.

Review of the facility log required by the permit and 10-day transfer facility log required by Rule 62-730.171(6), F.A.C. noted one instance where an in-coming date was incorrect. The default to a date of 7/1/2000, versus the date of 3/2/2020 when the waste entered the facility, is a known bug in the facility's containerized waste tracking system that the facility is working to correct. The log data was corrected and no further action is required.

The used oil registration, used lamps and devices registration, and hazardous waste registrations were current and posted.

Daily and weekly inspections are conducted on a mobile device with the records being stored on an electronic database. If any non-compliance is noted a work order is generated immediately. The issue is then either fixed in the field or sent on to Gary Howard for further review. Records provided to FDEP included the daily Branch Generated Hazardous Waste inspections, the Container Storage area inspections, the Container Return and Fill Area inspections, tank systems inspections, and the Haz Waste Tank BB inspections for the period of 7/1/2020 through 2/3/2021.

Review of inspection logs found some gaps in daily inspection logs. According to Jeff Curtis, the daily gaps appear to be associated with issues related to syncing of hand-held devices to the corporate database. Daily inspection logs missing included the following dates; 7/22/2020, 7/28/2020, 8/5/2020, 8/11/2020, 8/13/2020, 9/2/2020 through 9/16/2020, 10/16/2020, 12/7/2020, 12/10/2020, 12/11/2020, 12/17/2020, 12/18/2020, 12/21/2020, 1/7/2021, 1/14/2021, and 1/20/2021. Inspection procedures, including ensuring the inspection devices are syncing properly, have been reviewed with staff and should ensure the issue does not continue. The facility explained that over the period of 9/2/2020 through 9/16/2020 the computer system was down and inspections were conducted on paper logs.

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PHOTO ATTACHMENTS:

1. Main entry gate with signage



2. Hazardous Waste Tank



3. Tank farm release detection and signage



4. Tank spill bucket and fill ports



Conclusion:

Safety-Kleen Systems was inspected as a permitted hazardous waste storage facility and no violations were cited as a result 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.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
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	Inspector
Principal Investigator Name	Principal Investigator Title
JW	DEP
Principal Investigator Signature	Organization
	Date
	02/16/2021

Casey Brock	Inspector
Inspector Name	Inspector Title
	FDEP
	Organization

Gary Howard	Branch Manager
Representative Name	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.

Jeff Curtis	Sr. Environmental Compliance Mgr.
Representative Name	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:	Daniel K. Hall	Inspection Approval Date:	02/16/2021
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