



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 5, 2003

ELECTRONIC MAIL

Cindy.Bruce@Safety-Kleen.com

Safety-Kleen
600 Central Park Drive
Sanford, Florida 32771

OCD-HW-C-03-0208

Attention: Cindy Bruce, Branch Manager

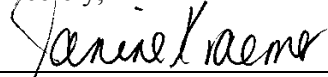
Orange County – HW
Safety-Kleen
FLD984171165
Inspection Summary

Dear Ms. Bruce:

A hazardous waste compliance inspection was conducted at your facility on August 20, 2003. The inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, and 279 as adopted in Florida Administrative Code (F.A.C.) Chapters 62-710 and 62-730.

Your facility was found to be in compliance with the regulations noted above at the time of the inspection. Please review the enclosed inspection report. If you have any questions, please call me at (407) 893-3323.

Sincerely,



Janine Kraemer
Environmental Specialist
Hazardous Waste Program

Enclosures:
RCRA Inspection Report

cc: Mike Redig, FDEP, Tallahassee, mike.redig@floridadep.net
Laurie DiGaetano, EPA Region 4, digaetano.laurie@epa.gov



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HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-Arranged

FACILITY NAME Safety Kleen Corporation EPA ID # FLD984171165

STREET ADDRESS 600 Central Park Drive, Sanford, Florida 32771

E-MAIL ADDRESS Cindy.Bruce@Safety-Kleen.com

COUNTY Seminole PHONE 407-321-6080 DATE 8/20/03 TIME 13:50

NOTIFIED AS: ☐ N/A

CURRENT STATUS:

- ☐ Non Handler
☐ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☒ Generator (>1000 kg/mo.)
☒ Transporter
☒ TSD Facility
Unit Type (s): Storage
☐ Exempt Treatment Facility
☐ Used Oil:

- ☐ Non Handler
☐ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☒ Generator (>1000 kg/mo.)
☒ Transporter
☒ TSD Facility
Unit Type (s): Storage
☐ Exempt Treatment Facility
☐ Used Oil:

2. **APPLICABLE REGULATIONS:**

- | | | | |
|---------------------------------------|--|---|--|
| <input type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input checked="" type="checkbox"/> 40 CFR 263 | <input checked="" type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input type="checkbox"/> 40 CFR 279 | <input type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC | <input type="checkbox"/> 62-737, FAC |

3. **RESPONSIBLE OFFICIAL(s):**

Cindy Bruce, Branch Manager, Safety-Kleen Corporation

4. **INSPECTION PARTICIPANTS:**

Janine Kraemer, FDEP
Bheem Kothur, FDEP
Bill Parker, FDEP

Robert Ferrell, Customer Service Manager,
Safety-Kleen Corporation

5. **LATITUDE/LONGITUDE:** 28°48'22"N/81°19'03"W

6. **SIC Code:** 7359-Equipment Rental and Leasing; 4214-Local Trucking with Storage

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** HO01-0022198-001 **ISSUE DATE:** May 10, 1999 **EXP. DATE:** May 10, 2004

"More Protection, Less Process"

Printed on recycled paper.

9. INTRODUCTION:

On August 20, 2003, Janine Kraemer, Bheem Kothur and Bill Parker of the Florida Department of Environmental Protection (FDEP), accompanied by Robert Ferrell, Customer Service Manager, Safety-Kleen, inspected Safety-Kleen, Corporation (Safety-Kleen), Sanford, for compliance with state and federal hazardous waste standards. 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 employs approximately 30 people who work Monday through Friday from 6:30AM to 5:30PM. City of Sanford provides potable water and sewer.

10. INSPECTION HISTORY:

The facility has been inspected yearly since 1993. The facility was last inspected as a permitted TSD and generator on September 12, 2002, and was in compliance at the time of inspection.

In August 2001, the Department received notice from Patrick AFB that Safety-Kleen transported hazardous waste off-site using a tolling agreement instead of a manifest (treating the site like a CESQG). In September 2001, the Department received notice from KSC that the same thing had occurred at their site. Safety-Kleen was cited for the manifest violations, including transporting hazardous waste without a manifest, and a permit violation for not reporting unmanifested waste shipments in a timely manner once they were notified of the problem.

11. PROCESS DESCRIPTION:

Safety-Kleen is currently operating under hazardous waste operation permit HO01-0022198-001. 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 protected by secondary containment. 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. 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.

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 #2 and tank #4 store product solvent. Tank #1 stores hazardous waste solvent. Tank #3 was issued a RCRA tank closure certification on December 21, 1999.

Safety-Kleen provides equipment leasing, product servicing and hazardous/non-hazardous waste transport, transfer, and/or storage. Hazardous wastes from parts washers are returned to the facility and used for barrel washing, managed according to the Continued Use Program (CUP), or stored in the container storage area or the 10-day transfer area prior to shipping off-site for reclamation.

Safety-Kleen uses spent mineral spirits to conduct barrel washing. Dirty empty drums are placed onto a rotary brush unit within the barrel washer, where spent mineral spirits are used to clean both the inside and outside of the drums. The rotary brush system is mounted on two 514-gallon process tanks. Waste in these tanks is pumped, using a float-actuated pump and overhead piping system, to one of the

20,000-gallon aboveground tank storage tanks, located outside. Clean drums are refilled with product mineral spirits to use in leased parts washers.

Used mineral spirits from specific customers is managed according to the CUP. Incoming continued-use drums of used mineral spirits are returned to the facility and emptied into a 395-gallon tank, labeled "Continued Use Product," that is directly piped to the drum washing units. A permit modification, dated October 10, 2000, was issued for implementation of the CUP.

The container storage area is used for storing waste parts washer solvent, 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.

The 10-day transfer facility accumulation area is located next to the container storage area. The area is identified by a sign, and marked with yellow tape identifying the transfer facility's boundaries.

Safety-Kleen trucks take used oil and antifreeze to a railroad car located in Sanford. The oil is going to a refinery in East Chicago. The facility will be changing the process in September and begin storing used oil in the empty 20,000-gallon tank on site. Prior to use, the tank must meet the requirements of 62-761.500 and be registered with the Department.

12. INSPECTION:

Return/Fill Area

Two drum washers, located in this area, were not in operation at the time of the inspection. Sumps beneath the drum washers appeared dry and clean. Sludge from the barrel washers is removed once a day and stored in a properly labeled and dated, 16-gallon satellite container. The container, when full, is staged in the container storage area prior to shipment off-site.

Adjacent to the drum washers was a 395-gallon tank used exclusively for CUP. The wire screen, used for straining the mineral spirits, is cleaned every two days. The resulting debris is managed as hazardous waste.

Container Storage Area and 10-Day Transfer Area

Approximately 79 containers of hazardous waste were being stored in this area. These included twelve 55-gallon drums, twenty-seven 15-gallon drums, eight 10-gallon drums, two 20-gallon drums, and thirty boxes of fluorescent bulbs. 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 defined 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.

The loading dock had seven SystemOne parts washers picked up from facilities for repairs. Mr. Ferrell indicated all waste is removed from parts washers prior to transportation from the lessee.

Permitted Aboveground Storage Tank Area

Tank #1, holding hazardous waste, was properly labeled "Hazardous Waste." The containment area around the tanks was dry and appeared free of cracks. A sign with the words "Danger No Smoking" was located in this area.

Record Review

Records were reviewed for 2001, 2002, and 2003. The records included daily and weekly inspection logs for the container and tank storage areas, contingency plan, local authority notification, position descriptions, waste minimization plan, financial assurance, training records, and manifests.

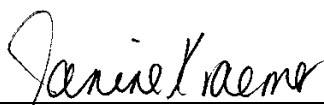
Training records, inspection logs, contingency plan, local authority notifications, waste minimization plan, financial assurance and manifests were in compliance. Position descriptions need to include the types and frequency of training for employees.

Annually, Safety-Kleen, conducts random waste analysis on wastes being transported off-site for treatment. Additionally, Safety-Kleen maintains a computerized database that includes the requirements of 40 CFR 264.73.

13. CONCLUSION:

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

Report Prepared By:



Janine Kraemer
Environmental Specialist

September 5, 2003

Date