



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 24, 2009

ELECTRONIC MAIL

Dwayne.Lewis@Safety-Kleen.com

Dwayne Lewis, Branch Manager
Safety-Kleen Systems, Inc.
600 Central Park Drive
Sanford, Florida 32771

OCD-HW-C-09-040

Seminole County – HW
Safety-Kleen Systems, Inc.- FLD984171165
Inspection Summary

Dear Mr. Lewis:

A hazardous waste compliance inspection was conducted at your facility on December 16, 2008. 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.

Please review the attached inspection report. If you have any questions, please call me at (407) 893-3329.

Sincerely,

Janine Kraemer, CHMM
Environmental Specialist
Hazardous Waste Program



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 12/16/2008 **On-Site Inspection End Date:** 12/16/2008
ME ID#: 40794 **EPA ID#:** FLD984171165
Facility Street Address: 600 Central Park Dr, Sanford, Florida 32771-6690
Contact Mailing Address: 5610 Alpha Dr, Boynton Beach, Florida 33426-8329
County Name: Seminole **Contact Phone:** (561) 523-4719

NOTIFIED AS:

LQG (>1000 kg/month)
Transporter
TSD Facility Unit Type(s)
Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Janine Kraemer, Inspector
Other Participants: Danielle Bentzen, Environmental Specialist; Dwayne Lewis, Branch 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 December 16, 2008 Janine Kraemer and Danielle Bentzen of the Florida Department of Environmental Protection (FDEP), accompanied by Dwayne Lewis, 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.

The facility has operated at this location since March 15, 1993 and employs approximately 30 people who work Monday through Friday from 6:30 AM to 5:30 PM. The facility is connect to the City of Sanford potable water and sewer systems.

Process Description:

Safety-Kleen is currently operating under hazardous waste operation permit HO01-0022198-004. 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 #1 stores

Inspection Date: 12/16/2008

hazardous waste solvent. Tank #2 and tank #4 store product solvent. Tank #3 was issued a RCRA tank closure certification on December 21, 1999. On November 21, 2003, Tank # 3 was put back into service for storage of used oil. The facility added a 17,000-gallon double walled tank for waste antifreeze, located next to the containment 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 is stored in the container storage area, the 10-day transfer area or 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.

CUP parts washer solvent from customers accepted in the program is emptied into a 200-gallon tank labeled "Continued Use Product". A permit modification, dated October 10, 2000, was issued for implementation of the CUP.

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

INSPECTION HISTORY

The facility has been inspected yearly since 1993. Only minor non-compliance issues and/or areas of concern were noted until 2001.

The facility was last inspected as a permitted TSD and generator on June 26, 2007. The Department opened an enforcement case, citing failure to use a manifest for two facilities participating in the Continued Used Program. Results from sampling indicated possible cross contamination by the facilities. This enforcement case has not been resolved yet.

During the January 19, 2005 inspection, Safety-Kleen was reminded that all containers of used oil filters must be properly labeled as "used oil filters".

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 Kennedy Space Center 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 un-manifested waste shipments in a timely manner once they were notified of the problem.

INSPECTION

Return/Fill Area

The two drum washers, located in this area, were not in use 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 55-gallon satellite container. The container, when full, is staged in the container storage area prior to shipment off-site.

Adjacent to the drum washers is a 200-gallon tank used exclusively for CUP solvent. The wire screen on top of the tank is used for straining the mineral spirits. The resulting debris is managed as hazardous waste in the same 55-gallon satellite accumulation drum mentioned above.

Inspection Date: 12/16/2008

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. A float-actuated pump sends the solvent from the sump through the 504-gallon tank to the hazardous waste tank located outside.

At the time of the inspection four 30-gallon, one 16-gallon, one 4-gallon hazardous waste parts washer containers were on the dock and destined for the hazardous waste storage tank via the drum washer. Also on the dock were three 30-gallon drums destined for the CUP tank.

Container Storage Area and 10-Day Transfer Area

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 storage area was under the allowable storage capacity of the facility.

Aboveground Storage Tank Area

Tank #1, storing hazardous waste, was properly labeled "Hazardous Waste." Tank # 3, storing used oil, was properly labeled "Used Oil". 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.

Next to the storage tank area were four properly labeled 250-gallon totes for waste antifreeze. The waste antifreeze totes are elevated and are allowed to settle out in order for the oil/water to rise and the antifreeze to settle on the bottom. Through gravity, the antifreeze is drained off the bottom of the totes. The oily waste water is drained into the above ground storage tank.

Records Review

Records were reviewed for 2007 and 2008. 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.

Annually, Safety-Kleen conducts random waste analysis on wastes being transported off-site for treatment including green parts washer solvent. Parts washer solvents are tested annually nationwide and an average is taken of the results from the testing. The results are used to assign waste codes to the parts washer waste. Currently, red parts washer waste is coded as D001, D018, D039, and D040. Green parts washer waste is coded as D039.

Waste solvent goes to Lexington, KY and is recycled into clean solvent. Antifreeze goes to Georgia Petroleum, Valdosta, GA for recycling. Oil filters go to a recycler in Miami and used oil goes to Safety-Kleen, Chicago, IL for recycling.

AREA OF CONCERN

Safety-Kleen was advised that they are not allowed to provide an EPA Identification number to a facility for use on a manifest unless the facility has actually notified the Department. The Department had a copy of a manifest that a Safety-Kleen employee had added the EPA Identification number after the facility shipped the waste for disposal. The EPA Identification number had not been provided to the facility.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Inspection Date: 12/16/2008

Areas of Concern

No Areas of Concern

Conclusion:

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

Inspection Date: 12/16/2008

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.

Janine Kraemer _____

PRINCIPAL INSPECTOR NAME

Inspector _____

PRINCIPAL INSPECTOR TITLE

NO SIGNATURE _____

PRINCIPAL INSPECTOR SIGNATURE

FDEP _____

ORGANIZATION

Danielle Bentzen _____

INSPECTOR NAME

Environmental Specialist _____

INSPECTOR TITLE

NO SIGNATURE _____

INSPECTOR SIGNATURE

FDEP _____

ORGANIZATION

Dwayne Lewis _____

REPRESENTATIVE NAME

Branch Manager _____

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.