



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

December 17, 2019

Jeff Curtis, EH&S Manager
Safety-Kleen Systems, Inc.
600 Central Park Dr.
Sanford, Florida 3771
Jeff.Curtis@safety-kleen.com

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

Dear Mr. Curtis:

Department personnel conducted an inspection of the above-referenced facility on June 21, 2019. Based on the information provided during 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@Floridadep.gov.

Sincerely,

A handwritten signature in black ink that reads "Daniel K. Hall".

Daniel K. Hall, Manager
Central District
Florida Department of Environmental Protection

Enclosure: Safety-Kleen Sanford 2019



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

FACILITY INFORMATION:

Facility Name: Safety-Kleen Systems Inc
On-Site Inspection Start Date: 06/21/2019 **On-Site Inspection End Date:** 06/21/2019
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

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector
Other Participants: Michael Eckoff, Inspector; Alex Hilley, Branch Manager

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

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On June 21, 2019, John White and Michael Eckoff, 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, 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 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-008, was issued on April 23, 2019, and expires on April 23, 2024.

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 May 2, 2019. The facility's transporter registration currently expires June 30, 2020. 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 July 7, 2017, and no violations were cited at that time.

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

Safety-Kleen Systems Inc Inspection Report

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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 from parts washers is received by the Sanford facility and processed through a solvent return station prior to storage in the 20,000-gallon permitted hazardous waste solvent storage tank. Other hazardous wastes are temporarily stored in the 10-day transfer facility prior to shipment off-site. Previously, some parts washer solvent transported by the facility was treated as product and was used for drum washing as part of the Continued Use Program (CUP). The Continued Use Program was phased out with the re-issuance of the RCRA permit in April 2019.

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 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.

Next to the drum washer was one 55-gallon drum containing flammable debris generated from washing activities. The drum is managed as a satellite accumulation area and was properly labeled "Hazardous Waste" and marked with a "Flammable" sticker.

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.

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

In the storage area was one 55-gallon drum containing flammable debris generated by the facility. The drum is managed as a satellite accumulation area and was properly labeled "Hazardous Waste" and marked with a "Flammable" sticker. Also in the area was one 15-gallon drum for spent aerosols. The drum is managed as a satellite accumulation area and was properly labeled "Hazardous Waste" and marked with a "Flammable" sticker. There were 3 aerosol cans on top of the drum. According to Mr. Hilley, this denotes the cans have at

Safety-Kleen Systems Inc Inspection Report

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least one last use in them. Once used they will be placed in the drum.

Located in the 10-day transfer area were 66 drums of hazardous waste. Located in the 90-day central accumulation area were 8 drums of hazardous waste. Non-hazardous solid waste was stored on a pallet adjacent to the central accumulation area. The volume of waste stored did not exceed the maximum amount of 6,912 gallons allowed by the permit.

Inspection of the tank farm found no issues. The tank farm secondary containment area was in good condition and the tanks were all properly labeled.

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 22, 2018. 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. Position descriptions were available for review and no issues were noted.

The 10-day transfer facility log is maintained electronically. Review of the log found no issues.

Hazardous waste manifests for 2018 and 2019 were reviewed and no issues were noted.

Conclusion:

Safety-Kleen Systems was inspected as a permitted hazardous waste storage facility 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.

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
	DEP
Principal Investigator Signature	Organization
	08/26/2019
	Date
<hr/>	
Michael Eckoff	Inspector
Inspector Name	Inspector Title
	FDEP
	Organization
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Alex Hilley	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.

Report Approvers:

Approver:	Daniel K. Hall	Inspection Approval Date:	08/26/2019
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