



FLORIDA DEPARTMENT OF Environmental Protection

South District
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Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

December 7, 2020

VIA ELECTRONIC MAIL

Kelli Gross, Senior Environmental Specialist
FPL Area Office West
1177 N Lime Avenue
Sarasota, Florida 34237-3513
E-mail: kelli.gross@fpl.com

Re: FPL Area Office West
Facility ID No. FLD000807420
Sarasota County - HW

Dear Ms. Gross:

Department personnel conducted a compliance inspection of the above-referenced facility on November 18, 2020. Based on the information provided during and following the inspection, the facility was determined to be in compliance. 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 Karen Bayly at (239) 344-5616, or via e-mail at Karen.Bayly@FloridaDEP.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer L. Carpenter".

Jennifer Carpenter
Assistant Director
South District
Florida Department of Environmental Protection

Enclosure: Inspection Report



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

FACILITY INFORMATION:

Facility Name: FPL Area Office West
On-Site Inspection Start Date: 11/18/2020 **On-Site Inspection End Date:** 11/18/2020
ME ID#: 45323 **EPA ID#:** FLD000807420
Facility Street Address: 1177 N Lime Ave, Sarasota, Florida 34237-3513
Contact Mailing Address: 2455 Port West Blvd, Riviera Beach, Florida 33407-1214
County Name: Sarasota **Contact Phone:** (561) 845-4973

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Universal Waste: Indicate types of UW generated and/or accumulated at the facility:**
Generate/Accumulate: Mercury Containing Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Karen R. Bayly, Inspector
Other Participants: Natalie Hardman, Environmental Consultant; Kelli Gross, Sr. Environmental Specialist

LATITUDE / LONGITUDE: Lat 27° 20' 51.3192" / Long 82° 31' 29.1356"

NAIC: 221122 - Electric Power Distribution

TYPE OF OWNERSHIP: Private

Introduction:

A compliance evaluation inspection was conducted by Florida Department of Environmental Protection (FDEP) hazardous waste staff at FPL Area Office West (facility) on November 18, 2020 to verify the facility's compliance status with state and federal used oil, hazardous waste and universal waste rules and regulations. The following is a summary of my observations.

A file review reflects the facility was last inspected by FDEP hazardous waste staff on 06-07-2016.

According to the Sarasota County Property Appraiser, Florida Power & Light Company (FPL) owns the property.

According to FDEP records, the facility is currently registered as a Conditionally Exempt Small Quantity Generator/Very Small Quantity Generator (CESQG/VSQG), Used Oil Transporter and Used Oil Transfer facility. The used oil transporter and transfer facility registration expires on 06-30-2021.

Upon arriving at the facility, the purpose of the inspection was reviewed with Kelli Gross, Senior Environmental Specialist. We were granted permission and escorted throughout the inspection by Ms. Gross.

Process Description:

Florida Power & Light maintains and repairs aerial and pad mounted transformers located throughout the service area. The FPL Area Office West is primarily a staging area for emergency stock transformers. No repair work is conducted at this facility. The property consists of office buildings and meeting rooms and does not normally

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generate hazardous waste. Spent fluorescent lamps are managed by a facility maintenance vendor and delivered to the FPL Venice service center. Spent lamps are managed as universal waste, picked up by Ryder Integrated Logistics (EPA ID# FLR000088377) and transported to FPL's Regulated Materials facility (RMF) in West Palm Beach. Shipping papers were reviewed and no issues were noted.

FPL transports its own used oil generated at its own non-contiguous operations to this facility for storage prior to having the used oil picked up by a certified used oil transporter and is therefore not subject to the record keeping and reporting requirements of Rule 62-710.510, F.A.C. and is exempt from Rule 62-710.600, F.A.C. with the exception of financial responsibility requirements. A 2017 Statement of Self Insurance for Used Oil Transporter was provided to FDEP on 01-08-2020.

Non-PCB used mineral oil is picked up from eight other FPL service centers in the local area using a single transfer truck with a volume capacity of 1500 gallons. Spill control material is maintained on the truck. Used oil is off loaded into a 6000-gallon double-walled above ground storage tank the same day the used oil is picked up. Ms. Gross verified that used oil is never stored in the truck >24 hours. The registered storage tank (ID#9814811) was inspected and no issues were noted. Ms. Gross indicated the storage tank was recently inspected by Sarasota County staff and no issues were noted.

Transporter used oil acceptance logs and used oil disposal manifests were reviewed. Acceptance logs document the date of used oil pick-up, volume of used oil, pick-up location, driver's signature, as well as the date, gallons and driver's signature of the used oil transferred to the used oil storage tank. The logs verify that used oil is off-loaded daily into the storage tank.

Used oil disposal manifests indicate Theta America Group/Titan America (EPA ID# FLR000220202) picks up the facility's used oil monthly. Records reflect that used oil is not stored on-site for >35 days.

Training records were reviewed for the three drivers and were up to date. The facility currently subcontracts with U.S. Ecology for 24/7 on-call assistance with oil response, management and recordkeeping.

According to Ms. Gross, the process for handling equipment not labeled as non-PCB has not changed since the previous inspection. Equipment that is not labeled as non-PCB is tested in the field to determine if PCBs are present. If the used oil is tested and fails, a sample is collected and sent to FPL's Physical Distribution Center (PDC) for further analysis before draining and pumping into the transfer truck. Oily debris or used mineral oil determined to contain >50 ppm PCBs is drummed and sent to FPL's PDC. All shipments are tracked on an internal shipping paper.

At the time of the inspection, one blue, 55-gallon, polyethylene drum was noted outside near the storage tank. The drum was closed, not labeled and appeared full. It was later determined to contain bags of top soil. It was recommended to maintain all drums and containers labeled as to their contents.

PHOTO ATTACHMENTS:

transfer truck



above ground storage tank



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unlabeled 55-gallon drum



empty drums



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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

Karen R. Bayly**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**12/07/2020**Date**Natalie Hardman**Inspector Name**Environmental Consultant**Inspector Title**FDEP**Organization**Kelli Gross**Representative Name**Sr. Environmental Specialist**Representative Title**FPL**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:**Karen R. Bayly**Inspection Approval Date:**12/07/2020