



# FLORIDA DEPARTMENT OF Environmental Protection

Central District Office  
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Orlando, Florida 32803

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

June 4, 2024

Jeffrey Curtis, Sr. Environmental Compliance Manager  
Safety-Kleen Systems, Inc.  
600 Central Park Drive  
Sanford, FL 32771  
[jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)

Re: Compliance Assistance Offer  
Safety-Kleen Systems, Inc  
Hazardous Waste Facility ID No.: FLD984171165  
Seminole County

Dear Mr. Curtis:

An inspection was conducted at your facility on March 12, 2024. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Potential non-compliance with the requirements of chapter 403, Florida Statutes, and chapter(s) 62-730, Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item(s) of concern noted and respond in writing within **30 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item(s) of concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Gina Laddick of the Central District Office at (407) 897-4309 or via e-mail at [Gina.Laddick@FloridaDEP.gov](mailto:Gina.Laddick@FloridaDEP.gov). We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel K. Hall".

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

Enclosures: Inspection Report

cc: Daniel K. Hall, CD DEP, [Daniel.K.Hall@FloridaDEP.gov](mailto:Daniel.K.Hall@FloridaDEP.gov)  
Gina Laddick, FDEP, [Gina.Laddick@FloridaDEP.gov](mailto:Gina.Laddick@FloridaDEP.gov)  
William Kappler, EPA, [Kappler.William@epa.gov](mailto:Kappler.William@epa.gov)  
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Gary Howard, Safety-Kleen, [gary.howard@safety-kleen.com](mailto:gary.howard@safety-kleen.com)



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

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**FACILITY INFORMATION:**

**Facility Name:** Safety-Kleen Systems Inc

**On-Site Inspection Start Date:** 03/12/2024

**On-Site Inspection End Date:** 03/12/2024

**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:** (561) 523-4719

**NOTIFIED AS:**

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

**WASTE ACTIVITIES:**

**Generator:** LQG **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer, Operating Commercial TSD **Used Oil:** On-Spec, 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 **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 TSD Facility Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Gina Laddick, Inspector

Other Participants: William Kappler, Inspector, Tarin Tischler, Inspector, Jeff Curtis, Sr. Environmental Compliance Manager

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

**NAIC:** 562112 - Hazardous Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On March 12, 2023, Gina Laddick, Florida Department of Environmental Protection (FDEP or Department) and Tarin Tischler and William Kappler, Environmental Protection Agency (EPA) inspected Safety-Kleen Systems, Inc. for compliance with state and federal hazardous waste regulations. Jeff Curtis, 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 (expires June 30, 2024) and transfer facility in accordance with the provisions of Rules 62-730.170 and 171, F.A.C. and as a used oil transporter, transfer facility, and marketer, and a used oil filter transporter and transfer facility (expires June 30, 2024) 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 Rule 62-737, F.A.C.

Hazardous waste transporter and used oil handler liability insurance coverage expires November 1, 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 has approximately

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thirteen 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 most recently inspected by the Department on April 20, 2022, and was determined to be out of compliance at that time. The violations cited include failure to properly complete a manifest and failure to keep a satellite accumulation area container closed. A warning letter was issued with the inspection report and the violations were resolved through short form consent order (OGC File No.: 22-2274)

Safety-Kleen Systems was inspected by the Department on February 4, 2021, and no violations were cited at that time.

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

**Process Description:**

The facility consists of one 0.37 acre building that is split into several areas including Return and Fill, an area for 10-day and 90-day waste storage, product storage, and office space.

**Return and Fill Area:**

In-coming spent mineral spirits parts washer solvent is emptied into one of two tanks, referred to as wet dumpsters, located in the Return and 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.

Inspectors also observed three 55-gallon drums sitting on the edge of the dock. These containers were marked as brought in 3/4/2024. Two of the containers were labeled as non-hazardous, and one was labeled as hazardous waste but was not labeled with an indication of hazards of the contents [40 CFR 262.17(a)(5)(i)]. Facility representatives informed inspectors that this container should have been dumped into the return and fill station upon arrival. Inspectors informed facility representatives that any container storing hazardous waste must be marked and labeled with an indication of the hazardous of its contents. The container was dumped into the wet dumpster on site.

Sludge and debris from the drum washer are periodically removed and stored in a satellite accumulation drum staged in the area. The drum was properly closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents.

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 these bulk containers for shipment off-site to a processing facility. Two shower/eyewash stations, fire extinguishers, spill control materials, fire alarm pull stations, and two mercury spill kits are available in the warehouse. The warehouse is equipped with a sprinkler system.

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 properly closed and labeled with the words "Hazardous Waste" and an indicator of the hazards of the contents.

Wastes managed by Safety-Kleen Systems can 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.

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The facility has mainly operated as a pass-through facility, using only the 10-day storage area instead of accepting hazardous waste into the permitted storage area. At the time of the inspection, the facility stated that they have only been terminating spent parts washer solvent and are not currently accepting, treating, or disposing of other hazardous waste.

In the 10-day area were 27 pallets of waste in containers including 5-gallon containers, 55-gallon drums, 250-gallon totes, and cubic yard boxes. The waste consisted of both hazardous and non-hazardous waste. All containers were properly closed and labeled. The oldest date noted in the 10-day storage area was 03/04/2024.

The 90-day central accumulation area for branch generated waste had two pallets of waste. One pallet had one 55-gallon drum of oil samples and the other pallet had four 55-gallon drums of hazardous waste branch debris. All the containers were properly closed and labeled. The oldest date noted in the 90-day storage area was 02/20/2024.

In the northwest corner of the property was a frac tank used to store used oil. The tank was labeled "Used Oil" and appeared to be managed properly.

#### Tank Farm:

The tank farm consists of five above ground storage tanks. Four of the storage tanks have a 20,000-gallon capacity and are located within concrete secondary containment and under a roofed structure. The four tanks include two used oil tanks, one hazardous waste tank for storage of used parts washer solvent, and one tank for storing new mineral spirits. Adjacent to the containment area is also one 12,000-gallon tank for storing antifreeze located adjacent to the tank farm.

Upon inspection, the secondary containment area and all five tanks appeared to be in good condition. The two used oil tanks, antifreeze, and new mineral spirits tanks were properly labeled with their contents, hazards, and capacities. The hazardous waste tank was also labeled with its contents and capacity but the indication of the hazards of the contents, an NFPA diamond to show flammability, was unclear due to fading. The facility was informed that the indication of the hazards of the contents was unclear and it was recommended that this indication be replaced. On March 19, 2024, the facility provided a photo via email that the label had been replaced.

Located within the secondary containment was a small oil spill under the facility's sample point. The facility noted the spill at the time of the inspection and on March 19, 2024, the facility provided a photo via email that the spill has been cleaned.

The tanks 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:

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

The contingency plan was on-site for review. The Safety-Kleen personnel document annual reviews of the contingency plan. The plan was most recently revised in January 2021 but most recently reviewed on October 31, 2023, and no changes were made.

The contingency plan notes the primary emergency coordinator as Gary Howard and the alternate emergency coordinator as Shane Adams. The facility has not been required to implement the contingency plan in the past two years. The contingency plan contained a quick reference guide which was present and complete with all required items.

Arrangements with the local police department, fire department, hospital and emergency response personnel

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were made in 2022 after reviewing and updating the contingency plan. Arrangements with the Sanford Police Department, Central Florida Regional Hospital, and the Sanford Fire Department were made on May 20, 2022.

Training records for staff were provided for review and appeared to be in compliance. Site specific RCRA and contingency plan training is conducted annually. The most recent trainings were conducted in September 2023 and again in March 2024.

Job descriptions of the following positions were provided: Sales and Service Representative, Material Handler, Branch Administrator, Customer Service Manager, Account Manager, and Branch General Manager, were reviewed and appeared to be in compliance.

Safety-Kleen inspects and documents both the 10-day storage transfer facility, titled "CO CSA (Container Storage Area) Inspections", and the 90-day storage central accumulation area, titled "CO Branch Generated Hazardous Waste Inspections", daily. The inspections are recorded on the Facility's internal online database. Inspections for the past three years were available for review and appeared to be in compliance, containing all required information.

Records of the daily visual inspections of the facility's tank system were also reviewed on-site. These inspections are included in the facility's internal database. The tank inspections are titled "CO Tank Systems" and appeared to contain all required information to record information about the tank equipment and conditions. These inspections are conducted daily during the week when the facility is open and does not include weekends. These inspections are to be conducted at least once each day the system contains hazardous waste, regardless of whether the facility is conducting manufacturing operations [40 CFR 40 CFR 262.17(a)(2) which incorporates 40 CFR 295.195(b) and (c)].

Daily inspections are conducted on the facility's operating days, Monday through Friday. Inspections are conducted in the 90-day branch generated waste storage area, the 10-day storage area, the tank farm, and the return and fill area. The inspections were reviewed on-site and appeared to be in compliance with the permit.

Hazardous waste shipping manifests were reviewed on-site and included proper Land Disposal Restriction Notification paperwork and appeared to be in compliance.

**New Potential Violations and Areas of Concern:****Violations**

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Type:	Violation
Rule:	262.17(a)(2)
Explanation:	<p>40 CFR 262.17(a)(2): If the waste is placed in tanks, the large quantity generator must comply with the applicable requirements of subpart J (except §§ 265.197(c) and 265.200 of this subchapter) as well as the applicable requirements of 40 CFR part 265, subparts AA through CC.</p> <p>40 CFR 295.195(a): The owner or operator must inspect at least once each operating day data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design.</p> <p>Specifically, the facility failed to conduct inspections at least once each day that the tank system contains hazardous waste. Safety-Kleen conducted inspections each week day when the facility was in operation but failed to inspect on weekends.</p>
Corrective Action:	<p>The facility must perform inspections at least once each day that the system contains hazardous waste.</p> <p>The facility shall provide a written response containing a plan moving forward to ensure the tank system is inspected as required and submit documentation of 2 weeks worth of inspections to demonstrate the corrective action.</p>

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Type:	Violation
Rule:	262.17(a)(5)(i)(B)
Explanation:	<p>Containers. A large quantity generator must mark or label its containers with the following: (B) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); [...]</p> <p>Specifically, the facility failed to label one 55-gallon drum of hazardous waste with an indication of the hazards of the contents.</p>
Corrective Action:	<p>During the inspection, the facility stated that the reason this container was not properly labeled is due to the fact that it should have been dumped into the wet dumpster upon arrival. The inspectors informed the facility that any container storing hazardous waste must be labeled with an indication of the hazards of the contents. The drum was dumped into the wet dumpster while the inspectors were on-site. No further action is required.</p>

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**Conclusion:**

Safety-Kleen Systems, Inc. was inspected on March 12, 2023 for compliance with state and federal hazardous waste regulations and was determined to be out of compliance at that time.

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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

Gina Laddick**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**05/29/2024**Date**William Kappler**Inspector Name**Inspector**Inspector Title**EPA**Organization**Tarin Tischler**Inspector Name**Inspector**Inspector Title**EPA**Organization**Jeff Curtis**Representative Name**Sr. Environmental Compliance  
Manager**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:**05/30/2024