



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Alexis A. Lambert
Secretary

South District
PO Box 2549
Fort Myers, FL 33902-2549
SouthDistrict@FloridaDEP.gov

March 14, 2025

Porfirio Cevallos, Environmental Services Project Manager
Florida Power & Light CO
2455 Port West Blvd
West Palm Beach, FL 33407
Porfirio.cevallos@FPL.com

Re: In Compliance Letter
Florida Power & Light CO - Area Office West
Facility EPAID No. FLD000807420
1177 N Lime Ave, Sarasota, FL 34237
Sarasota County – Hazardous Waste

Dear Mr. Cevallos:

Department personnel conducted a routine compliance evaluation inspection of the above-referenced facility on February 18, 2025. 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 compliance efforts. Should you have any questions or comments, please contact **Genevieve Grah** at **239-344-5667** or via e-mail at **Genevieve.Grah@FloridaDEP.gov**.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Czahor".

Matt Czahor
Environmental Administrator
Compliance Assurance Program
South District
Florida Department of Environmental Protection

Enclosure: Hazardous Waste Inspection Report dated February 18, 2025

cc: Kelli Gross, Florida Power & Light Company, Kelli.Gross@FPL.com



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

FACILITY INFORMATION:

Facility Name: FPL Area Office West

On-Site Inspection Start Date: 02/18/2025

On-Site Inspection End Date: 02/18/2025

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

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility Facility

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for VSQG (<100 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Genevieve Grah, Inspector

Other Participants: Ashley Giron, Environmental Specialist, 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 routine compliance evaluation inspection of FPL Area Office West (hereinafter, "FPL" or "facility") was conducted on February 18, 2025 (2/18/2025) by Genevieve Grah with the Florida Department of Environmental Protection (DEP). The facility is located at 1177 N Lime Ave, Sarasota, Sarasota County, Florida. FPL was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, and 279 adopted and incorporated by reference in Rule 62-710, 62-730, Florida Administrative Code (F.A.C.). The inspector was accompanied by Ashley Giron from DEP.

The inspectors were escorted around the facility by Kelli Gross, Sr. Environmental Specialist. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection.

FPL occupies 218,792 square feet of property, but utilizes approximately 23,100 square feet, and is connected to city water and sanitary sewer. FPL has been operating at its current location since 1980 and employs two staff.

Notification History:

FPL initially notified with the department as a non-handler of hazardous waste on 5/18/1983. The facility then notified as a transporter and transfer facility of used oil on 10/26/2015. The facility was assigned the EPA Identification (EPAID) Number FLD000807420. The facility most recently notified as a used oil transporter and transfer facility on 2/6/2025.

Inspection History:

Inspection Date: 02/18/2025

The facility was previously inspected by the department on 11/18/2020 as a used oil transporter and transfer facility and was found to be in compliance at the time of inspection.

Personal Protective Equipment (PPE) was not required to enter the facility. Department personnel were equipped with steel-toed boots.

Process Description:

FPL is responsible for maintaining and repairing aerial and pad mounted transformers located throughout their service area. 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. This location is primarily utilized for storage of used mineral oil, oily dirt and debris, as well as storage for environmental supplies for the transporter trucks. The property consists of the office building, two conex containers, and a storage area for oily debris and used oil. No other waste is generated at this facility. According to Mrs. Gross, the office building is no longer used, and all employees on-site have been transferred to the FPL Ringling Substation (EPAID: FLD98168518) at 2300 Hammock Place, Sarasota, FL 34235. All used oil generation and storage are maintained at FPL (EPAID: FLD000807420).

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 section 62-710.510, F.A.C. and is exempt from section 62-710.600, F.A.C. with the exception of financial responsibility requirements. A 2025 Statement of Self Insurance for Used Oil Transporter was provided to DEP on 1/6/2025.

Non-PCB used mineral oil is picked up from various other FPL service centers in the local area using a single transfer truck with a volume capacity of 1,500 gallons. At the time of inspection, inspectors observed one 6,000-gallon double-walled aboveground storage tank (AST), labeled with the words, "Used Mineral Oil" and "<50 PPM PCB's" (photo 1). According to Ms. Gross, the used oil is never stored in the pumper truck for >24 hours and is offloaded into the AST the same day the used oil is picked up. The registered storage tank (ID#9814811) was inspected, and no issues were noted at the time of inspection.

Inspectors also observed two closed 30-yard roll-offs containing oily debris (photo 2), labeled "Oily Dirt & Debris" and "49 PPM PCB's or Less." Additionally, inspectors observed four closed 55-gallon containers of oily debris, not properly labeled but currently in process of being tested for PCB levels (photo 3). As a Best Management Practice (BMP), all drums and containers should be properly labeled with the words identifying their contents.

*Following the inspection, email confirmation was provided that the 55-gallon drums contained non-PCB oily dirt and have since been properly labeled.

At the time of inspection, inspectors noted the two conex containers contained environmental supplies utilized for the facility and drivers. This includes new absorbents, tools, spill kits, chemicals used for the pumper truck such as antifreeze coolant, and cleaners to combat oil spills (photos 4 & 5). Inspectors also observed nine blue poly drums containing new absorbent material outside of the conex containers, and two open containers of waste absorbent material that were generated due to rainwater exposure (photos 6 & 7). Outside of the conex containers, inspectors observed approximately 23 empty 55-gallon drums utilized for future oily debris storage (photo 8).

According to Ms. Gross, the process of 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.

Training records and certifications were reviewed for the facility's two drivers and were up to date for the

Inspection Date: 02/18/2025

Hazardous Waste Operations and Emergency Response.

The facility displays a valid registration form and identification number in a prominent location inside the facility.

Records Review**Acceptance Logs:**

The facility maintains a "Transporters Used Oil Acceptance Log," which is used by facility's personnel to track the time of the first batch of used oil is accepted from facilities and transferred to the used oil tank to ensure that used oil is not stored on-site for more than 35 days. The Acceptance Logs document the date of used oil pickup, 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 following wastes were observed on the Acceptance Log:

- On 01/17/2025 a total of 750-gallons from 6 sites
- On 01/31/2025 a total of 750-gallons from 5 sites
- On 02/04/2025 a total of 1,250-gallons from 1 site
- On 02/06/2025 a total of 1,400-gallons from 3 sites

At the time of inspection, the Acceptance Logs had not been completed with the date of used oil pick-up. Therefore, the inspector could not verify via records review that the used oil is offloaded daily into the storage tank.

Manifests:

Non-hazardous waste manifests for years 2025, 2024, and 2023 were available for review during the inspection. The facility maintains all documentation of reconciliation or noncompliance with the RCRA requirements. Used oil disposal manifests indicate Theta America Group/Titan America (EPAID: FLR000110536) picks up the facility's used oil monthly.

Manifest tracking number #11782 documents that the most recent pickup of 3,763 gallons of non-hazardous mineral oil occurred on 02/10/2025 by TA America Group LLC (EPAID: FLR000110536).

Annual Report:

The facility does not submit an annual report on DEP Form 62-701.900(14) summarizing the onsite records for the previous calendar year [62-710.510(5), F.A.C.] because the facility is a generator who transports only its own used oil generated at their own non-contiguous operations to their own central collection facility for storage prior to having their used oil picked up by a certified used oil transporter [62-710.510(3), F.A.C.]

PHOTO ATTACHMENTS:

Photo 1: 6,000-gallon AST



Photo 2: 30-yard Roll-off containers



Photo 3: Four closed 55-gallon containers of oily debris



Photo 4: Inside Conex Containers



Photo 5: Inside Conex Containers (Pt.2)



Photo 6: Nine blue poly drums containing new absorbent



Photo 7: Two open waste absorbent containers



Photo 8: Empty 55-gallon drums



Conclusion:

FPL Area Office West was inspected as a Used Oil Transporter and Transfer facility and was found to be in compliance at the time of inspection.

Inspection Date: 02/18/2025

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	✓		

Inspection Date: 02/18/2025

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

Genevieve Grah**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**03/14/2025**Date**Ashley Giron**Inspector Name**Environmental Specialist**Inspector Title**DEP**Organization**Kelli Gross**Representative Name**Sr. Environmental Specialist**Representative Title**Florida Power & Light Company**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:**Pamela S Coffin**Inspection Approval Date:**03/14/2025