



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** Routine Complaint Follow-Up Permitting File Review

FACILITY NAME Safety-Kleen Systems Sanford EPA ID # FLD984171165

STREET ADDRESS 600 Central Park Drive, Sanford, Florida 32771

MAILING ADDRESS 600 Central Park Drive, Sanford, Florida 32771

COUNTY Seminole PHONE 407/321-6080 DATE 8/10/01 TIME _____

NOTIFIED AS: N/A

CURRENT STATUS:

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s): Storage
- Exempt Treatment Facility
- Used Oil:

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s): Storage
- Exempt Treatment Facility
- Used Oil:

2. **APPLICABLE REGULATIONS:**

- | | | | |
|---------------------------------------|--------------------------------------|---|--|
| <input type="checkbox"/> 40 CFR 261.5 | <input type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input checked="" type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input type="checkbox"/> 40 CFR 279 | <input type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC | <input type="checkbox"/> 62-737, FAC |

3. **RESPONSIBLE OFFICIAL(s):**

Keith Marcille, Branch Manager

4. **INSPECTION PARTICIPANTS:**

John White

5. **LATITUDE/LONGITUDE:**

6. **SIC Code:** N/A

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** HO01-0022198-001 **ISSUE DATE:** May 10, 1999 **EXP. DATE:** May 10, 2004

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Website: www.dep.state.fl.us

Phone: 407/894-7555 ♦ Fax: 407/893-3167

9. INTRODUCTION:

Safety-Kleen, located at 600 Central Park Drive, Sanford, Florida, operates as a generator, transporter, transfer facility, and permitted hazardous waste storage facility. Safety-Kleen has operated at this particular location since March 15, 1993 and employs approximately 30 people Monday through Friday from 6:00AM to 9:00PM. Potable water and domestic waste needs are serviced by the City of Sanford.

Safety Kleen Sanford was last inspected on March 12, 2001 as a permitted storage, transfer facility, transporter, and generator. The facility was in compliance with hazardous waste regulations at that time.

Safety-Kleen is currently operating under the hazardous waste operation permit, HO01-0022198-001. Safety-Kleen, Sanford operates under the permit which includes the following areas: 1) 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; 2) a separate outside aboveground tank storage area with four 20,000-gallon steel tanks with secondary containment. Tank #1 contains waste solvent and is regulated under this permit. Tank #3, which had stored antifreeze, received a closure certification on December 21, 1999. This tank is planned to store used oil. Tank #2 and #4 contain product Parts Cleaner 105 and product Premium 150 Solvent, respectively. The amount of waste stored in the container storage area at any one time is not to exceed 6,912 gallons.

10. INSPECTION HISTORY:

Inspection conducted on March 12, 2001 - facility was in compliance.

Inspection conducted on August 3, 2000 – facility was in compliance.

Inspection conducted on August 4, 1999 – facility was in compliance.

Inspection conducted on June 10, 1998 – facility was in compliance.

Inspection conducted on September 18, 1997 – facility was in compliance.

Inspection conducted on March 12, 1996 – facility was in compliance.

Inspection conducted on February 20, 1995 – facility was in compliance.

Inspection conducted on December 10, 1993 – facility was in compliance.

11. PROCESS DESCRIPTION:

Safety-Kleen Sanford has 17 trucks that are used for servicing customers. The trucks are constructed to provide an estimated 20 services per day and/or transport 20 drums back to the facility. Equipment and solvent, including mineral spirits, immersion cleaner and perchloroethylene, are leased to Safety-Kleen customers. Spent solvent is picked up at regular intervals, at which time the spent solvent is exchanged for clean product.

Spent mineral spirits is returned to the Sanford facility's return/fill area where the drums are emptied into barrel washers. Empty drums are placed onto a rotary brush unit, within the barrel washer, and the dirty mineral spirits is used to clean the inside and outside of the drum. Clean drums are refilled with mineral spirits and returned to the service trucks. The waste mineral spirits is transferred, using a float actuated pump and overhead pipe system, from the barrel washers to the aboveground tank storage tank. Sludge accumulated in the barrel washer is removed at least once per day. The sludge is collected in 16-gallon satellite containers, which when full, are then stored in the container storage area prior to shipment off-site. The waste mineral spirits storage tank is pumped out when the capacity reaches 19,000-gallons or a height of 22 feet 5 inches. Waste mineral spirits is transported to Safety-Kleen's Lexington, South Carolina facility for reclaiming.

Safety-Kleen also operates a service referred to as "continued use". This "Continued Use Program" diverts a portion of used mineral spirits from qualified customers and places it in a continued use "wet dumpster" that is directly piped to the drum washing units for chemical and mechanical cleaning of incoming continued use drums. A permit modification, dated October 10, 2000, was issued for implementation of the Continued Use Program.

Safety-Kleen provides customers with paint thinner, and cleaning solvent. When the material is no longer useful, Safety-Kleen picks up the spent material and stores the hazardous waste in the container storage area, prior to shipping the spent materials to Safety-Kleen's Lexington, South Carolina and Hebron, Ohio facilities.

Safety-Kleen also services facilities generating used oil. Safety-Kleen samples and analyzes the used oil for PCB's and other contaminants prior to accepting the used oil from the customer. The drivers test used oil samples with the use of CLOR-D-TECT 1000 screening kits. No results of these tests are kept. A metal fire cabinet located next to the container storage area is used for the accumulation of used oil samples. Oil samples are only analyzed if the East Chicago refinery reports that a rail car shipment they received is contaminated. The samples are accumulated for less than 90 days and then properly disposed.

12. Record Review:

On August 10, 2001 the Department received written notice from U.S. Patrick Air Force Base that, between June 2000 and August 2001, Safety-Kleen Corp. transported 8 shipments of hazardous waste off of Patrick Air Force Base property without a hazardous waste manifest [40 CFR 263.20(a)]. Patrick Air Force Base is a large quantity generator of hazardous waste and, as such, a uniform hazardous waste manifest is required for each shipment of hazardous waste off of the property.

On September 7, 2001, the Department received written information from U.S. NASA Kennedy Space Center documenting that, between August 2000 and May 2001, Safety-Kleen Corp. transported 7 shipments of hazardous waste off of U.S. NASA Kennedy Space Center property without a hazardous waste manifest [40 CFR 263.20(a)]. U.S. NASA Kennedy Space Center is a large quantity generator of hazardous waste and, as such, a uniform hazardous waste manifest is required for each shipment of hazardous waste off of the property.

This is a repeat violation by Safety-Kleen. On February 27, 1992, the Department took state-wide enforcement against Safety-Kleen for violations, including the transportation of hazardous waste without a manifest from Olin Corporation, U.S. NASA Kennedy Space Center, Emergency One, and Hartland Pontiac.

An inspection of Safety-Kleen's operations conducted on October 30, 1991, when the facility was located at 505 Plumosa Drive, Altamonte Springs, Florida, documented the removal of hazardous waste from U.S. NASA Kennedy Space Center without the use of a hazardous waste manifest. In response to the enforcement action, in a submittal dated April 1, 1992, Safety-Kleen provided the Central District with an Unmanifested Waste Report for wastes removed from U.S. NASA Kennedy Space Center without the use of a hazardous waste manifest

13. Summary of Potential Non-Compliance Items and Recommended Corrective Actions:

a) Permit HO01-0022198-001 Specific Conditions Part I, Condition 14 / 40 CFR 264.76 - Unmanifested Waste Report

The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76. In accordance with 40 CFR 264.76, if a facility accepts for treatment, storage, or disposal any hazardous waste from an off-site source without an accompanying manifest, or without an accompanying shipping paper as described in § 263.20(e)(2) of this chapter, and if the waste is not excluded from the manifest requirement by § 261.5 of this chapter, then the owner or operator must prepare and submit a single copy of a report to the Regional Administrator within fifteen days after receiving the waste.

Violation

Safety-Kleen Sanford accepted 15 unmanifested shipments of hazardous waste from U.S. NASA Kennedy Space Center and U.S. Patrick Air Force Base between June 2000 and August 2001. No unmanifested waste reports have been received regarding shipments from these two facilities during the time period in question.

Recommended Corrective Action

Within 15 days of receipt of this report, Safety-Kleen Corp. must file unmanifested waste reports covering all of the shipments in question.

b) 40 CFR 263.20(a) The manifest system.

A transporter may not accept hazardous waste from a generator unless it is accompanied by a manifest signed in accordance with the provisions of 40 CFR 262.20.

Violation

Safety-Kleen Sanford transported 15 unmanifested shipments of hazardous waste from U.S. NASA Kennedy Space Center and U.S. Patrick Air Force Base between June 2000 and August 2001.

Recommended Corrective Action

Safety-Kleen Corp. must provide the Department with a written plan documenting efforts to properly train staff to ensure waste is not transported from generators without the use of a uniform hazardous waste manifest.

14. CONCLUSION:

At the time of this File Review Safety-Kleen, Sanford was regulated as a permitted hazardous waste storage facility, generator, transporter, and transfer facility and was not in compliance.

Report Prepared By:



John White
Environmental Specialist

Date: October 10, 2001