



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 Pre-Arranged

FACILITY NAME Safety-Kleen Systems Sanford EPA ID # FLD984171165

STREET ADDRESS 600 Central Park Drive, Sanford, Florida 32771

MAILING ADDRESS Same as above

COUNTY Seminole PHONE 407/321-6080 DATE 3/12/01 TIME 1100 hrs.

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 checked="" type="checkbox"/> 40 CFR 262 | <input checked="" 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 checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC | <input checked="" type="checkbox"/> 62-737, FAC |

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

Ray Zimmerman, Branch Manager-Safety Kleen

4. **INSPECTION PARTICIPANTS:**

Morgan Leibrandt, FDEP

Ray Zimmerman-Safety Kleen

Steve Johnson, Warehouse Supervisor-Safety Kleen

5. **LATITUDE/LONGITUDE:** 28°48'22"N/81°19'03"W

6. **SIC Code:** 7359, 4214

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:**

On March 12, 2001, Morgan Leibrandt of the Florida Department of Environmental Protection (FDEP), accompanied by Ray Zimmerman, Branch Manager-Safety Kleen and Steve Johnson, Warehouse Supervisor-Safety Kleen inspected the facility for compliance with state and federal hazardous waste standards. Safety-Kleen was inspected as a generator, transporter, transfer facility, and permitted hazardous waste storage facility. The facility 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 August 3, 2000 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 above-ground 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 anti-freeze, 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 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 instituted a new service of "continued use". This "Continued Use Program" diverts a portion of used mineral spiritss 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 also 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. INSPECTION:

Return/Fill Area

The first area inspected was the return/fill area. Two drum washers are located in this area. The facility began operation of these units in March, 1993. The area was not in operation at the time of the inspection. Sumps beneath the drum washers appeared dry, clean and the satellite container for sludge was properly labeled. Adjacent to the drum washers was a "wet dumpster" of similar construction used exclusively for continued use solvent. This dumpster has no washing mechanism. The continued use wet dumpster was not in operation at the time of the inspection, but according to Mr. Zimmerman somewhere between 20-25 drums of solvent per day are placed there. A small amount of debris was observed on the wire screen at the bottom on the dumpster. The wire screen is cleaned every two days. Said debris is managed as hazardous waste.

10 Day Transfer Area

Waste stored in this area included; waste paint related material, waste combustible liquid, used oil, and waste solvents. Each container was marked with the date the waste entered the transfer

area, labeled hazardous waste, and closed. No violations were noted in this area at the time of this inspection

All of the drums and containers were marked with the date the waste entered storage, labeled hazardous waste, and closed. No violations were noted in this area at the time of this inspection.

Used Oil Sample Area

Along the west wall, in the return/fill area next to the permitted drum storage area are two metal fire cabinets used for oil samples. This area also had several cardboard boxes containing used oil samples. The samples are analyzed by Safety-Kleen prior to accepting used oil from the customer. Tracking of the samples is done by facility name and invoice number, which are labeled on each container. The drivers do not maintain records of the analysis, and the samples are usually discarded after 90 days.

Permitted Aboveground Storage Tank Area

The hazardous waste in the regulated tanks is drained once per week and shipped to Safety-Kleen's, Lexington, South Carolina facility for recycling. The waste storage tank was properly labeled "Hazardous Waste". The containment area around the tanks was dry and appeared free of cracks. A sign with the words "Danger No Smoking" was located in this area. Emergency procedures include safety and emergency devices, including a 500-1000-gallon tank containing foam suppression material in the event a fire develops in the tank storage area. The fire suppression tank is located in the container storage area. No violations were noted in this area at the time of this inspection.

Waste Management Practices

Safety-Kleen maintains a permitted container storage area, permitted storage tanks, and a 10-day accumulation (transfer) area for the above mentioned hazardous waste. The permitted container storage area is used for storing waste immersion cleaner, sludge generated from containers of waste mineral spirits, dry cleaning waste and waste paint related material. The amount of waste stored in this area at any one time is not to exceed 6,912 gallons. The container storage area is located within a totally enclosed building and is constructed with a concrete floor. The storage area's concrete floor is marked with yellow tape identifying the container storage boundaries. The 10-day transfer facility accumulation area is located next to the container storage area. The area is identified by a sign as the transfer facility area and marked with yellow tape identifying the transfer facility's boundaries.

The permitted hazardous waste aboveground tank storage area is constructed with a concrete floor and a three-foot high concrete dike. The floor is covered with an impervious coating of Simstone and protected from the weather by an aluminum roof. Four 20,000-gallon tanks are presently located in this area. The tanks are constructed on 15-foot by 15-foot concrete pads and are electronically monitored for level and temperature. Storm water accumulated in the containment area flows by gravity to an in-ground grated sump located in front of the tank storage area. From the sump, Storm water is pumped indoors to the barrel washers and then pumped to one of the regulated 20,000-gallon tanks. Each tank is permitted to store 20,000-gallons, but Safety-Kleen considers the tanks full at 19,000 gallons. Tank #2 stores product 105 solvent and tank #4 stores

product 150 solvent. Tank #1 stores hazardous waste solvent, tank #3 was issued a closure certification on December 21, 1999 and was empty at the time of the inspection. Waste solvent is shipped approximately once per week.

Oil filters are accumulated in 30 gallon drums. Safety-Kleen accumulates 150-200 crushed oil filters per 30-gallon drum. When the drum is full, it is transported to Safety-Kleen's Hebron, Ohio facility where the filters are shredded. The metal is recycled, the oil is reclaimed, and the paper filter goes to a fuels blending program.

Record Review

Safety-Kleen Systems, Inc. Sanford was inspected as a permitted storage facility, generator, and transporter/transfer facility. Records reviewed included daily and weekly inspection logs for the container and tank storage areas, training records and contingency plan. Training is conducted in house by Safety-Kleen and is performed on a monthly and annual basis. Certain segments of the training program are provided at each monthly session. The facility is maintaining waste analysis records for off-site shipments of waste. Manifests and LDR notifications for the past year were reviewed and found to be in order. Inspection logs verified that inspections of the storage tank area, transfer area, and drum storage area were performed as required by regulation. Transfer waste is removed every seven days. Training was found to be current for Ray Zimmerman, the facility's Emergency Coordinator and Steve Johnson, Warehouse Supervisor. The facility contingency plan was updated and all records appeared to be in order.

13. CONCLUSION:

At the time of this inspection Safety-Kleen, Sanford was regulated as a permitted, hazardous waste storage facility, generator, transporter, and transfer facility and was in compliance.

Report Prepared By: 
Morgan Leibrandt

Date: June 27, 2001