Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 30, 2002

Certified Mail
7001 2510 0001 0820 1860

Matt Hedrick
Environmental Health & Safety Manager
Safety-Kleen Corp.
5309 24th Avenue South
Tampa, Florida 33619

OCD-HW/C/E-02-0503

Seminole County – HW
Safety-Kleen Corp. Sanford
Enforcement Case

Dear Mr. Hedrick:

On October 11, 2001 a Warning Letter was mailed to Safety-Kleen Corp. for alleged violations of hazardous waste regulations by the Sanford facility. Based on information provided during an informal meeting on February 21, 2002 and in your letter dated February 28, 2002, the Department adjusted the assessed civil penalties from $14,798.00 to $4,547.00.

On June 4, 2002, a Short Form Consent Order was mailed in an effort to complete the resolution of this enforcement case in an informal manner. The Order has not been returned to this Office so the enforcement case remains open.

Efforts have been made by both the Department and Safety-Kleen to schedule an additional meeting to discuss the Department's relationship with Safety-Kleen's Sanford facility; however, due to scheduling conflicts we were not able to meet as planned. Unless additional compelling information can be provided documenting the alleged violations did not take place, the assessed penalty still stands. Any future meetings between the Department and Safety-Kleen, while welcome and appreciated, will not affect the assessed penalty in this case.

We are requesting that Safety-Kleen Corp. sign the Short Form Consent Order dated June 4, 2002, and return the document to this Office within 10 days of receipt of this request. If the Consent Order is not acceptable,, please inform the Department in writing within the same time frame.

We look forward to your assistance in the timely resolution of this case.

Sincerely,

John White
Environmental Specialist

cc: Kenneth L. Bednar, Attorney

"More Protection, less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Matt Hedrick Mgr
Safety Kleen Corp
5309 24th Ave South
Tampa Fl 33619

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X M. Hedrick
☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

OCD-HW-02-0503

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from se 7001 2510 0001 0820 1860

OCT - 3 2002

PS Form 3811, August 2001 Domestic Return Receipt 102595-01-M-2509

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
2319 MAGUIRE BLVD., SUITE 232
ORLANDO, FL 32803 - 3767

0 55

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 4, 2002

CERTIFIED MAIL
7001 0360 0000 6784 9625

Cindy Bruce, Branch Manager
Safety-Kleen, Corp.
600 Central Park Drive
Sanford, Florida, 32771

OCD-HW-C-02-0514

Seminole County -HW
Safety-Kleen, Corp.
Compliance Evaluation Inspection

Dear Ms. Bruce:

A hazardous waste compliance inspection was conducted at your facility on September 10, 2002. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facilities with 40 CFR 260-268, adopted in Florida Administrative Code Chapter 62-730, and 40 CFR Part 279, adopted in Florida Administrative Code Chapter 62-710.

Please find the attached RCRA report that outlines our inspection at the above described facility. If you have any questions, please contact Nancy McKee at (407) 893-3323.

Sincerely,

Nancy McKee
Environmental Specialist
Hazardous Waste Section

NM

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms Cindy Bruce, Mgr
Safety Kleen Corp
600 Central Park Dr.
Sanford, Fl 32771

COMPLETE THIS SECTION ON DELIVERY

A. Signature: X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery: 10/16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

OCD-HW-02-0514

VM C

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

5. Article Number (Transfer from: 7001 0360 0000 6784 9625 OCT 1 5 2002

PS Form 3811, August 2001 Domestic Return Receipt HAZARDOUS WASTE

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

* Sender: Please print your name, address, and ZIP+4 in this box *

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
[illegible] BLVD., SUITE [illegible]
ORLANDO, FL 32803-3767

[illegible]

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, Corp. EPA ID # FLD984171165

STREET ADDRESS 600 Central Park Drive, Sanford, Florida 32771

MAILING ADDRESS Same as above

COUNTY Seminole PHONE (407) 321-6080 DATE 9/10/02 TIME 1:00 PM

NOTIFIED AS: ☐ N/A	***CURRENT STATUS***:
☐ Non Handler	☐ Non Handler
☐ CESQG (<100 kg/mo.)	☐ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)	☐ SQG (100-1000 kg/mo.)
☒ Generator (>1000 kg/mo.)	☒ Generator (>1000 kg/mo.)
☒ Transporter	☒ Transporter
☒ Transfer Facility	☒ Transfer Facility
☐ Interim Status TSD Facility	☐ Interim Status TSD Facility
☒ TSD Facility	☒ TSD Facility
Unit Type(s): Storage	Unit Type(s): Storage
☐ Exempt Treatment Facility	☐ Exempt Treatment Facility
☒ Used Oil: Transporter	☒ Used Oil: Transporter

2. **APPLICABLE REGULATIONS:**

☐ 40 CFR 261.5	☒ 40 CFR 262	☒ 40 CFR 263	☒ 40 CFR 264
☐ 40 CFR 265	☐ 40 CFR 266	☒ 40 CFR 268	☐ 40 CFR 273
☒ 40 CFR 279	☒ 62-710, FAC	☒ 62-730, FAC	☒ 62-737, FAC

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

Ray Zimmerman, Interim Branch Manager - Safety-Kleen, Corp.

4. **INSPECTION PARTICIPANTS:**

Nancy McKee - FDEP

Ray Zimmerman - Safety-Kleen

Bill Kappler - FDEP

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

"More Protection, less Process"

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9. **INTRODUCTION:**
On September 10, 2002, Nancy McKee and Bill Kappler of the Florida Department of Environmental Protection (FDEP), accompanied by Ray Zimmerman, Interim Branch Manager, inspected Safety-Kleen, Corp. (Safety-Kleen), Sanford, for compliance with state and federal hazardous waste standards. Safety-Kleen was inspected as a generator, transporter, transfer facility, and hazardous waste storage facility.

Safety-Kleen is currently operating under hazardous waste operation permit HO01-0022198-001. The permit 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.
2) A separate, outdoor aboveground tank storage area with four 20,000-gallon steel tanks protected by secondary containment.

The facility has operated at this location since March 15, 1993 and employs approximately 30 people who work Monday through Friday from 6:00AM to 9:00PM. City of Sanford provides potable water and sewer.

10. **INSPECTION HISTORY**:
The Safety-Kleen facility was last inspected as a permitted TSD and generator on March 12, 2001, and was in compliance at the time of inspection.

Although the facility was found to be in compliance, currently the Department is pursuing formal enforcement in response repeat violations, including transporting and accepting hazardous waste without the use of a hazardous waste manifest.

11. **PROCESS DESCRIPTION**:
Safety-Kleen provides equipment leasing, product servicing and hazardous/non-hazardous waste transport, transfer, and/or storage.

Hazardous wastes transported by Safety-Kleen are returned to the Sanford facility and used for barrel washing, managed according to the Continued Use Program (CUP), or stored in the container storage area or 10 day transfer area prior to shipping off-site for reclamation.

Safety-Kleen uses spent mineral spirits to conduct barrel washing. Empty drums are placed onto a rotary brush unit within the barrel washer, where the spent mineral spirits is used to clean both the inside and outside of the drums. The facility began operation of these units in March 1993. Clean drums are refilled with product mineral spirits and sold to customers.

Using a float-actuated pump and overhead pipe system, spent mineral spirits is transferred from the barrel washers to the aboveground tank storage tank located outside. Sludge from the barrel washers is removed once a day and collected in 16-gallon satellite containers, which when full, are stored in the container storage area prior to shipment off-site. The spent mineral spirits storage tank is pumped out when the capacity reaches 19,000-gallons or a height of 22 feet, 5 inches.

Used mineral spirits from specific customers is managed according to CUP. Incoming continued-use drums of used mineral spirits are returned to the Sanford facility and emptied into a wet dumpster that is directly piped to the drum washing units for chemical and mechanical cleaning. A permit modification, dated October 10, 2000, was issued for implementation of the CUP.

The container storage area is used for storing waste parts washer solvent, waste immersion cleaner, waste mineral spirits sludge, waste dry cleaning solvent, waste paint related material, and items to be recycled, such as used oil filters and mercury containing lamps. The container storage area is located within a totally enclosed building with a concrete floor marked with yellow tape identifying the container storage boundaries. The amount of waste stored in the container storage area at any one time must not exceed 6,912 gallons.

The 10-day transfer facility accumulation area is located next to the container storage area. The area is identified by a sign, and marked with yellow tape identifying the transfer facility's boundaries.

Non-hazardous waste (used oil) is picked up by Safety-Kleen trucks and transported by rail to the East Chicago refinery. Safety-Kleen samples and analyzes the used oil for PCBs and other contaminants prior to accepting the used oil from the customer.

Safety-Kleen manages an aboveground tank storage area. Four 20,000-gallon tanks are located in this area. The tanks are each constructed on a concrete base and the four bases are located on a concrete pad, which is surrounded by a three-foot high concrete secondary containment. The floor is covered with an impervious coating of Simstone and protected from the weather by an aluminum roof. Storm water accumulated in the containment area flows by gravity to an in-ground grated sump, from which the water is pumped to an on-site dry retention pond.

The tanks are electronically monitored for level and temperature. Each tank is permitted to store 20,000-gallons, but Safety-Kleen considers the tanks full at 19,000 gallons. Tank #2 and tank #4 store product solvent. Tank #1 stores hazardous waste solvent. Tank #3 was issued a closure certification on December 21, 1999.

12. **INSPECTION**:

Return/Fill Area

The first area inspected was the return/fill area. Two drum washers are located in this area. The area was not in operation at the time of the inspection. Sumps beneath the drum washers appeared dry and clean, and the satellite container for sludge was properly labeled.

Adjacent to the drum washers was a wet dumpster used exclusively for CUP. The wet dumpster was not in operation at the time of the inspection, but according to Mr. Zimmerman approximately 50 - 100 drums of used mineral spirits per week are placed there. The wire screen used for straining the mineral spirits is cleaned every two days, and the resulting debris is managed as hazardous waste.

This area has a satellite accumulation area. At the time of the inspection, one 30-gallon drum of waste wet dumpster debris and sludge was accumulating. The containers were labeled and closed.

Container Storage Area and 10 Day Transfer Area

Approximately 50 containers of hazardous waste, 7 containers of used oil (non-hazardous waste), and 8 boxes of mercury containing lamps (non-hazardous waste) were being stored at the time of the inspection. All containers appeared to be DOT approved, were organized according to compatibility, and were stored with adequate aisle space at a maximum of two containers high. The containers were managed according to the approved "Container Management Plan," as defined in section 8.4 of the permit; the containers were marked with the date the waste entered the transfer area, labeled hazardous waste (if appropriate), labeled Used Oil (if appropriate), and closed.

Permitted Aboveground Storage Tank Area
Tank #1, holding hazardous waste, 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 and safety and emergency devices were observed available.

Record Review
Records reviewed include daily and weekly inspection logs for the container and tank storage areas, contingency plan, local authority notification, position descriptions, waste minimization plan, financial assurance, closure plan, air emission requirements (40 CFR 264 Subpart AA, BB, and CC), training records, and manifests.

Safety-Kleen's EHS Manager, Matt Hedrick, conducts training. Training was found to be current for Ray Zimmerman, Plant Manger; Steve Johnson, Warehouse Supervisor; Karl Brown, Dock Worker; and Richard Baum, Dock Worker.

Manifests including LDR notifications and waste analysis records for the past year were reviewed. Annually, Safety-Kleen conducts a random waste analyses on wastes being transported off-site for treatment. Additionally, Safety-Kleen maintains a computerized database that includes the requirements of 40 CFR 264.73.

13. CONCLUSION:
Safety-Kleen was inspected as a permitted storage facility, generator, and transporter/transfer facility, and was in compliance at the time of the inspection.

Report Prepared By: _____ Date: October 4, 2002
Nancy McKee

Department of Environmental Protection

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3319 Maguire Boulevard, Suite 232
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