



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

FACILITY INFORMATION:

Facility Name: Synergy Recycling of Central Florida LLC

On-Site Inspection Start Date: 04/28/2011

On-Site Inspection End Date: 04/28/2011

ME ID#: 47082

EPA ID#: FLR000053611

Facility Street Address: 3800 W Lake Hamilton Dr, Winter Haven, Florida 33881-9262

Contact Mailing Address: 3800 W Lake Hamilton Dr, Winter Haven, Florida 33881-9262

County Name: Polk

Contact Phone: (863) 419-0556

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: James Dregne, Hazardous Waste Program Manager

Other Participants: Gerry Allen, Partner

LATITUDE / LONGITUDE: Lat 28° 4' 42.4848" / Long 81° 39' 38.0584"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

Synergy Recycling of Central Florida, LLC (Synergy) was inspected on April 28, 2011, to determine the facility's compliance with state and federal hazardous waste and used oil regulations. Mr. Gerry Allen accompanied the inspector throughout the inspection. Synergy is a registered used oil processor/transporter and a used oil filter transporter/transfer facility. Synergy received its Used Oil Processing and Material Handling Permit on January 26, 2010. The permit was modified on June 30, 2011, following the installation of two additional 25,000 gallon single walled used oil storage tanks located in secondary containment.

Process Description:

Synergy currently has approximately seven drivers, two of whom operate out of Synergy's Tampa location. The Tampa transfer facility is located at the Florida Tank Wash facility at the intersection of I-4 and Martin Luther King Jr. Blvd. The Tampa Synergy location has its own EPA ID number and is inspected by the Department separately. Route drivers operating from the Winter Haven facility pick-up and deliver used oil, used oil filters, oily water, antifreeze, oily rags, oil contaminated dirt and oil dry to the Winter Haven facility daily for temporary storage. The used oil, used oil filters, oily rags, oil contaminated dirt and oil dry are then transported to Synergy's Kingsland, Georgia facility for management and processing. There are about seven shipments to Kingsland weekly. Spent antifreeze is picked up and managed by MMT of Lakeland and On-Site Recycling in Ft. Meyers. Oily water is sent to Diversified Environmental Services (DES) in Tampa for processing.

The inspection of the containers in the drum storage area and the storage tanks revealed no violations. All tanks and containers were in good condition, had no leaks, and were all properly labeled. The two new 25,000 gallon single walled used oil tanks were not in service at the time of

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the onsite inspection.

The shop area had one parts washer which contained diesel. At the time of the inspection there were no spent fluorescent bulbs on-hand. Spent bulbs were being managed by AERC and had been previously picked up on August 30, 2010, and April 22, 2011. Fire extinguishers were located throughout the building and inside each truck. All the extinguishers were functional and had been serviced by Haines City Fire Extinguisher Service in June of 2010.

There were four trucks inspected during the inspection. They included three that were being prepared for their daily runs and a vac truck that was parked on a non-paved area in the southeast corner of the facility. There were no deficiencies noted with the trucks. All were properly licensed and had their annual inspection sticker properly displayed. Each truck contained a fire extinguisher, warning triangles, absorbent pads and a functioning sniffer. Driver records for five drivers were reviewed and were found to be in order except for up-to-date training records for Mr. Leonard Stout who was a new driver who had not received his required training at the time of the inspection. Mr. Stout received the required training following the inspection. All drivers had current driver licenses and medical cards.

The facility's lab area had been moved since the previous inspection. A dedicated room has now been established to perform required screening of the used oil. The Department is concerned that the facility's analysis plan was not being followed. Halogen screening using a Dexsil Clor-D-Tect kit was not being performed on all incoming loads of used oil. Mr. Allen said that he would insure that all inbound shipments would be screened using an approved EPA method.

A representative number of incoming and outgoing manifests were reviewed for completeness and accuracy. Every incoming manifest had the proper documentation showing that it had been screened for halogen content. Synergy was also documenting all shipments of used oil refused because of a halogen content of greater than 1000 ppm and an inability to rebut the presumption. There were a few manifests that did not have a manifest numbers on them. These manifests were limited to call-in pick-ups in which the driver was using a spare manifest that he was carrying with him.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type:	Area Of Concern
Rule:	279.55
Explanation:	The facility analysis plan says that all incoming loads of used oil will be screened for halogen content using a Dexsil Clor-D-Tect. This was not being done for all incoming loads.
Corrective Action:	Mr. Allen stated that the analysis plan would be followed and an approved EPA method would be used.

Type:	Violation
Rule:	62-710.600(2)(c)
Explanation:	One of the drivers had not received the required training before he was allowed to perform his duties unsupervised. (corrected)
Corrective Action:	The driver received his training following the inspection.

Type:	Violation
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Rule: 279.22(d)(3)

Explanation: Used oil staining was in the area of the vac truck parked at the southeast corner of the property. (coorected)

Corrective Action: The oil contaminated soil was excavated and containerized during the inspection.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 62-710.600(2)(c)		04/28/2011	One of the drivers had not received the required training before he was allowed to perform his duties unsupervised. (corrected)
279.22(d)(3)		04/28/2011	Used oil staining was in the area of the vac truck parked at the southeast corner of the property. (coorected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern 279.55		04/28/2011	The facility analysis plan says that all incoming loads of used oil will be screened for halogen content using a Dexsil Clor-D-Tect. This was not being done for all incoming loads.

Conclusion:

Synergy had a couple of minor used oil violations at the time of the inspection. These infractions were quickly addressed and the facility had returned to compliance with all used oil transporter and processor rules within 24 hours of the inspection.

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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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

James Dregne

PRINCIPAL INSPECTOR NAME

Hazardous Waste Program Manager

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

8/15/2011

DATE

Gerry Allen

REPRESENTATIVE NAME

Partner

REPRESENTATIVE TITLE
REPRESENTATIVE SIGNATURE

Synergy Recycling

ORGANIZATION

8/16/2011

DATE

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.