



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

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**FACILITY INFORMATION:**

**Facility Name:** Synergy Recycling of Central Florida LLC

**On-Site Inspection Start Date:** 11/16/2009

**On-Site Inspection End Date:** 11/16/2009

**ME ID#:** 47082

**EPA ID#:** FLR000053611

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

**Contact Mailing Address:** PO Box 88, Sharpsburg, Georgia 30277-0088

**County Name:** Polk

**Contact Phone:** (770) 304-0257

**NOTIFIED AS:**

Non-Handler

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Shannon D Camp, Inspector

Other Participants: James Dregne, Program Manager; Jeff Englin, Director of Operations

**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 November 16, 2009 to determine the facility's compliance with state and federal hazardous waste and used oil regulations. Mr. Jeff Englin accompanied the inspectors throughout the inspection. This facility has been inspected by the Department in the past when it was On-Time Environmental. Synergy is a registered Used Oil and Used Oil Filter Transporter/Transfer Facility.

**Process Description:**

Synergy currently employs seven drivers, two of whom operate out of Synergy's Tampa location. Drivers pick up spent antifreeze, used oil and filters in pump trucks and box trucks which are unloaded nightly. Drums of used oil, spent antifreeze and spent filters are unloaded into the drum storage area located inside the building. Used oil filters are segregated by type. The metal filters are placed in a 20 CY roll-off and are picked up by US Foundry out of Miami. The paper filters are transported to Synergy's Kingsland, GA facility. The spent antifreeze drums are pumped out into the tank. Spent antifreeze is managed by MMT of Lakeland or On-Site Recycling. Used oil is typically pumped out of the pump truck and into the facility's 10,000 gallon tank located in the rear of the facility. Contents of the tank are then pumped out through a filter sock into the 18,000 gallon used oil compartment of the facility's 25,000 gallon tank. The remaining two compartments contain used oil, oily water or spent antifreeze. The filter lint is removed from the socks and is disposed of through the Kingsland facility. Recent analytical data deemed the sludge as non-hazardous.

The facility's records indicate that they calibrate the drivers' Tek-Mate "sniffer" units monthly. The records also indicate the the drivers last received used oil training on February 26, 2009. The Tampa-based driver had additional training on August 6, 2009. During the inspection it was observed that the fire extinguisher in one of the box truck had been expended and had not been replaced. Subsequent to the inspection, a new extinguisher was placed inside the vehicle.

Inspection Date: 11/16/2009

**New Potential Violations and Areas of Concern:****Checklist Independent Potential Violations and Areas of Concern**

Type: Area Of Concern

Rule: 62-710.510(1)

Explanation: (Also in accordance with 279.46(a)(2)) Upon reviewing the facility's used oil pick up receipts, it was observed that several receipts did not list the EPA Identification numbers of customers that have one.

Corrective Action: Synergy must make an attempt to verify if a customer has an EPA Identification. If customers have an EPA ID, the number must be marked on the acceptance records.

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Type: Violation

Rule: 62-737.400(5)

Explanation: At the time of the inspection, Synergy had one open, unlabeled box containing approximately six spent mercury containing lamps. (Corrected)

Corrective Action: Subsequent to the inspection, the facility placed the lamps in closed, labeled containers.

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Type: Violation

Rule: 62-710.401(6)

Explanation: At the rear of the facility, just outside the company's 10,000 gallon used oil tank is a bermed area where the used oil transport trucks unload. In the center of this bermed area is an approximately 12"x12"x8" sump. At the time of the inspection, the sump contained approximately 6.5" of used oil. Mr. Englin stated that the oil was from the transport hose which is stored in this bermed area. The bermed area and the sump are not oil-impervious.

At the time of the inspection, Synergy was utilizing a 275 gallon tote to store used oil drained from the used oil filter roll-off. The tote was not provided with secondary containment.

Near the used oil testing area, a single wall tank was observed containing used oil. The tank was mainly utilized as a work surface, however it was labeled "Used Oil." The tank was also not provided with secondary containment. (Corrected)

Corrective Action: Subsequent to the inspection, Synergy pumped out the used oil from the sump and concreted it in. Mr. Allen stated that all required containers have been placed within secondary containment.

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Type: Area Of Concern

Rule: 265.31

Explanation: At the time of the inspection, one 55-gallon metal drum storing spent antifreeze in the storage building was observed leaking from the bottom.

Corrective Action: The Department recommends inspecting all incoming containers thoroughly to ensure they are in good condition as well as to ensure they are properly labeled.

Inspection Date: 11/16/2009

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Type: Violation

Rule: 62-710.850

Explanation: At the time of the inspection, at least four drums storing used oil filters were observed without labels. In addition, five drums storing used oil filters were observed in a parked box truck located on the gravel parking area. The drums had been on the truck since 11/6/09. The bed of the truck was constructed of deteriorating wood, and the truck was not parked on an oil impervious surface, either. (Corrected)

Corrective Action: Subsequent to the inspection, Synergy removed the drums from the box truck, emptied the used oil filters into the roll-off and ensured that all the drums within the storage area were properly labeled.

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Type: Violation

Rule: 279.22(d)

Explanation: At the time of the inspection, several 5 gallon buckets of oil were observed being stored in the unsealed, bermed area in the rear of the facility. At least one of the buckets was leaking used oil. In addition, a large cut-off box on a wood pallet in the maintenance area, storing quart containers of transmission fluid, was observed to contain a large amount of leaked transmission fluid. The fluid was soaked into the box however, the inspectors could not determine if the leakage had dripped to the concrete floors beneath. (Corrected)

Corrective Action: According to Mr. Allen, all oil releases have been properly cleaned up.

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**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
62-737.400(5)		11/16/2009	At the time of the inspection, Synergy had one open, unlabeled box containing approximately six spent mercury containing lamps. (Corrected)
62-710.401(6)		11/16/2009	<p>At the rear of the facility, just outside the company's 10,000 gallon used oil tank is a bermed area where the used oil transport trucks unload. In the center of this bermed area is an approximately 12"x12"x8" sump. At the time of the inspection, the sump contained approximately 6.5" of used oil. Mr. Englin stated that the oil was from the transport hose which is stored in this bermed area. The bermed area and the sump are not oil-impervious.</p> <p>At the time of the inspection, Synergy was utilizing a 275 gallon tote to store used oil drained from the used oil filter roll-off. The tote was not provided with</p>

Inspection Date: 11/16/2009

Rule Number	Area	Date Cited	Explanation
			secondary containment.
			Near the used oil testing area, a single wall tank was observed containing used oil. The tank was mainly utilized as a work surface, however it was labeled "Used Oil." The tank was also not provided with secondary containment. (Corrected)
62-710.850		11/16/2009	At the time of the inspection, at least four drums storing used oil filters were observed without labels. In addition, five drums storing used oil filters were observed in a parked box truck located on the gravel parking area. The drums had been on the truck since 11/6/09. The bed of the truck was constructed of deteriorating wood, and the truck was not parked on an oil impervious surface, either. (Corrected)
279.22(d)		11/16/2009	At the time of the inspection, several 5 gallon buckets of oil were observed being stored in the unsealed, bermed area in the rear of the facility. At least one of the buckets was leaking used oil. In addition, a large cut-off box on a wood pallet in the maintenance area, storing quart containers of transmission fluid, was observed to contain a large amount of leaked transmission fluid. The fluid was soaked into the box however, the inspectors could not determine if the leakage had dripped to the concrete floors beneath. (Corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
62-710.510(1)		11/16/2009	(Also in accordance with 279.46(a)(2)) Upon reviewing the facility's used oil pick up receipts, it was observed that several receipts did not list the EPA Identification numbers of customers that have one.
265.31		11/16/2009	At the time of the inspection, one 55-gallon metal drum storing spent antifreeze in the storage building was observed leaking from the bottom.

**Conclusion:**

At the time of the inspection, Synergy was not operating in compliance with state and federal regulations governing Used Oil Transporter/Transfer Facilities.

Inspection Date: 11/16/2009

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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.

Shannon D Camp

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

12/14/2009

**DATE**

James Dregne

**INSPECTOR NAME**

Program Manager

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

Jeff Englin

**REPRESENTATIVE NAME**

Director of Operations

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

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.