



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

FACILITY INFORMATION:

Facility Name: Synergy Recycling of Central Florida LLC

On-Site Inspection Start Date: 08/23/2012

On-Site Inspection End Date: 08/23/2012

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: Shannon D. Camp, Inspector

Other Participants: Garry Allen, Manager; Andrea Stermer, ES III Polk Co.

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 August 23, 2012, to determine the facility's compliance with state and federal hazardous waste and used oil regulations. Mr. Garry Allen accompanied the inspector throughout the inspection. Synergy is a registered used oil processor/transporter and a used oil filter transporter/transfer facility. The Department last inspected this facility in April 2011.

Process Description:

Operations at this facility have not changed since the previous inspection. Route drivers pick-up and deliver used oil, used oil filters, oily water, antifreeze, oily rags, oil contaminated dirt and oil dry to the 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 several shipments to Kingsland weekly. Spent antifreeze is picked up and managed by MMT of Lakeland and On-Site Recycling in Ft. Myers. Oily water is sent to Diversified Environmental Services (DES) in Tampa for processing. Used oil is screened by sniffers in the field. Synergy conducts quality assurance tests on the sniffers monthly. A log of monthly testing is maintained on site. All incoming loads of used oil are tested with a Dexsil Clor-D-Tect kit prior to placing into the tank system. Synergy is not currently marketing on specification oil.

The containers in the drum storage area and the trailer being loaded for transport to Georgia, along with the storage tanks were inspected. All tanks and containers were in good condition, had

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no leaks, and were all properly labeled. One bucket used to collect used oil located under the used oil fill port was unlabeled at the time of the inspection. In addition, the fill hose for Tank 1 was not located within the secondary containment structure. No trucks were on site for inspection during the inspection.

A representative number of incoming and outgoing manifests were reviewed for completeness and accuracy. Synergy was also documenting all shipments of used oil refused because of a halogen content greater than 1000 ppm and an inability to rebut the presumption. Rejected loads are often managed as hazardous waste and brokered to Clean Solutions for disposal. A small number of the manifests reviewed did not have the halogen screening results noted. In addition, a small portion did not have the generators signature. A review of the facility's other requested documentation was also conducted. Records indicate used oil training was last given in August 2012. The facility's permit, operating log, and contingency plan were available for inspection. Discrepancies with the required documentation are noted below.

At the time of the inspection there were no spent fluorescent lamps on-hand. Spent lamps are being managed by AERC and Veolia. Synergy last disposed of spent lamps in July 2012 through Veolia.

At the time of the inspection, Synergy was not registered with the Department of Transportation (DOT) to transport Hazardous Materials. Records indicate that the facility routinely transports used oil with a flash point less than 200 degrees Fahrenheit along with "bad" gas and used oil and fuel mixtures. In addition, the shipping papers for these materials did not have the appropriate shipping descriptions noted. Subsequent to the inspection, the facility registered with DOT and made new shipping papers to help the drivers select more appropriate shipping descriptions for flammable materials.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	265.52(d)
Explanation:	At the time of the inspection, the facility did not have the addresses of the emergency coordinators noted in the contingency plan. (Corrected)
Corrective Action:	Mr. Allen noted the emergency coordinators' addresses in the contingency plan during the inspection.

Type:	Violation
Rule:	62-710.401(6)
Explanation:	At the time of the inspection, the facility had one unlabeled bucket collecting used oil under the used oil fill port. In addition, the fill hose for Tank 1 was not located within secondary containment during the inspection. (Corrected)
Corrective Action:	A label was provided for the bucket and the fill hoses were placed inside the secondary containment structure during the inspection.

Type:	Violation
Rule:	62-740.100(4), 62-740.200(2)
Explanation:	At the time of the inspection, Synergy was not registered with the state to transport petroleum contact water. Synergy was not managing incoming shipments of petroleum contact water properly. The material was being

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managed as oily water, which includes being co-mingled with used oil. (Corrected)

Corrective Action: Subsequent to the inspection, Synergy submitted a 8700-FL form to register with the state to transport PCW. In addition, Mr. Allen changed the shipping papers used by the drivers to contain a proper petroleum contact water selection (with a proper DOT shipping description). Mr. Allen also stated that he will no longer off load PCW at his facility. He stated that he will now transport PCW to Aqua Clean for processing.

Conclusion:

At the time of the inspection, Synergy Recycling of Central Florida LLC was not operating in compliance with state and federal used oil regulations governing used oil processors. The facility returned to compliance following 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.

Shannon D. Camp

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

9/7/2012

DATE**Supervisor:** James Dregne

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.