

Florida Department of Environmental Protection Hazardous Waste Inspection Report

FACILITY INFORMATION:

 Facility Name:
 Synergy Recycling of Central Florida LLC

On-Site Inspection Start Date: 03/28/2013 **On-Site Inspection End Date:** 03/28/2013 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: Contact Phone: Polk (863) 419-0556

NOTIFIED AS:

CESQG (<100 kg/month) Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector:Shannon D. Camp, InspectorOther Participants:Dinah Frazier, ES II; Garry Allen, Manager

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 March 28, 2013, to determine the facility's compliance with state and federal hazardous waste and used oil regulations. Mr. Garry Allen accompanied the inspectors throughout the inspection. Synergy is a registered used oil processor/transporter and a used oil filter transporter/transfer facility. The Department's Hazardous Waste Program last inspected this facility in August 2012.

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/debris to the facility daily for temporary storage. The used oil, used oil filters, oily rags and oil contaminated dirt/debris are then transported to Synergy's Kingsland, Georgia facility for management and processing. There are several shipments to Kingsland weekly. Used antifreeze is also transported to the Kingsland facility prior to recycling at PolyFreeze in Indiana. Oily water is sent to Diversified Environmental Services in Tampa for processing. Petroleum contact water is transported directly to Aqua Clean 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 no leaks, and were all properly labeled. Only 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

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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 review of the facility's other requested documentation was also conducted. Records indicate used oil training was last given in February 2013. The facility's permit, operating log, and contingency plan were available for inspection.

At the time of the inspection there were no spent fluorescent lamps on-hand. Spent lamps are being managed by Veolia. Synergy last disposed of spent lamps in July 2012 through Veolia. Synergy also picks up waste tires from select customers for disposal. Waste tires are transported to Wheelabrator for disposal.

New Potential Violations and Areas of Concern:

Violations	
Туре:	Violation
Rule:	62-710.401(6)
Explanation:	At the time of the inspection, the fill hose for Tank 1 was not located within the secondary containment structure. (Corrected)
Corrective Action:	The fill hose was placed inside the secondary containment structure during the inspection. As this is a common violation at this facility, the Department highly recommends that the area just outside the secondary containment structure of Tanks 1 & 2 be sealed with an oil impervious sealant. As this area is concrete and bermed, it can act as secondary containment for the fill hoses once it is coated with an oil impervous sealant.

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 during 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

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PRINCIPAL INSPECTOR SIGNATURE

4/5/2013 DATE

Supervisor: <u>Erin DiBacco</u>

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.