

3905 Kidron Road • Lakeland, FL 33811 • 863-647-2877 • Fax 863-647-1770

November 26, 2014

Mr. Bheem Kothur, PE III
Florida Department of Environmental Protection
Hazardous Waste Regulation Division
Bob Martinez Center, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400
(For FedEx: Telephone No. 850-245-8781)

RE:

Synergy Recycling of Central Florida, LLC

US EPA I.d. No. FLR 000 053 611; FDEP Permit Nos. 292753-HO-001/29753-SO-002

Used Oil Processing Permit Application, Renewal

Dear Mr. Kothur:

Please find attached one copy of the application to renew the referenced permit and a \$2000 check for the Used Oil Permit and a \$1000 check for the Solid Waste Permit renewal. The complete applications are also attached. Please do not hesitate to contact us for any questions. Please do not hesitate to contact us for any questions.

Sincerely,

Imperial

Michael H. Stillinger, P.E. Vice President of Engineering

Attachments

Attachments I, through XI

cc: FDEP Bureau of Waste Management, 2600 Blairstone Road, Tallahassee, Florida 32399-2400 (Telephone No. 850-245-8705)

FDEP Southwest District, 13051 N. Telecom Parkway, Temple Terrace, Fl. 33637

(Telephone No. 813-470-5700)

Project File No. 8731

Amount Discount Amount Comment Invoice Number

2,000.00

Net Amount

2,000.00

0.00

1/21/2014 2014 1121 1 FDEP

Used Oil Permit Renewal

neck: 010806

11/25/2014 Vendor 1-FLOR260 Fla Dept of Envir Protection

Check Total:

2,000.00

Synergy Recycling of Central Florida

.O. Box 669295 /liami, FL 33166

United Community Bank 27 Bull Street Savannah, GA 31401

Check No 010806

Check Date

11/25/2014

Amount

*******2,000.00*

mount of: *TWO THOUSAND AND XX / 100

'ay to

Fla Dept of Envir Protection he order of: Storag Tank Registratio MS4525

2600 Blair Stone Road Tallahassee, FL 32399-2400

or:

01-FLOR260

"Olobob" (1061112843): 2306100260"

Discount Amount Net Amount Amount Date Invoice Number Comment 1,000.00 0.00 1,000.00 11/21/2014 2014 1121 2 FDEP

Solid Waste Operations Permit Renewal

Check: 010820

11/25/2014 Vendor 1-FLOR260 Fla Dept of Envir Protection

Check Total:

1,000.00

Synergy Recycling of Central Florida

P.O. Box 669295 Miami, FL 33166

United Community Bank 27 Bull Street Savannah, GA 31401

Check No 010820

Check Date

11/25/2014

Amount *00.000,1******

Amount of: *ONE THOUSAND AND XX / 100

Pay to

Fla Dept of Envir Protection the order of: Storag Tank Registratio MS4525

2600 Blair Stone Road Tallahassee, FL 32399-2400

For:

01-FLOR260

53067005601

USED OIL PROCESSING FACILITY PERMIT RENEWAL APPLICATION U.S. EPA ID NUMBER FLR 000 053 611 SYNERGY RECYCLING OF CENTRAL FLORIDA, LLC WINTER HAVEN, FLORIDA

Prepared for:
MR. ELLIOT PAUL
3800 WEST LAKE HAMILTON DRIVE
WINTER HAVEN, FLORIDA 33881
AND
THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

Prepared by:
IMPERIAL TESTING LABORATORIES
3905 KIDRON ROAD
LAKELAND, FLORIDA 33811
(863) 647-2877
PROJECT NUMBER 8731

November 2014

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

TO BE COMPLETED BY ALL APPLICANTS (Please type or print)

| A. | General Information | | | |
|------|---|--------------------------------|------------------------------|------------------|
| 1. | NewRenewal× Modific | ation Date current pe | rmit expires ⁰¹⁻² | 6-2015 |
| 2. | Revision number1 | | | · |
| | NOTE: Used Oil Processors must also scription for applicable standards) if Generators (Subpart C of Transporters (Subpart E) Burners of off-spec used Marketers (Subpart H) | they are: Part 279) | s, (describe comp | liance in proces |
| | are disposing of used oil (| (Subpart I) | • | |
| 4. | Date current operation began: 1984 | | | |
| 5. | Facility name: Synergy Recycling of Central Flor | ida, LLC | VP41V | |
| 6. | EPA identification number: FLR 000 053 | 611 | | |
| 8. | Facility mailing address: 3800 WEst Lake Hamilton, Winter Haven, Florida | o 33811 | | |
| | Street or P.O. Box | City | State | Zip Code |
| 9. (| Contact person: Elliot Paul | Telep | ohone: (904) 652-6 | 765 |
| | Title: Managing Member | Email_EPaul@s | Synergyrecycling.org | |
| | Mailing Address: 7209 NW 66th Street, Miami, Florida 33166 | | | |
| | Street or P.O. Box | City | State | Zip Code |
| 10. | Operator's name: Same | Te | elephone: (904) _6 | 552-6765 |
| | Mailing Address: | | | |
| | Street or P.O. Box | City | State | Zip Code |
| (1. | Facility owner's name: Same | | Telephone: (904 |)652-6765 |
| | Mailing Address: | | | |
| | Street or P.O. Box | City | State | Zip Code |
| 12. | Legal structure: | | | |
| | × Corporation (indicate state | e of incorporation) Georgia | | |
| | Individual (list name and a | address of each owner in space | es provided belov | w) _ |
| | | address of each owner in spa | ices provided belo | ow) |
| | Other, e.g., government (p | lease specify) | | |

| Name: NA | | | | | |
|--|--|----------------------|-------------------|----------------------|----------|
| Mailing Address: | | | | | |
| Street or P.O. Box | | City | | State | Zip Code |
| Name: NA | | | | | |
| Mailing Address: | 14.00 | | | 3. 3. | |
| Street or P.O. Box | City | | State | Zip Cc | de |
| Name: NA | | | | | |
| Mailing Address: | | | | | |
| Street or P.O. Box | City | | State | Zip Co | de |
| Name: NA | | | | | |
| Mailing Address: | | | | | |
| Street or P.O. Box | City | | State | Zip Co | de |
| [l | D] presently leased; Land owner's name: | the expiration | date of the lease | e is: | |
| <u>.</u> | nesently leased; | the expiration | date of the leas | State | Zip Code |
| If leased, indicate: Mailing Address: | Description of presently leased; Land owner's name: Ingineer Michael H. Stillinger | the expiration | date of the lease | State | Zip Code |
| If leased, indicate: Mailing Address: Street or P.O. Box Name of professional er Mailing Address: | presently leased; Land owner's name: ngineer Michael H. Stillinger ida 33811 City | the expiration | date of the lease | state | Zip Code |
| If leased, indicate: Mailing Address: Street or P.O. Box Name of professional er Mailing Address: 3905 Kidron Road, Lakeland, Flori Street or P.O. Box | Dipresently leased; Land owner's name: Ingineer Michael H. Stillinger Ida 33811 City Testing Laboratories | the expiration | date of the lease | State | Zip Code |
| If leased, indicate: Mailing Address: Street or P.O. Box Name of professional er Mailing Address: 3905 Kidron Road, Lakeland, Flori Street or P.O. Box Associated with: Imperial SITE INFORMATIO | Description of the present of the pr | the expiration | date of the lease | State | Zip Code |
| If leased, indicate: Mailing Address: Street or P.O. Box Name of professional er Mailing Address: 3905 Kidron Road, Lakeland, Flori Street or P.O. Box Associated with: Imperial SITE INFORMATIO Facility location: County: Polk Nearest community: Win | Description of the present of the pr | the expiration City | date of the lease | State | Zip Code |
| If leased, indicate: Mailing Address: Street or P.O. Box Name of professional er Mailing Address: 3905 Kidron Road, Lakeland, Flori Street or P.O. Box Associated with: Imperial SITE INFORMATIO Facility location: County: Polk Nearest community: Win Latitude: 28 04' 42" | Description of the property of | the expiration City | Registration No | State 47011 Zip Co | Zip Code |
| If leased, indicate: Mailing Address: Street or P.O. Box Name of professional er Mailing Address: 3905 Kidron Road, Lakeland, Flori Street or P.O. Box Associated with: Imperial SITE INFORMATIO Facility location: County: Polk Nearest community: Win Latitude: 28 04' 42" Section: 6 | Description of the present of the pr | the expiration City | date of the lease | State 47011 Zip Co | Zip Code |
| If leased, indicate: Mailing Address: Street or P.O. Box Name of professional er Mailing Address: 3905 Kidron Road, Lakeland, Flori Street or P.O. Box Associated with: Imperial SITE INFORMATIO Facility location: County: Polk Nearest community: Win Latitude: 28 04' 42" | Ingineer Michael H. Stillinger Ida 33811 City Testing Laboratories N Ider Haven Longitude: 81 39' 39" 28 South / / / | the expiration City | Registration No | State 47011 Zip Co | Zip Code |

| C. | OPERATING INFORMATION | | |
|----|---|--|--|
| 1. | . Hazardous waste generator status (SQG, LQG, Etc.) NA | | |
| 2. | List applicable EPA hazardous waste codes: | | |
| | | | |
| | | | |
| 3. | Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative. | | |
| | A brief description of the facility operation is labeled as Attachment . | | |
| 4. | A detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. [See item four (4), page four (4) of the instructions.] | | |
| | The facility's detailed process description is labeled as Attachment | | |
| | The following parts of the facility's operating plan should be included as attachments to the permit application. [See item five (5), page four (4) of the instructions.] | | |
| | a. An analysis plan which must include: (i) a sampling plan, including methods and frequency of sampling and analyses; (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment provided the lots are discreet units) to include: metals and halogen content | | |
| | The analysis plan is labeled as AttachmentIV. | | |
| · | b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal. | | |
| | Sludge, residue and byproduct management description is labeled as Attachment | | |
| | c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil. | | |
| | The tracking plan is included as Attachment | | |
| 6. | Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. [See item six (6), page five (5) of the instructions.] | | |
| | The proporedness and provention plan is labeled as Attachment VII. | | |

5.

| 7. | Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. [See item seven (7), page five (5) of the instructions.] The contingency plan is labeled as Attachment |
|-----|--|
| 8. | Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable. The unit management description is labeled as Attachment |
| 9. | Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. [See item nine (9), page six (6) of the instructions.] The closure plan is labeled as Attachment |
| 10. | Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and |
| | federal rules and regulations as well as personal safety and emergency response equipment and procedures. [See item ten (10), page seven (7) of the instructions.] |
| | A description of employee training is labeled as Attachment |

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

| Form 62-710.901(6) Operator Certification |
|---|
| Synergy Recycling of Central Florida, LLC FLR 000 053 611 Facility Name: EPA ID# |
| I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection |
| Signature of the Operator or Authorized Representative* |
| EL D |
| Elliot Paul, Managing Member |
| Name and Title (Please type or print) 904 652-6765 Date: |

st If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

| Form 62-710.901(6) Facility Owner Certification |
|--|
| Synergy Recycling of Central Florida FLR 000 053 611 Facility Name: EPA ID# |
| This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection. |
| Signature of the Operator or Authorized Representative* |
| Elliot Paul, Managing Member |
| Name and Title (Please type or print) 904 652-6765 Date: |
| * If authorized representative, attach letter of authorization. |

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT PART II - CERTIFICATION

| Form 62-710.901(6) Land Owner Certification |
|---|
| Facility Name: Synergy Recycling of Central Florida EPA ID# FLR 000 053 611 |
| This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described. |
| Signature of the Operator or Authorized Representative* |
| Elliot Paul, Managing Member |
| Name and Title (Please type or print) Date: 11-25-14 Telephone: (904) 652-6765 |

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT **PART II - CERTIFICATION**

Form 62-710.901(6) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62 -4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

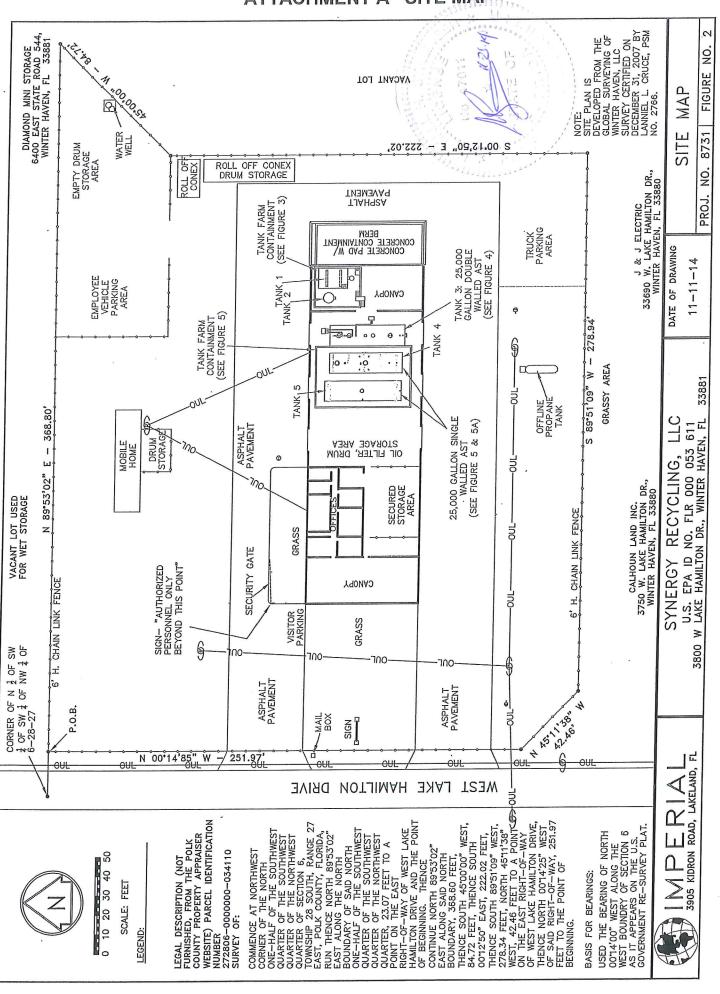
| Use this | s form to cert | ify to the Department of Envi | ronmental Prot | tection for: | |
|-----------|--|---|-----------------------------------|--|--|
| 1. | Certification | n of secondary containment a round process piping for stora | dequacy (capac ge tanks, proce | city), structural integ ess tanks, and contai | grity (structural strength), ner storage. |
| 2. | Certification of leak detection. | | | | |
| 3. | Substantial construction modifications. | | | | |
| 4. | Those elements of a closure plan requiring the expertise of an engineer. | | | | |
| 5. | Tank design | n for new or additional tanks. | | | |
| 6. | Recertificat | ion of above items. | | | |
| | | Please | Print or Type | | |
| | | Initial Certifi | | Χ | Recertification |
| 1. DEP | Facility ID N | Tumber: 53/9802060 | 2. Tank | Numbers: 1, 2, 3 | 3, 4, 5. |
| | ity Name: | Synergy Recycling | g of Centra | al Florida, LL | C |
| 4. Facil | ity Address: | 3800 West Lake Har | milton Drive | , Winter Haven | , FL 33881 |
| This is t | to certify that | the engineering features of the | nis used oil prod | cessing facility have | e been designed/examined |
| by me a | nd found to o | conform to engineering princi | ples applicable | to such facilities. In | n my professional |
| judgme | nt, this facilit | y, when properly constructed | , maintained an | d operated, or close | d, will comply with all |
| applicat | ore statutes of | the State of Florida and rules | s of the Departi | Heur of Pilanomiler | ital i rotoction. |

| applicable statutes of the state of Florida and | a ruics of the Depa | artificant of Da |
|---|---------------------|------------------|
| Signature Signature | | |
| Michael H. Stillinger | | |
| Name (please type) | | |
| Florida Registration Number: 47011 | | |
| Mailing Address: 3905 Kidron Ro | ad | |
| Street or P. O. Box | | |
| Lakeland, Florida 33811 | , | |
| City | State | Zip |
| Date: 11.21.14 Telephone 263 | 6472877 | |

[PLEASE AFFIX SEAL]

Page 8 of 8
DEP Form 62-710.901(6), incorporated in Rule 62-710.800(3), F.A.C. Effective Date 4-23-13

ATTACHMENT A SITE MAP



ATTACHMENT B TANK TABLE

| Tank <u>Number</u> | Tank Capacity gallons | Tank Contents |
|-----------------------|-----------------------------|--|
| 1 | 10,000 | Oily Water, Used Oil |
| 2 | 1,500 | Oily Water, Used Oil or Spent Antifreeze |
| 3-a | 18,000 | Used Oil |
| 3-ь | 3,500 | Used Oil, Oily Water, Spent Antifreeze |
| 3-с | 3,500 | Used Oil, Oily Water, Spent Antifreeze |
| 4 | 25,000 | Used Oil |
| 5 | 25,000 | Used Oil |

Tank 3 is a 25,000-gallon double walled tank, separated into (3) compartments with the cited capacities above.

Tank 4 is single-walled tank installed in September 2010.

Tank 5 is single-walled tank installed on April 18, 2011.

The containment structure for Tanks 4 and 5 was installed on April 23, 2011.

Tanks 4 & 5 were placed into service upon receipt of June 30, 2011 FDEP Used Oil Permit Modification.

ATTACHMENT I

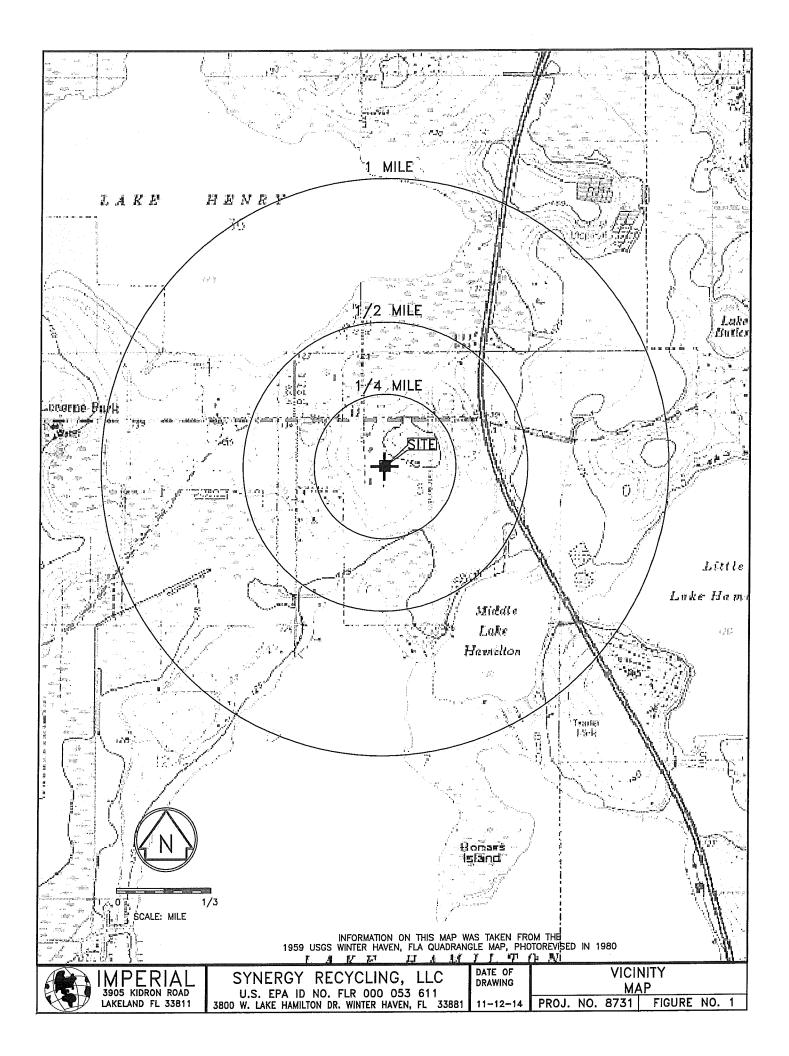
FACILITY FIGURES
AND
ILLUSTRATIONS

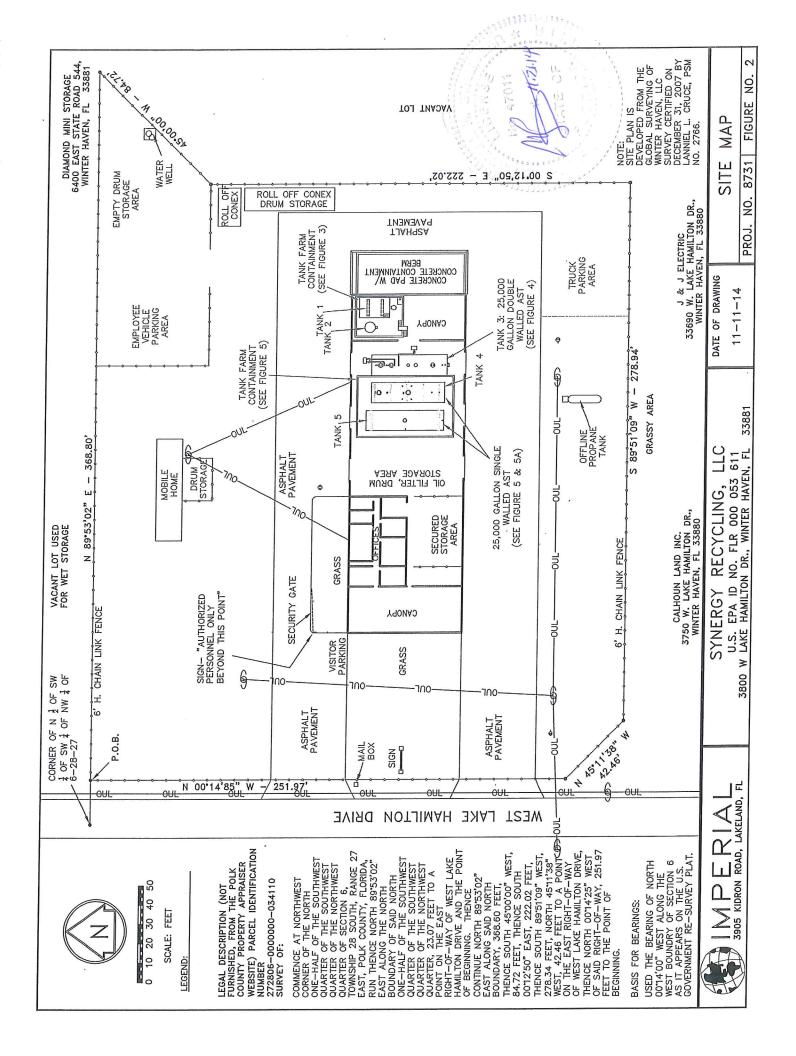
Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-HO-001 Revision 1 Section I November 21, 2014 Page 1 of 1

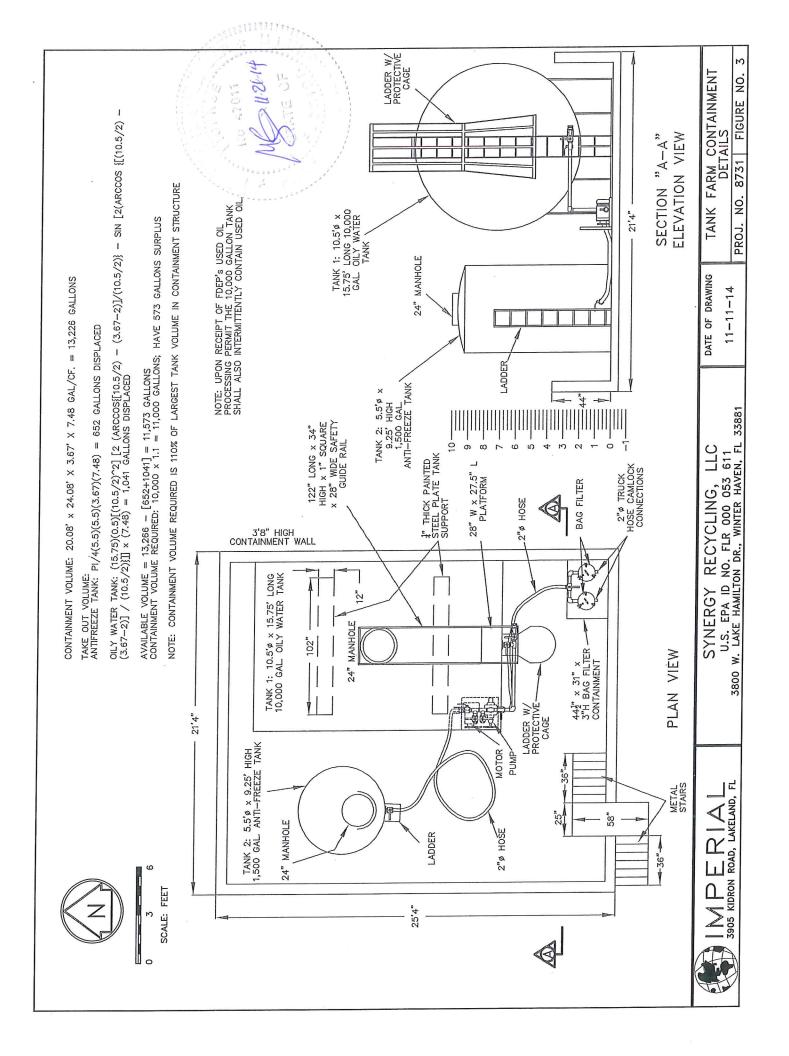
Attachment I

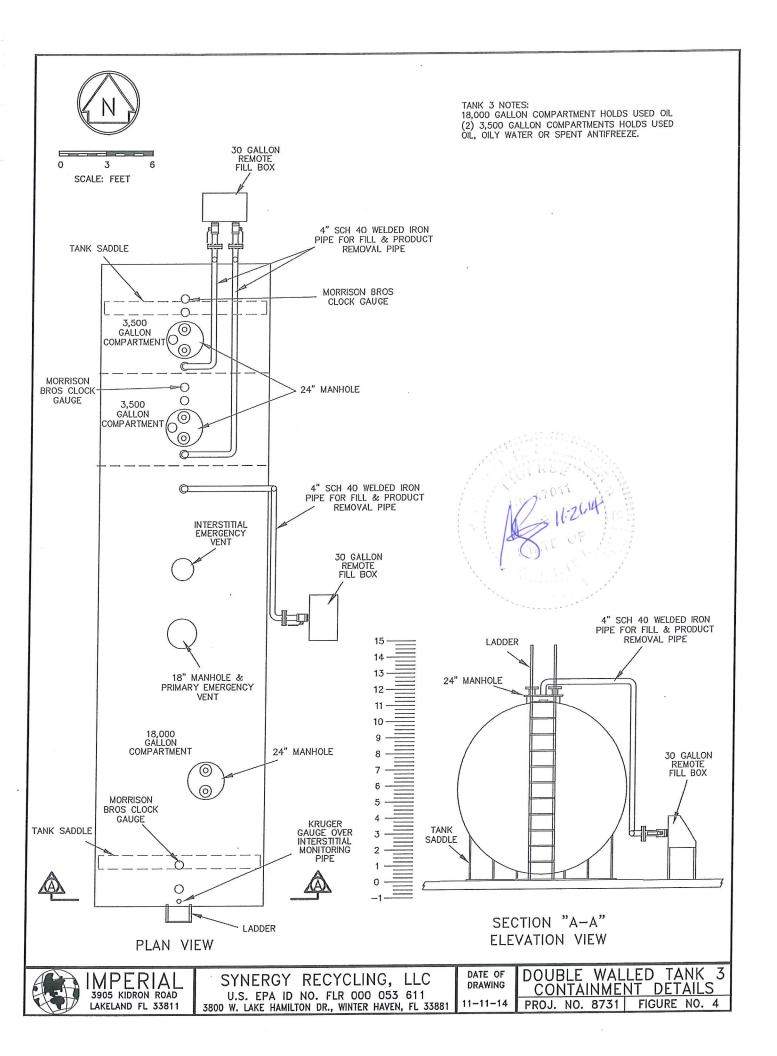
Facility Figures and Illustrations

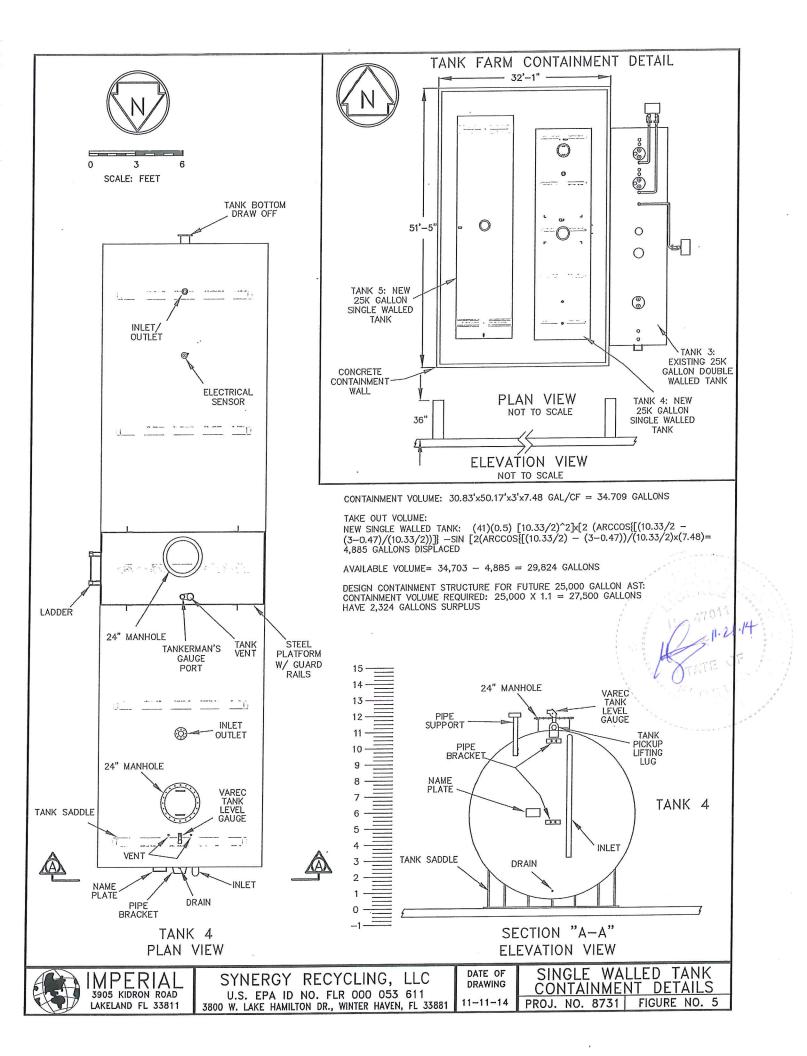
| Figure 1 | Vicinity Map (The vicinity map shows the site location and topography). |
|-----------|--|
| Figure 2 | Site Map (The site map illustrates all structural improvements and property boundaries). |
| Figure 3 | Tank Farm Containment Details (The figure provides a containment volume calculation, tank specifications and dimensions to scale). |
| Figure 4 | Double Walled Tank Details (The figure provides tank specifications and dimensions to scale). |
| Figure 5 | Single Walled Tank Containment Details (The figure provides tank specifications and dimensions to scale for Tank 4). |
| Figure 5A | Single Walled Tank Containment Details (The figure provides tank specifications and dimensions to scale for Tank 5). |
| Figure 6 | Loading and Unloading Area (The location of the loading and unloading area is illustrated on this figure). |
| Figure 7 | Fire and Spill Control Equipment (The location of fire and spill control equipment is illustrated on this figure). |
| Figure 8 | Stormwater Drainage (Surface water runoff directions and Stormwater control improvements are illustrated on this figure). |
| Figure 9 | Traffic Flow |
| Figure 10 | Evacuation Routes (Exit Traffic Routes and an Assembly Point are illustrated on this figure). |
| Figure 11 | Flood Insurance Rate Map (The FEMA developed map illustrates locations nearby the site that can flood). |
| Figure 12 | Closure Plan (The figure illustrates proposed soil boring locations to demonstrate reasonable assurance that the site is not impacted by the used oil activities). |

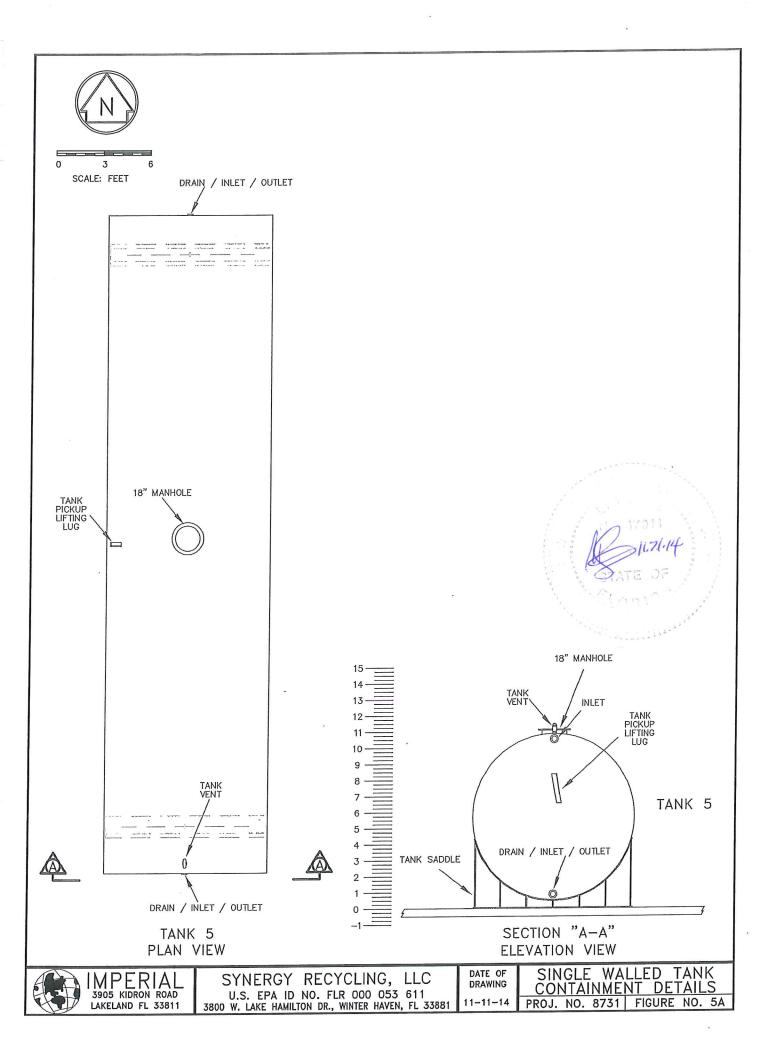


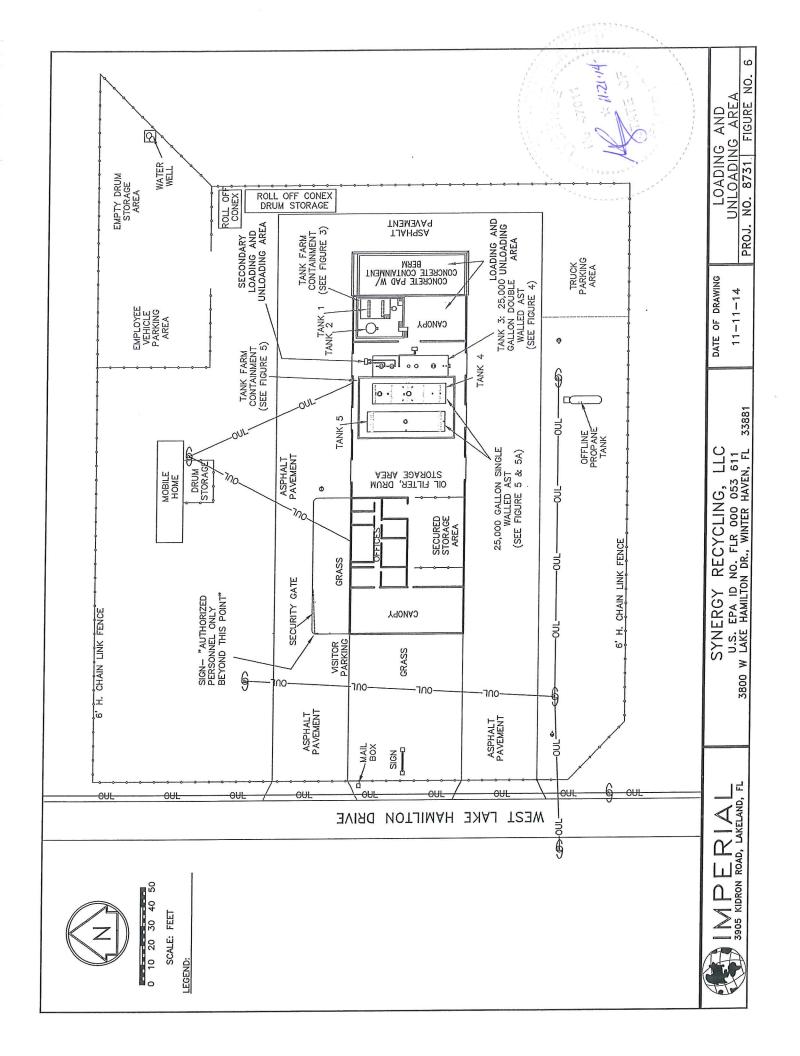


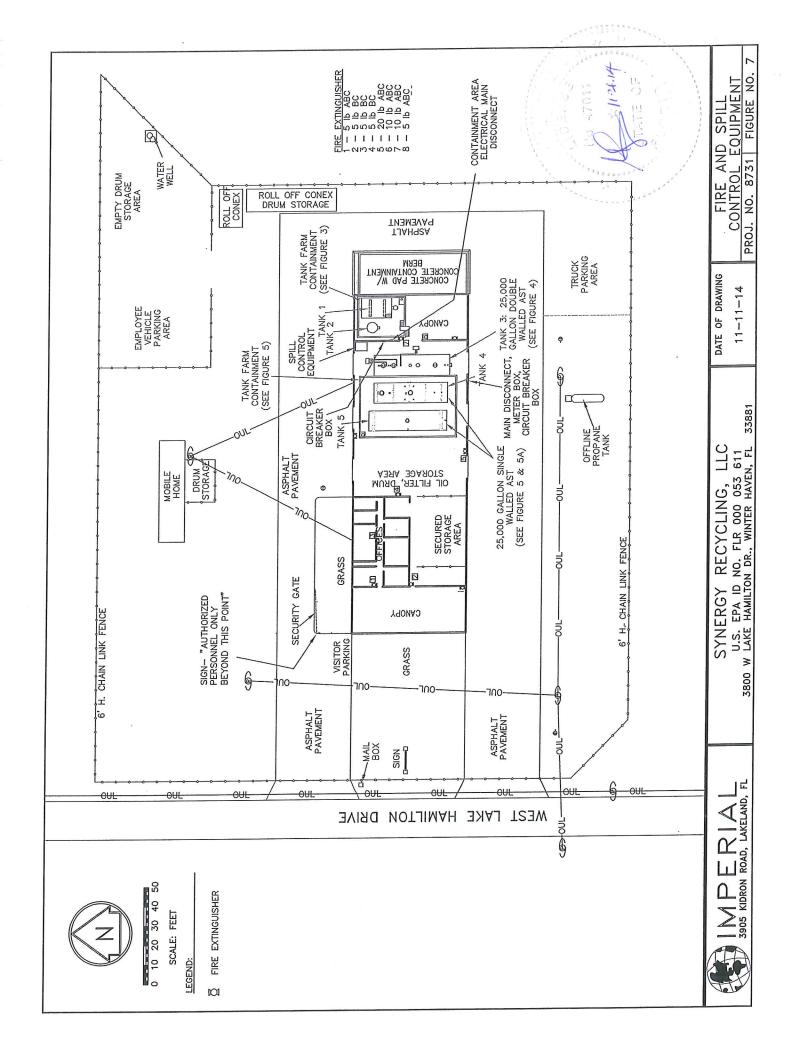


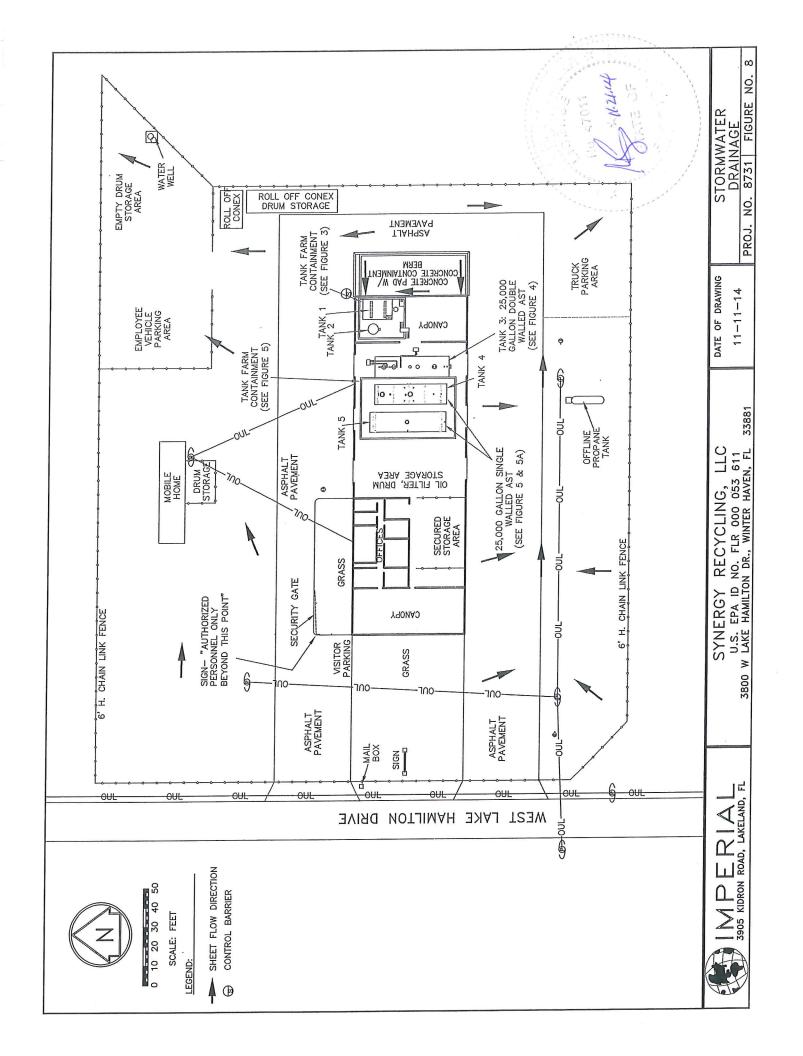


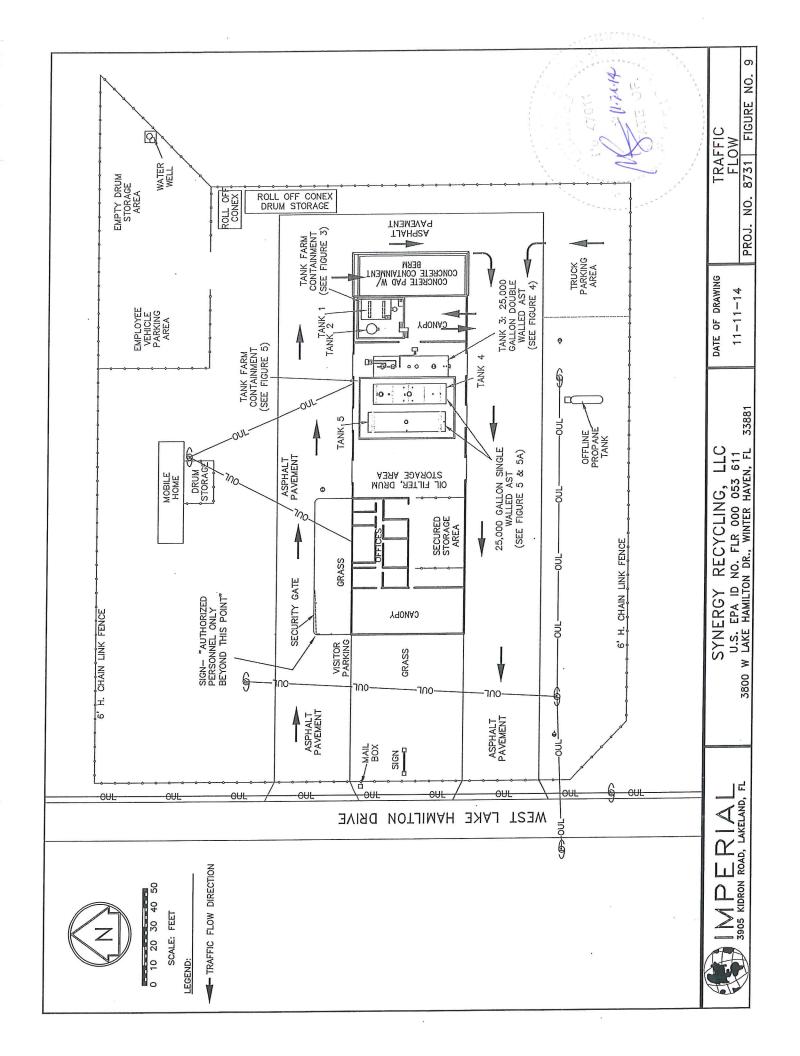


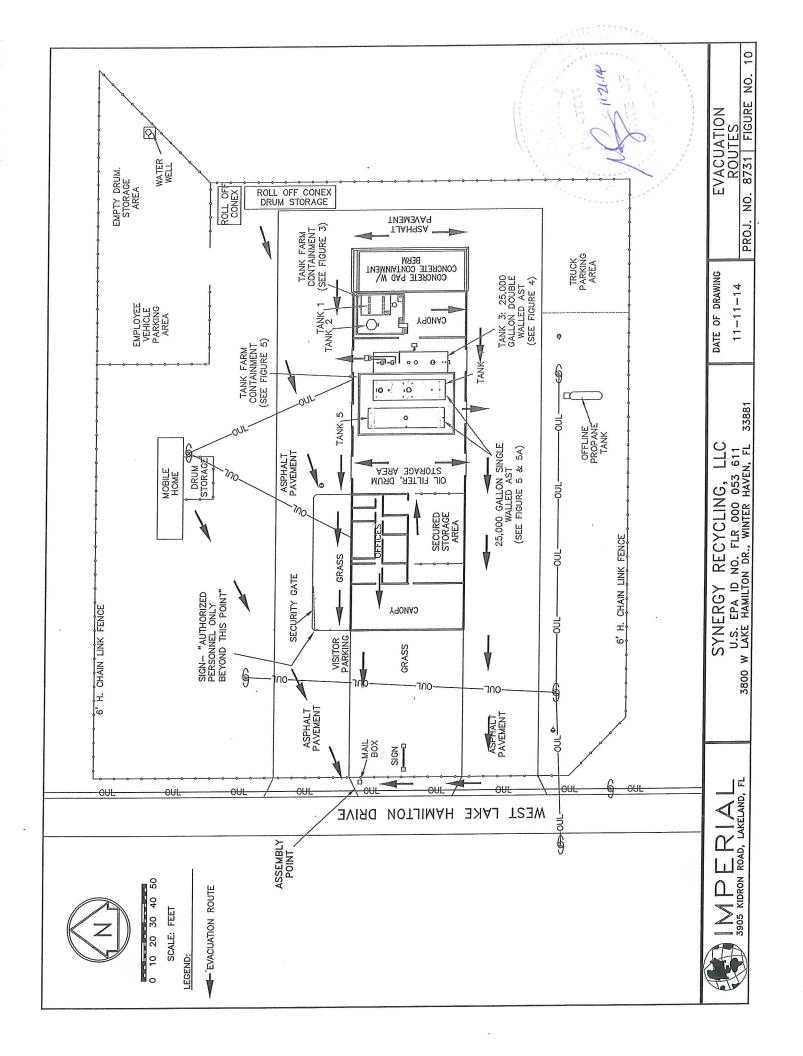


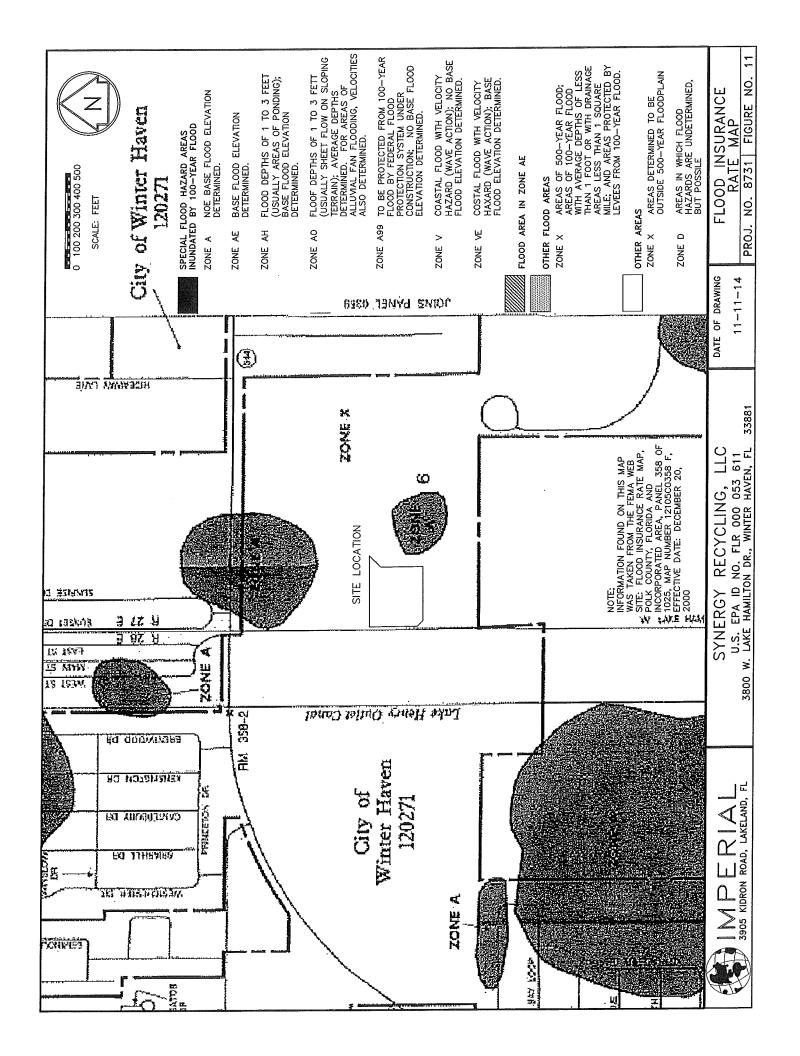


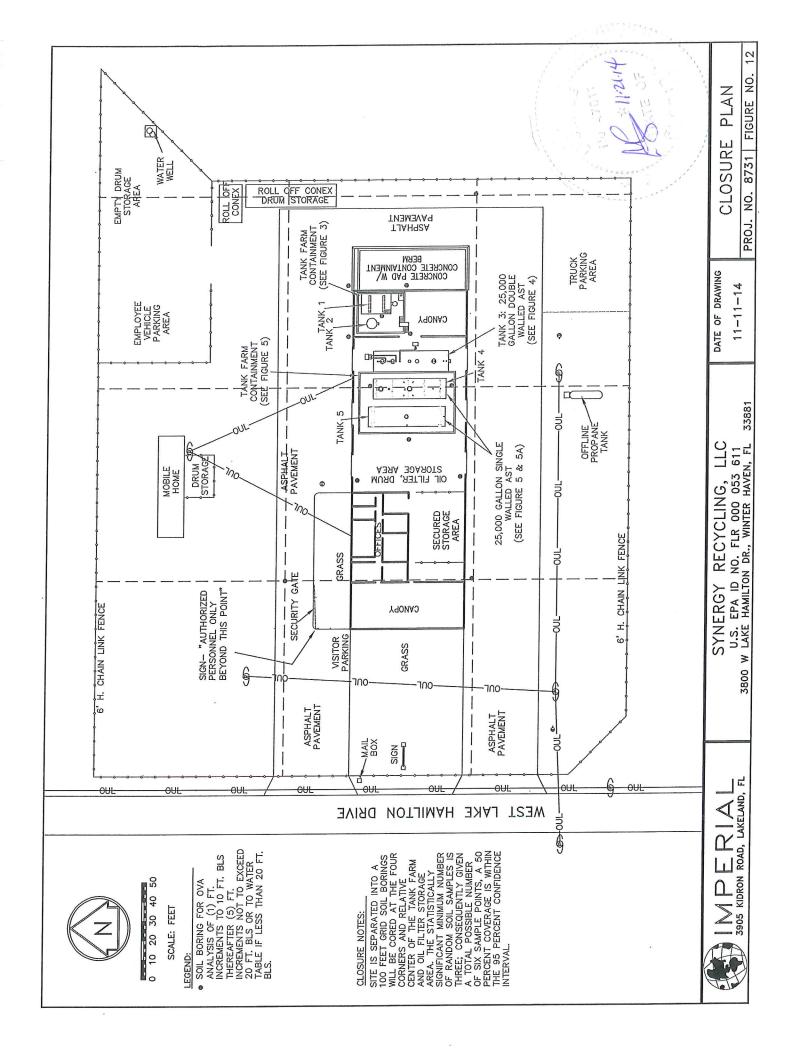












ATTACHMENT II

FACILITY OPERATION

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section II November 21, 2014 Page 1 of 2

Attachment II.

Facility Operation

Synergy Recycling of Central Florida, LLC. (Synergy) is located in Section 6, Township 28 South, Range 27 East, Polk County, Florida. The physical address is 3800 West Lake Hamilton Drive, Winter Haven, FL 33881. The facility is located on a 2.03 acre property. The site and facility location is illustrated on Figures 1 and 2, in Attachment I.

Used oil, oily water, petroleum contact water, used antifreeze, and used oil filters are collected and transported to the facility. At the request of the generator, antifreeze is picked up by the driver only if the generator can demonstrate that the antifreeze is not a hazardous waste (see FDEP's BMPs for Managing Used Antifreeze, attached to the Analysis Plan, Attachment IV). In addition, intermittently de minimis amounts of absorbent pads and rags that have been contaminated with used oil appear in the drums of used oil filters collected from customers. Synergy will request of new customers or customers with a revised process stream to have their oily waste analyzed in accordance with 40 CFR 279.10(c), before the oily waste is picked up. Used oil filters shall be managed in compliance with 62-710, FAC (see Process Flow, Paragraph 13 and Attachment XI). Rags, booms, pads and other absorbent materials if impacted by oil are handled as an oily waste as cited in 62-710.201(1), F.A.C. Occasionally, rags, booms, pads and other absorbent materials if not impacted by oil handled as a solid waste (see Attachment XI); are collected from the customers and staged in the Winter Haven warehouse until truck load quantities are accumulated. These drums are then shipped to the Synergy Recycling facility in Kingsland, Georgia where they are bulked in a roll off container and shipped to a Georgia permitted land fill.

Synergy uses one 10,000-gallon above ground storage tank (Tank 1) for processing used oil and oily water (or PCW, petroleum contact water); one 1,500-gallon above ground storage tank (Tank 2) for bulking antifreeze for recycling or for processing used oil and oily water. Given Synergy is a Used Oil facility and as cited in 62-710.201(1), F.A.C., Oily Water shall be managed in compliance with 62-710, F.A.C. The processing of oily water shall focus on phase separation between oil and water; any available oil in the oily water that can be separated shall be separated as used oil. The 10,000-gallon and 1,500-gallon above ground tanks are placed in a concrete secondary containment structure that is sealed and impervious to petroleum products. Upon receipt of the Used Oil Processing Permit, Synergy shall also use the 10,000-gallon above ground storage tank for intermittently processing oil. Tanks 1 and 2 shall be labeled as used oil when containing used oil. Tank contents shall be dependent on customer needs.

In September 2008 Synergy has installed a 25,000-gallon double-walled tank (Tank 3), split in three compartments rated for 18,000/3,500/3,500-gallons. The 18,000-gallon compartment shall contain used oil. The 3,500-gallon compartments shall contain used oil, oily water or spent antifreeze. The tank compartment contents are subject to customer needs. In September 2010 and on April 18, 2011 Synergy had installed Tank 4 and Tank 5, respectively (two 25,000-gallon single walled tanks). The concrete secondary containment structure that is sealed and impervious to petroleum products was installed around Tanks 4 and 5 on April 23, 2011. Tanks 4 and 5 were placed into service upon

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section II November 21, 2014 Page 2 of 2

Attachment II

Facility Operation

FDEP approval of the Used Oil Permit Modification received on June 30, 2011. The tank locations and specifications are illustrated on Figures 2, 3, 4 and 5, in Attachment I.

During the five-year permit cycle the number of employees and support equipment is driven by dynamic market conditions and subject to change. Each driver carries a sniffer (Inficon TEK-Mate Refrigerant Leak Detector see manual attached to Analysis Plan, Attachment IV) and checks the sniffer to activate at the beginning of each day.

At the beginning of each day the driver will turn on the sniffer. The sniffer sensor self calibrates automatically and is ready for use. Each pick up of oil (from each customer) is tested by a sniffer. The sensor of the sniffer is placed inside the oil container or if topped within one inch from the oil. The sniffer is designed to sense the dominant group of chlorinated halogens.

Used antifreeze collected from generators is bulked at the Synergy Recycling facility and shipped to a recycling facility, or shipped to the Synergy Recycling Kingsland, Georgia facility where they further bulk it and ship it to an antifreeze recycling facility.

Upon arrival at the plant each compartment of the truck load is tested by a Dexsil kit (Dexsil Clor-D-Tect 1000 or 4000 chlorine halogen test kit) or equivalent EPA approved kit to insure proper field screening before off-loading from the truck tanker. If the load titrates less than 1000-ppm, the truck-pump transfers the oil and first filters the oil through a basket strainer then to the designated on-site used oil tank.

If the load titrates greater than 1000 ppm, the driver's paperwork is checked to be sure it includes paperwork from a CESQG (conditionally exempt small quantity generator). Information relating to the CESQG is not online, and then Synergy can use the presumption that the facility is not recognized as a SQG (small quantity generator) or LQG (large quantity generator).

Each batch of oil that is sold as "on-specification oil" shall be tested by a by a laboratory certified by the Florida Department of Heath Environmental Laboratory Certification Program (DOH ELCP) in the solid and chemical matrix for total halides in units of chloride, flash point, PCBs and metals (arsenic, cadmium, chromium, and lead). The DOH ELCP Laboratory shall use the most current and Rule allowed methods for analysis. Samples are collected from the outbound load as set forth in the Analysis Plan. As an alternative, Synergy may sell its used oil directly to a permitted used oil recycler.

Used oil filters are drained, containerized and to transported to an out of State processing facility. All metal used oil filters shipped to US Foundry in Medley, Florida to be smelted into new metal products.

ATTACHMENT III

PROCESS FLOW

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section III November 21, 2014 Page 1 of 2

Attachment III

Process Flow

- 1. At the beginning of each day the driver will turn on the sniffer (Inficon TEK-Mate Refrigerant Leak Detector, see manual attached to Analysis Plan, Attachment IV). The sniffer sensor self calibrates automatically and is ready for use. Each pick up of oil (from each customer) is tested by a sniffer. The sniffer is designed to sense the dominant group of chlorinated halogens.
- 2. All trucks are compartmented (2 to 3) compartments). The driver pulls up a truck to a customer's (generator) used oil container or tank, takes out the sniffer and analyzes the contents of each customer's storage tank or container (see analysis plan for instructions). The sensor of the sniffer is placed inside the oil container or tank if topped within one inch from the oil.
- 3. With the sniffer on, if the sniffer starts clicking real fast (typical for oil exceeding 1000 ppm halogens), the oil is rechecked. Given the sniffer's potential to provide false positive readings, if the sniffer gives an audible reading above 1000 ppm, the driver then retests the oil using a Dexsil test kit. If the Dexsil test shows the results less than 1000 ppm, the driver documents the results on the customer manifest. Should the Dexsil test show over 1000 ppm, the driver follows the procedure for determining if the generator is a CESQG or has the customer provide information relative to rebutting the presumption that the oil has been mixed with hazardous waste.
- 4. If the sniffer screening process indicates that the oil contains less than 1000-ppm halogens, the driver pumps out the oil container into one of the two to three compartments on the truck.
- 5. Procedures 1, 2, 3 and 4 are repeated for each oil pick up. Once the truck is full (typically towards the end of the day) the driver delivers the contents to the plant to the unloading rack and unloads into one tank at a time. The tank locations are shown as **Figure 2** in **Attachment I**.
- 6. A customer (generator) may request that Synergy pick up some used antifreeze. Antifreeze collected by Synergy Recycling is ultimately delivered for recycling to a properly permitted antifreeze recycling facility.
- 7. Before unloading the truck the contents of each truck compartment are tested again by the facility staff with a Dexsil kit (Dexsil Clor-D-Tect 1000 or 4000 chlorine halogen test kit) or equivalent EPA approved kit. If the oil is less than 1000 ppm the oil is ready to be pumped to the tank farm. Should a tank truck compartment show results above 1000 ppm, the drivers paperwork is checked for documentation of a CESQG. If there is documentation of a CESQG, the oil is pumped into an oil tank at the facility. If the method used detects a hot load (>1000 ppm reading halogen content) and there is no documentation of a generator providing oil to the contents of that tank truck compartment being a CESQG, the load is rejected and is managed as a hazardous waste in compliance with 40 CFR Part 262, unless the load can be rebutted.

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section III November 21, 2014 Page 2 of 2

Attachment III (continued)

Process Flow (continued)

- 8. The driver or a material handler connects the truck's hoses to the plant collection piping. Typically, before any fluid (oil or antifreeze) enters a tank at the facility the fluid is pumped through the straining basket that may incorporate a sock liner.
- 9. Water present in any compartment of an unloading truck is separated into a separate holding tank at the facility. Once enough volume is ready for transport, the oily water is transported to an approved wastewater or petroleum contact water treatment plant.
- 10. Each batch of oil that is sold as "on-specification oil shall be tested by a by a laboratory certified by the Florida Department of Heath Environmental Laboratory Certification Program (DOH ELCP) in the solid and chemical matrix for total halides in units of chloride, flash point, PCBs and metals (arsenic, cadmium, chromium, and lead). The DOH ELCP Laboratory shall use the most current and Rule allowed methods for analysis. A Batch is a volume of used oil less than the storage tank capacity of the facility ready to be tested and marketed as one common outgoing shipment. Samples are collected from the outbound load as set forth in the Analysis Plan. As an alternative, Synergy may market its used oil directly as off specification used oil fuel.
- 11. If and when Synergy sells on-specification oil Synergy shall have a log (available for review) that shows date of the batch, tank(s), volume(s) in tank(s); institute a lock out and tag out system; document when tank(s) contents were sampled, with the laboratory ID number; maintain results, correlating analytical results with the tank contents; have logs showing the quantities of on-specification oil removed from the tank to where and when. When the batch has been removed, the logging procedure is repeated for the next batch. In the example of using the 18,000 gallon tank, the lock-out tag out system is regulated by valve that controls the inflow and outflow of product from the 18,000-gallon tank.
- 12. After receipt of the analytical results, from a NELAP certified lab, demonstrates that the oil is on-specification; an outbound load is taken from the used oil tanks and pumped to tractor trailer pump truck(s) to deliver the on-specification oil to approved and permitted buyer(s).
- 13. Drums of used oil filters are opened, inspected for its contents and bulked into a roll off or similar container inside the building and over an impervious surface (see Figure 1). Used oil that may further drain from the filters into the container is removed by pumping out the liquids. Once a container is full, arrangements are made to transport the covered and labeled container to a permitted end user. Such an end user may be US Foundry, however other recycling sites may be used. Synergy may also choose to send drummed used oil filters by box truck and trailer to its Kingsland, Georgia facility for processing or other licensed filter processing operations, where the oil filters are compressed into bricks, any remnant oil is further extracted and the compressed oil filters are shipped to smelters for recycling.

ATTACHMENT IV

ANALYSIS PLAN

Revision 1 Section IV November 21, 2014 Page 1 of 3

Attachment IV

Analysis Plan

Synergy Recycling of Central Florida, LLC (Synergy) shall follow the requirements of Chapter 62-160, Florida Administrative Code, addressing quality assurance of sampling and analysis, when applicable for verifying on-specification oil. This includes, but is not limited to the requirement to use a laboratory certified by the DOH ELCP for testing oil, and the requirement to follow FDEP SOPs for sampling.

At the beginning of each day the driver will turn on the sniffer (Inficon TEK-Mate Refrigerant Leak Detector). Attached as **Appendix IV-A** (12-pages, numbered at the bottom of the manual text) is the operation and maintenance manual for the sniffer. Once the sniffer is turned on it is ready for testing. The sniffer sensor shall activate in alarm condition by emitting fast clicking audible tone when the sensor is placed nearby oil that may contain greater than 1000-ppm chlorinated halogens. The sniffer has been approved by FDEP before 1993 as an acceptable standard industry-wide field screening device able to consistently detect an exceedance of 1000-ppm halogens.

Typically, many of Synergy's the customers (generators) dispose of less than 100 kilograms of hazardous waste per month and can be considered a Conditionally Exempt Small Quantity Generator (CESQG). For CESQG determination, Synergy provides the customer a blank form, which completes and returns the form to Synergy before materials pick-up. Synergy understands that only by regulatory definition is it considered a hazardous waste. However, if the waste was analyzed, it would typically be considered non-hazardous.

During the pre-qualification process for a generator the driver will open the generator's containers. After opening the container the driver will note and record any unusual color or odor. The driver tests the contents of each container separately with the sniffer. The driver then records on the manifest if the used oil passed or failed the sniffer test.

If the sniffer registers an audible result, the driver may have available and use a backup Dexsil kit (Dexsil Clor-D-Tect 1000 chlorine halogen test kit) to test the used oil. Should the driver not have a backup Dexsil kit, the driver shall leave without loading any oil until a Synergy employee's return to the customer, passing the oil's field screening test with the Dexsil Kit will the driver pump out the oil. If the titration from the Dexsil kit determines that the sample exceeds 1000 ppm halogens the generator is asked to have the oil sampled by a certified laboratory before it can be accepted unless other information rebutting the presumption is provided to Synergy. Records (manifests) of all shipments, including those refused due to suspected oil mixed with hazardous waste or titrates greater than 1000-ppm halogens with the driver's back-up Dexsil kit, will be maintained for five years. A manifest for each pick up is signed by the generator who through a laboratory analysis or "generators knowledge" attests that the material is non-hazardous.

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Attachment IV (continued)

Analysis Plan (continued)

When the driver returns to the facility, each truck tank compartment is sampled by a material handler who by lowering an "oil thief" into the compartment, obtains a core sample of the contents and places it in a sample jar for testing. The material handler will then test the oil with a Dexsil kit or equivalent EPA approved kit. Results are recorded in a daily log book.

The sampler is triple-rinsed with the sampled oil in order to minimize potential cross contamination between tank samples. Once field screen tested the in-house samples are returned to the sampled container. The truck record, driver's name and manifest shall be kept at the facility, and will be maintained for a minimum time specified in Chapters 62-160 and 62-710, Florida Administrative Code or 40 Code of Federal Regulations 279.1, whichever is more stringent.

If at the facility the Dexsil kit provides for a reading greater than 1000-ppm, the used oil is rebutted, tested or handled as a hazardous waste.

At the request of the customer (generator), Synergy drivers pick up used antifreeze. Used antifreeze collected from generators by Synergy Recycling is destined for recycling at one of several recycling facilities in and out of the State of Florida.

Used oil ready for "on-specification oil" testing is typically contained in the 10,000-gallon used oil tank (Tank 1), in the 18,000-gallon compartment of the 25,000-gallon double-walled tank (Tank 3), the two new (2011) 25,000-gallon used oil tanks (Tanks 4 and 5). Occasionally, as market conditions dictate, the two 3,500-gallon compartments of the 25,000-gallon double-walled tank may contain used oil for "on-specification oil" testing and sale. Any batch sample for an outgoing shipment of on-specification oil shall be a representative composite of the selected tanks. An industry standard oil thief shall provide a representative composite sample. Any used oil that is left in the facility tanks shall be retested with the next batch for on-specification screening.

Facility staff shall use a sampler that meets the minimum laboratory volume of 4-ounces to analyze the sample for on-specification parameters. The sampling procedure is identical to sampling the truck tanks described above. Once removed from the tank, the sampled oil is placed in glass sample jar for analysis.

If any of its outgoing shipments are to be sold as on specification oil; the batch of oil shall be analyzed by a laboratory certified by the DOH ELCP in the solid and chemical matrix for the analyte and test combinations to be performed. Synergy shall have a receipt of the laboratory analytical results before selling the selected batch of used oil as "on-specification" oil.

Any used oil that is marketed and sold by the facility will not be manifested as "on-specification" without a supporting analysis completed from a NELAP laboratory.

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Attachment IV (continued)

Analysis Plan (continued)

In between sampling tanks, in order to minimize potential cross contamination between tank samples, the sampler is triple-rinsed by the sampled oil.

Synergy complies with the on-specification performance criteria: 100 degrees Fahrenheit min. flash point, 4000 ppm maximum halides, 5 ppm maximum arsenic, 2 ppm maximum cadmium, 10 ppm maximum chromium, 100 ppm maximum lead and 2 ppm maximum PCB. Records of testing of incoming and outgoing loads shall be catalogued and filed. Synergy shall maintain records for all in-house tests, documentation for all sampling and all laboratory reports will be maintained for a minimum time specified in Chapters 62-160 and 62-710, Florida Administrative Code or 40 Code of Federal Regulations 279.1, whichever is more stringent.

Appendix IV-A "Sniffer" Manual

RATING MANUAL



TEK-Mate® Refrigerant Leak Detector



Declaration Of Conformity

This is to certify that this equipment, designed and manufactured by Inficon® Inc., 2 Technology Place, East Syracuse, NY 13057 USA meets the essential safety requirements of the European Union and is placed on the market accordingly. It has been constructed in accordance with good engineering practice in safety matters in force in the Community and does not endanger the safety of persons, domestic animals or property when properly installed and maintained and used in applications for which it was made.

Equipment Description TEK-Mate® Refrigerant Leak Detector

Applicable Directives. 73/23/EEC as amended by 93/68/EEC 89/336/EEC as amended by 93/68 EEC

Applicable Standards EN 61010-1: 1993 EN55011, Group 1,

Class A: 1991 EN50082-1: 1992

CE Implementation Date...March 1, 1997

Authorized Representative . Gary W. Lewis

Vice President, Quality Assurance Inficon Inc.

Any questions relative to this declaration or to the safety of Inficon's products should be directed, in writing to the quality assurance department at the above address.



WARNING

This symbol is intended to alert the user to the presence of important operating and maintenance (servicing) instructions in the literature accompanying the instrument.

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Contents

TEK-Mate®, Toolbox Tough™ and Inficon® are trademarks of Inficon Inc. DURACELL® is a registered trademark of Duracell Inc.

TEK-Mate's Features And Specifications

TEK-Mate combines sophisticated technology with durability for an instrument with outstanding sensitivity that's Laboratory Accurate, Toolbox Tough™.

- Electrochemical heated-diode sensor.
- "No-reset" detection of CFCs, HCFCs, and HFCs.
- ÷ Automatic adjustment (zeroing) to refrigerants in leak test area.
- Rugged flexible probe with a foam filter for sensor protection.
- High/Low leak-sensitivity and ON/OFF in one switch.
- Variable-pitch audible leak signal.

To get the best performance from your TEK-Mate Leak Detector, please read this manual carefully before you start using it. If you have any questions or need additional assistance, please call 800-344-3304. We'll be happy to help you!

Specifications

| UsageIndoor or Outdoor |
|---|
| Minimum sensitivity to R12, R22, and R134a 0.4 oz/yr (11 g/yr) |
| Operating temperature range +32 °F to 113 °F (0 °C to +45 °C) ¹ |
| Storage temperature range +14 $^{\circ}$ F to + 140 $^{\circ}$ F (-10 $^{\circ}$ C to +60 $^{\circ}$ C) |
| Humidity |
| Altitude |
| Power Supply Two "D" cell alkaline batteries |
| Battery Life Approximately 16 hours |
| Pollution degree |
| Overvoltage category2 |
| Weight (with power cells) 1.28 lb (0.58kg) |
| ¹ May be operated for a limited time In lower temperature environments. |

Getting Started

- 1. Install the batteries and sensor as described below.
- Slide the OFF-LOW-HIGH Sensitivity switch to the HIGH position.
- Wait for the TEK-Mate to warm up. A high-pitched audible tone
 will be heard and the "LEAK" indicator will be illuminated while
 the TEK-Mate is warming up. When this tone changes to a chirp
 and the "LEAK" indicator starts flashing, the TEK-Mate is ready
 to find leaks.
- 4. Begin checking for leaks.

The Inficon TEK-Mate Refrigerant Leak Detector provides similar responses to all CFC's, HCFC's, HFC's and refrigerant blends (i.e. R-404A, R407c) as well as SF6. There is no need to select the refrigerant you're working with.

How to Install the Alkaline Batteries

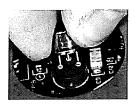
- Remove the battery cover by releasing the latch and sliding the cover down and off the handle.
- 2. Install two "D" size alkaline batteries as shown in Figure 1.
- 3. Reinstall the battery cover by aligning it with the handle and sliding it up until the latch engages.

When the batteries are nearing the end of their useful life, the yellow Low Battery indicator illuminates. While the batteries may operate the TEK-Mate up to a period of one hour after the Low Battery indicator illuminates, the batteries should be replaced as quickly as possible.

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Reinstall the rubber sensor cover by pressing it down firmly around the edges. Be sure the edges of the cover are flat against the surface of the detector.

Figure 2. Installing the Sensor



Using Your Inficon TEK-Mate



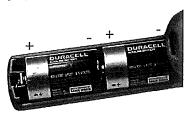
Do not operate this instrument in the presence of gasoline, natural gas, propane, or in other combustible atmospheres.

How To Find Leaks

NOTE: A sudden whipping of the leak detector probe or "blowing" into the sensor tip will affect the air flow over the sensor and cause the instrument to alarm.

- Place the tip of the leak-detector probe as close as possible to the site of the suspected leak. Try to position the probe within 1/4 inch (5 mm) of the possible leak source.
- Slowly (approximately 1 to 2 inches/second (25 to 50 mm/second)) move the probe past each possible leakage point.

Figure 1. Properly Installed Alkaline Batteries



How to Install or Change the Sensor

A new TEK-Mate is shipped with its sensor packed separately. The sensor must be installed in the TEK-Mate before use. This specialized sensor will operate for about 100 hours before it will need to be replaced.

- 1. Remove the rubber sensor cover by lifting at the outer edge.
- If you are replacing a worn out sensor, remove the worn out sensor by pulling it straight out of the socket and discard it.



WARNING

If you are replacing the sensor, the worn out sensor may be hot.

- 3. Remove the new sensor from its packaging.
- 4. Carefully align the three sensor leads (small wires coming out of the bottom of the "can") with the three holes in the sensor socket. Insert the leads into the holes by gently pressing straight down on the sensor until the sensor leads contact the bottom of the socket. Be careful not to bend the sensor leads. See Figure 2.

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NOTE: It is important to move the tip of the probe past the leak. If held on a leak, the auto zero feature will gradually zero out the leak signal.

- When the instrument detects a leak source, it will emit a different audible tone.
- 4. When the TEK-Mate signals a leak, pull the probe away from the leak for a moment, then bring it back to pinpoint the location. If the refrigerant leak is large, setting the sensitivity switch to LOW will make it easier to find the exact site of the leak.
- Return the sensitivity switch to HIGH before searching for additional leaks.

NOTE: When you reset the instrument to HIGH, as when you turn it on initially, the tone will sound continuously then give way to a chirp.

When you've finished leak-testing, turn OFF the instrument and store it in a clean place, protected from possible damage.

How To Change the Filter

The foam filter at the probe tip should be replaced if it becomes plugged with water or oil. To replace the filter, simply pull out the old filter (with a paper clip or similar device). Then, push in the new filter.

Cleaning The TEK-Mate's Housing

The TEK-Mate's plastic housing can be cleaned with standard household detergent or isopropyl alcohol. Care should be taken to prevent the cleaner from entering the instrument. Since gasoline and other solvents may damage the plastic, protect your Inficon TEK-Mate from contact with these substances.

Disposing Of The Alkaline Batteries

At the end of the life of a set of alkaline batteries, please dispose of them according to applicable state and local regulations. In the absence of such regulations, Inficon encourages its customers to recycle and/or dispose of the cells through voluntary waste recycling programs.

Troubleshooting

Except for the batteries and the sensor, the internal parts of the TEK-Mate Leak Detector are not user serviceable. If you experience a problem with your TEK-Mate, see the Troubleshooting Table below to determine how to remedy the problem. If you can not remedy the problem, take your TEK-Mate to your wholesaler for warranty evaluation.

| PROBLEM | CAUSE | REMEDY |
|---|--|---|
| Poor sensitivity. The TEK-Mate does not find leaks. | 1a. Sensor has reached the end of its useful life. | 1a. Replace the sensor. See page 5. |
| | 1b. Power switch set to LOW instead of HIGH | 1b. Set the Power Switch to HIGH and scan for the leak again. |
| 2. The TEK-Mate responds slowly to a leak. | 2a. Dirty or wet filter. | 2a. Replace the filter. See page 7. |
| | 2b. Failure in the pumping system. | 2b. Turn the TEK-Mate on and listen for a high-pitched motor sound. If you do not hear the motor, return the TEK-Mate to your wholesaler for warranty evaluation. |

| ۰ | |
|---|--|

Replacement Parts and Accessories

Replacement parts and accessories for your Inficon TEK-Mate Refrigerant Leak Detector are available through the same dealer from whom you bought the instrument.

Plastic storage case 705-401-P2

Replacement sensor.....703-020-G1

Tip filters, package of 20...705-600-G1

Warranty and Liability

Inficon warrants your TEK-Mate Refrigerant Leak Detector to be free from defects of materials or workmanship for one year from the date of purchase. Inficon does not warrant items that deteriorate under normal use, including power cells, sensors and filters. In addition, Inficon does not warrant any instrument that has been subjected to misuse, negligence, or accident, or has been repaired or altered by anyone other than Inficon.

Inficon's liability is limited to instruments returned to Inficon, transportation prepaid, not later than thirty (30) days after the warranty period expires, and which Inficon judges to have malfunctioned because of defective materials or workmanship. Inficon's liability is limited to, at its option, repairing or replacing the defective instrument or part.

This warranty is in lieu of all other warranties, express or implied, whether of merchantability or of fitness for a particular purpose or otherwise. All such other warranties are expressly disclaimed. Inficon shall have no liability in excess of the price paid to Inficon for the instrument plus return transportation charges prepaid. Inficon shall have no liability for any incidental or consequential damages. All such liabilities are excluded.

| | 2c. The sensor cover is not sealing. | 2c. Make sure the sensor cover is properly installed. See step 5 on page 6. |
|---|--|--|
| 3. Will not power up. | 3a. Batteries are worn out. | 3a. Install a new set of batteries. See page 4. |
| | 3b. Batteries have been improperly installed. | 3b. Check battery installation as shown in Figure 1. on page 5. |
| 4. False alarms - the TEK-Mate alarms when the probe is moved or bumped. | 4a. Sensor leads are bent. | 4a. Remove the sensor and inspect the leads. Straighten the leads with needle nose pliers, if necessary, and reinstall the sensor. |
| | 4b. Moisture was absorbed by the sensor during a long period without use. | 4b. Run the TEK-Mate for at least 20 minutes. The absorption of moisture does not affect the life or sensitivity of the sensor. |

Return Authorization Procedure

All defective TEK-Mates, or defective replacement parts and accessories, should be returned to your wholesaler for warranty evaluation. If you have any questions, please contact Inficon at 800-344-3304.

NOTE: Do not return you defective unit directly to the factory without first contacting your wholesaler.

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Special Information For Automotive Technicians

Inficon's TEK-Mate Refrigerant Leak Detector Model #705-202-G1 is design certified by MET Laboratories, Inc. to meet SAE J1627, "Rating Criteria for Electronic Refrigerant Leak Detectors" for R12, R22, and R134a. The following SAE Recommended Practice applies to this instrument and to the use of generally available electronic leak detection methods to service motor vehicle passenger compartment air conditioning systems.

- The electronic leak detector shall be operated in accordance with the equipment manufacturer's operating instructions.
- 2. Leak test with the engine not in operation.
- The A/C system shall be charged with sufficient refrigerant to have a gauge pressure of at least 50 PSI (340 kPa) when not in operation. At temperatures below 59 °F (15 °C) leaks may not be measurable, since this pressure may not be reached.
- 4. Take care not to contaminate the detector probe tip if the part being tested is contaminated. If the part is particularly dirty, it should be wiped off with a dry shop towel or blown off with shop air. No cleaners or solvents shall be used, since many electronic detectors are sensitive to their ingredients.
- 5. Visually trace the entire refrigerant system, and look for signs of air conditioning lubricant leakage, damage, and corrosion on all lines, hoses, and components. Each questionable area shall be carefully checked with the detector probe as well as all fittings, hose-to-line couplings, refrigerant controls, service ports with caps in place, brazed or welded areas, and areas around attachment points and hold-downs on lines and components.

- Always follow the refrigerant system around in a continuous path so that no areas of potential leaks are missed. If a leak is found, always continue to test the remainder of the system.
- 7. At each area checked, the probe shall be moved around the location, at a rate no more than 1 to 2 inches/second (25 to 50 mm/second) and no more than 1/4 inch (5 mm) from the surface completely around the position. Slower and closer movement of the probe greatly improves the likelihood of finding a leak.
- 8. An apparent leak shall be verified at least once by blowing shop air into the area of the suspected leak, if necessary, and repeating the check of the area. In cases of very large leaks, blowing out the area with shop air often helps locate the exact position of the leak.
- 9. Leak testing of the evaporator core while in the air conditioning module shall be accomplished by turning the air conditioning blower on high for a period of 15 seconds minimum, shutting it off, then waiting for the refrigerant to accumulate in the case for time specified in step 10, then inserting the leak detector probe into the blower resistor-block or condensate drain-hole if no water is present, or into the closest opening in the HVAC case to the evaporator, such as the heater duct or a vent duct. If the detector alarms, a leak apparently has been found.
- 10. The accumulation time for evaporator testing is 13 minutes.
- 11. Following any service to the refrigerant system of the vehicle, and any other service which disturbs the refrigerant system, a leak test of the repair and of the service ports of the refrigerant system shall be done.



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074-336A-P1

ATTACHMENT V

BY-PRODUCTS

Revision 1 Section V November 21, 2014 Page 1 of 1

Attachment V

By-Products

The by-products from the Synergy Recycling of Central Florida, LLC (Synergy) operations are deminimus amounts of rags and soil/sludge. Deminimus sludge residues, filter basket solids and other residues shall be shipped via an FDEP approved hauler. It is anticipated that Synergy shall generate significantly less than 100-kilograms per month and be considered a CESQG (Conditionally Exempt Small Quantity Generator). Synergy prefers to follow the industry standard frequency of sampling (or once per permit cycle). Synergy agrees to sample the basket filters on an annual basis if FDEP can demonstrate the Rule requirement in 62-710, FAC.

Rags, booms, pads and other absorbent materials are collected from the customers and staged in the Winter Haven warehouse until truck load quantities are accumulated, if impacted by oil, shall be managed as oily waste. In accordance with 40 CFR 279(c)(1) materials such as rags, booms, pads and other absorbent materials containing used oil shall be properly drained to the extents possible such that no visible signs of free-flowing oil remain in or on the material and hence according to 40 CFR 279(c)(1)(i) are not subject to this part [or 40 CFR 279(c)(1)(ii)].

On occasion rags, pads and other absorbent materials are not intermixed with oily waste and shall be managed as a solid waste (see **Attachment XI**). These drums are then shipped to the Synergy Recycling facility, located in Kingsland, Georgia where they are bulked in a roll off container and shipped to a Georgia permitted land fill.

Oily water collected and bulked from customers has as much oil skimmed from the top as possible and the remaining water is sent to a permitted waste water pre treatment facility.

All by-products shall be manifested to FDEP or USEPA approved and permitted facilities (See Tracking Plan, VI).

Approximately 25-60 drums of paper filter, rags, absorbents and filter lint are sent to an approved out of state processing facility on a monthly basis.

ATTACHMENT VI

TRACKING PLAN

Revision 1 Section VI November 21, 2014 Page 1 of 2

Attachment VI

Tracking Plan

Incoming and outgoing shipment records shall be kept a minimum of 3-years, pursuant to 40 CFR, Part 279.56.

Incoming shipments:

Incoming shipments shall be accompanied by in-house manifests, which shall include, the generator's (customer's) name, address, EPA Id number (if known by the customer or if applicable), the quantity of oil accepted, the sniffer result(s) (pass/fail) and the pick up date. Also, Synergy's name, address, US EPA Id. number, and driver shall be standard on the delivery manifest.

Outgoing shipments:

Outgoing shipments shall include Synergy's name, address, US EPA Id. number, and driver name on the delivery manifest. Also, the manifest shall include the end user's company name, the end user's street address, city and state along with the quantity of oil shipped and the date of shipment.

An example-manifest is **attached** and numbered as Page 2 of 2.

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Attachment VI

Tracking Plan

Incoming and outgoing shipment records shall be kept a minimum of 3-years, pursuant to 40 CFR, Part 279.56.

<u>Incoming shipments</u>:

Incoming shipments shall be accompanied by in-house manifests, which shall include, the generator's (customer's) name, address, EPA Id number (if known by the customer or if applicable), the quantity of oil accepted, the sniffer result(s) (pass/fail) and the pick up date. Also, Synergy's name, address, US EPA Id. number, and driver shall be standard on the delivery manifest.

Outgoing shipments:

Outgoing shipments shall include Synergy's name, address, US EPA Id. number, and driver name on the delivery manifest. Also, the manifest shall include the end user's company name, the end user's street address, city and state along with the quantity of oil shipped and the date of shipment.

An example-manifest is attached and numbered as Page 2 of 2.

SYNERGY RECYCLING OF CENTRAL FLORIDA

RECYCLE / TRANSPORTATION RECEIVING MANIFEST

MANIFEST NUMBER

Corporate Mailing Address: P.O. Box 88 Sharpsburg, Ga. 30277 Facility Address: 3800 Lake Hamilton Drive W. Winter Haven Fl. 33881 EPA ID # FLR000053611 And the second of the second o

| | EPA ID # FLR000053611 | | DEP / Customer # | | | | |
|---|--|---|--|--|---|--|--|
| Generator Name | The Child of the Children of t | | Billing Address (if different from location) | | · · · · · · · · · · · · · · · · · · · | | |
| Address | City | | | | | | |
| State Zip | County | | Phone | 144 | | · ************************************ | |
| | • | otion / Classification: No | n-Hazardous | | | | |
| Used Oil, Flash Greater th No Placard Required | | ntity of Gallons | | | Halogen | Test M | ethod: |
| GUsed Antifreeze, Flash Gr | cater than 200 F° | | | | Check | Result | S |
| No placard Required | Quan | ntity of Gallons | | T | NFICON | TEK-N | IATE |
| Oily Water, Flash Greater No Placard Required | | tity of Gallons | *** | | Above Below | | |
|] Used Oil Filters, Flash Gre No Placard Required | ater than 200 F | itity of Drums | | | De | exsil | |
| TO I month required | Quan | ing of Branks | **** | L | Above | 1000 | ppm |
| I Spent Absorbents, Flash G No Placard Required | | tity of Drums | | 11 | Below | 1000 | ppm |
| • | | | | | | | |
| I Other: Specify | Specia | al Billing Information or | | | | | |
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SYNERGY RECYCLING OF CENTRAL FLORIDA

RECYCLE / TRANSPORTATION / RECEIVING MANIFEST

| MANIFEST | DOCUMENT | VО. |
|----------|----------|-----|
| | | |

51738

| Corporate/Mailing Address P.O. Box 88 |
|---------------------------------------|
| Sharpsburg, GA 30277 |

Facility Address: 3800 Lake Hamilton Dr. W Winter Haven, FL 33881 EPA ID# FLR000053611

SERVICE HOTLINE (863) 419-0556

| ACCURATE AUTOMOTIVE Location | Olsi | 4212 | 2 |
|--|--|--|--|
| 2069 CORNELL STREET | City | State | |
| Billed To | SARASOTA | FL | |
| ACCURATE AUTOMOTIVE | City SARASOTA | | A STATE OF THE STA |
| Business Mailing Address 2069 CORNELL STREET | | State FL | Zip 34237 |
| Date Shipped 03/04/2009 | Time . | Telephone # 941-955-78 | 886 |
| D | escription / Classification: Non-Hazard | | *************************************** |
| Used Lubricants, Flash Greater than 200 No Placard Required | | .Halogen Test M | ethod: |
| ☐ Used Antifreeze, Flash Greater than 200 No Placard Required | F Quantity Gallons | (Circle Res Halogèn Leak D | • |
| Oily Water, Flash Greater than 200F No Placard Required | Quantity Gallons | Pass Fa | |
| ☐ Used Oil Filter, Flash Greater than 200F No Placard Required ☐ Spent Absorberta, Flash Greate (Lee 200 | Quantity Drums | Dexsil Páss Fa | ail |
| Spent Absorbents, Flash Greate than 200 No Placard Required DD'L DESCRIPTION/SPECIAL HANDLING IN Incl. Officers (1988) No. 1989 No. 1989 | Quantity Drums | | |
| Ised Oil is subject to regulation by the Florida I FR Part 279 void Skin & Tissue Contact, Wear Gloves & Ey rotection and Synergy Recycling at (886) 492-6 | DEP Statute 403, Florida Administrative (| Code 62-710 and The United S act the Florida Department of E | tates EPA 40 Environmental |
| ENERATOR CERTIFICATION: /e the generator of this product, hereby certify in the generator of this product is being transposal laws. We the generator also certify that this in the contents of this shipment is siffed, packed, marked and labeled, and are ernational, national, and state regulations. Jess I am a small generator who has been exected and section 3002(b) of RCRA. Lalso certify the | s product does not contain any detectable it are fully and accurately described above in all respects in proper condition for tran | d in accordance with all federa e levels of PCB,s (53 Fed, Reg we by proper shipping name an isport by highway according to | il, state, and p. 24206, June nd are applicable |
| der Section 3002(b) of RCRA, I also certify that degree I have determined to be economically | bracticable and ruave selected the meth | volume and toxicity of waste g nod of treatment, storage, or dis | enerated to sposal |
| ted Name Sig | nature | Date | |
| TRANSPORTER A | CKNOWLEDGEMENT OF RECEIPT OF | MATERIALS | |
| ted Name Sign | nature | Date | |
| RECEIVING FACITLIT | Y ACKNOWLEDGEMENT OF RECEIPT | OF MATERIALS | · · · · · · · · · · · · · · · · · · · |
| ed Name Sigr | nature | Date | |

ATTACHMENT VII

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

AND

CONTINGENCY PLAN

ATTACHMENT VII SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

AND

CONTINGENCY PLAN

FOR:

SYNERGY RECYCLING OF CENTRAL FLORIDA, LLC 3800 WEST LAKE HAMILTON DRIVE WINTER HAVEN, FLORIDA 33881 U.S. EPA ID. NO. FLR 000 053 611

PREPARED BY:

Imperial Testing Laboratories 3905 Kidron Road, Lakeland, Florida 33811 Telephone: (863)-647-2877

November 2014
Revision from May 2011
Revision from February, 2009
Revision from March, 2008
Revision from June, 2005

Sealed By: Michael H. Stillinger

P.E. No. 47011

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| Section 1.0 | Name of Facility | Synergy Recycling of Central Florida, LLC |
|---------------------------------|--|--|
| Section 2.0 | Type of Facility | Used Oil Transfer and Used Oil Filter Processor Proposed Used Oil Processor (pending FDEP permit) Proposed Solid Waste Transfer (pending FDEP permit) |
| Section 3.0 | Date of Initial Operation | The facility began in 1984; in December 2001 was purchased by Necessary Services; in June 2005 was purchased by On-Time Environmental Services, Inc.; in October 2007 was purchased by Synergy Recycling of Central Florida, LLC |
| Section 4.0 | Facility Location | 3800 Lake Hamilton Dr, W, Winter Haven, FL 33881 SE 1/4 of NE 1/4 of Section 6, Township 28 South, Range 27 East Latitude 28° 04′ 42″ and Longitude 81° 39′ 39″ See Figures 1 and 2 . |
| Section 5.0 | Owner Name and Address | Mr. Elliott Paul, Managing Member Synergy Recycling of Central Florida, LLC 3800 Lake Hamilton Dr, W, Winter Haven, FL 33881 |
| Section 6.0 | Designated Person Responsible for Oil Spill Prevention | Primary - <u>Mr. Jeff Englin</u> Alternate – <u>Ms. Montinique Buquoi</u> |
| Section 7.0 Signat Name: Title: | | The SPCC/Contingency Plan for Synergy Recycling of Central Florida, LLC will implemented as herein described: Signature: Name: Michael H. Stillinger, P.E. Vice President, Engineering Imperial Testing |
| Section 8.0 | P.E. Certification | I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR 265.52 and 40 CFR Part 112, attest that the SPCC Plan has |

and 40 CFR Part 112, attest that the SPCC Plan has been prepared with good engineering practices.

Signature: Name: Michael H. Stillinger, P.E. Florida Registration No. 47011

Section 9.0 Oil Spill History

Minor spillage is handled by absorbent pads. All storage tanks are above ground and contained (see attached figures). The site has never had a major oil spill until one occurred on May 27, 2014 at approximately 7:30 pm. Mr. James Clements, the plant assistant, was transferring product from a used oil collection truck into Tank #4. During the transfer a pneumatic valve had failed on an adjacent truck compartment causing the flow of oil to transfer into this compartment and out of the compartment vent, instead of transferring into Tank #4 as designated. Mr. Clements was filling out his paperwork within 15 feet on the south side of the truck when the spill occurred. The spill occurred from overflowing the compartment and draining to the north of the property. Mr. Clements did not realize the spill immediately as he was standing on the south side of the truck. The spill (approximately 95-gallons) traveled north on inclined asphalt paving following a driveway path into the gravel parking area. Mr. Clements immediately implemented the SPCC Plan by first containing the spill and immediately notifying Mr. Jeff Englin, the Plant Manager. Because the used motor oil traveled onto a pervious surface "Gravel Parking Area" Mr. Englin immediately contacted SWS for emergency response assistance. SWS responded at approximately 9:00 pm with (4) personnel, a Bobcat Skid-steer, and a 20-yard roll off container. At 3:00 am the initial cleanup was complete. Approximately 10 cubic yards of contaminated gravel was removed from the surface and placed into the roll off for proper disposal off site. SWS had also cleaned and removed the oily residue on the asphalt paving surface. Cement grout was applied on the asphalt surface for oil recovery. The spill was contained and cleaned within a short period of time. The spill was reported to the FDEP Southwest District Emergency Response Division (Tel. #813-470-5700, ext. 45919). Mr. Jeff Englin had contacted Mr. Timyn Rice, Emergency Response Director. Mr. Rice had provided Mr. Englin Emergency Response Number 2014-3815, for the reported spill. Also, on May 28, 2014 Mr. Englin had mailed certified the Discharge Reporting Form within 24-hours of the spill, in accordance with Chapters 62-761, 62-762 and 62-780, Florida Administrative Code.

Later, in the morning, on May 28, 2014 SWS had returned to the site and recovered another 40-cubic yards of potentially oil impacted soil and gravel to fill up a total of (5) roll off containers. After testing, on May 30, and June 2, 2014 the filled roll off containers were transported to Clark Environmental, Inc. located in Mulberry, for soil incineration. Clark Environmental, Inc. had provided Manifests. SWS had collected soil samples for analysis per conversations with Domenic LetoBarone, FDEP Southwest District Emergency Response Specialist (813-470-570, ext. 45920) and SWS personnel. The soil samples had demonstrated that the soil that was impacted by the May 27, 2014 spill was fully removed off-site for incineration and can be considered closed for a "No Further Action" (NFA) status. On August 26, 2014 Mr. Timyn Rice, Emergency Response Manager issued an NFA for Office of Emergency Response Incident #2014-41-50919z.

Corrective Action: Used Oil Collection Pneumatic valve will be immediately repaired.

Section 10.0 Spill Prevention Analysis

Maximum Spill Gallons:

| Tank No. | Tank Id. | Overflow Failure | Tank Rupture Failure |
|----------|--|---------------------------------------|----------------------|
| 1 | Oily Water / Used Oil Tank | 1,000 | 10,000 |
| 2 | Oily Water / Used Oil / Antifreeze Tar | nk 150 | 1,500 |
| 3A | Used Oil/Oily Water/Antifreeze (Doul | | 3,500 |
| 3B | Used Oil/Oily Water/Antifreeze (Doul | · · · · · · · · · · · · · · · · · · · | 3,500 |

| 3C | Used Oil Tank (Double-Walled) | | 18,000 |
|-------|-------------------------------|-------|---------------|
| 4 | Used Oil Tank | 1,000 | 25,000 |
| 5 | Used Oil Tank | 1,000 | <u>25,000</u> |
| Total | | | 86,500 |

All storage tanks are above ground storage tanks, which are stored under cover, inside a 7,620-square-feet metal building. Hence containment structures are not impacted by rainfall. The site covers 2.03-acres.

For the 10,000-gallon Oily Water / Used Oil Tank and 1500-gallon Antifreeze / Oily Water / Used Oil Tank secondary containment is an impervious coated concrete floor with a 3-feet, 8-inches high coated concrete block retaining wall. The containment structure has an available surplus volume of 573-gallons above the minimum 110% of the largest tank and tank displacement volume (see calculations on **Figure 3**), required by Rule 62-710.401(6), Florida Administrative Code. Upon receipt of FDEP's Used Oil Processing Permit Synergy shall also use the 10,000-gallon above ground storage tank to intermittently contain Used Oil.

In September 2008 Synergy has installed a 25,000-gallon double-walled tank, split in three compartments rated for 18,000/3,500/3,500-gallons. The 18,000-gallon compartment shall contain used oil. The 3500-gallon compartments shall contain used oil, oily water or spent antifreeze (see **Figure 4**). The former 8,000 gallon Used Oil Tanker Trailer has been decommissioned. In September 2010 and on April 18, 2011 Synergy had installed Tank 4 and Tank 5, respectively (two 25,000-gallon single walled tanks). The 36-inch high coated concrete secondary containment structure that is sealed and impervious to petroleum products was installed around Tanks 4 and 5 on April 23, 2011. <u>Tanks 4 and 5 were placed into service upon the June 30, 2011 FDEP approval of the Used Oil Permit Modification (see **Figure 5**).</u>

If a spill or release should occur, this SPCC plan will be amended to include a written description of the spill, the corrective action taken, and a plan for preventing a recurring incident.

Section 11.0 Emergency Procedures & Actions

In the event of an emergency situation the primary designated person (see **Appendix A**) must be notified immediately. If the primary designated person cannot be contacted, alternate contacts are provided in **Appendix A**.

The primary designated person or alternate contacts shall meet the following qualifications:

- 1. Must be familiar with all aspects of this plan, all operations and activities at this facility, the location and characteristics of the materials handled, the location of all associated records within the facility and the facility layout.
- 2. Must have the authority to commit the resources needed to carry out Emergency Response Plan.
- 3. Must be trained in the use of all emergency control and safety equipment.

Report to the Primary or Alternate designated person the following:

- 1. Determine the nature of the emergency; fire, explosion potential, or spill. Identify the source.
- 2. Utilize the portable telephones available in the trucks or the telephones in the office. Also,

notify all personnel that an emergency situation exists and to issue any special instructions.

In the event of an emergency all personnel will discontinue any telephone conversations. Personnel escorting visitors must accompany the visitor to the nearest safe exit shown in **Figure 10**. All work stations will be shut down.

In the event that the emergency takes place during non-business hours (nights and weekends), a security system shall immediately notify the main designated person.

3. Determine whether help is required from any of the outside agencies listed in **Appendix B** of this document. Call and inform agencies of the situation and solicit their help if necessary.

In the event that emergency response agencies are called to assist, the gated entrance(s) to the facility are locked in the open position so as not to impede the response teams. Main power shut-off locations are reflected on **Figure 7**. The primary designated person or alternate person has the primary responsibility for the power shut down of the tank farm and gate control. It is also the primary designated person's responsibility to ensure that the above tasks are completed.

If the emergency is within the company's scope of service to respond, in-house personnel will be directed for cleanup. If the emergency is beyond the facility's capability, spill containment procedures will be implemented and the proper authorities notified for response.

- 4. Determine the nature and quantity of materials involved by:
 - physical observation / label identification
 - inventory records
 - chemical analysis and materials profiles
- 5. Decide what should be done immediately to keep the situation from deteriorating:

A. Explosion Hazard

Determine whether any reactive substances in the area need to be relocated. If explosion has occurred which does not result in a fire, remove any hazardous obstacles that can be safely retrieved.

B. Spill

If a spill has occurred; determine the source, contain it by using the emergency equipment, absorbent material and initiating any product transfers that may be deemed necessary to minimize the spill.

Obtain the following information:

- a) material released
- b) location of material
- c) quantity of material released
- d) any injury from the release

If the spill is less than 25 gallons FDEP does not require notification. If the spill is greater than 25 gallons outside the containment structure report the incident to FDEP. If the spill is greater than 500-gallons inside the containment structure the Primary Designated Person shall notify the State Warning Point Contact. Contacts for FDEP are

shown in Section 14.0 and **Appendix B**. Fill out and submit the attached DRF (discharge reporting form) within the required time frame.

In order to minimize the volume captured in the containment structure route the spilled used oil to an empty tank or truck. Given the value of the used oil, all used oil should be captured and no used oil should be wasted.

The loading and unloading area (see **Figure 6**) has a concrete slab foundation and is surrounded by a concrete curb, allowing minimal containment for minor spills, which may occur when hoses are disconnected following loading and unloading. In case of a minor spill the sorbent pads or clay can be used to collect the lost oil inside the loading and unloading area. In the unlikely event of a tanker developing a major leak, the containment curbing could be supplemented with absorbent booms, pads or clay.

C. Fire Hazard

If fire has occurred, if possible, use the fire extinguishers to control the fire. Do not attempt to control a blaze that appears to be out of control; rely on proper authority response. Ensure that all storage areas are accessible to fire fighters. If a fire should break out, concentration will be placed on preventing the fire from spreading. The primary designated person will monitor for leaks and pressure build-up while waiting for the proper fire fighting agency.

The primary designated person will show the local fire department the location of the nearest fire hydrant. The fire hydrant is located at the northwest corner of Lucerne Park Road and West Lake Hamilton Drive. According to personnel of Station No. 2, Winter Haven Fire Department located at Lucerne Park Road, Winter Haven, Florida, the subject hydrant is routinely tested by the fire department for adequate pressure and volume. Also, there are four fire hydrants in the area for additional water supply. Fire extinguishers are routinely checked by the local fire department on a bi-annual basis.

- 6. Before the facility may be brought back into production following an emergency event, the primary designated person must:
 - A) Have the facility declared safe for re-entry by any outside organizations responding.
 - B) All involved materials must be accounted for and properly stored.
 - C) Emergency equipment has been cleaned and is ready for use.
- 7. Mop-Up: Clean all reusable emergency equipment with liquinox. Properly dispose of the washwater. Properly dispose all used sorbent pads and booms. Immediately replace existing stock for future use.

Section 12.0 Emergency Precautions

- 1) KEEP CALM, THINK, AVOID PANIC AND CONFUSION.
- 2) <u>KNOW ALL EXIT LOCATIONS</u>: BE SURE YOU KNOW THE SAFEST AND QUICKEST WAY OUT OF THE FACILITY.
- 3) DO NOT LOCK DOORS WHEN VACATING THE FACILITY, THE PRIMARY DESIGNATED PERSON AND EMERGENCY SUPPORT PERSONNEL MUST HAVE

ACCESS TO ALL PARTS OF THE FACILITY.

- 4) DO NOT USE THE VOICE PAGING SYSTEM. THE LINES MUST REMAIN CLEAR FOR THE PRIMARY DESIGNATED PERSON.
- 5) WHEN EVACUATING THE FACILITY, **WALK** TO THE NEAREST SAFE EXIT. REPORT TO SAFE AREAS AWAY FROM THE BUILDINGS AND WAIT.
- 6) DO NOT RE-ENTER THE FACILITY UNLESS INSTRUCTED TO DO SO BY THE PRIMARY DESIGNATED PERSON.
- 7) KEEP OUT OF THE WAY OF EMERGENCY RESPONSE PERSONNEL.

Section 13.0 Evacuation Procedures

A. PURPOSE:

1. Plan for safe evacuation in the event of an emergency.

B. RESPONSIBILITIES:

- . The primary designated person is responsible for implementing the evacuating procedure.
- 2. Each employee is responsible for escorting any visitor(s) from his/her work area to the proper exit.

C. PROCEDURES:

- 1. The primary designated person will order the evacuation and any other actions required.
- 2. When an evacuation is announced, **stop work**. Exit your work area in accordance with the evacuation routes.
- 3. All employees must leave the facility unless instructed Otherwise by the primary designated person. Do not run. Do not linger in the hallways or doorways.
- 4. Each employee must report to his/her manager once outside the facility.
- 5. Each manager must report to the primary designated person. All personnel must be accounted for at the main entrance off West Lake Hamilton Drive, just west of the office.
- 6. The primary designated person will notify the managers when it is safe to re-enter the facility.
- 7. Stay outside the facility until notified by the manager or primary designated person it is safe to re-enter.

Emergency equipment is shown on **Figure 7**. A list of emergency equipment is attached as **Appendix D**. Given the small facility size everybody on site will evacuate to the main front gate (**ASSEMBLY POINT**) and be counted (see **Figure 10**).

Section 14.0 Record Keeping and Reporting

1. The primary designated person must keep a record of all emergency events. Verbal reports are to be presented within 24 hours of each incident with written reports submitted within seven days. In the event of a spill or discharge within the containment area exceeds 500-gallons the primary designated person shall prepare a Discharge Reporting Form, in accordance with Rule 62-762.451(2)(a)6., Florida Administrative Code. In the event of a spill or discharge outside the containment area exceeds 25-gallons the primary designated person shall prepare a Discharge Reporting Form, in accordance with Rule 62-780.210, Florida Administrative Code.

Reports are to be filed and submitted to the:

Florida Department of Environmental Protection Southwest District, Hazardous Waste Section 13051 N. Telecom Parkway, Temple Terrace, Florida 33637

Florida Department of Environmental Protection Hazardous Waste Management Section 2600 Blair Stone Road, Mail Station 4555 Tallahassee, Florida 32399-2400

Florida Department of Environmental Protection Bureau of Petroleum Storage Systems 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Florida Department of Health in Polk County – Environmental Engineering Division Curtis Peterson Building 200 N. Kentucky Avenue, Suite 404 Lakeland, Florida 33801-4963

- 2. The report must include the following information:
 - a) Name, address, and telephone number of the primary designated person.
 - b) Name, address, and telephone number of the facility.
 - c) Date, time, and type of incident.
 - d) Name, type, and quantity of materials involved.
 - e) Any injuries that may have occurred.
 - f) An assessment of the actual or potential harm to human health and the environment.
 - g) Estimated quantity and disposition of any materials recovered.

The contingency plan will be maintained at the facility and submitted to local emergency response authorities who are identified in this plan. Copies of return receipts will serve to verify receipt of the plan with local response authorities.

This plan will be amended when needed (e.g.: regulations change, plan fails upon use, the facility process or contingency plan is modified).

Section 15.0 Inspections, Operation and Maintenance

A. Daily inspections by selected personnel are taken on all tanks, valves, pipe lines, filters, pumps cam-lock fittings, hoses, dikes, electrical wiring trucks, etc. When valve packings, pump packings, cam-lock gaskets or other fixtures are found to be leaking they are adjusted or repaired immediately. All work is documented and kept for the business at the previously cited address. All corrective actions are documented on daily log sheets, reviewed by the supervisor and kept in the business files. During non-business hours, the facility is secured and locked. At all times, the facility is under 24-hour video surveillance recorded on-site and monitored. Twenty-four hour lighting, throughout the facility during dark periods.

Operations and maintenance procedures and personnel training are as follows:

- 1. All valves are in the closed position at all times except when loading or unloading from a tank. Dust caps over all cam-lock fittings are to be in place at all times when not in use.
- 2. When loading or unloading from any tank or tank trailer, place an empty (5) five gallon pail under the hose to pipe cam-lock connection to catch any possible drippage when the dust covers are removed and the hoses connected.
- 3. Double check all the valves to make sure they are in a closed position before opening any valves needed to pump into or out of any tank. During any pumping operation the tank farm operator or other qualified person MUST remain in the area of product transfer until the pumping procedure is completed.
- 4. When the pumping procedure is completed, close the valve on the suction side of the pump and open the air valve to permit the residual product to be pumped out of all the hoses and pipe lines. Close the discharge valve and turn off the pump. The pressure relief valve on the pump will allow a few moments without causing any damage.
- 5. Check all packing glands and adjust tension if any seepage on the valves or pumps is visible. Check and replace gaskets on cam-lock fittings if gaskets become cracked or compressed to a point where they do not provide an adequate seal to insure against leakage.
- 6. On a monthly basis check all emergency equipment. Use the attached "Tank Farm Inspection Report" form (see **Appendix G**), supplied by the primary designated person. Also, based on the direction of the primary designated person, accommodate the representative from the Fire Department during any routine inspection of the facility. Continue to make arrangements requested by the Fire Marshall.
- B. The previous operation and maintenance procedure to prevent oil discharge is used as the written briefing for any new employee. Tank farm personnel are given a list of duties to refer continuously and are given personal training and help by the management. These duties are as follows:
 - 1. Keep all strainers washed and clean. This can sometimes be done when you are unloading a truck or tank and are waiting for it to fill up or empty out.
 - 2. Keep pumps, pipe lines, hoses, filters, etc. washed off.
 - 3. Clean yard of miscellaneous trash and keep yard trash cans empty.
 - 4. Clean and keep hoses and hose fittings in a neat and orderly fashion.
 - 5. Check all tanks first thing in the morning for any leakage.
 - 6. Measure oil in all tanks at the beginning of the day and leave an inventory sheet on the manager's desk as to the measurements and volume (gallons).
 - 7. Strain out trash in distillate pails as needed. Refill pails as needed.
 - 8. Keep tops of tanks washed, also wash stairs leading to the tanks.
 - 9. Check all trucks for water in their loads and then measure trucks. NEVER take the driver's word for the amount in the truck. After measuring the truck, check with the driver on the inches in his truck before unloading that truck. Sample each tank compartment. Take samples to the oil laboratory and wait for laboratory results before unloading.
- 10. Sweep entire parking lot as necessary.
- 11. At the end of the day shift, make sure all tank valves are closed, tools are secured, the yard

lights turned on and the garden hose turned off.

12. Make sure all automatic sump pumps are operational and that all sumps are pumped dry before leaving the tank farm.

Section 16.0 Training

All facility personnel involved in the daily management and emergency procedures described in this plan shall be instructed in the procedures to follow as written in this plan. They shall be continuously updated with any new information regarding the procedures or materials as outlined in this plan. In addition to the procedures outlined in the plan, training will include an appropriate discussion on general rules and regulations, security, and safety practices which comply with the company's policy and with all Federal, State, and Local rules and regulations. Also, causes of spill/discharge events, new spill/discharge prevention and abatement will be discussed. The primary designated person or alternate contact shall conduct initial training and semi-annual reviews of the required training.

Section 17.0 Plan Amendments

A. Emergency phone numbers and security

- a. All valves which permit a tank's direct outward flow are locked in non-operating or standby status.
- b. Starter controls on all oil pumps in non-operating of stand-by status are in the off position.
- c. The loading/unloading connections (cam-lock fittings) of oil pipelines are covered with Dust caps when not in service or on stand-by status for extended periods.
- d. The facility is well lighted with two high intensity mercury vapor lights that provide lighting for the bulk storage tank area, the tank truck loading and unloading area, and the tank truck storage area.
- e. Plant area is totally enclosed by fencing to keep out all unauthorized persons.
- f. A video surveillance system is operating on site 24 hours a day.

B. Proper Isle Space for Containers

a. Containers (for example, 55 gallon drums) holding used oil filters can be stored back to back for access. However, each set of two rows of drums shall be separated by a minimum 30 inch wide isle for safe access.

APPENDIX A EMERGENCY PHONE LIST AND SECURITY

Primary Responsibility:

Mr. Jeff Englin

Telephone: (863) 419-0556 Mobile: (813) 410-4974

Alternate Responsibility:

Ms. Montinique Buquoi Telephone: (305) 887-1653 Mobile: (904) 625-4217

Plant Emergency

Mr. Elliott Paul (904) 652-6765

APPENDIX B EMERGENCY RESPONSE AGENCIES

For Reporting Spills:

Federal: National Response Center 1-800-424-8802 (24 Hour)

1-202-267-2675 (24 Hour)

Environmental Protection Agency

1-800-424-8802 (24 Hour) 1-800-320-0519 (24 Hour)

State Warning Point

1-888-404-3922 (24 Hour)

Florida Marine Patrol Dept. of Environmental Protection

1-813-<u>470-5700</u> (8 am - 5 pm, M-F)

Florida Dept. of Health in Polk County

1-863-413-3325 (8 am - 5 pm, M-F) 863-291-5204 (8 am - 5 pm, M-F)

803-271-3204 (0

Local:

State:

Fire Department HazMat

911 (24 Hour)

For Reporting Fires:

Local: Fire Department HazMat Lucerne Park Road Fire Station No. 2

911 (24 Hour) 863-298-7881

For Reporting Injures:

Local: Fire EMT

911 (24 Hour)

Lucerne Park Road Fire Station No. 2

863-298-7881

Winter Haven Hospital

1-863-293-1121

200 Avenue F, Northeast, Winter Haven, Florida 33881

Heart of Florida Regional Medical Center

1-863-422-4971

40100 Highway 27 North, Davenport, Florida

APPENDIX C RESOURCES FOR SPILL CONTROL

1. Use of manpower, equipment and materials:

Internally, the plant has one (1) 2" electrically driven gear-type pump, with a pumping capacity of 200 gallons per minute (gpm). The electric pump is plumbed into all tanks with the facility and can be actuated to start pump any quantity of oil within moments of discovery of an oil discharge. The tank trucks can be actuated within three to eight minutes of discharge discovery depending on the spill location.

A back-up has the capability of a twenty four (24) hour emergency response team with vacuum trucks, tankers, and a large inventory of sorbent products retained for any occurrence. In case of a catastrophic rupture of a tank, outside help via SWS Environmental, located at 18630 US HWY 27 S, Lake Wales, Florida 33853, telephone number (800) 881-8369 is also available if necessary for rapid pump out of a product in all facility areas. The contact is Ken "KC" Straub.

In addition to the local response teams, additional safety equipment and/or manpower may be obtained through the following:

| 0 | Diversified Environmental Services | (800) 786-3256 |
|---|------------------------------------|----------------|
| 0 | Cliff Berry Inc. (CBI) | (800) 899-7745 |
| • | Aqua Clean | (863) 644-0665 |

Synergy Recycling of Central Florida, LLC is also equipped to respond and handle any oil spills. Synergy Recycling of Central Florida, LLC has on hand the following Spill Control Equipment:

| EQUIPMENT | QUANTITY | TYPE |
|--------------------|----------|--------------------|
| Spill Pads | 5 bales | Synthetic Abs. |
| Empty Drums | 3 | Open Top |
| Absorbent Clay | 5 Bags | 401b |
| Spill Booms | 1 Case | Synthetic Abs. |
| Pressure Washer | 1 | 2,500 psi |
| Visquene | 1 roll | 6 mil |
| Safety Glasses | 2 pair | Assorted |
| Fire Extinguishers | 7 | ABC (dry)/AFF Foam |

APPENDIX D RECAP OF MANPOWER, EQUIPMENT AND MATERIALS

- A. Manpower
 - 1. Material Handler
 - 2. Five (5) truck drivers
- B. Equipment and materials
 - 1. One (1) 2" electrically driven gear-type pump (gpm). The electric pump is plumbed into all tanks
 - 2. Five (5) 2,000 to 4,500 gallon pump trucks (75 gpm)
 - 3. Two hundred feet of 3" diameter suction line
 - 4. Two hundred feet of 2" diameter suction line
 - 5. One Case absorbent booms
 - 6. Two (2) shovels
 - 7. One (1) wheel barrow
 - 8. Two (2) hoes
 - 9. Two (2) rakes
 - 10. Five (5) bales of absorbent pads
 - 11. Compressor (electrical)
 - 12. Pressure washer with 5 hp engine.

APPENDIX E FDEP Chapter 62-710 FAC Permit Requirement of SPCC (Index)

a. An internal communications or alarm system capable of giving immediate emergency instruction to facility personnel.

See Section 11.0, paragraphs 1 through 3.

<u>b.</u> A communication device capable of summoning assistance from local emergency response groups (fire, law enforcement, emergency response.

See Section 11.0, paragraphs 1 through 3.

c. Fire and spill control equipment: inventories and maps (including fire extinguishers appropriate in type, size and location; adequate spill containment; decontamination equipment).

See Appendix D, Figure 7.

d. Water at adequate volume and pressure for all fire control equipment.

See Section 11.0, paragraph 5. C.

e. Testing and maintenance schedules for all emergency equipment.

See Section 15.0, paragraph 6.

f. Access to a communication or alarm device, either directly or by visual or auditory (voice) contact with another employee, wherever used oil is being handled.

See Section 11.0, paragraph 2.

g. <u>Immediate access to a device capable of summoning external emergency assistance in the event only one employee is on the premises.</u>

See answers to items a. and b.

h. Proper aisle space for containers and equipment.

For containers see Section 16.0, paragraph B. For equipment see Figures 2, 3, 4, and 5.

i. Arrangements with Local Authorities

See Section 15.0, paragraph 6.

APPENDIX F FDEP Chapter 62-710 Permit Supplement (Index)

Contingency Plan Issues

General Information

Foremost, the reader should understand that no hazardous wastes are generated at this site. By definition used oil <u>may not</u> be a hazardous waste or material, unless levels found in the oil exceed TCLP levels. The properties of used oil as an "ignitable" hazardous material are less explosive than gasoline. The consequences of ignition are also less likely than gasoline. An additional benefit of oil over gasoline is that if discharged to the surrounding soil, the soil easily adsorbs the oil allowing penetration typically not to exceed the first six inches below land surface. The soil can be easily removed and depending on the amount be transported to a soil burner (e.g. Kleen Soil, Port Manatee, Florida or Clark Environmental, LLC, Mulberry, Florida).

The most volatile material stored on site is diesel, also called No. 2 Fuel Oil, is slightly less combustible or volatile than kerosene. Often Diesel's physical characteristics (e.g.: flash point) are grouped with kerosene. NIOSH mentions that diesel or kerosene is composed of 25 percent normal paraffin's, 11 percent branched paraffin's, 30 percent moncycloparaffins, 12 percent dicycloparaffins, 1.0 percent tricycloparaffins, 16 percent mononuclear aromatics and 5.0 percent dinuclear aromatics. The NIOSH recommended (not required) exposure limits are 100 milligrams per cubic meter. OSHA has no TWA (time weight average) exposure limits. Diesel or kerosene is colorless to yellowish, an oily liquid with a strong characteristic odor. The molecular weight is 170 grams, specific gravity is 0.81, boiling point 347 to 617 degrees Fahrenheit, typically insoluble in water, flash point of 100 to 162 degrees Fahrenheit (therefore, by definition in NFPA 329 a combustible liquid and not a flammable liquid such as gasoline), vapor pressure at 100 degrees Fahrenheit is 5.0 mm, UEL is 5 percent and LEL is 0.7 percent. Diesel or kerosene is considered a strong oxidizer. The dominant parameters are naphthalenes. Method of detection can be by an organic vapor analyzer (OVA) or by GC using EPA method 8270 in water and EPA method 8100 in soil or sediment. Diesel or kerosene will irritate the eyes, skin, nose and throat. If exposed to the eyes and skin, rinse with water immediately. When rinsing the skin, use of soap is encouraged. If inhaled seek repertory support, if ingested seek immediate medical attention. Used oil has a flash point of 100 to 200 degrees Fahrenheit.

a. Specific actions/procedures to follow in case of a fire, explosion, or sudden releases.

See Section 11.0

<u>b.</u> <u>A description of the emergency response arrangements required in Preparedness and Prevention Plan.</u>

See Section 11.0, 12.0 and 13.0

<u>c.</u> Names, addresses, phone numbers and qualifications of the primary emergency response coordinator (ERC) as well as designated subordinate ERCs.

See Appendix A.

d. Procedures used by the ERC to activate the emergency response plan (notify employees and appropriate authorities), assess the situation, and to commit resources to properly contain and

manage clean-up the situation.

See item a.

e. Descriptive inventory and location (map) of all emergency response equipment (fire extinguishing systems, spill control equipment, internal and external communications and alarm systems, and decontamination equipment) including location (map).

See Appendix C and D, and Figure 7.

f. Identify containers and/or tanks available to hold released material.

See Section 11.0, paragraph 5.B. and Figures 2, 3, 4, and 5.

g. Describe how equipment will be replaced/cleaned for future use.

See Section 11.0, paragraph 7, and paragraph 5.C.

h. Facility personnel evacuation plan, describing signals and both primary and alternate routes.

See Section 13.0.

i. Copies of this plan must be maintained at the facility and submitted to local emergency response authorities identified in the preparedness and prevention plan.

See Section 14.0.

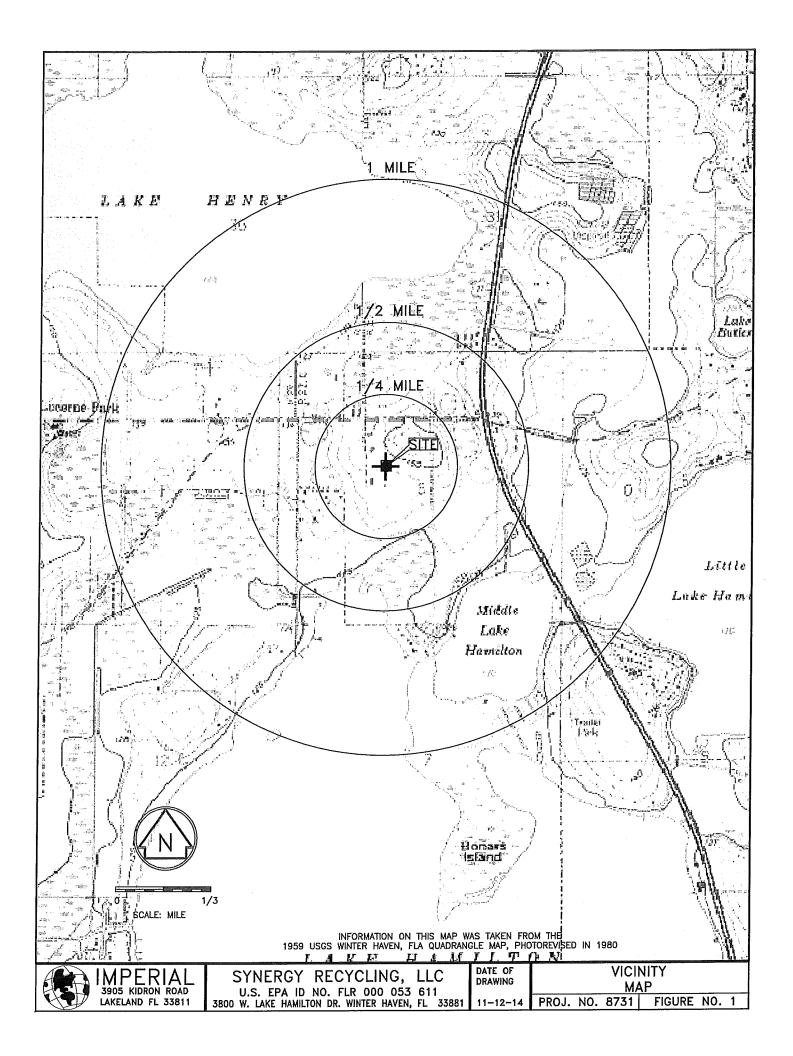
j. The plan must be amended when needed (i.e., regulations change, plan fails upon use, the facility process or contingency plan is modified).

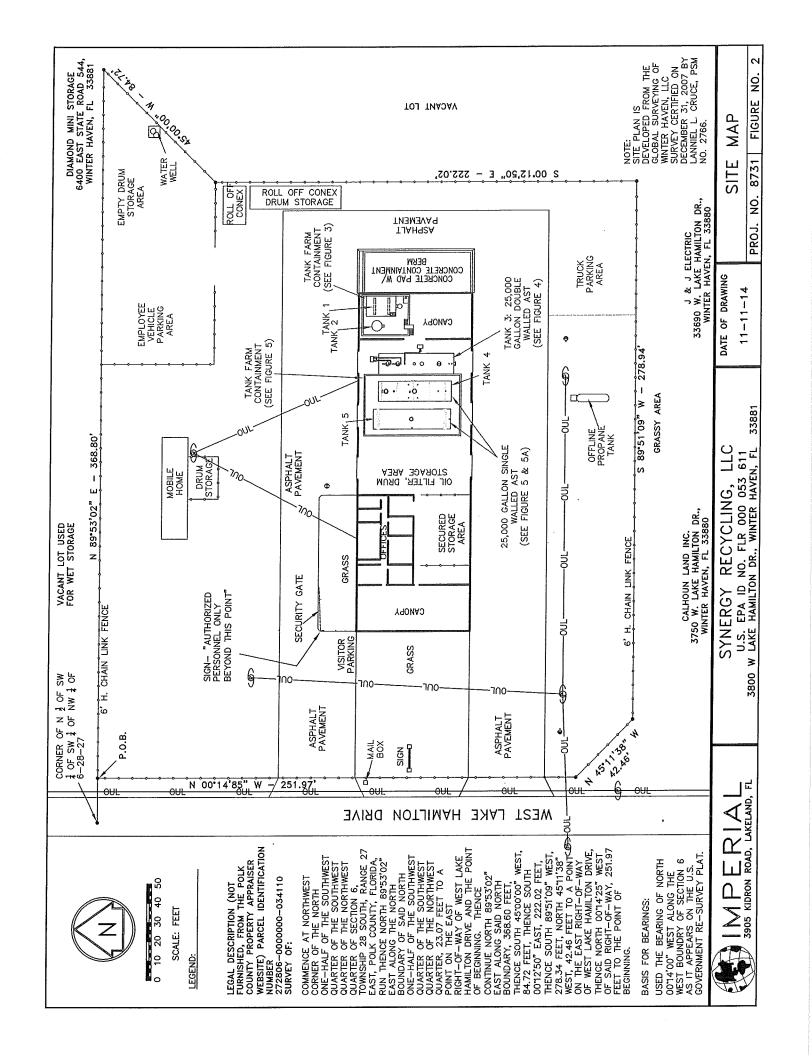
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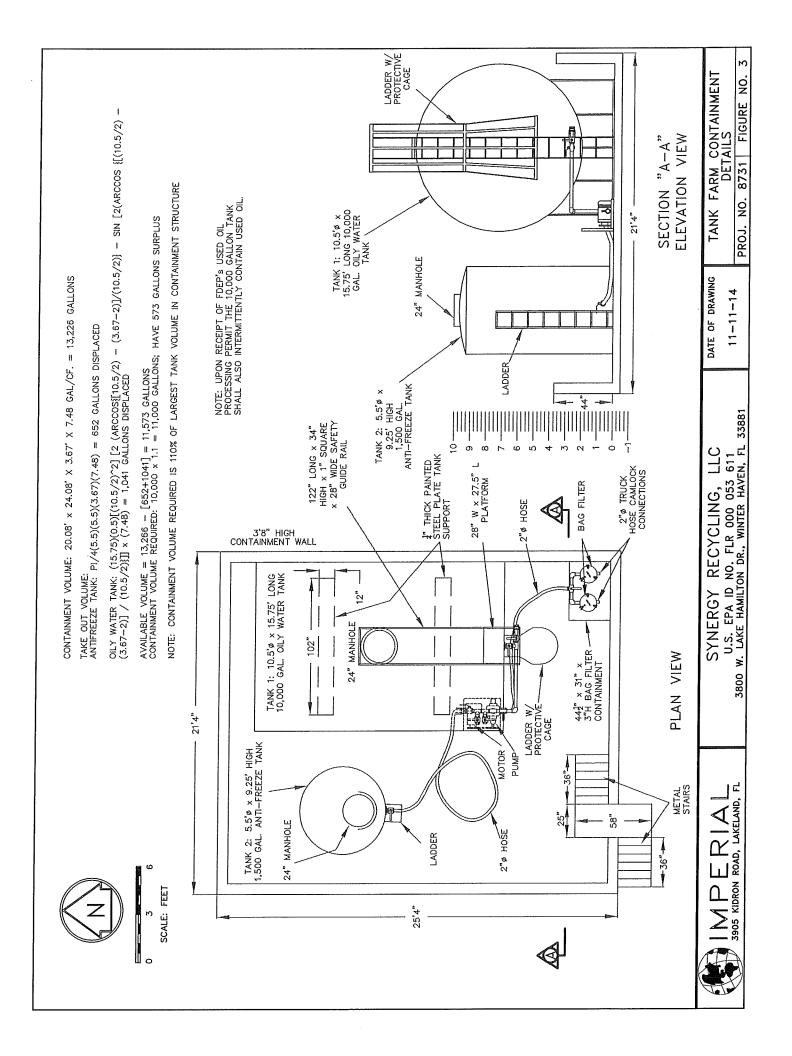
k. Incidents must be reported to the appropriate agencies.

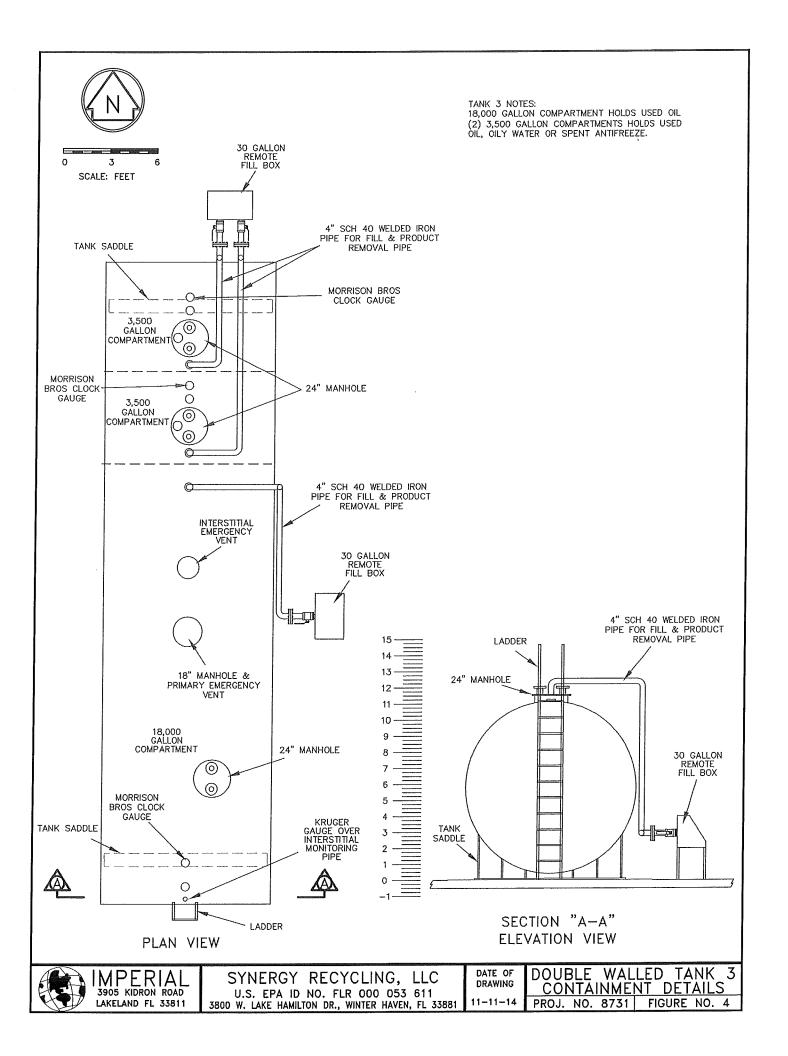
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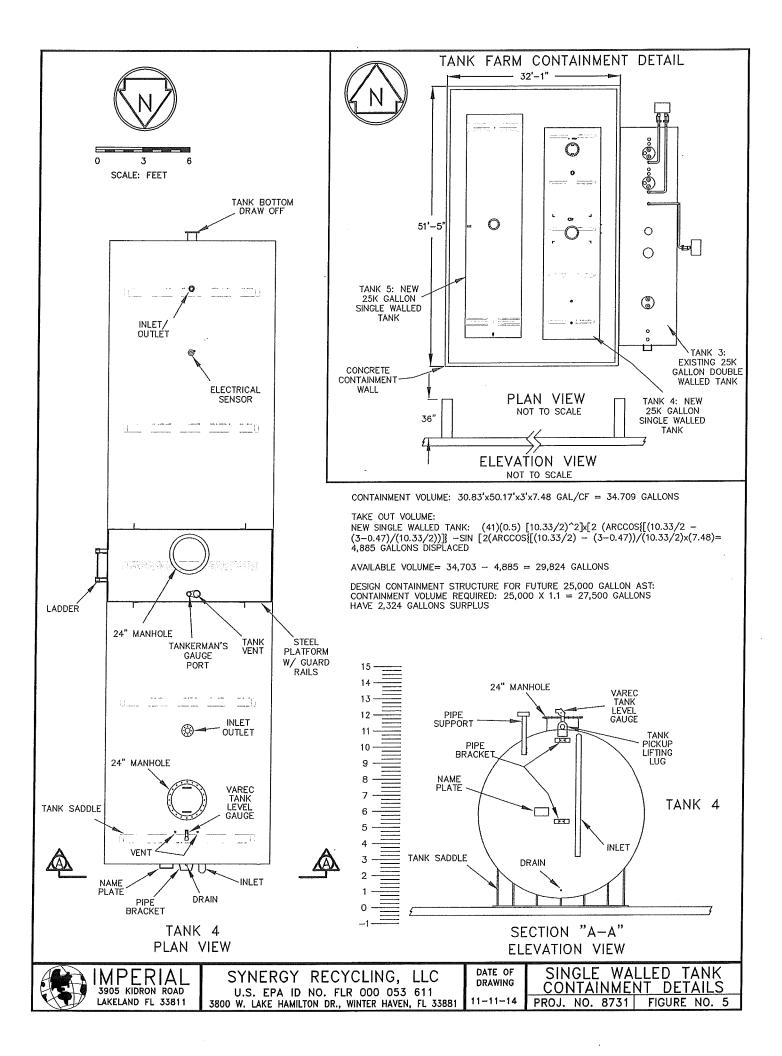
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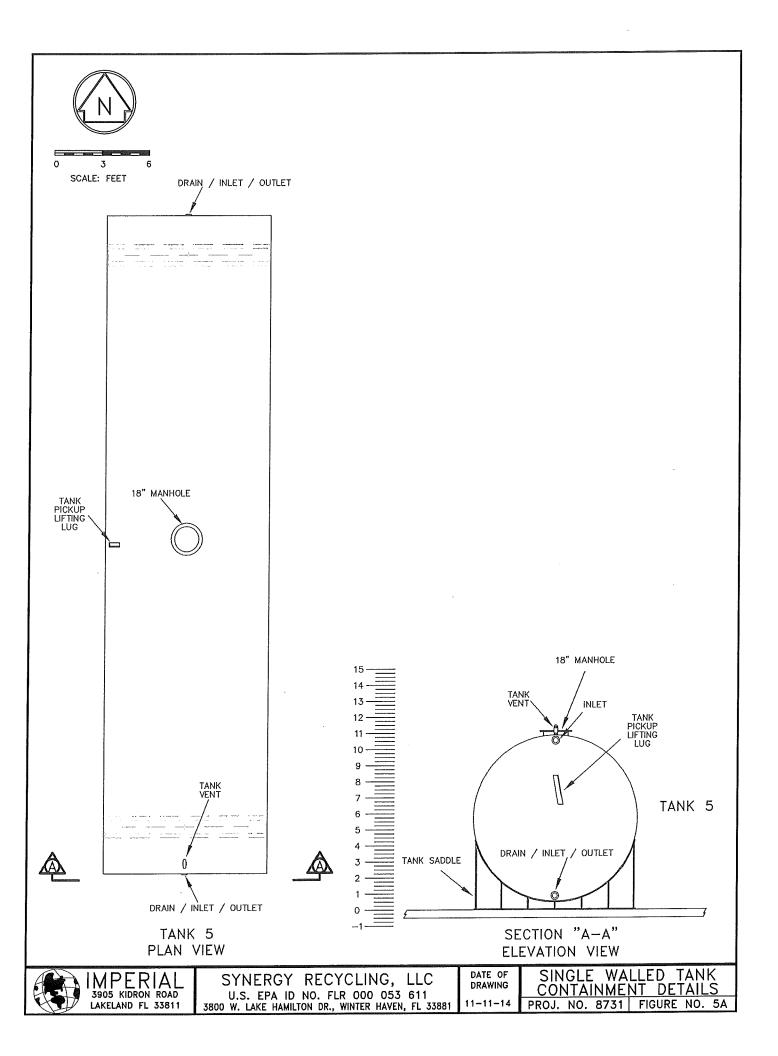


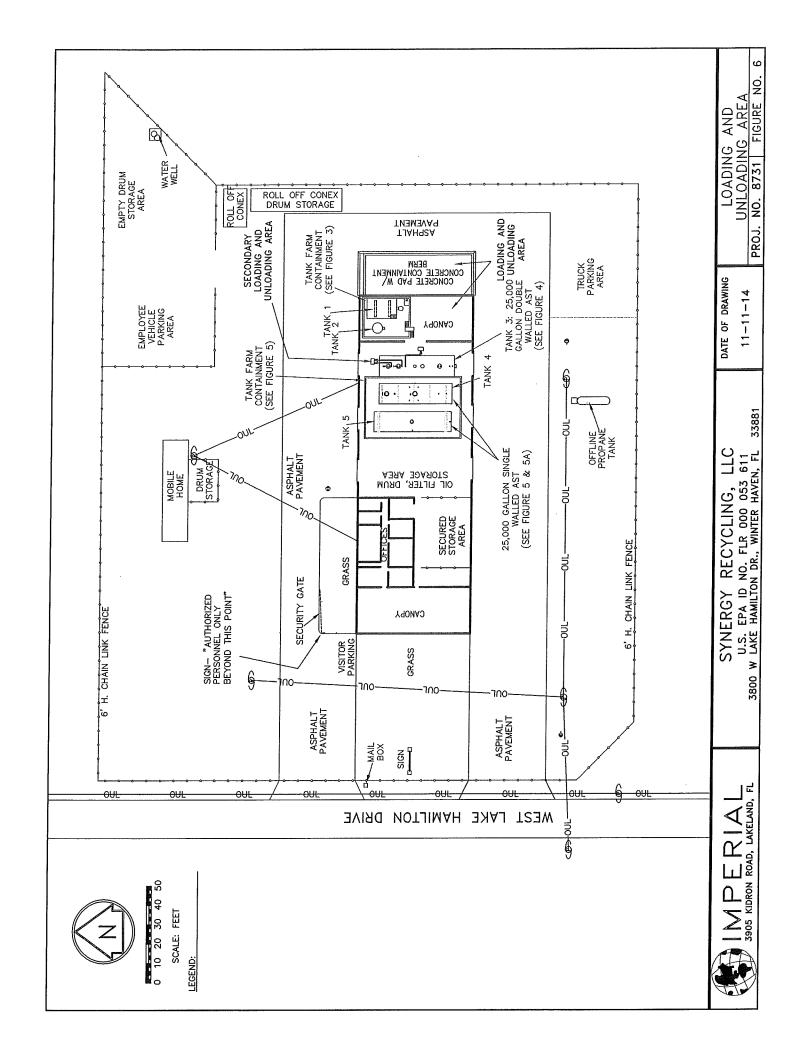


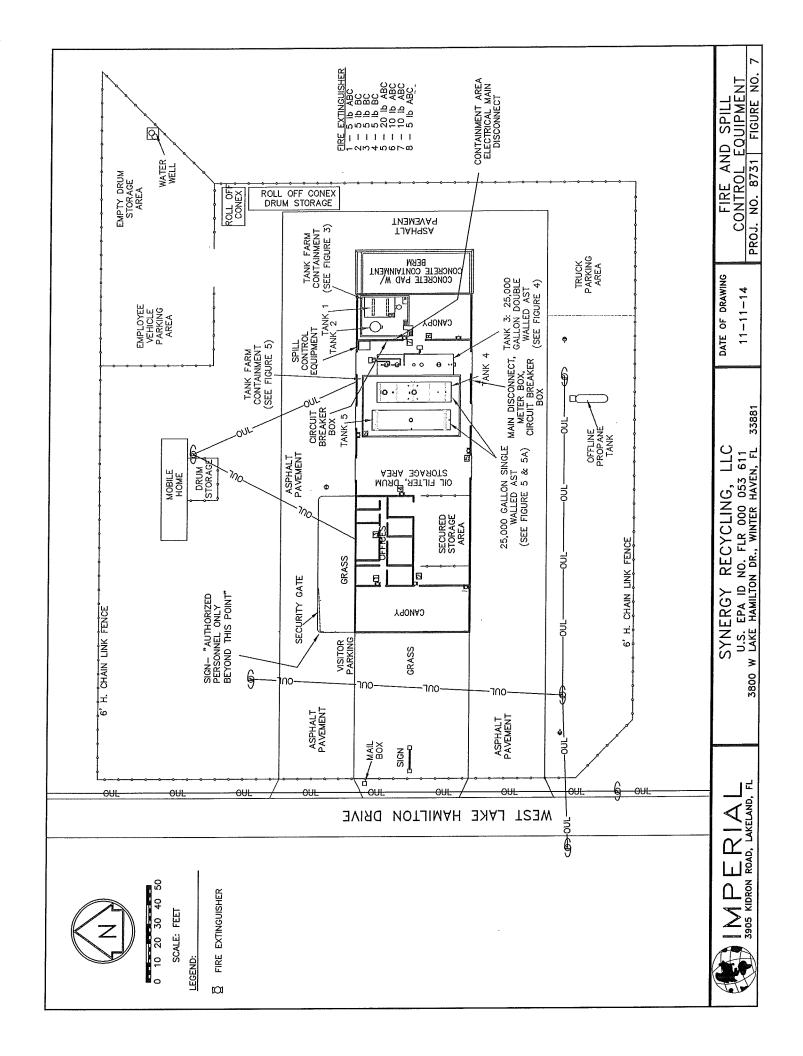


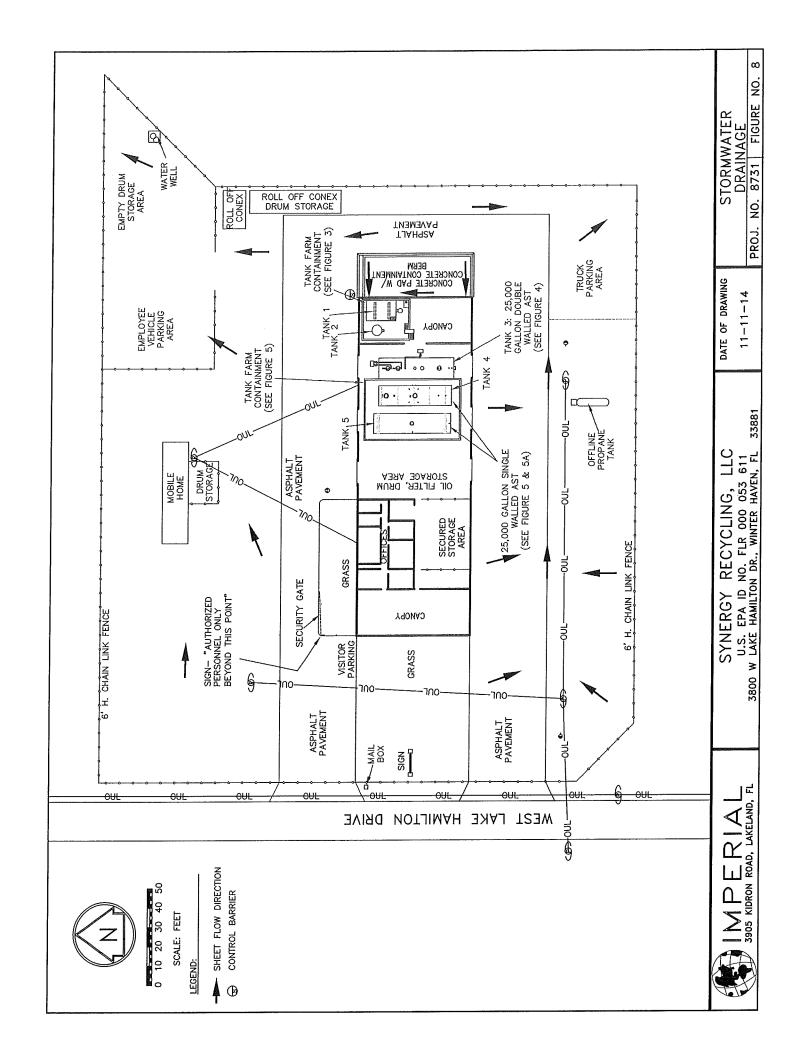


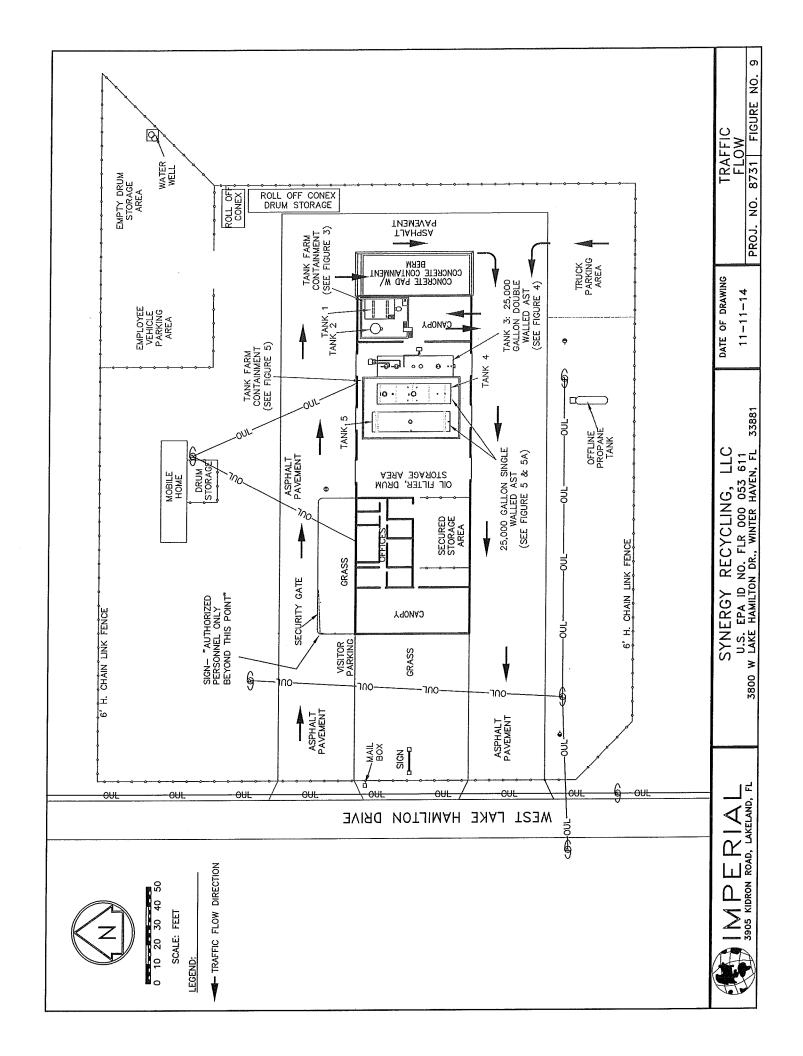


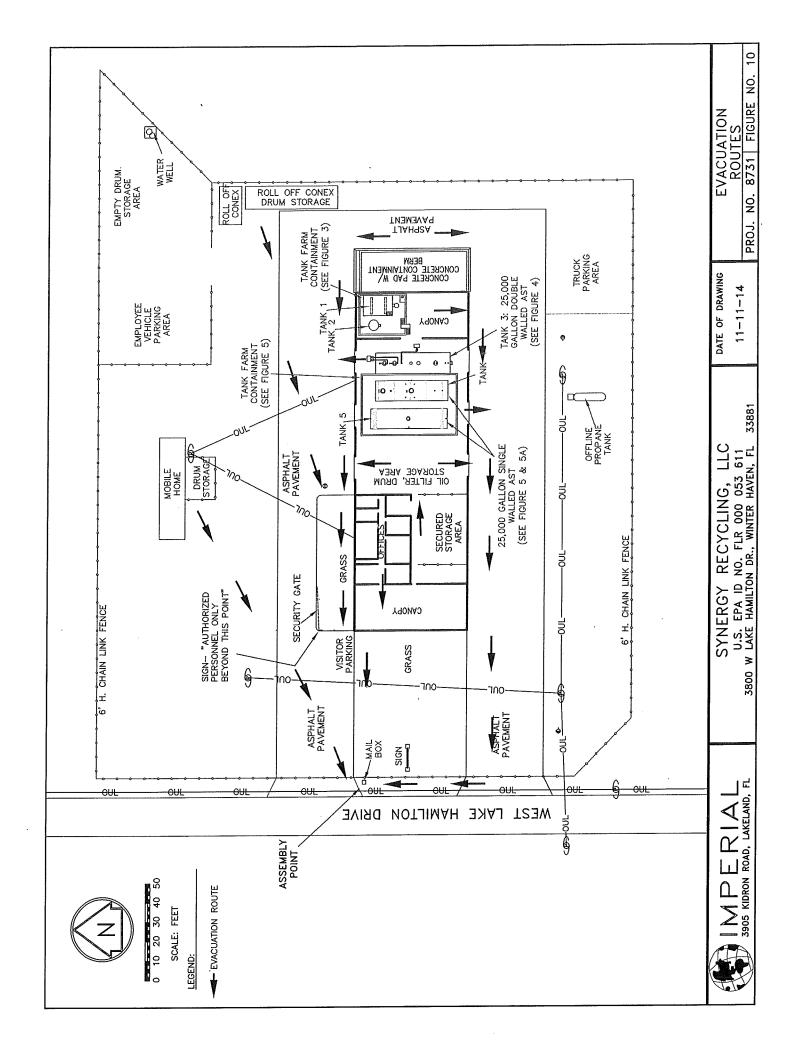


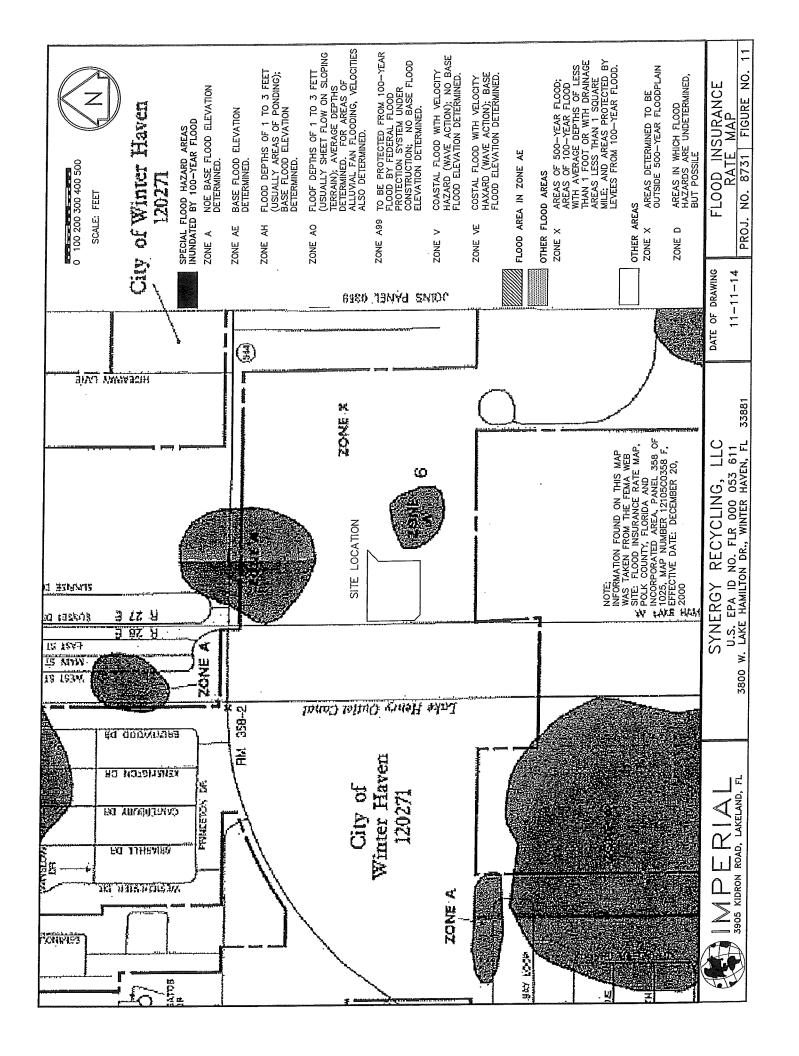


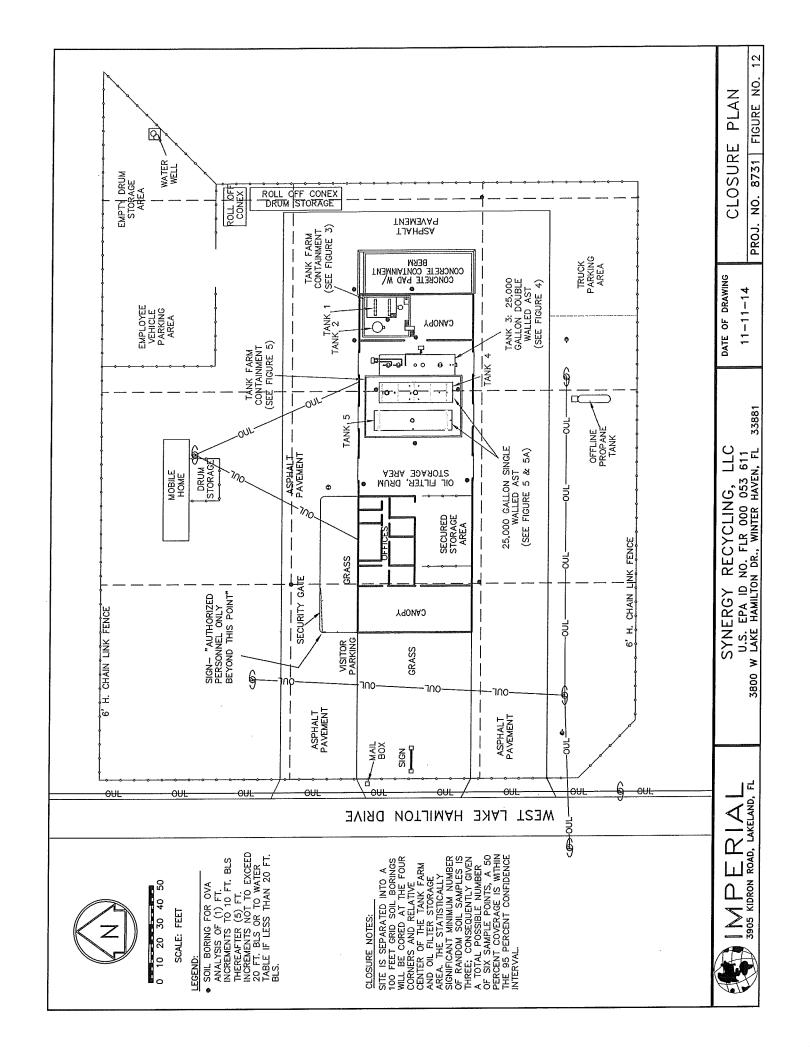












APPENDIX G INSPECTION FORMS

| | | | S | WEEKLY | | Ž | PE | INSPECTION REPORT | NO | | | 2 | |
|--|-----------------------|----------------------|---------------------|---------|----------|-------------|----------|-------------------|---|--------------|---------------|---------------|----------|
| | | | | | | | | | | | | | |
| Jobsite Yard | d Month | | Year | | | - | - | | | | | | |
| | | | | | | | | | | | | _ | |
| Inspector's Name: | - | | | | | | - | | | | | | |
| Inspector;s Title: | | | | Date | | H | | | H | | L | ╀ | |
| Inspector's Signature: | :ure: | | | Time | | | | | | | - | | |
| Reviewed and approved by: | proved by: | | | | sse | lis: ass | lis | SSE | lis | sss | SSE | lis | O II HON |
| 1. First Aid Supplies - convenient, adequate. | convenient, adea | uate. | | | а | | + | d | *************************************** | + | | | |
| 2. Excavating/trenching-shoring, underground lines | g-shoring, underg | ground lines | | | | | - | | | + | | + | |
| 3. Employee practices - lifting, safety rules | - lifting, safety ru | lles | | | | | 1 | | | - | + | - | |
| 4. Floor openings - barricaded, covered, perimeter floor protection. | rricaded, covered | I, perimeter floor p | rotection. | | | | | | | | ╀ | + | |
| 5. Housekeeping - debris, fall & fire hazards. | oris, fall & fire haz | ards. | | | r | _ | | | | 1 | - | - | |
| 6. Ladders - safety feet, lashed, sound, base out of 1/4 length of ladder. | it, lashed, sound, | base out of 1/4 le | ngth of ladder. | | | | | | | 1 | - | - | |
| 7. Marterial hoist - gates, signals, signs, no riding. | es, signals, signs | , no riding. | | | | - | | | | - | - | ╀ | |
| 8. Overhead protection - falling objects - entrances, openings, sidewalks. | n - falling objects | - entrances, open | ings, sidewalks. | | <u> </u> | _ | _ | | | - | | - | |
| 9. Personal protective equipment - hard hat, goggles, subs, employees, footwear. | equipment - hard | i hat, goggles, suk | os, employees, foo | twear. | | | - | | | | | - | |
| 10. Shaftway protection - barricades, guard rails. | n - barricades, gu | uard rails. | | | | | | | | | | - | |
| 11. Stairways - gaurd rails, tread fillers, clean. | rails, tread fillers, | clean. | | | | | | | | - | | - | |
| 12. Storage of materials - neat, lashed, nails in scrap lumber bent over or removed. | ils - neat, lashed, | nails in scrap lum | ber bent over or re | smoved. | | | _ | | | | - | \perp | |
| 13. Temporary lighting - stairs, closed areas, condition. | - stairs, closed a | reas, condition. | | | | | | | <u> </u> | | | | |
| 14. Tools, equipment - guarded, grounded, condition. | guarded, ground | ded, condition. | | | | | | | | | | ┞ | |
| 15. Tank and valve check for leaks. | eck for leaks. | | | | | | | | | | <u> </u> | | |
| 16. Visual inspection of containment concrete. | of containment co | ncrete. | | | | | _ | | | | | _ | |
| 17. Trucks properly placarded and secured. | acarded and secu | rred. | | | | | _ | | | <u> </u> | | - | |
| 18. Fire extinguishers - accessible, adequate pressure. | - accessible, ade | quate pressure. | | | | <u> </u> | | | | ig | | | |
| 19. Fire hoses - accessible, functional | sible, functional | | | | | \vdash | | | | | - | 1 | |
| 20. Exits and walkways are marked and clear. | s are marked and | i clear. | | | | | | | | H | <u></u> | - | |
| 21. Facility secured against unauthorized entry. | gainst unauthorize | ed entry. | | | | | _ | | | | <u> </u> | L | |
| 22. Storage tanks - leaks, corrosion, bulging. | aks, corrosion, bu | ılging. | | | | | | | | | | - | |
| 23. Storage drums - closed, leaks, corrosion, bulging. | losed, leaks, corr | osion, bulging. | | | | | | | | - | | | |
| 24. Storage Tanks and drums - properly labeled. | d drums - propert | y labeled. | | | | | | | | - | | <u> </u> | |
| 25. Working area perimeter, discolored soil, liquids, stressed vegetation. | meter, discolored | soil, liquids, stres | sed vegetation. | | | | <u> </u> | | | | | ┞ | |
| | | | | | | | - | | | 1 | $\frac{1}{1}$ | $\frac{1}{2}$ | |

ATTACHMENT VIII

UNIT MANAGEMENT PLAN Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section VIII November 21, 2014 Page 1 of 3

Attachment VIII

Unit Management Plan

All above ground used oil processes (including used oil filters and oily water) and storage tanks and containers are properly labeled with the words "Used Oil." In addition, all used oil storage and process tanks meet the requirements of updated Rules 62-762.511 (Performance Standards for Existing Shop Fabricated Storage Tank Systems), 62-762.701 (Repairs to Storage Tank Systems), 62-761.801 (Aboveground Storage Tank Systems: Out of Service and Closure Requirements), and 62-762.601 (Aboveground Storage Tank Systems: General Release Detection Standards). Used Oil Filters shall be handled in accordance with Rule 62-710.850(5).

Secondary containment, including design, capacity and specifications is shown on **Figures 3, 4** and <u>5</u> in **Attachment I**. Also, containment calculations are attached. These attachments show all the supporting documentation and information that is available. The concrete containment structure is coated with a chemical resistant epoxy (Devoe Coatings - Tru-Glaze 4508 or approved equivalent). This coating complies with the impervious requirements specified in updated F.A.C. Rule 62-762.501 and is resistant to petroleum products such as used oil, kerosene and diesel.

A facility material handler inspects the tank farm or interstitial monitoring gauge of the double-walled tank weekly for leaks and spills. The exterior of each tank and the secondary containment are inspected for wetting, discoloration, blistering, corrosion, cracks or other signs of structural damage. All piping is above ground and inside the containment structure. Consequently, all piping is inspected during the tank farm inspection. No integral piping is in contact with the soil. Given that all piping is within a containment structure or is double-walled no pressure testing is required.

If a leak is detected the contents are immediately transferred to an empty storage tank. Available are one (1) - 2" electrical driven gear pump (100-gpm) directly plumbed into the tank farm piping within the containment structure. This pump and the truck pumps are able to move tank contents from the leaking or spilt tank to other tanks. Also, five (5) - 2,000 to 4,500 gallon pump trucks (75 gpm) are available to temporarily contain any contents from a leaking tank or a spill. Sorbant materials are also on site for any cleanup. Sorbant materials are stored in the spill kit located in between the tank farm and double-walled tank shown in **Figure** 7 in **Attachment I.**

Accumulated precipitation does not fall in the containment structure given the structure is located inside a one story metal building.

Michael H. Stillinger Senior Project Engineer

Imperial Testing Laboratories

3905 Kidron Rd., Lakeland, FL 33811

Tel: (941) - 647-2877

Florida Registration No. 47011

Synergy Recycling of Central Florida, LLC 3800 Lake Hamilton Drive West, Winter Haven, Florida 33881 U.S. EPA ID. NO. FLR 000 053 611 Tanks #4 & #5 Containment Structure (Figure 5)

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Containment Volume:

Outside Dimensions

Width

30.83 feet

32.08

Length Height 50.17 feet 3.00 feet

51.42 36 inches

Total Volume

34,709 gallons containment volume

Take Out Tank Volumes:

25-kgal Used Oil Tank Volume:

Diameter

10.33 feet

Length

41.00 feet

Wall Height

3.00 feet

Tank Height

0.46875 feet

Displaced Height

2.53 feet

phi 2.071403 radians

Cross Sectional Area

Displaced Volume:

15.93 square feet

4.885 gallons displaced by tank in containment structure.

25-kgal Used Oil Tank Volume:

Diameter

Length

10.50 feet 39 feet

Wall Height

3.00 feet

Tank Height

0.46875 feet

Displaced Height

2.53 feet

phi 2.052904 radians

16.08 square feet

Displaced Volume:

4,691 gallons displaced by tank in containment structure, but remains in tank.

Total Displaced Volume

4,885 gallons displaced by tanks in containment structure.

Volume Available

29,824 gallons containment volume

Volume Needed:

27,500 gallons required for spill containment

Surplus Volume:

2,324 gallons additionally available

Notes:

Two Used Oil tanks have shared containment structure.

Containment Structure able to contain 110 percent of maximum tank volume (Used Oil Tank = 25,000 gallons).

By Rule 62-762.520(1)(b) F.A.C. existing facilities will be required to meet 110 percent containment by December 31, 1999.

Sample Calculations:

For Horizontal Tanks, calculations are:

phi = 2*(arccos((tank radius-wall height)/tank radius))

Ver. cross-sectional area = 0.5*(tank radius^2)*(phi - sin(phi))

Displaced volume = Ac x L x 7.48 gallons/cubic feet

Ac - Vertical cross section area; L - tank length

- [plb] × h

Tank Volume Displaced

Michael H. Stillinger, P.E. #47011

11/21/2014

Synergy Recycling of Central Florida, LLC 3800 Lake Hamilton Drive West, Winter Haven, Florida 33881 U.S. EPA ID. NO. FLR 000 053 611 Primary (Tank 1 and 2) Containment Structure (Figure 3)

Revision 1 Section VIII November 21, 2014 Page 2 of 3

Containment Volume:

Width 20.08 feet 24.08 feet Length Height 3.67 feet

Total Volume 13,266 gallons containment volume

Take Out Tank Volumes:

Antifreeze Tank Volume:

5.50 feet Diameter

3.67 feet inside containment structure Height

652 gallons displaced by tank in containment structure. Displaced Volume:

Used Oil Tank Volume:

Diameter 10.50 feet Length 15.75 feet Wall Height 3.67 feet Tank Height 2 feet

Displaced Height 1.67 feet

phi 1.639129 radians Cross Sectional Area 8.84 square feet

1,041 gallons displaced by tank in containment structure. Displaced Volume:

1,693 gallons displaced by tanks in containment structure. Total Displaced Volume 11.573 gallons containment volume Volume Available

11,000 gallons required for spill containment

Volume Needed:

573 gallons additionally available Surplus Volume:

Notes:

Antifreeze and Used Oil tanks have shared containment structure.

Containment Structure able to contain 110 percent of maximum tank volume (Used Oil Tank = 10,000 gallons).

By Rule 62-762.520(1)(b) F.A.C. existing facilities will be required to meet 110 percent containment by December 31, 1999.

Sample Calculations:

For Vertical Tanks, calculations are:

Displaced volume = pi / 4 x (d^2) x h x 7.48 gallons/cubic feet

d-tank diameter; h-height displaced

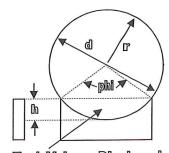
For Horizontal Tanks, calculations are:

phi = 2*(arccos((tank radius-wall height)/tank radius))

Ver. cross-sectional area = 0.5*(tank radius^2)*(phi - sin(phi))

Displaced volume = Ac x L x 7.48 gallons/cubic feet

Ac - Vertical cross section area; L - tank length



Tank Volume Displaced

Michael H. Stillinger, P.E. #47011

ATTACHMENT IX

CLOSURE PLAN Synergy Recycling of Central Fla. LLC 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section IX November 21, 2014 Page 1 of 3

Attachment IX

Closure Plan

Contents

1. Closure schedule

2. Listing of Tanks, piping and other equipment that will be cleaned and closed.

3. Procedures for decontamination of tanks, containers, pipes, equipment and other process areas.

4. Listing and justification of sampling methods (including number of samples), sampling parameters and analytical methods (must be in accordance with EPA approved methods).

5. Description and characterization and disposal of rinse waters and residues generated from cleanup and closure activities.

6. Description of soil sampling near secondary containment.

a. Describe if soil contaminated, how groundwater will be sampled.

b. Describe if groundwater contaminated, how facility will meet closure requirements of 40 CFR, Part 265.310, Closure and Post-Closure Permit.

This site specific closure plan is prepared for Synergy Recycling of Central Florida, LLC, located at 3800 West Lake Hamilton Road, Winter Haven, Polk County, Florida. The estimated life of the facility is 30 years; consequently, the closure is scheduled for **November 1, 2028**. Also, FDEP will be notified in writing 60 days before closure commences (Permit Condition Part VI-1e).

1. Schedule

One month. Removing all tank contents, oil filters and sludge. One month. Cleaning tanks and piping with rinsate and properly disposing rinsate. Two weeks. Tank and piping removal. Three weeks. Soil analysis As needed. Groundwater analysis As needed. Supplemental Contamination Assessment As needed. Remedial Action As needed. Post remedial action monitoring. Site rehabilitation completion order / no further action approval. As needed. As needed. Final 40 CFR, Part 265.310, Closure and Post-Closure Permit.

Note that the "as needed" time frames are dependent on the amount of contamination found at the site.

2. <u>Listing of Tanks</u>

A listing and location of the tanks is shown the SPCC Plan and on Figure 3, 4 and 5 in Attachment I.

All used on-specification oil in the tank farm will be sold to asphalt burners or other approved facilities. Synergy Recycling of Central Florida, LLC shall transport any petroleum contact water to an approved FDEP permitted processor. Any antifreeze shall be transported to an FDEP approved recycler. All remaining oil filters will be drained, temporarily (within one month) stored in covered containers ready for disposal, and transported to an approved recycling center or foundry. These activities can be accomplished within one month.

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section IX November 21, 2014 Page 2 of 3

Attachment IX (continued)

Closure Plan (continued)

3. Procedures for decontamination of tanks, containers, pipes, equipment and other process areas.

After all contents in the tank farm and piping have been removed all tanks, pipes and equipment (e.g.: pumps) will be rinsed with a mixture of water and Liqui-nox as a rinsate. The rinsate will be collected and hauled to an FDEP approved facility that can handle petroleum contact water. These activities can be accomplished within one month.

The tanks and piping will be removed by a licensed tank contractor. The tanks will be sold to a recycler or another tank farm and certified by a registered engineer that the tanks meet the structural requirements specified in Chapter 62-761, Florida Administrative Code.

4. <u>Listing and justification of sampling methods (including number of samples), sampling parameters and analytical methods (must be in accordance with EPA approved methods).</u>

All sampling methods and analytical methods for the rinsate water are cited in Chapter 62-777, **Table C**, Florida Administrative Code (attached). The volume of rinsate water will determine the number of composite samples necessary. All sampling methods shall be performed per the requirements of Chapter 62-160, Florida Administrative Code, using relevant FDEP standard operating procedures for field activities.

5. Description and characterization and disposal of rinse waters and residues generated from cleanup and closure activities.

The rinsate will be collected and hauled to a facility that can handle petroleum contact water, such as Aqua Clean Environmental Co., Inc. in Lakeland, Florida or other FDEP approved facility. Any sludge or residue will be properly disposed of at Ogden Waste Treatment Services at 3830 Rogers Industrial Park Road, Okahumpka, Florida 34762, US EPA Id No. FLD 984 58 731, other FDEP or US EPA approved facility.

6. Description of soil sampling near secondary containment.

A contractor or consultant with knowledge of Chapter 62-160, FAC and FDEP's SOP-001/01 will be hired to sample the soil for possible contamination. A total of thirteen soil borings will be drilled and sampled using an organic vapor analyzer and the head space method. The location of the soil borings is shown on **Figure 12** in **Attachment I**. As specified in Chapter 62-780, Florida Administrative Code, borings will be sampled from land surface to six inches from six inches to two feet and at two feet intervals thereafter until to the extent necessary to define soil contamination. Guidance specified in 62-780.100 (2), FAC shall be used. If a soil boring interval sample exceeds an OVA reading of 50 ppm, a verification sample for total arsenic (EPA method 6010, 7060 or 7061), total barium (EPA method 6010, 7080 or 7081), total cadmium (EPA method 6010, 7130 or 7131), total chromium (EPA method 6010, 7190 or 7191), total lead (EPA method 6010 or 7421), total mercury (EPA method 7471),

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section IX November 21, 2014 Page 3 of 3

Attachment IX (continued)

Closure Plan (continued)

total selenium (EPA method 6010, 7740 or 7741), total silver (EPA method 6010, 7760 or 7761), priority pollutant volatile organics (EPA method 8240 or 8260), priority pollutant extractable organics (EPA method 8250 or 8270), non-priority pollutant organics with GC/MS peaks greater than 10 ppb (EPA method 8240 or 8260 and 8250 or 8270), and TRPHs (FL-PRO) will be sent to and analyzed by a laboratory with certification from the DOH ELCP in the solid and chemical matrix for each method analyte combination to be reported. All parameters are specified in Chapter 62-780, **Table D**, Florida Administrative Code (attached).

If a verification soil sample exceeds the levels specified in Chapter 62-777, **Table II**, Florida. Administrative Code (attached) and the soil boring interval is within three feet above the water table a monitor well will be installed. The monitor well specifications cited in Chapter 62-780, Florida Administrative Code will be followed. Within one week after well installation the groundwater will be analyzed for the same parameters specified in the previous paragraph using EPA methods specified in Chapter 62-780, **Table D**, Florida Administrative Code (attached).

If the monitor well sample demonstrates groundwater water contamination, contamination assessment and remedial action up to site rehabilitation actives will be followed as specified in Chapter 62-780, Florida Administrative Code. Upon a receipt of an FDEP directed site rehabilitation completion order, the facility will be considered closed as required by 40 CFR, Part 265.310.



Florida Department of Environmental Protection

Bob Martinez Center • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form#62-710.901(7)
Form Title Used Oil Processing Facility
Closing Cost Estimate Form
Effective Date 4-23-13
Incorporated in Rule 62-710.800(6)(b)

Used Oil Processing Facility Closing Cost Estimate Form

| Date: | 11.07.14 | | | Date of D | EP Approval: | | (DEP use only) |
|--|--|--|---|---|---|---|--|
| I. GEN | ERAL INFORMATION | 1: Latitud | e: 28 04'42" | Longitude: | 81 39'39" | EPA ID Numbe | er: |
| Facility | _{Name:} Synergy F | Recyclir | ng of Central | Florida, L | LC | Permit Number | 2972753-HO-004 er: |
| Facility | Address: 3800 We | est Lake | Hamilton Dr | ive, Winte | er Haven, Flo | orida 33881 | <u> </u> |
| Mailing | Address: 7209 NV | V 66th 9 | Street, Miami, | , Florida 3 | 33166 | | |
| | Person's Name: | | | | Phone Number | 904-652 | -6765 |
| E-mail: | EPaul@Synerg | yrecycl | ing.org | | | 305-887- | 2800 |
| | E OF FINANCIAL AS | | | | | | |
| | Letter of Credit* | | | | Guarantee Bor | nd* * | Indicate mechanisms tha require use of a Standby |
| | Insurance Certificate | | Financial Test | - | _ Trust Fund Agr | eement | Trust Fund Agreement |
| of cost of the cos | dollars. Estimates are estimate adjustment b a) Inflation Factor A adjustment using an changes have occurre factor is derived from | elow. djustment inflation faction faction the faction that the faction the faction that the faction | t ctor may only be m cility operation whi recent Implicit Pric | nade when a ch would nec e Deflator for | Department appro essitate modificati Gross National P | oved closing co on to the closu roduct publishe | st estimate exists re plan. The ed by the U.S. |
| Departn | nent of Commerce in i Deflator by the Deflato | ts survey o | of Current Business | s. The inflati | on factor is the res | sult of dividing t | he latest published |
| Financia | al Coordinator at (850) | 245-8732 | or be found online | at http://www | v.dep.state.fl.us/was | te/categories/sw | fir/ |
| This adj | ustment is based on t | he Departr | ment approved clos | sing cost esti | mate dated: | | |
| | | Χ | | = | | | |
| | EP approved Cost Estimate | | Current Year Inflation Factor | | Inflation Adjus Annual Closin | sted g Cost Estimat | e |
| Signatuı | re: | | | Phoi | าe: | | |
| Name a | nd Title: | | | E-ma | il: | | |
| lf you ha | ave questions concern | ing this for | m, please contact | the Used Oil | Permitting Coordi | nator at the ad | dress below, by |

phone at (850) 245-8781, or by e-mail at: Bheem.Kothur@dep.state.fl.us

Please mail this completed cost estimate to:

Used Oil Permitting Coordinator Florida Department of Environmental Protection 2600 Blair Stone Road MS 4560 Tallahassee, FL 32399-2400

Please e-mail or mail a copy of the cost estimate to:

Solid.Waste.Financial.Coordinator@dep.state.fl.us Solid Waste Financial Coordinator - FDEP 2600 Blair Stone Road MS 4565 Tallahassee, FL 32399-2400

(b) Recalculated Cost Estimates (complete items IV and V)

IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing most expensive.

Third Party Estimate/Quote must be provided for each item. Costs must be for a third party providing all materials and labor.

| DESCRIPTION | UNIT | QUANTITY | UNIT COST | TOTAL |
|--|-------------------|-----------------|-------------------------|-------------------------------|
| Decontamination and Disposal Note: These costs must be broken dov recalculated to include remediation cos | | waste stream. | If contamination is fou | nd, the cost estimate must be |
| a. Used Oil Tanks, containers, piping, equipment and secondary containment decontamination | Lumpsum | L | \$22,400 | 922,400 |
| waste characterization | Lumpum | | 46 | <i>d</i> 2 |
| disposal | Costs. | | 92,200 | 42,200 |
| b. Wash Water waste characterization | Group Anadysis | | \$ 502,92 | 502.92 |
| disposal | Gallons | 2,595 | \$ 0.40 | \$ 1,038,00 |
| c. Sludges/Sediment waste characterization | Sample | _7_ | \$502.92 | \$3520,44 |
| disposal | Gallons | <u> 300 _</u> | \$1.50 | 9450.00 |
| d. Used Oil Filter Management waste characterization | Group Amounts | | \$502.92 | \$502.92 |
| disposal | <u>Ton</u> | 6,5 | 485.91 | 9 343,43 |
| e. Petroleum Contaminated Water (PC tanks, containers, piping, equipement a secondary containment waste characterization | | | | |
| disposal | Gallons | 3,500 | \$0.40 | \$1,400,00 |
| f. Mobilization Costs | Lump Sum | | #3200 | \$3,200,Q0 |
| g. Other Varrum Truck | Hours | 20 | 9/56,00 | \$3/20.00 |
| | Subto | tal (1) Deconta | mination/Disposal: | A 38, 697.71 |

2. Engineering (On-site Inspections and Quality Assurance are to be included in this item).

a. Closure sampling and analysis plan implementation as described in the permit application

b. Closure Certification Report

\$ 10,889.19 \$ 954.41

Subtotal (2) Professional Services:

\$11,843,60

Subtotal of (1) and (2) Above:

59541.31

3. Contingency (10% of the Subtotal)

5,054.13

TOTAL CLOSING COST:

\$ 55,595.49

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Closing Cost Estimates pertaining to the engineering features of the this used oil processing facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.) Rule 62-710 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Closing Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1 of each year and revised, adjusted and updated as required by Rule 62-710.800(6)(c), F.A.C.

Signature of Engineer

Michael H. Stillinger, VP-Engineering

Engineer's Name and Title (please print or type)

47011

Florida Registration Number (please print or type)

3905 Kidron Road, Lakeland, FL 33811

Engineer's Mailing Address

863-647-2877

Engineer's Telephone Number
mike@imperialtesting.com

Engineer's E-mail Address

Signature of Owner/Operator

Elliot Paul, Managing Memeber

Owner/Operator's Name and Title (please print or type)

904-652-6765

Owner/Operator's Telephone Number

EPaul@Synergyrecycling.org

Owner/Operator's E-mail Address

Abbreviated & Summarized DEP Form 62-710.901(7) Costs, Effective 06-09-05

| Statute Salkhar | | T | Abbreviat | ed & Summ | arized DEP For | m 62-710.901(| 7) Costs, Ellet | :tive 06-03-03 |
|-------------------|---------------------------------------|---|---|-----------------------|-------------------|-----------------|-------------------------|---|
| Section Number | Description Number | | Description | Unit | Quantity | Unit Cost | Total Cost | Notes |
| IV. | | | Recalculate Estimated Closing Cost | | | | | |
| | 1 | | tamination & Disposal, Costs | Broken Dowi | n by individual w | aste stream. If | contamination t | found, the cost estimate must be recalculated to |
| | | а | Used Oil Tanks, Containers, | Piping, Equi | pment & Second | ary Containme | ent | |
| | | | Decontamination | Lump Sum | 1 | \$22,400.00 | \$22,400.00 | Trac Quote |
| | | | Waste Charaterization | Lump Sum Transport | | | \$0.00 | Assume all material recycled. Assume all tanks are recycled, costs related to |
| | | | Disposal | Cost | 1 | \$2,200.00 | \$2,200.00 | transport only (Trac Quote). Used Oil Group, one sample (\$85.20/RCRA Metals; |
| | | b | Washwater Waste Characterization | Group Analysis | 1 | \$502.92 | \$502.92 | \$84.00/8260; \$210.00/8270; \$78.00/TRPH + 10% |
| | | | Washwater Disposal | Gallons | 2595 | \$0.40 | \$1,038.00 | AquaClean Quote, pick up from site. |
| | | С | Sludges Waste Characterization | Sample | 7 | \$502.92 | \$3,520.44 | One analysis per tank x 4 tanks + 3 compartments. |
| | | | Sludges Disposal | Gallons | 300 | \$1.50 | \$450.00 | AquaClean Quote, pick up from site. Used Oil Group, one sample (\$85.20/RCRA Metals; |
| | | d | Used Oil Filter Waste Characterization | Group Analysis | 1 | \$502.92 | \$502.92 | \$84.00/8260; \$210.00/8270; \$78.00/TRPH + 10% accounting & processing) |
| | | | Used Oil Filter Disposal | Ton | 6.5 | \$55.91 | \$363.43 | |
| | | е | Petroleum Contact Water (Po | CW) Tanks, | Containers, Pipir | ng, Equipment | & Secondary C | ontainment |
| | | | Waste Charaterization | No cost | 1 | | \$0.00 | Included in washwater disposal costs. |
| | | | Disposal | Gallons | 3500 | \$0.40 | \$1,400.00 | AquaClean Quote, pick up from site. |
| | | f | Mobilization Costs | Lump Sum | 1 | \$3,200.00 | \$3,200.00 | Mobilization of Personnel and Equipment. |
| | | g | Other | | | 2,50,00 | 20,400,00 | Port to Port, 1 trip x 12-hrs/trip, AquaClean Rate |
| | | | Vacuum Truck | Hours | 20 | \$156.00 | \$3,120.00 | Quote. |
| | | | | | | | | |
| | · · · · · · · · · · · · · · · · · · · | | | | | | | |
| | | | Subtotal (1) Decontam | ination / Dis | posal Cost (\$): | | \$38,697.71 | |
| | | | | | | | | |
| | 2 | | ering (on-site inspections and Closure Sampling and Analysis Plan implementation as described | | | | | Two Person Mobilization to site (\$810.76); Drilling setup & utility clearance (\$565.93); Hand auger installation of 13 soil borings (\$236.65 / boring; and sampling of each boring for used oil group constiuents (\$502.92/analysis). Use of core drill |
| | | | in Permit Application | Lump Sum | 1 | \$10,889.19 | | included (\$200) Prepare sign & seal closure report (FDEP Petroleum Program 20% allowance of field work costs). |
| | | b | Closure Certification Report Subtotal (2) Profe | | vices Cost (\$): | \$954.41 | \$954.41 \$11,843.60 | Program 20% anowance of neig work costs). |
| | | | | | | | | |
| | | | Subtotal of | (1) and (2) A | Above Cost (\$): | | \$50,541.31 | |
| | 3 | | Contigency (10% of Subtota | al) | | | \$5,054.13 | |
| | | | | TOTAL CL | OSING COST: | | \$55,595.44 | |
| 1 | | | | | | İ | | |

Imperial Testing Laboratories, Inc.

Environmental & Geotechnical Engineering & Consulting, Drilling, Materials Testing, Contamination Assessments, Audits and Remediation

Third Party Unit Costs

Synergy Recycling of Central Florida, LLC, Winter Haven, Florida

Used Oil Facility Closure Costs

| Used On Facility Cit | Jaure Costs | |
|---|------------------|--|
| <u>Item</u> | <u>Unit Cost</u> | <u>Unit</u> |
| Used Oil Tanks, Containers, piping, equipment, & | | |
| secondary containment decontamination | \$22,400.00 | Lump Sum |
| Used Oil Tanks, Containers, piping, equipment, & | QI . | |
| secondary containment disposal | \$2,200.00 | Transport Cost |
| | | |
| Washwater Waste Characterization | \$502.92 | Group Analysis |
| | | |
| Washwater Waste Disposal | \$0.40 | Gallon |
| 3 | | |
| Sludges/Sediment Waste Characterization | \$502.92 | Group Analysis |
| _ | 27 | |
| Sludges/Sediment Waste Disposal | \$1.50 | Gallon |
| • | | |
| Used Oil Filter Management Waste Characterization | \$502.92 | Group Analysis |
| | | |
| Used Oil Filter & Oily/Solid Waste Disposal | \$55.91 | Ton |
| • | | |
| PCW Disposal | \$0.40 | Gallon |
| • | | |
| | | Mobilization of Personnel |
| Mobilization Costs | \$3,200.00 | and Equipment. |
| | Ø156 00 | Hour |
| Vacuum Truck | \$156.00 | noui |
| | 440,000,10 | r 0 1 1 1 |
| Closure Sampling and Analysis Plan Implementation | \$10,889.19 | Lump Sum, see breakdown FDEP Petroleum Program |
| | | Allowance for 20% of field |
| Closure Certification Report | \$954.41 | work costs |
| Ciosaro Ceranounon report | Ψ,υ,,,,1 | 2222 5 5 2 2 2 |
| | | |

Subcontract Mailing Address: 3905 Kidron Road, Lakeland, Florida 33811

Signature of Person Submitting Quote:

Name:

Date:

Michael H. Stillinger V.P.-Engineering November 12, 2014



ATTACHMENT X

TRAINING REQUIREMENTS

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001 Revision 1 Section X November 21, 2014 Page 1 of 1

Attachment X

Training Requirements

Records are kept by the company Managing Member in office files on site. The materials used are the UAUOS Training Manual adopted by the Used Oil Association, the DOT Compliance Training/education checklist, the NIOSH Pocket Guide to Chemical Hazards, NIOSH Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, 40 CFR Parts 261-281 and OSHA 29 CFR 1910.120.

Annual Safety Meetings with Sign in Sheets and topics covered shall be kept on file.

Regulatory changes will be addressed to staff by the company Operating Partner.

Training records will be retained at the facility for a minimum of three years.

ATTACHMENT XI

SOLID WASTE MATERIALS PROCESSING SECTION

AND

FDEP FORM 62-701.900(4) SOLID WASTE PERMIT APPLICATION Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001/SO-002 Revision 1 Section XI November 21, 2014 Page 1 of 2

Attachment XI

Solid Waste Materials Processing Section FDEP Form 62-701.900(4), Page 3 of 4 Narrative

- 1. a. As part of Synergy Recycling of Central Fla. LLC. (Synergy) used oil processes Synergy shall collect from their customers (generators) used oil filters, rags, absorbent pads, booms, air filters and kitty litter. The material is typically transported in 55-gallon steal drums, secured with a steel lid. The rags, absorbent pads, booms and air filters are at times intermixed with the used oil filters and at times picked up separately. Synergy personnel separate easily detectable materials from the Used Oil Filters and place the materials in separate containers (typically 55-gallon drums). Materials separation takes place inside the center of the building (see Drum Storage Area labeled on **Figure 2** in **Attachment I**).
 - b. On an average month Synergy handles approximately 80 to 100 55-gallon drums of material for disposal. Synergy expects to handle no more than 200 drums per month (solids only). On-site (and inside the building) at any given time shall be no more than one roll-off dumpster and (200) 55-gallon drums (solids only) filled with material in processing.
 - c. The material is typically transported in 55-gallon steal drums, secured with a steel lid. The rags, absorbent pads, booms and air filters are at times intermixed with the used oil filters and at times picked up separately. Synergy personnel separate easily detectable materials from the Used Oil Filters and place the materials in separate containers (typically 55-gallon drums). Materials separation takes place inside the center of the building (see Drum Storage Area labeled on **Figure 2** in **Attachment I**). After the Used Oil Filter delivery container (typically a 20-cubic yard roll-off dumpster, also stored in the building) is considered adequately filled for delivery, Synergy personnel transports the used oil filters to metal recyclers, such as US Foundry. The metal recycler's magnet picks up the filters and leaves the non-magnetic material in the delivery container (again, typically a roll-off dumpster). The non-magnetic material (typically air filters, rags, absorbent pads and booms) is left in the container for Synergy to handle. Once the container is returned to the Synergy facility, Synergy personnel place the non-metallic materials in 55-gallon drums with hand tools.
 - d. The materials are transported in 55-gallon drums to the Oil Filter Storage Area, labelled on Figure 2 in Attachment I. Loading, unloading, sorting, and temporary storage take place at this location. The regular facility operations are addressed in Item 1 of Attachment XI and in Attachment II.
 - e. Equipment includes 55-gallon drums, drum dolly's, trucks with lift gates, and when available a forklift.
 - f. The maximum time materials will be stored at the facility is approximately 45 days.
 - g. The maximum amounts of wastes, recyclable materials and recovered materials that will be stored at the facility at one time is the 1800-square feet of area, which is dedicated for the materials (solid waste) processing and storage inside the building.
 - h. . . Used oil filters are recycled. The remaining materials are processed for eventual disposal.
- 2. The site plan is illustrated as **Figure 2** in **Attachment I**. The site vicinity map is illustrated as **Figure 1** in **Attachment I**. There are no water bodies or wetlands within 200-feet of the property. Other than the on-site well, located in the northeastern corner of the property, there are no potable

Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-H053-001/SO-002 Revision 1 Section XI November 21, 2014 Page 2 of 2

Attachment XI (continued)

Solid Waste Materials Processing Section (continued) FDEP Form 62-701.900(4), Page 3 of 4 Narrative

- 2. (continued) water wells within 500-feet of the property. The onsite well is closed. Finally, there are no Community Water Supply Wells within 1000-feet of the property. The closest well, which is private is approximately 1051-feet from the property, located at 7025 Fairview Village Circle, Winter, Haven (Latitude: 28 degrees, 4 minutes, 51.70 seconds North and Longitude 81 degrees, 39 minutes, 43.56 seconds West) documented under Permit Number AAC6165. The next nearby well, which is also private is approximately 1341-feet from the property, located at 6658 State Road 544 East, Winter, Haven (Latitude: 28 degrees, 4 minutes, 39.59 seconds North and Longitude 81 degrees, 39 minutes, 24.19 seconds West) documented under Permit Number AAG3802.
- 3. The boundary survey and legal description are provided on Figure 2 in Attachment I.
- 4. The facility is existing. No construction is proposed.
- 5. The facility operations are provided in **Attachments II** and **III**. Operational records shall be maintained to include a daily log of the quantity of materials (including solid waste) received, processed, stored and removed from the facility. Records shall include materials volumes (55-drums or 20-yard roll-off dumpster) processed for recycling and disposal. Records shall be complied on a monthly basis and made available for inspection by the Department (Florida Department of Environmental Protection) personnel. Records shall be maintained a minimum of **five** years, as required by Chapter 62-160, Florida Administrative Code, which is more stringent than Chapter 62-701-710(9). Record keeping forms are provided in **Attachment VI**.
- 6. The Closure Plan is included as **Attachment IX**. Non metallic materials shall be handled and disposed of in 55-gallon drums.
- 7. A contingency plan citing emergency response operations is provided in Attachment VII.
- 8. Financial assurance documentation is provided with the Used Oil Processing Permit Application.
- 9. The facility had remained in compliance with Chapter 62-701, F.A.C. No enforcement action has been taken.
- 10. Documentation of ownership is provided with the Used Oil Permit Application.



Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 DEP Form #: 62-701.900(4). F.A.C.

Form Title: Application to Construct, Operate, or Modify a Waste Processing Facility

Effective Date: August 12, 2012

Incorporated in Rule: 62-701.710(2), F.A.C.

APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

GENERAL REQUIREMENT: Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with subsection 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

Please Type or Print in Ink

| A. | GENERAL INFORMATION | | |
|----|---|-----------------------------|--|
| 1. | Type of facility (check all that apply): | | |
| | ☐ Transfer Station: | | |
| | □ C&D | ☐ Class III | ☐ Class I |
| | ☐ Other Describe: | | |
| | ☐ Materials Recovery Facility: | | |
| | ☐ C&D Recycling | ☐ Class III MRF | ☐ Class I MRF |
| | ☐ Other Describe: | | |
| | ☐ Other Facility That Processes But □ | oes Not Dispose Of Solid V | Vaste On-Site: |
| | ☐ Storage, Processing or Dis | posal for Combustion Facili | ties (not addressed in another permit) |
| | 凹 Other Describe: Oily/Solid | d Waste associated wi | th Used Oil Processing Permit. |
| | NOTE: C&D Disposal facilities that als | o recycle C&D shall apply o | n DEP Form 62-701.900(6), F.A.C. |
| 2. | Type of application: | | |
| | ☐ Construction/Operation | | |
| | ☑ Operation without Additional | al Construction | |
| 3. | Classification of application: | | |
| | ☐ New | ☐ Substantial Modificat | ion |
| | 🗹 Renewal | ☐ Intermediate Modification | ation |
| | | ☐ Minor Modification | |
| 4. | Facility name: Synergy Recycling | of Central Florida, LLC | |
| 5. | DEP ID number: <u>53/9802060</u> , FLR 00 | | |
| 6. | | | Drive, Winter Haven, FL 33811 |
| | | | · |

| Location coordinate | es: | | |
|-------------------------|--------------------------------|----------------------------|--|
| Section:06 | Township:28 | S Range: | 27E |
| Latitude: 28 | Township:28: 0 | Longitude: 81 | <u> </u> |
| | Coordinate Me | | |
| Collected by: | | Company/Affiliation: | |
| Applicant name (on | erating authority):_ Syner | gy Recycling of 0 | Central Florida, LLC |
| 7 Applicant name (op | 209 NW 66th Street, | Miami, Florida 3 | 33166 |
| Mailing address: 1 | Street or P.O. I | Box City | State Zip |
| Contact person: E | lliot Paul | Telephor | _{ne' (} 904 ₎ 652-6765 |
| Managing | g Member | EPaul@S | Synergyrecycling.org |
| Title: | , | | ldress (if available) |
| | | d., ., 1 | lin a |
| Authorized agent/C | onsultant: Imperial Test | ing Laboratories | , inc. |
| Mailing address: 3 | 905 Kidron Road, La | akeland, Florida | 33811 |
| | Street or P.O. E | Box City | State ∠ıp |
| Contact person: N | lichael H. Stillinger, l | P.E. Telephor | ne: (<u>863</u>) <u>647-2877</u> |
| Title. VP-Engin | eering | mike@im | perialtesting.com |
| | | E-Mail ad | dress (if available) |
| | | | |
| Landowner (if different | ent than applicant): | | And the second s |
| Mailing address: | Street or P.O. E | Box City | State Zip |
| • | | • | · |
| Contact person: | | Telepnor | ne: () |
| | | F-Mail ad | dress (if available) |
| | Centra | l Florida | a. 555 (ii arailasio) |
| Cities, towns and ar | eas to be served: | | |
| | | | annia val |
| Date site will be read | dy to be inspected for comple | tion: upon permit a | approvai |
| Estimated costs: | | | |
| | Not Applicable | Closing Costs: \$ | 55,595.44 |
| | | | |
| • | tion starting and completion o | _{To:} Not Applic | rahle |
| From: Not Appl | | | |
| Expected volume of | waste to be received: 0.73 | yo | ds³/day tons/d |

Provide a brief description of the operations planned for this facility:

Oily/solid waste collected from customers who arrange for pick up of used oil, used oil filters, air & transmission filters, absorbant pad and booms, kitty litter and other absorbant materials.

B. ADDITIONAL INFORMATION

Please attach the following reports or documentation as required.

- 1. Provide a description of the operation of the facility that shall include (62-701.710(2)(a), F.A.C.):
 - a. The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed;
 - b. The expected daily average and maximum weights or volumes of materials to be managed or processed;
 - c. How the materials will be managed or processed;
 - d. How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas;
 - e. The types of equipment that will be used;
 - f. The maximum time materials will be stored at the facility;
 - g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and
 - h. The expected disposition of materials after leaving the facility.
- 2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (62-701.710(2)(b), F.A.C.).
- 3. Provide a boundary survey and legal description of the property (62-701.710(2)(c), F.A.C.).
- 4. Provide a construction plan, including engineering calculations, that describes how the applicant will comply with the design requirements of subsection 62-701.710(3), F.A.C. (62-701.710(2)(d), F.A.C.).
- 5. Provide an operation plan that describes how the applicant will comply with subsection 62-701.710(4), F.A.C. and the recordkeeping requirements of subsection 62-701.710(8), F.A.C. (62-701.710(2)(e), F.A.C.).
- 6. Provide a closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C. (62-701.710(2)(f), F.A.C.).
- 7. Provide a contingency plan that describes how the applicant will comply with subsection 62-701.320(16), F.A.C. (62-701.710(2)(g), F.A.C.).
- 8. Unless exempted by subparagraph 62-701.710(1)(d)1., F.A.C., provide the financial assurance documentation required by subsection 62-701.710(7), F.A.C. (62-701.710(2)(h), F.A.C.).
- 9. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)
- 10. Provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a waste processing facility (62-701.710(2), F.A.C. and 62-701.320(7)(g), F.A.C.)

CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER C. 1. Applicant: Synergy Recycling of Central Florida, LLC The undersigned applicant or authorized representative of Solid Waste is aware that statements made in this form and attached information are an application for a Processing Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility. 7209 NW 66th Street Mailing Address Signature of Applicant or Agent Miami, FL 33166 Elliot Paul, Managing Member City, State, Zip Code Name and Title (please type) 904, 652-6765 EPaul@Synergyrecycling.org Telephone Number E-Mail address (if available) Attach letter of authorization if agent is not a governmental official, owner, or corporate officer. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, 2. Florida Statutes): This is to certify that the engineering features of this waste processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility. 3905 Kidron Road Mailing Address Signature Lakeland, Florida 33811 Michael H. Stillinger, VP-Eng. City, State, Zip Code Name and Title (please type) mike@imperialtesting.com E-Mail address (if available) 863, 647-2877 47011 Telephone Number Florida Registration Number (please affix seal)

DEP FORM 62-701.900(4) Effective August 12, 2012

Page 4 of 4

Parcel Details: 27-28-06-000000-034110

56.07 PRT CALC TRIM TAX BILL TAX EST

Owners

SYNERGY RECYCLING OF CENTRAL FLORIDA

100%

Mailing Address

Address 1

7101 NW 126TH TER

Address 2

Address 3

PARKLAND FL 33076-1985

Site Address

Address 1

3800 W LAKE HAMILTON DR

Address 2

City

WINTER HAVEN

State

FL

Zip Code

33881-9262

Parcel Information

6666.00

Neighborhood

Show Recent Sales in this

Neighborhood

Subdivision

NOT IN SUBDIVISION

Property (DOR)

Misc. Industrial Facility

Use Code

(Code: 4105)

2.03 Acreage

WINTER

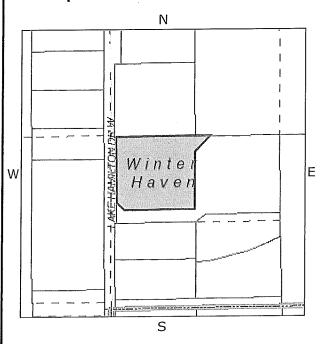
Taxing District HAVEN/SWFWMD (Code: 90410)

Property Desc

DISCLAIMER: This property description is a condensed version of the original legal description recorded in the public records. It does not include the section, township, range, or the county where the property is located. The property description should not be used when conveying property. The Property Appraiser assumes no responsibility for the consequences of inappropriate uses or interpretations of the property description. No warranties, expressed or implied, are provided for the data herein, its use, or its interpretation.

COMM AT NW COR OF N1/2 OF SW1/4 OF SW1/4 OF NW1/4 E ALONG N BNDRY OF N1/2 OF SW1/4 OF SW1/4 OF NW1/4 23.07 FT TO PT ON E R/W OF W LAKE HAMILTON DR & POB THENCE EAST 368.60 FT S 45 DEG W 84.72 FT S 222.02 FT W 278.34 FT N 45 DEG 11' 38" W 42.46 FT TO PT ON E R/W OF WEST LAKE HAMILTON DR N ALONG SAID R/W 251.97 FT TO POB

Area Map



Mapping Worksheets (plats) for 272806

Mapping Worksheet Info Section_272806.pdf

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| y Pro |
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| Polk |
| _ |

| Township of the state of the st | | | 卜 | County Pro | olk County Property Record Card | Card | | | | | 11/21/2014 11:32:19 AM | 1:32:19 AM |
|--|---|---|--------------|--------------------------------|--|--------------------------|-------------------|-----------------------------------|----------------------------------|---------------------|------------------------|---------------------|
| raicai 17.2.1 280000000034 1 10 | Value I | Value Information | | Non A | Non Ad-Valorem Assessments | यः | | S | Sketch | | | |
| Owner: SYNERGY RECYCLING OF | Land Value: | \$53, | \$53,269.00 | Fire: | | | | | | | | |
| Mailing Address of the second | Building Value: | \$165 | \$165,856.00 | Other: | | | | | | | | |
| | Misc. Item(s) Value: | 403 | #21 303 00 H | | | | | | | | | |
| /101 NW 1261H TER | : | | 200 | Gene | General Property Information | | | | | | | |
| PARKLAND FL 33076-1985 | Total Just Value (Market): | | 8 | Neighborhood # | 00'9999 | | | | | | | |
| | Exemption Information Addfl Homestead does not apply to all tax districts | i Information not apply to all tay distr | | Subdivision # | 000000 | | | | 156 | | | |
| Site Address | Homestead: | | 5 | Subdivision Name | NOT IN SUBDIVISION | /ISION | | | | | | |
| 3800 W LAKE HAMILTON DR | Addil. Homestead: | | _ | DOR Use Code (DOR) | JR) 4105 | | | | | | | |
| WINTER HAVEN FL 33881-9262 | Widow/er: | | _ | DOR Description | | Facility | 丰 • | | の可以 | | | <u>, pi</u> |
| | Disability: | | \$0.00 | hort Legal: | | | | | | | | |
| | Senior: Veteran: | | | OMM AT NW CO F NW1/4 E ALON | COMM AT NW COR OF N1/2 OF SW1/4 OF SW1/4 OF NW1/4 E ALONG N BNDRY OF N1/2 OF SW1/4 | OF SW1/4 | | | 56 | | | |
| | Other: | | _ | F SW1/4 OF NW LAKE HAMILTO | 1/423.07 FT TO PT OF N DR & | I E R/W OF | | | | | | |
| | Taxable Valu | Taxable Value (Tax Dist: 90410) | | | the state of the s | | | | | • | | |
| District Description | Tax Rate Assessed Value | Assessed Value Assessed Taxes | Exemplio | Exemption Tax Savings | Tayable Value | Toxog | | | | • | | |
| BOARD OF COUNTY COMMISSIONERS | 6.866500 \$240,428.00 | \$1,650.90 | \$0.00 | \$0.00 | \$240.428.00 | \$1 650 90 | | | | | | |
| POLK COUNTY SCHOOL BOARD - STATE | 4.960000 \$240,428.00 | | 80.00 | | \$240,428,00 | \$1,000.30 \$1,100.50 | BAS | 794 DACE ADEA | < !! | | | |
| POLK COUNTY SCHOOL BOARD - LOCAL | 2.248000 \$240,428.00 | | 20.00 | | \$240,428,00 | \$540 AB |) i | 2000 | S | | | |
| CITY OF WINTER HAVEN | 5.790000 \$240,428.00 | ь | \$0.00 | | \$240,428,00 | \$1.302.08 | | | | | | - |
| SOUTHWEST FLA WATER MGMT DIST | | | 00 08 | | \$240,428.00 | \$0.70E | | | | | | |
| Total | | ě | 2 | | 00.024.0420 | CS: 100 | | | | | | •••• |
| | 20,5000 | 44,003,33 | | 00.0¢ | | \$4,863.93 | | Residentia | Residential Building Information | | | |
| | | | | | | | | | Ø | Stories: | | |
| | | | | | | | Year Built: | 1977 | ш | Bedrooms: | | |
| | | | | | | | Eff Yr Built: | 1977 | ц | Full Baths: | | |
| | | | | | | | Description: | Mobile Home | 1 | Half Baths: | | |
| | | | | | | | Units: | | Ľ | Fireplaces: | | |
| | | | | | | | Total Under Roof; | 784 | _ | Living Area (SFLA): | Ë | |
| | Sales | Sales Information | | | | | | | | | | |
| Grantee Name | Vac/Imp | p Sale Date | Sale | Sale Amount OR Book OR Page | Deed OR Page Type | Multi-Parcel Sale | | | | | | |
| 1 SYNERGY RECYCLING OF CENTRAL FLORIDA | | *** | 3788 | \$345,000,00 7463 | | } = | | | | | | - |
| 2 SMERKERS RICK | _ | 06-Mar-2006 | 2 | | 5 6 | 8 8 | | | | | | |
| 3 ON TIME ENVIRONMENTAL SERVICES INC | • •- | 30 Lus 2005 | - 0100 | | 7410 | 5 6 | | | | | | |
| | | cooz-linc-oc | 0076 | \$258,UUU.UU 6276 | 1947 W | 8 | | | | | | |
| | Land Information | | | | | | Misc | Miscellaneous Item(s) Information | ormation | | | |
| Description Commercial/Industrial | Aa/GreenBelt Land Unit Tvoe N S | Front 0 | Depth 0 | Units 88782 | Description CARPORT 1000 FENCE | | | Yr Blt 1984 1987 | Ē | Lenath 16 0 | Width 27 0 | Units 1 1,540 |
| | | | | | ASPHALI | | | 0 | 1984 1985 | 0 | 0 | 17,435 |
| | | | | | | | | | | | | |