

Knauss, Elizabeth

From: Knauss, Elizabeth
Sent: Friday, January 27, 2017 4:55 PM
To: jenglin@synergyrecycling.org
Cc: Kennedy, Shannon; 'jclements@synergyrecycling.org'; 'adore@synergyrecycling.org'
Subject: Compliance Inspection.

Hi, Jeff –

Sorry I missed you today – I will probably have to come back out when you return to town to complete my record review.

Items that I could not review included:

- The most recent update to your contingency plan. Has it been updated since 2014? I have a concern that the list of emergency coordinators needs updating if neither you nor Montinique are on site.
- Training records
- Weekly inspection records
- The most recent specification and USDOT flash point analyses and rail shipping records. During our last inspection, most of the oil was going to Louisiana by rail. When was the last time that you shipped by rail, and are you still leasing a siding to transfer your oil to rail cars?
- Documents related to SafeServ operations – when did Synergy acquire SafeServ, and was it a corporate merger or an asset acquisition? When did it take place, and when did SafeServ cease transporting oil under their identification number? Were the company's records transferred to Synergy?
- Documents related to your parts washer – does the washer used Tekusolv Red or Heritage Crystal Clean solvent? When was the washer last serviced, and how was the material managed?

Some of the issues we saw included:

- Ensuring that Dexsil tests are done in accordance with the method – there was no timing device in the waste analysis area. The lab recordkeeping sheet for the trucks did not include a space to record the Dexsil results.
- Used oil filter bins were stored outside, off the pavement in preparation for shipment. Two of the filter bins did not have covers, and several of the covers were damaged and would not prevent rain from entering the container.
- A plastic containment tub was stored along the east fence line – it was open and held a couple of oil filters and a layer of oil over water. It was not labeled. During the inspection, the bin was moved under cover and into containment in preparation for pumping. A couple of other oil containers had visible oil and were not labeled.
- The facility has not filed for coverage under the NPDES multi sector generic storm water permit program. Used oil processors fall within Sector N (SIC 5093). Sector P for land transportation may also be applicable (SIC 42XX). As you currently operate, you would not be eligible for a No Exposure Certification (NEX).

- Numerous issues were noted on the records that were reviewed. The records for shipments to Kingsland all state that the oil is being transported to Synergy Recycling of Central Florida – the Kingsland address is in the billing information section, but the papers do not include a destination location or EPA identification number of the receiving facility. Many of the records do not have a signature under the oil provider block, and many that are signed were signed after the oil was delivered. A couple were not signed by the receiving facility. Very few of the typed “date shipped” dates match the actual transporter signature dates. The records all certify that the oil does not contain detectable PCBs, but no PCB analyses were available for review.
- At least one shipment to US foundry was lacking a signature of the designated facility
- The rejected shipment log does not appear to have been updated since 11/21/13
- We did not review many shipping records on incoming oil. We found issues with signatures and halogen checks on a couple. James was not able to tell me how you determine or record the source of the oil – I reviewed Synergy’s last annual report, and all the oil was recorded as A – Automotive. You do accept oil from a number of industrial customers, like Valpak and Halkey Roberts.
- Synergy of Central Florida transported several loads of oily water from Kingsland to Liquid Environmental Solutions in Jacksonville on 11/21/16, but the records related to the shipment did not include the signature of the receiving facility or the EPA ID numbers of either Kingsland or your transporter ID.

Please let me know when you will be available for a follow up. I am free next Thursday afternoon or on Friday. I also have several days free the week after.

Thanks,

Elizabeth Knauss
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