Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

June 30, 2011

SENT VIA E-MAIL
gallen@synergyrecycling.org

Mr. Garry R. Allen, Operating Partner
Synergy Recycling of Central Florida, LLC
3800 West Lake Hamilton Drive
Winter Haven, FL 33881

SUBJECT: Synergy Recycling of Central Florida, LLC
Facility Permit Major Modifications
EPA I.D. Number: FLR 000 053 611
Permit Numbers: 292753-HO-004; 292753-SO-002
Polk County

Dear Mr. Allen:

Enclosed are modifications to Permit Numbers 292753-HO-004 issued to Synergy Recycling of Central Florida, LLC pursuant to Section 403.815, Florida Statutes (F.S.), and Chapters 62-4, 62-701, 62-710 and 62-740, Florida Administrative Code (F.A.C.).

This permit modification is final and effective on the date filed with the Clerk of the Department. When the permit modification is final, any party to the permit has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice to Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by applicable filing fees with the appropriate District Court of Appeal.

The notice of Appeal must be filed within thirty (30) days from the date the final permit is issued. If you have any questions, please contact Bheem Kothur at (850) 245-8781 or via e-mail: bheem.kothur@dep.state.fl.us.

Executed in Tallahassee, Florida, on this 30 day of June, 2011.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Charles F. Goddard, Chief
Bureau of Solid & Hazardous Waste
2600 Blair Stone Road, M.S. 4550
Tallahassee, Florida 32399-2400

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk (or Deputy Clerk) — June 30, 2011 Date

CG/at
Enclosure

cc:

James Dregne, DEP/Southwest District, james.dregne@dep.state.fl.us
Heath Rauschenberger, U. S. Fish and Wildlife Services, heath_rauschenberger@fws.gov
Florida Fish and Wildlife Conservation Commission, FWCConservationPlanningServices@myfwc.com
Frank Hornbrook, DEP/Tallahassee, frank.hornbrook@dep.state.fl.us
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Jeff Potter, Mayor, City of Winter Haven, jpotter@mywinterhaven.com
Edwin Smith, Chairman Polk County Commission, ed.smith@polk-county.net

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PERMITTEE:

Synergy Recycling of Central Florida, LLC
3800 West Lake Hamilton Drive
Winter Haven, FL 33881

I.D. Number: FLR 000 053 611
Permit Number: 292753-HO-004
Permit Number: 292753-SO-002
Date of Issue: June 30, 2011
Expiration Date: January 26, 2015
County: Polk County
Lat/Long: 28°04' 42" N/81° 39' 39" W

Attention:
Mr. Garry R. Allen, President

Project: Used Oil and Material Processing Facility

This permit is issued under the provisions of Section 403 of Florida Statutes (F.S.), Chapters 62-4, 62-160, 62-701,62-710, 62-730, 62-740 and 62-762 of Florida Administrative Code (F.A.C.), and 40 Code of Federal Regulations (CFR) Part 279. The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereto and specifically described as follows:

TO OPERATE: To operate a Used Oil and Material Processing Facility hereinafter referred to as "Facility". The Used Oil and Material Processing Facility is located on an approximately 2.03-acre parcel of land owned by Synergy Recycling of Central Florida, LLC. in Polk County at 3800 West Lake Hamilton Drive, FL, 33881. Diagrams of the site layout and tank storage area are included as Attachments (Attachment – A and B, respectively), Tank capacity and its contents are shown in Tank Table (Attachment - B) of this permit.

The Permittee is authorized to process used oil, oily wastewater, petroleum contact water (PCW), oily solid waste, used antifreeze, and used oil filters under this permit.

The Facility consists of a total of five (5) tanks with a total capacity of 86,500 gallons. One (1) 25,000 gallon double-walled tank, split in three compartments (3a, 3b and 3c) rated for 18,000/3,500/3,500-gallons, respectively. The 18,000-gallon compartment shall contain used oil. The 3,500-gallon compartments shall contain used oil, oily water or spent antifreeze. The Permittee also uses one (1) 10,000-gallon storage tank for processing used oil and/or oily water (or PCW), and one (1) 1,500-gallon storage tank for processing used oil, oily water (or PCW) or antifreeze. The two (2) 25,000 gallon single-walled new tanks are used for used oil. These tanks are placed in a concrete secondary containment structure that is sealed and impervious to petroleum products. Two tank containers are located within the secondary containment unit and one tank utilizes double-walled construction and is located outside the secondary containment. All tanks are shown on the drawing in Attachment A of this permit.

The Permittee shall submit as built drawings for the proposed and constructed tanks within thirty (30) days of issuing this permit. Each drawing shall be signed and sealed and certified by a Professional Engineer registered in the State of Florida.

The Permittee shall not use, operate, or otherwise conduct any activities with the proposed new tanks until receipt of Department approval for the newly installed tanks. "Upon receipt of Department approval for the newly installed tanks the Permittee may start using the tanks.

There are no other changes to this permit.

A copy of this permit must be attached to the existing permit.

The following documents were used in preparation of this permit:

1. Used Oil Processing Facility Permit Application Dated October 23 and FDEP received on November 10, 2008.
2. Solid Waste Processing Facility Application Dated February 27, 2009 and FDEP received on March 5, 2009.
3. Used Oil Processing Facility Permit Application, NOD Letter Dated December 17, 2008 and the Facility Responses Dated February 27, 2009.
4. Used Oil Processing Facility NOD-2 Letter Dated April 10, 2009 and the Facility Responses Dated April 20, 2009.
5. Used Oil Processing Facility NOD-3 Letter Dated May 15, 2009 and the Facility Responses Dated June 11, 2009.
6. Used Oil Processing Facility Permit Application For Major permit Modification Dated March 14, 2011 and DEP received on March 21, 2011.
7. FDEP, NOD-1 Letter Dated April 20, 2011 and the Facility responses Dated May 10, 2011 and FDEP received on May 11, and 13, 2011.

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Part I - GENERAL AND STANDARD CONDITIONS

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the Permittee and enforceable pursuant to the authority of Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The Permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The Permittee shall at all times properly operate and maintain the facility and systems of processing and control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The Permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

   a. Having access to and copying any records that must be kept under the conditions of the permit;

   b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the Permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the Permittee shall immediately notify and provide the Department with the following information:

   a. A description of and cause of non-compliance; and

   b. The period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

   The Permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The Permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the Permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-710.800, F.A.C., as applicable. The Permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction, operation, or closure.

13. This permit also constitutes:

   a. Determination of Best Available Control Technology (BACT);

   b. Determination of Prevention of Significant Deterioration (PSD);

   c. Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500); and

   d. Compliance with New Source Performance Standards.

14. The Permittee shall comply with the following monitoring and record keeping requirements:

   a. Upon request, the Permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action;

b. The Permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule; and

c. Records of monitoring information shall include:

(1). The date, exact place, and time of sampling or measurements;

(2). The person responsible for performing the sampling or measurements;

(3). The date(s) analyses were performed;

(4). The person responsible for performing the analyses;

(5). The analytical techniques or methods used; and

(6). The results of such analyses.

15. When requested by the Department, the Permittee shall, within a reasonable period of time furnish any information required by law that is needed to determine compliance with the permit. If the Permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

16. The Permittee shall comply with the following requirements during the life of this permit:

a. The facility shall comply with all applicable portions of 40 CFR Part 279 and Chapter 62-710, F.A.C.).

b. This facility shall be constructed, operated and maintained in accordance with all applicable requirements of Chapters 62-4, 62-701, 62-710, 62-730, 62-740, and 62-762, F.A.C., and all other applicable requirements of Department Rules.

c. By acceptance of this permit, the Permittee certifies that he has read and understands the obligations imposed by the General and Standard Conditions contained herein, including the date of permit expiration and renewal deadlines. It is a violation of this permit to fail to comply with all conditions and deadlines.

d. Nothing contained in General and Standard Condition 10 of this permit shall be deemed to waive any right Permittee has under Florida Statutes or Department rules to oppose application of any such changes to the facility if Permittee is otherwise legally entitled to do so.

17. Submittals in response to these conditions shall be submitted as follows:

a. One (1) hard copy and one (1) electronic copy shall be submitted to:

Environmental Administrator

Hazardous Waste Regulation Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 4560
Tallahassee, Florida 32399-2400

b. One (1) hard copy and one (1) electronic copy shall be submitted to:

Hazardous Waste Program Administrator
Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

c. The Permittee shall submit one (1) copy of the renewal permit and/or modifications cover letter and appropriate fee to:

Environmental Administrator
Hazardous Waste Regulation Section
Department of Environmental Protection
2600 Blair Stone Road, M.S. 4560
Tallahassee, Florida 32399-2400

The Permittee shall submit the other copies of the renewal permit and/or modifications (one hard and one electronic) to the addresses in the General and Standard Condition 17 (a) and (b) of this permit.

d. Financial Assurance Mechanism:

The Permittee shall maintain, in good standing, the financial assurance mechanisms established to demonstrate proof of financial assurance. Supporting documentation, for proof of financial assurance and required annual adjustments, shall be submitted within the time frames specified in Rule 62-701.630, F.A.C. as adopted by reference in Rule 62-710.800(6), F.A.C. All submittals in response to this specific condition shall be sent to:

Florida Department of Environmental Protection
Financial Coordinator – Solid Waste Section
2600 Blair Stone Road, MS 4565
Tallahassee, Florida 32399-2400

e. Annual Closing Cost Estimate Adjustment:

The Permittee shall annually adjust the closing cost estimate for inflation using Form 62-710.901(7). Adjustments shall be made in accordance with Rule 62-710.800(6), F.A.C. An owner or operator shall submit the adjusted cost estimate between January 1 and March 1. All submittals in response to this specific condition shall be sent to the addresses on the cost estimate form.

18. The Permittee shall annually register their used oil handling activities with the Department on DEP Form 62-710.901(1) in accordance with Rule 62-710.500, F.A.C.

19. The Permittee shall display the validated registration form and identification number in a prominent place at the facility location [Rule 62-710.500(4), F.A.C].

20. The Permittee shall submit an annual report covering used oil processing facility activities conducted during the previous calendar year to the Department on DEP Form 62-701.901(3) by March 1 of each year in accordance with Rule 62-710.510(5), F.A.C. The report shall summarize the records kept pursuant to Rule 62-710.510 and 62-740.300(5), F.A.C.

21. Before transferring ownership or operation of this facility during its operating life, the Permittee must notify the new owner or operator in writing of the requirements of 40 CFR Part 279 and Rule 62-710, F.A.C. The Permittee shall also submit an application for transfer of the permit, at least thirty (30) days prior to transferring the facility, on DEP Form 62-1.201(1) accompanied with an appropriate application fee, required pursuant to Rule 62-4.050, F.A.C.

22. Before closing or making any substantial modification to the facility, the Permittee shall submit to the Department the Used Oil Processing Facility Permit Modification Request, pursuant to Rules 62-4.080 and 62-710.800(3), F.A.C. The engineering aspects of the request must be certified by a Professional Engineer registered in the State of Florida.

23. The Department may modify, revoke, reissue, or terminate for cause, this permit in accordance with the provisions of Rule 62-710.800, F.A.C. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee may submit any subsequent revisions to the Department for approval. These revisions shall meet the requirements of Rules 62-4.050 and 62-710.800(3), F.A.C. and must be accompanied with an appropriate application fee.

24. The Permittee shall submit a complete application for renewal of the permit, on DEP form 62-710.901(6) and in a manner prescribed by the Department, sixty (60) days before the expiration of this permit, unless the facility is to be closed prior to the expiration date of this permit per the requirements of Rule 62-710.800(4), F.A.C.

25. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of used oil, sludge, residues or constituents to air, soil, or surface water which could threaten human health or the environment, in accordance with 40 CFR 279.52.

26. The Permittee shall not accept or store any hazardous wastes in the permitted tanks or in any other area at the facility without receiving written approval from the Department.

27. The Permittee is allowed to store used oil only in the aboveground tanks within the secondary containment, and or with double walled tanks as shown in Attachment - A of the permit. The permitted units are Tanks 1 through 3.

28. The Permittee shall not exceed the maximum storage capacities of the permitted tanks as specified in facility operations of the permit application in Attachment II and Attachment B of the permit

29. To prevent overflow, the Permittee shall notify the Department when the volume of the used oil stored in any of the tanks exceeds ninety-five (95) percent of the maximum storage capacity of the tank as specified in Attachment II of the permit application and Attachment B of the permit.

30. Tanks installed on or after July 13, 1998 shall comply with the performance standards of F.A.C., Rule 62-762.501. Repairs to aboveground storage and process tanks shall meet the criteria of Rule 62-762.701, F.A.C. [Rule 62-710.300(3), F.A.C.].

31. The inspection records and release detection monitoring required in Rule 62-762.601, F.A.C. for aboveground process and storage tanks and integral piping shall be maintained in the Permittee's operating record [Rule 62-710.510, F.A.C.].

32. The Permittee shall prevent the release of used oil, oily waste or oily wastewater to the environment. The secondary containment systems shall be maintained in accordance with Attachment No. 8 of the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:

    a. All new components shall have secondary containment as required by parts (b) and (c) of this condition prior to being put into service;

    b. Pursuant to 40 CFR 279.54, the secondary containment system shall be:

        (1). Designed, installed and operated to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters;

        (2). Capable of detecting and collecting releases and run-on until the collected material is removed;

        (3). Constructed of or lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses which may be induced by the environment;

        (4). Placed on a foundation or base capable of providing support to the secondary containment system;

        (5). Provided with a leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours;

        (6). Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation; and

        (7). Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.

    c. Ancillary equipment shall be provided with secondary containment.

33. Prior to beginning operation, the Permittee shall inspect the secondary containment system floor and perimeter walls for any cracks or gaps. If any cracks or gaps are found, the Permittee shall repair the cracks and gaps prior to beginning operation of the used oil processing facility [40 CFR 279.54(d)(2) and 40 CFR 279.54(e)(2)].

34. The Permittee shall label or mark all containers and aboveground tanks, used for storage or processing of used oil, with the words "Used Oil" [40 CFR 279.54(f)].

35. The Permittee shall label or mark all containers or tanks which are solely used for the storage of Petroleum Contact Water with the words "Petroleum Contact Water" or "PCW" [Rule 62-740.100, F.A.C.].

36. The Permittee shall store used oil, PCW, used oil residues or used oil filters only in those containers or tanks which are made of or lined with materials that will not react with and are otherwise compatible with the waste to be stored.

37. If a container or tank holding used oil, PCW, used oil residues or used oil filters is not in good condition (e.g., rusting, bulging) or begins to leak, the Permittee shall transfer the waste to another container or tank which is in good condition [40 CFR 279.22].

38. As part of the general operating requirements, the Permittee shall:

    a. Not place used oil, other wastes or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail;

    b. Use appropriate controls and practices to prevent spills and overflows;

    c. Follow the operating procedures described in Attachments II and III of the permit application; and

    d. Comply with the requirements of 40 CFR 279.54(g) if a leak or spill occurs.

39. The Permittee shall inspect the tank system in accordance with Attachments II and III of the permit application. These requirements include:

    a. Developing and following a schedule and procedure for inspecting overfilling controls;

    b. Inspecting at least once each operating day the aboveground portions of the tank system, and the construction materials and area immediately surrounding the tank storage area. However, the Permittee shall document the daily inspections at least once a week; and

    c. The results of the inspections in (a) and (b) of this condition shall be maintained in the operating record of the facility.

40. The Permittee shall remove spilled or leaked waste and accumulated precipitation from the secondary containment areas within 24 hours of detection and managed in accordance with Spill Prevention Control and countermeasures Plan (SPCC) And Contingency Plan of the permit application.

41. Pursuant to the requirements of 40 CFR 279.52(a), concerning preparedness and prevention, the Permittee shall:

    a. Maintain a copy of the preparedness and prevention plan, of the permit application, at the facility;

b. Equip the facility with the required emergency equipment described in SPCC Plan of the permit application [40 CFR 279.52(a)(2)];

c. Test and maintain the required emergency equipment in accordance with the requirements of 40 CFR 279.52(a)(3);

d. Provide all facility personnel involved in used oil processing operations with immediate access to an internal alarm or emergency communication device, as described in SPCC Plan of the permit application [40 CFR 279.52(a)(4)]; and

e. Make arrangements with the local authorities as described in SPCC Plan of the permit application [40 CFR 279.52(a)(6)].

42. Pursuant to the requirements of 40 CFR 279.52(b), concerning the contingency plan, the Permittee shall:

a. Immediately carry out the provisions of the Attachment VII, Contingency Plan, and SPCC Plan of the permit application, and follow the emergency procedures described by 40 CFR 279.52(b)(6), whenever there is a fire, explosion, or release of used oil, oily waste or oily wastewater that threatens or could threaten human health or the environment. The Permittee shall give proper notification to the Department if an emergency situation arises and within fifteen (15) days must submit to the Department a written report which includes all information required in 40 CFR 279.52(b)(6)(ix);

b. Maintain a copy of the contingency plan at the facility and submit copies to all local police departments, fire departments, hospitals, and State and local emergency response teams pursuant to the requirements of 40 CFR 279.52(b)(3);

c. Amend the plan and submit the amended plan for Department approval within seven days of meeting any criteria listed in 40 CFR 279.52(b)(4). Any other changes to the plan must be submitted to the Department within seven days of the change in the plan. All amended plans must be distributed to the appropriate agencies;

d. Comply with the requirements of 40 CFR 279.52(b)(5), concerning the emergency coordinator; and

e. Notify the Department of Environmental Protection's 24-hour emergency telephone number [(800) 320-0519] in the case of emergency. During normal business hours, the Department's Southwest District office may be contacted at (813) 632-7600.

43. The Permittee shall maintain reports of all releases that are greater than one (1) gallon, as part of its on-site operating records. The reports shall include amount and time of release and a schedule that details the corrective action taken. The Permittee shall submit a written report to the Department within fourteen (14) days for all the releases that are greater than fifty (50) gallons. The Permittee shall inform the Department immediately if a release requires the Permittee to take any of the tanks out of service.

44. The Permittee shall inspect the facility operating, emergency and safety equipment in accordance with the schedules approved in Attachment VII of the permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, in accordance with 40 CFR

279.52. Changes, additions, or deletions to the schedule must be approved in writing by the Department. The schedules must be maintained as part of the operating record of the facility [40 CFR 279.54].

45. Pursuant to 40 CFR 279.55, concerning the written analysis plan, 40 CFR 279.56, concerning Tracking, the Permittee shall:

a. Sample and analyze each incoming shipment for the parameters listed in Attachment IV of the permit application, prior to accepting used oil from off-site facilities. The sampling frequency shall be in accordance with Attachment IV of the permit application;

b. Test all containers of the same waste stream for the parameters listed in Attachment IV of the permit application, if any of the samples fail the analysis required by General and Standard Condition 45.(a), the Permittee may collect a representative sample from containers received from the same generator for this analysis;

c. Reject any incoming containers of used oil which fail the analysis required by the General and Standard Condition 45(a). The Permittee shall maintain documentation of any shipment of used oil which is refused due to suspected mixing with hazardous waste in the facility operating record; and

d. Analyze, prior to shipment, all outgoing shipments of used oil for the parameters listed in Attachment C of the permit application to determine whether the used oil is on-specification or off-specification. However, the testing is not required if it is sent to another Used Oil processor for further processing.

IV

e. All sampling and analysis activities shall be conducted in accordance with Chapter 62-160, F.A.C.

f. The Permittee must keep the written analysis plan at the facility.

PART II – USED OIL PROCESSING CONDITIONS

1. Pursuant to 40 CFR 279.56 (Tracking) and Rule 62-710.510(1), F.A.C., the Permittee must comply with the following tracking requirements: the Permittee shall maintain records on DEP Form 62-701.900 (2) or on substantially equivalent forms which contain at least the same information as the Department form.

a. ACCEPTANCE: Used oil processors/re-refiners must keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:

(1). The name, address and EPA identification number (if applicable) of the transporter who delivered the used oil to the processor/re-refiner, oil-burner or disposal facility;

(2). The name, address and EPA identification number (if applicable) of the generator or processor/re-refinery from whom the used oil was received for processing/re-refining;

(3). The quantities of each type of used oil accepted and date of acceptance; and

(4). Waste stream approval number and the off load tank number.

b. DELIVERY: Used oil processor/re-refiners must keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:

(1). The name, address and EPA identification number (if applicable) of the transporter delivering the used oil to the receiving facility;

(2). The name, address and EPA identification number (if applicable) of the oil-burner, processor/re-refinery or disposal facility receiving the shipment;

(3). The quantities of used oil shipped and date of shipment; and

(4). The laboratory analytical results.

c. Record Retention: The records described in paragraph (a) and (b) of this section must be maintained for at least five years. The records shall be kept at the permitted facility and shall be available for inspection by the Department during normal business hours.

2. Pursuant to 40 CFR 279.57, the Permittee must keep and maintain a written operating record at the Facility until closure of the Facility, which includes the following information:

a. Records and results of used oil analyses performed as described in the analysis plan required under 40 CFR 279.55; and described in Attachment (C) .5a, (C).5b and (C).5c of the permit application.

b. Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 279.52(b).

3. The Permittee shall maintain as part of the operating record of the Facility the inspection records and release detection monitoring records required in Rule 62-762.601, F.A.C., for aboveground storage tanks, integral piping, and process tanks. Reports of releases greater than one (1) gallon shall include the amount, time of the release, time of the response and a description of the response. Reports of releases greater than fifty (50) gallons shall be submitted to the Department within fourteen (14) days. The Permittee shall inform the Department immediately if a release requires the Permittee to take any of the tanks out of service.

4. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of used oil, sludge, residues or constituents to air, soil, or surface water which could threaten human health or the environment, in accordance with 40 CFR 279.52(1).

5. Pursuant to Rule 62-710.800(3), F.A.C., aboveground storage and process tanks having a capacity greater than 550 gallons, and all integral piping shall comply with the performance standards for new tanks of Rule 62-762.501 , F.A.C., for existing shop fabricated/field erected tanks of Rule 62-

762.511, F.A.C. Repairs to aboveground storage and process tanks shall meet the criteria of Rule 62-762.701, F.A.C.

6. The Permittee shall prevent the release of used oil, oily waste or oily wastewater to the environment. The secondary containment system shall be maintained in accordance with the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:

   a. All new components shall have secondary containment as required by parts (b) and (c) of this condition prior to being put into service.

   b. The secondary containment system shall meet the requirements of 40 CFR 279.54 and shall be:

      (1). Designed, installed and operated to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters.

      (2). Capable of detecting and collecting releases and run-on until the collected material is removed.

      (3). Constructed of or lined with materials compatible with the waste to be stored and have sufficient strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses that may be induced by the environment.

      (4). Placed on a foundation or base capable of providing support to the secondary containment system.

      (5). Provided with leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours.

      (6). Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation.

      (7). Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.

   c. Ancillary equipment shall be provided with secondary containment.

7. Permittee shall submit as built drawings for the proposed and constructed Tanks within thirty (30) days of issuing this permit. Each drawing shall be signed and sealed and certified by a Professional Engineer registered in the State of Florida.

8. The Permittee shall not use, operate, or otherwise conduct any activities with the proposed new Tanks until the Permittee has established Financial Assurance for the tanks in accordance with Condition Part I.17.(d) of this permit and the Department has approved installation of the tanks. Upon Department approval of the newly installed and the updated Financial Assurance mechanism, the Permittee may start using those tanks.

PART III – PETROLEUM CONTACT WATER PROCESSING CONDITIONS

1. The Permittee shall ship or accept petroleum contact water (PCW) only by using a transporter who is a registered hazardous waste transporter in compliance with Rule 62- 730.170, F.A.C., or has received a DEP/EPA ID number by notifying the Department on DEP/EPA Form 8700-12FL of its intent to transport PCW. [62-740.200(2), F.A.C.]

2. The Permittee shall label or mark all containers or tanks which are used for the storage of petroleum contact water with the words "Petroleum Contact Water" or "PCW". [62-740.100, F.A.C.]

3. The Permittee shall store PCW only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored.

4. If a container holding PCW is not in good condition (e.g. rusting, bulging) or begins to leak, the Permittee shall either overpack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]

5. The Permittee shall store or treat PCW in tanks registered under the specifications of Rule 62-762, F.A.C. or in containers or tanks that do not require registration but meet the requirements of 62-740.100(2), F.A.C. [62-740.300(2)(a) and (b), F.A.C.]

6. The Permittee shall test and manage all waste residuals after the recovery of product from PCW in accordance with Chapter 62-730, F.A.C., or other applicable rules of the Department [62-740.300(6), F.A.C.].

7. The Permittee shall maintain the following records for a minimum of three years [62-740.300(2)(c), F.A.C.

   a. For each shipment of PCW received.

      (1). Name and address of the PCW producer.

      (2). Name and address of the PCW transporter.

      (3). Date of receipt of the PCW shipment.

      (4). Volume of PCW received.

      (5). A copy of the shipping paper used for shipment of the PCW.

      (6). Have on file written assurances from the producers that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW [62-740.300(4), F.A.C.].

   b. Weekly PCW container or tank inspections as required in 62-740.100(2)(e), F.A.C.

   c. Records to demonstrate that, under normal operating practices, the Facility recovers product from PCW [62-740.300(3), F.A.C.].

8. The Permittee shall submit an annual report covering petroleum contact water (PCW) activities for the previous year by March 1 of each year. The report shall include:

   a. The total quantity of PCW received during the previous calendar year.

   b. An estimate of the total quantity of product recovered from the PCW.

PART IV – TANK AND CONTAINER CONDITIONS

"Tank system", for the purpose of Part IV of this permit, is defined as storage tank(s), appurtenant equipment and secondary containment structures comprising the Permittee's used oil processing facility.

1. The Permittee shall prevent the release of petroleum contact water, used oil, oily waste or oily wastewater to the environment. The secondary containment system shall be maintained in accordance with the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:

   a. All new components shall have secondary containment as required by Parts (b) and (c) of this condition prior to being put into service.

   b. The secondary containment system shall meet the requirements of 40 CFR279.54 and shall be:

      (1). Designed, installed and operated to prevent any migration of waste or accumulated liquid to the soil, groundwater or surface waters.

      (2). Capable of detecting and collecting releases and run-on until the collected material is removed.

      (3). Constructed of, or lined with, materials compatible with the waste to be stored and of sufficient strength to sustain the stresses induced by failure of the primary containment system as well as other stresses that may be induced by the environment.

      (4). Placed on a foundation or base capable of providing support to the secondary containment system.

      (5). Provided with a leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours.

      (6). Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation.

      7). Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.

   c. Ancillary equipment shall be provided with secondary containment.

2. The Permittee shall, in the event of a release:

a. Stop the release;

b. Contain the release;

c. Clean up and manage properly the released waste and other materials; and

d. If necessary, repair or replace any leaking storage containers or tanks prior to returning them to service.

3. The Permittee shall, as part of the general operating requirements:

   a. Not place petroleum contact water, used oil, other wastes or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail;

   b. Use appropriate controls and practices to prevent spills and overflows;

   c. Follow the Operating Procedures described in Attachment II of the permit application; and

   d. Comply with the requirements of 40 CFR 279.54(g) if a leak or spill occurs.

4. The Permittee shall label or mark all above ground tanks and containers used to store or process used oil, with the words "Used Oil". [40 CFR 279.54(f)]

5. The Permittee shall store used oil only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored.

6. If a container holding used oil is not in good condition (e.g. rusting, bulging) or begins to leak, the Permittee shall either over pack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]

7. The Permittee shall inspect all regulated tank systems in accordance with procedures presented in Attachment VIII of the permit application.

8. The Permittee must initiate the removal of spilled or leaked waste from the secondary containment areas within twenty-four hours of the incident and the waste should be completely removed within three (3) days. Accumulated precipitation must be removed from the secondary containment areas within twenty-four hours after a rainfall event. The above materials shall be managed in accordance Attachment VII of the permit application dated October 23, 2008 and revised February 27, 2009.

9. The Permittee shall keep containers closed except when adding or removing waste.

10. To prevent overflow, the Permittee shall notify the Department when the volume of used oil, oily wastewater or PCW stored in any of the permitted tanks exceeds 95% of the maximum storage capacity of the tank.

PART V – NON-HAZARDOUS, NON-USED OIL WASTE CONDITIONS

1. The facility may accept non-hazardous oil-contaminated solid wastes generated from CERCLA sites that do not qualify as used oil, such as petroleum contaminated debris and soil, used oil filters, rags, absorbent pads, boom, air and transmission filters, and kitty litter. The waste will be bulked and/or processed for acceptance at permitted solid waste disposal or processing facilities.

    a. All wastes received at the site for solidification will be received either by drum in the drum storage area or in bulk via vacuum truck into the existing on site mixing chamber, both of which are located in the north warehouse. The mixing chamber will be used for the blending and solidifying of the oil contaminated solid waste. Once the oil contaminated solid waste has been stabilized to meet disposal profiles, the material will be transferred to a sealed roll-off container which will be staged on the bermed concrete slab.

    b. All waste shall be analyzed in accordance with the Analysis Plan, and Attachment IV of the permit application using the appropriate analytical methods as described in Update IV of SW-846. Oil contaminated solid waste determined to be non-hazardous as defined by 40 CFR Part 260-262 may be processed at the facility. Waste that is characterized as being hazardous shall be properly transported to a facility permitted to accept hazardous waste.

    c. Roll-off containers will be used to transport the processed waste to a permitted solid waste disposal facility. The amount of oil-contaminated solid waste on the site shall not exceed 100 55-gallon drums or one 20- to30-cubic yard (CY) roll-off dumpster processed for recycling and disposal. The maximum area of the drum storage area shall not exceed 3600 square ft. No other material (solidifying agent) will be added to the mixture.

    d. Maximum amount of oil-contaminated solid waste to be brought in to the facility shall be 0.73 CY per day or 23 CY per month. The oil contaminated solid waste shall be brought into the facility in the form of approximately 80 to 100 55-gallon drums of material for disposal. .

    e. Roll off containers shall be covered at all times.

PART VI – CLOSURE CONDITIONS

1. The Permittee shall close the facility in compliance with 40 CFR 279.54(h), 62-710.800(5), F.A.C. and Attachment IX, closure plan of the permit application dated October 23, 2008. The closure plan requires at a minimum the following:

    a. Test residue in the tanks. If the residue is hazardous, follow the closure plan in Attachment IX of the permit application dated October 23, 2008.

    b. Remove and properly dispose any non-hazardous residue.

    c. Triple rinse the tanks, piping and ancillary equipment.

    d. Remove the tanks and piping to a scrap steel dealer.

e. Submit a closure report, within 30 days after closing these tanks, that describes the closure process and includes documentation of:

(1). The weight of #1 heavy metal scrap sold.

(2). The weight of other scrap sold, by classification.

(3). The weight of scrap disposed and how disposed.

(4). An inventory of the valves and fittings that were retained for future application.

(5). A statement that the tanks and piping have been completely removed and that everything removed is included in the above listing.

2. The Permittee shall maintain an approved written closure plan and it must demonstrate how the facility will be closed in accordance with Attachment IX of the permit application dated October 23, 2008 and subsequent revisions in order to meet the following requirements that:

a. There will be no need for further Facility maintenance;

b. Used oil will not contaminate soil, surface water or groundwater;

c. All tanks, piping, secondary containment & ancillary equipment will be emptied, cleaned and decontaminated, and all materials removed and managed;

d. Aboveground storage tanks and process tanks and all integral piping will be closed pursuant to Rule 62-762.801, F.A.C.

e. Permittee who store or process used oil in above ground tanks must, pursuant to closure requirements of 40 CFR 279.54(h), remove or decontaminate used oil residues in tanks, contaminated containment system components, contaminated soil, and structures and equipment contaminated with used oil, and manage them as hazardous waste, unless the materials are not hazardous waste as defined in 40 CFR 261 or determined, pursuant to 40 CFR 262.11;

f. The closure plan, as described in Attachment IX of the renewal permit application dated October 23, 2008 shall be updated whenever significant operational changes occur or design changes are made;

g. The closure plan shall be maintained with records required under Rule 62-710.510, F.A.C.

h. The Permittee shall submit an updated and detailed plan to the Department at least 60 days prior to the schedule date of closing the Facility; and

i. The Permittee shall submit a certification of closure completion to the Department that demonstrates that the Facility was closed in substantial compliance with the approved closure plan, within 30 days after closing the Facility.

3. Within 90 days of determining that the Facility cannot be clean closed under this permit, the Permittee shall submit a permit application to close the tank system(s) and perform post-closure care in accordance with the closure and post-closure requirements of 40 CFR 264.310 that apply to hazardous waste landfills.

4. Containers: Permittee who store used oil in containers must, pursuant to closure requirements of 40 CFR 279.54(h), comply with the following requirements:

   a. At closure, containers holding used oil or residues of used oil must be removed from the site; and

   b. The Permittee must remove or decontaminate used oil residues, contaminated containment system components, contaminated soils, and structures or equipment contaminated with used oil, and manage them as hazardous waste unless the materials are not hazardous waste as defined in 40 CFR 261 or determined, pursuant to 40 CFR 262.11.

Issued January 26, 2010

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Charles F. Goddard, Chief
Bureau of Solid and Hazardous Waste

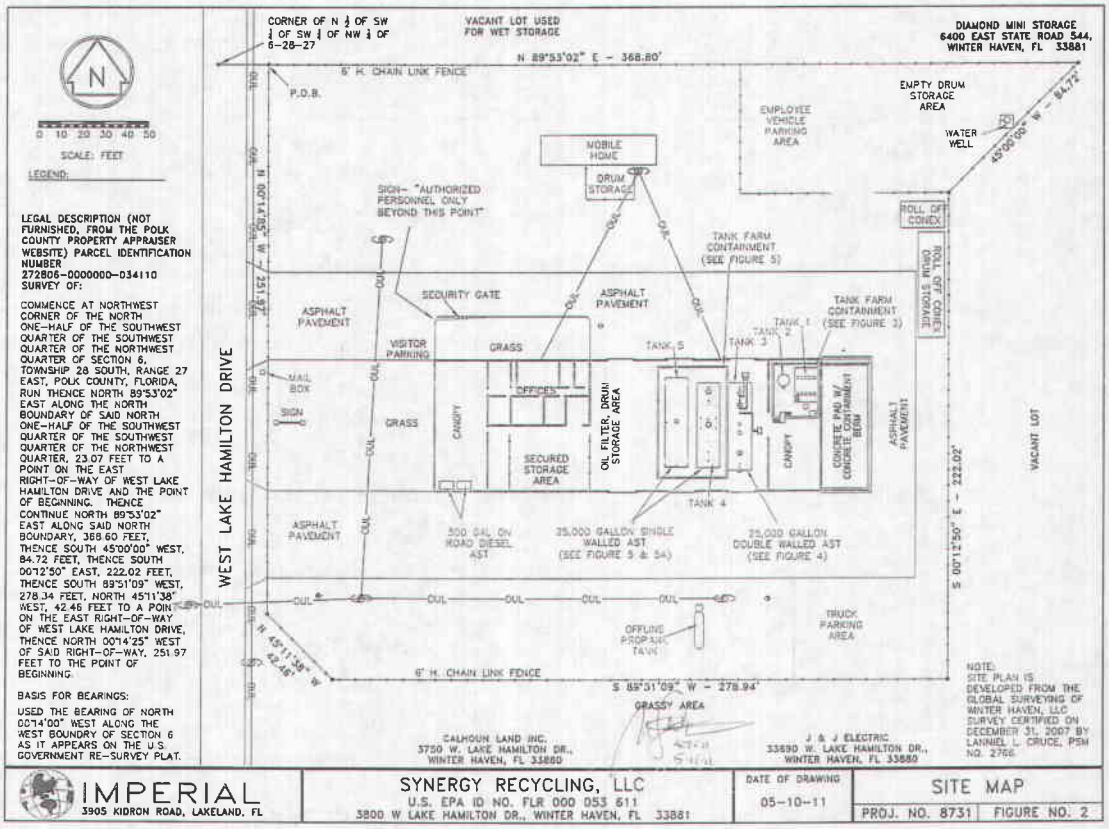
FILING AND ACKNOWLEDGMENT

Filed on this date, pursuant to Section 120.52, Florida Statutes, with the designated Clerk, receipt of which is acknowledged.

CLERK

January 26, 2010
DATE

ATTACHMENT-A
SITE MAP



ATTACHMENT-B
TANK TABLE

Tank Number	Tank Capacity gallons	Tank Contents
1	10,000	Oily Water, Used Oil
2	1,500	Used Oil, Oily Water or Spent Antifreeze
3-a	18,000	Used Oil
3-b	3,500	Used Oil, Oily Water, Spent Antifreeze
3-c	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 and 5 shall be placed into service upon FDEP approval of the Used Oil Permit Modification.

Synergy Recycling LLC

A Refined Solution to Environmental Services

March 14, 2011

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

RE: Synergy Recycling of Central Florida, LLC
US EPA I.d. No. FLR 00 053 661; FDEP Permit No. 292753-HO-003
Initial Used Oil Processing Permit Application, Revision 1

Dear Mr. Kothur:

Please find attached two copies of the application to modify the referenced permit and a $500 check. Synergy Recycling proposes to add two 25,000-gallon ASTs. Excerpts of Attachments with changes from the initial application are also attached. Please do not hesitate to contact us for any questions. Please do not hesitate to contact us for any questions.

Respectfully,

Synergy Recycling of Central Florida LLC

Garry R. Allen
Operating Partner

Attachments
Changes to Attachments I, II. VII, VIII, and IX

cc: Project File No. 8731

3800 Lake Hamilton Drive W. • Winter Haven, FL 33881 • (863) 419-0556 • Fax (863) 419-0126

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

Prepared for:
MR. GARRY R. ALLEN
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

March 2011

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New X Renewal _____ Modification ____ **Date old permit expires** _____

2. Revision number 0

3. NOTE: Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:
   - ____ generators (Subpart C)
   - X transporters (Subpart E)
   - ____ burners of off-spec used oil (Subpart G)
   - X marketers (Subpart H)

   or
   - ____ are disposing of used oil (Subpart I)

4. Date current operation began: 1984

5. Facility name: Synergy Recycling of Central Florida, LLC

6. EPA identification number: FLR 000 053 611

7. Facility location or street address: 3800 West Lake Hamilton Dr Winter Haven, FL

8. Facility mailing address: 3800 West Lake Hamilton Drive, Winter Haven, FL 33881
   Street or P.O. Box City State Zip Code

9. Contact person: Garry R. Allen Telephone: (863) 419 0556
   Title: Operating Partner
   Mailing Address:
   Same
   Street or P.O. Box City State Zip Code

10. Operator's name: Same Telephone: (__)_____
    Mailing Address:
    Street or P.O. Box City State Zip Code

11. Facility owner's name: Same Telephone: (__)_____
    Mailing Address:
    Street or P.O. Box City State Zip Code

12. Legal structure:
    - X corporation (indicate state of incorporation) Georgia
    - ____ individual (list name and address of each owner in spaces provided below)
    - ____ partnership (list name and address of each owner in spaces provided below)
    - ____ other, e.g. government (please specify) _____

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New____ Renewal ____ Modification X **Date old permit expires** 1/26/2015

2. Revision number 1

3. NOTE: Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:

____ generators (Subpart C)
X transporters (Subpart E)
____ burners of off-spec used oil (Subpart G)
X marketers (Subpart H)
or
____ are disposing of used oil (Subpart I)

4. Date current operation began: 1984

5. Facility name: Synergy Recycling of Central Florida, LLC

6. EPA identification number: FLR 000 053 611

7. Facility location or street address: 3800 West Lake Hamilton Dr., Winter Haven, FL

8. Facility mailing address:
3800 West Lake Hamilton Drive, Winter Haven, FL 33881
Street or P.O. Box City State Zip Code

9. Contact person: Garry R. Allen Telephone: 863 419 0556
Title: Operating Partner
Mailing Address:
Same
Street or P.O. Box City State Zip Code

10. Operator's name: Same Telephone: (__)____
Mailing Address:
Street or P.O. Box City State Zip Code

11 Facility owner's name: Same Telephone: (__)____
Mailing Address:
Street or P.O. Box City State Zip Code

12 Legal structure:
X corporation (indicate state of incorporation) Georgia
____ individual (list name and address of each owner in spaces provided below)
____ partnership (list name and address of each owner in spaces provided below)
____ other, e.g. government (please specify) ____

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County _____ State _____

Name: NA
Mailing Address:
Street or P.O. Box City State Zip Code

Name: NA
Mailing Address:
Street or P.O. Box City State Zip Code

Name: NA
Mailing Address:
Street or P.O. Box City State Zip Code

Name: NA
Mailing Address:
Street or P.O. Box City State Zip Code

13 Site ownership status: [X]owned [ ]to be purchased [ ]to be leased ____ years
[ ]presently leased; the expiration date of the lease is: _____

If leased, indicate:
Land owner's name: NA
Mailing Address:
Street or P.O. Box City State Zip Code

14 Name of professional engineer Michael H. Stillinger Registration No. 47011
Mailing Address:
3905 Kidron Road, Lakeland, FL 33811
Street or P.O. Box City State Zip Code
Associated with: _____

B. SITE INFORMATION

1. Facility location:
County: Polk
Nearest community: Winter Haven
Latitude: 28°09'42" Longitude: 81°39'39"
Section: 6 Township: 28 South Range: 27 East
UTM # ____/____/____/____

2. Facility size (area in acres): 2.03

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

Attachment I

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) 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 II

4. Attach 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 4, page 4).

   The facility's detailed process description is labeled as Attachment III

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):
   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 Attachment IV

   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 V.

   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 VI.

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 6, page 5).

   The preparedness and prevention plan is labeled as Attachment VII.

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 modifiying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

   The contingency plan is labeled as Attachment VII.

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 VIII.

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 9, pages 6 and 7).

   The closure plan is labeled as Attachment IX

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 10, page 7).

    A description of employee training is labeled as Attachment X

DEP Form#	62-710.901(6)(a)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: Synergy Recycling of Central Florida, LLC EPA ID# FLR 000 053 611

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 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*

Garry R. Allen, Operating Partner
Name and Title (Please type or print)

Date: 3-17-11 Telephone: (863) 419-0556

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(b)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: Synergy Recycling of Central Florida, LLC EPA ID# FLR 000 053 611

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 Facility Owner or Authorized Representative*

Garry R. Allen, Operating Partner
Name and Title (Please type or print)

Date: 3/17/11 Telephone: (863) 419-0556

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(c)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: Synergy Recycling of Central Florida, LLC EPA ID# FLR 000053611

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 Land Owner or Authorized Representative*

Garry R. Allen, Operating Partner
Name and Title (Please type or print)

Date: 3/17/11 Telephone: (863) 419-0556

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) 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 form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container 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 for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification 4 Recertification

1. DEP Facility ID Number: FLR 000 053 611 2. Tank Numbers: See Attached

3. Facility Name: Synergy Recycling of Central Florida, LLC

4. Facility Address: 3800 West Lake Hamilton Drive, Winter Haven, FL 33881

This is to certify that the engineering features of this used oil 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 constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature

Michael H. Stillinger

Name (please type)

Florida Registration Number: 47011

Mailing Address: 3905 Kidron Road

Street or P. O. Box

Lakeland FL 33811

City State Zip

Date: 3/14/11 Telephone 8636472877

[PLEASE AFFIX SEAL]

ATTACHMENT B
TANK TABLE

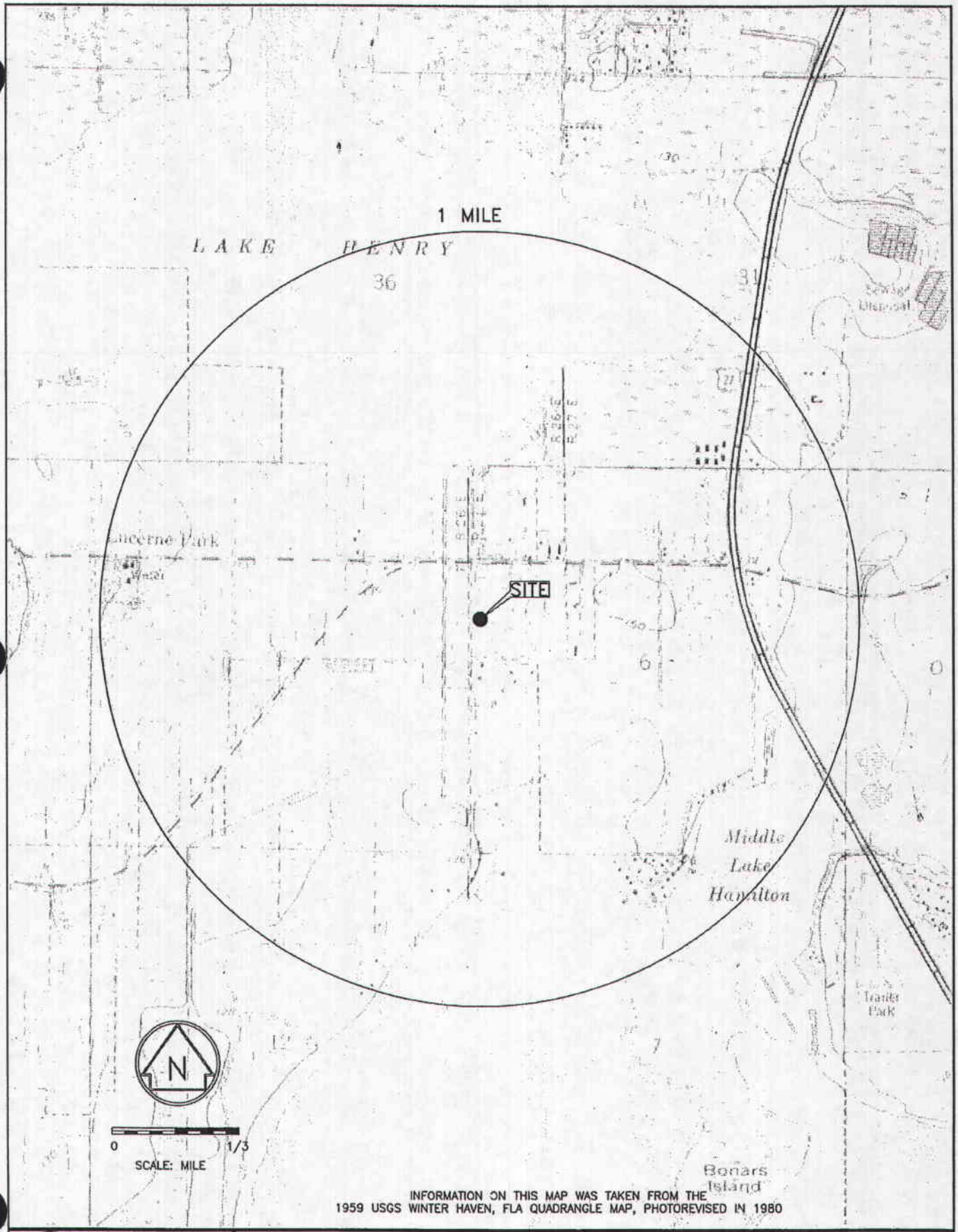
Tank Number	Tank Capacity gallons	Tank Contents
1	10,000	Oily Water, Used Oil
2	1,500	Oily Water, Used Oil or Spent Antifreeze
3-a	18,000	Used Oil
3-b	3,500	Used Oil, Oily Water, Spent Antifreeze
3-c	3,500	Used Oil, Oily Water, Spent Antifreeze
4	25,000	Used Oil
5	25,000	Used Oil

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 and 5 shall be placed into service upon FDEP approval of the Used Oil Permit Modification.

Attachment I

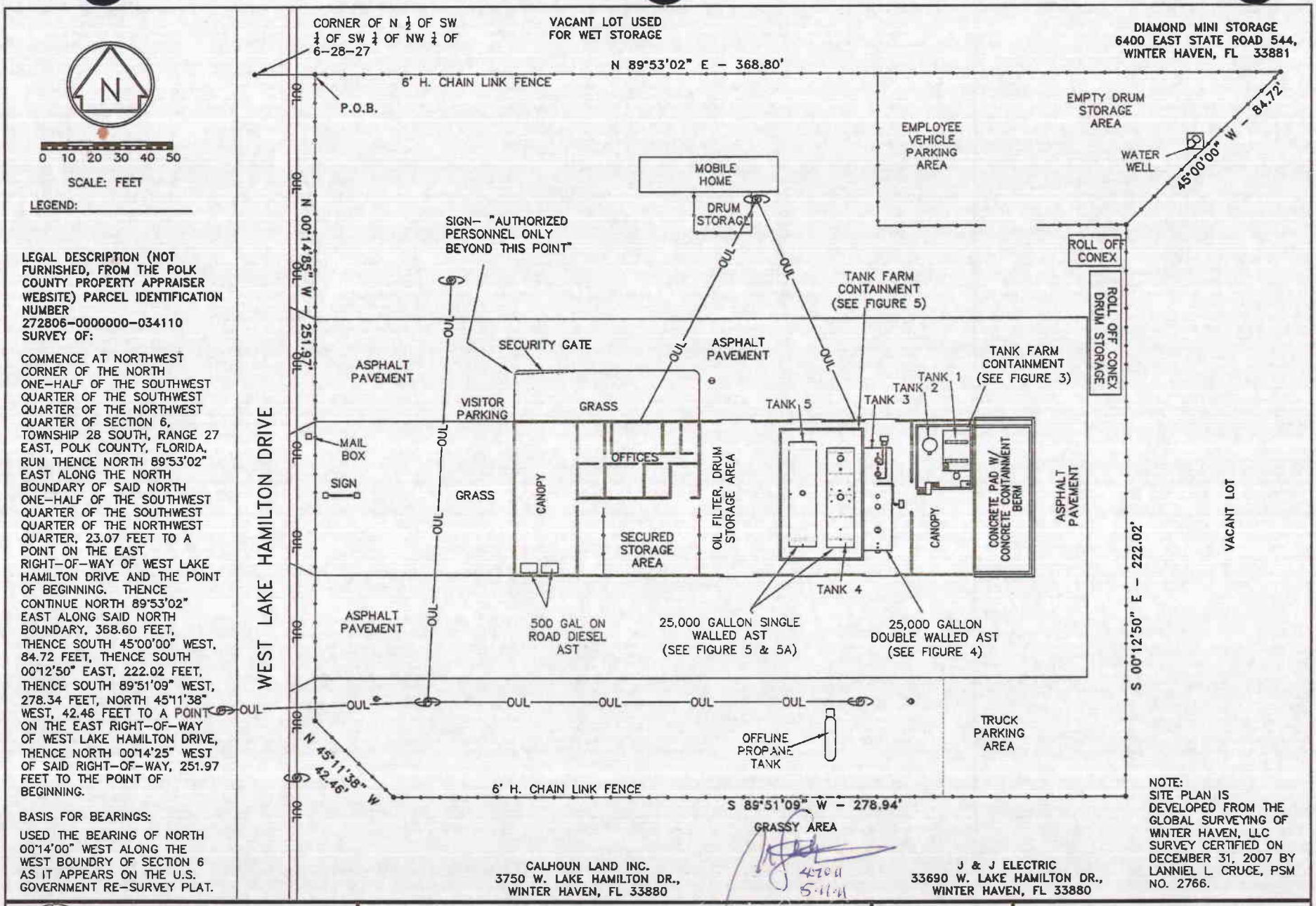
Facility Figures and Illustrations

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).



INFORMATION ON THIS MAP WAS TAKEN FROM THE 1959 USGS WINTER HAVEN, FLA QUADRANGLE MAP, PHOTOREVISED IN 1980

IMPERIAL 3905 KIDRON ROAD LAKELAND FL 33811	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W. LAKE HAMILTON DR. WINTER HAVEN, FL 33881	DATE OF DRAWING 11-3-10	VICINITY MAP PROJ. NO. 8731 | FIGURE NO. 1



LEGAL DESCRIPTION (NOT FURNISHED, FROM THE POLK COUNTY PROPERTY APPRAISER WEBSITE) PARCEL IDENTIFICATION NUMBER 272806-0000000-034110 SURVEY OF:

COMMENCE AT NORTHWEST CORNER OF THE NORTH ONE-HALF OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 6, TOWNSHIP 28 SOUTH, RANGE 27 EAST, POLK COUNTY, FLORIDA, RUN THENCE NORTH 89°53'02" EAST ALONG THE NORTH BOUNDARY OF SAID NORTH ONE-HALF OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER, 23.07 FEET TO A POINT ON THE EAST RIGHT-OF-WAY OF WEST LAKE HAMILTON DRIVE AND THE POINT OF BEGINNING. THENCE CONTINUE NORTH 89°53'02" EAST ALONG SAID NORTH BOUNDARY, 368.60 FEET, THENCE SOUTH 45°00'00" WEST, 84.72 FEET, THENCE SOUTH 00°12'50" EAST, 222.02 FEET, THENCE SOUTH 89°51'09" WEST, 278.34 FEET, NORTH 45°11'38" WEST, 42.46 FEET TO A POINT ON THE EAST RIGHT-OF-WAY OF WEST LAKE HAMILTON DRIVE, THENCE NORTH 00°14'25" WEST OF SAID RIGHT-OF-WAY, 251.97 FEET TO THE POINT OF BEGINNING.

BASIS FOR BEARINGS:

USED THE BEARING OF NORTH 00°14'00" WEST ALONG THE WEST BOUNDRY OF SECTION 6 AS IT APPEARS ON THE U.S. GOVERNMENT RE-SURVEY PLAT.

NOTE:
SITE PLAN IS DEVELOPED FROM THE GLOBAL SURVEYING OF WINTER HAVEN, LLC SURVEY CERTIFIED ON DECEMBER 31, 2007 BY LANNIEL L. CRUCE, PSM NO. 2766.

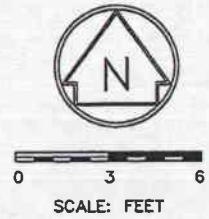
IMPERIAL
3905 KIDRON ROAD, LAKELAND, FL

SYNERGY RECYCLING, LLC
U.S. EPA ID NO. FLR 000 053 611
3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881

DATE OF DRAWING
05-10-11

SITE MAP

PROJ. NO. 8731 | FIGURE NO. 2



CONTAINMENT VOLUME: 20.08' x 24.08' X 3.67' X 7.48 GAL/CF. = 13,226 GALLONS

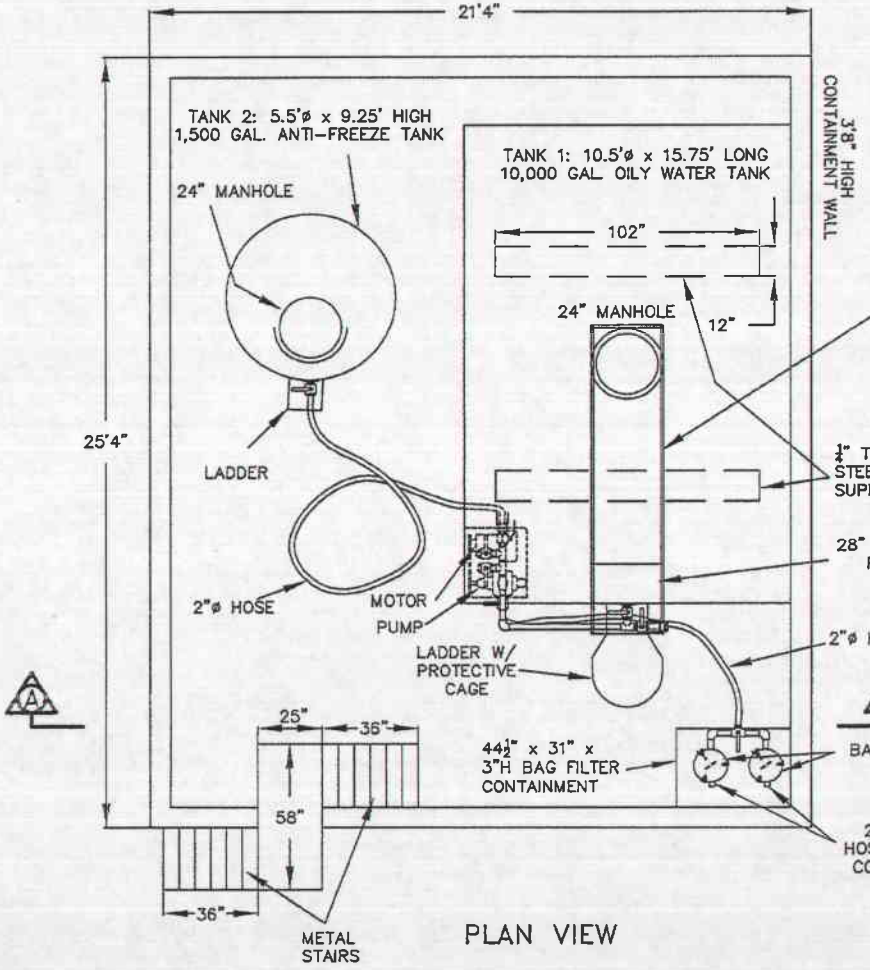
TAKE OUT VOLUME:
ANTIFREEZE TANK: PI/4(5.5)(5.5)(3.67)(7.48) = 652 GALLONS DISPLACED

OILY WATER TANK: (15.75)(0.5)[(10.5/2)^2] [2 (ARCCOS{[10.5/2) – (3.67–2)]/(10.5/2)} – SIN [2(ARCCOS {[(10.5/2) – (3.67–2)] / (10.5/2)}]] x (7.48) = 1,041 GALLONS DISPLACED

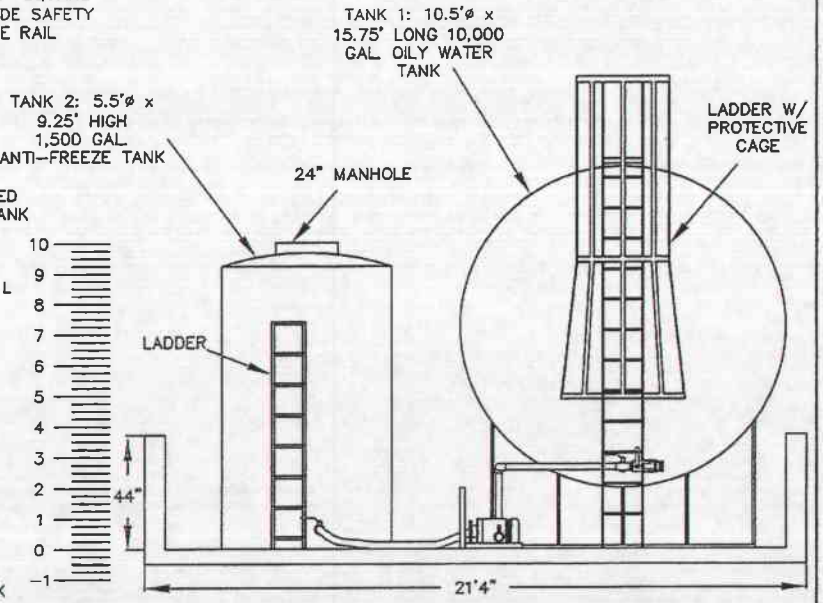
AVAILABLE VOLUME = 13,266 – [652+1041] = 11,573 GALLONS
CONTAINMENT VOLUME REQUIRED: 10,000 x 1.1 = 11,000 GALLONS; HAVE 573 GALLONS SURPLUS

NOTE: CONTAINMENT VOLUME REQUIRED IS 110% OF LARGEST TANK VOLUME IN CONTAINMENT STRUCTURE

NOTE: UPON RECEIPT OF FDEP's USED OIL PROCESSING PERMIT THE 10,000 GALLON TANK SHALL ALSO INTERMITTENTLY CONTAIN USED OIL.

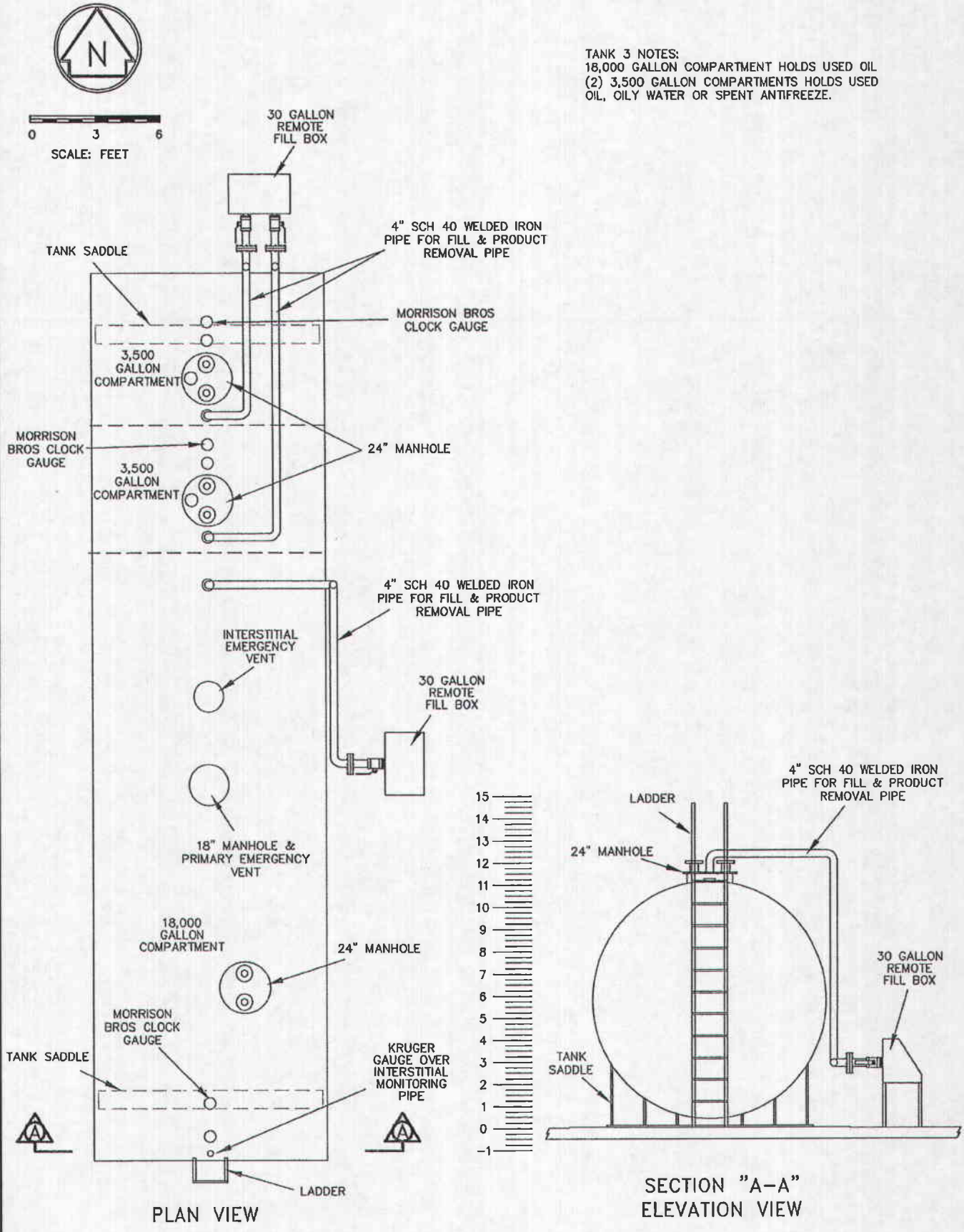


PLAN VIEW

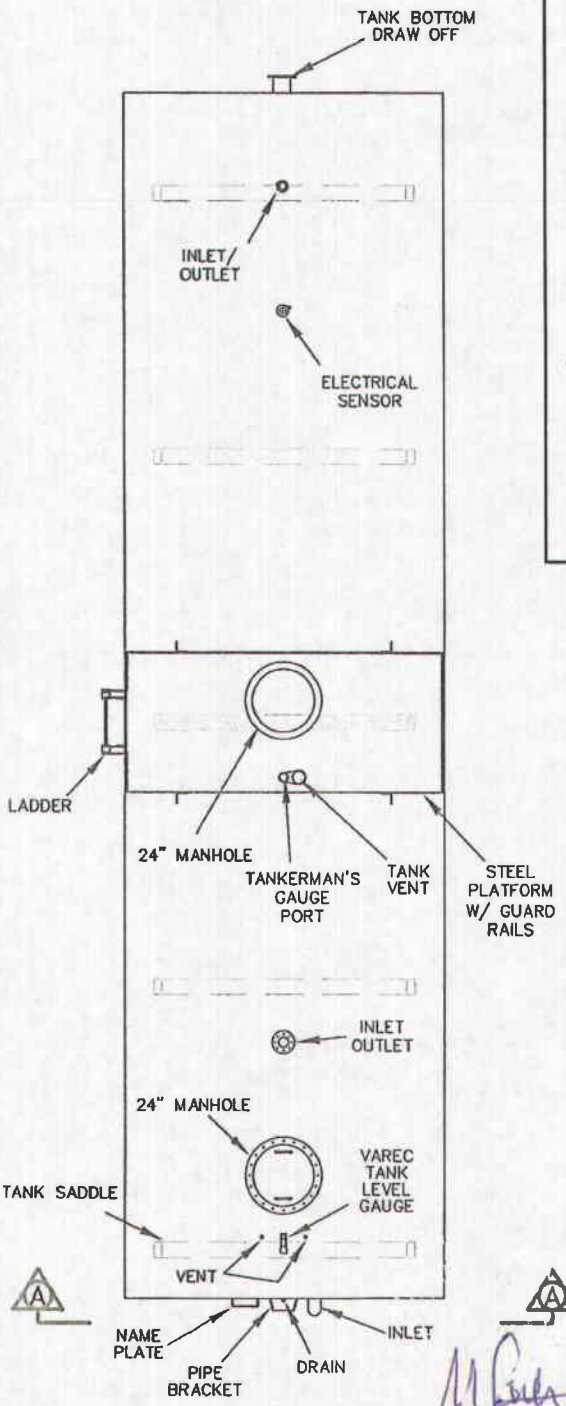


SECTION "A–A"
ELEVATION VIEW

IMPERIAL 3905 KIDRON ROAD, LAKELAND, FL	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W. LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05-10-11	TANK FARM CONTAINMENT DETAILS PROJ. NO. 8731 | FIGURE NO. 3

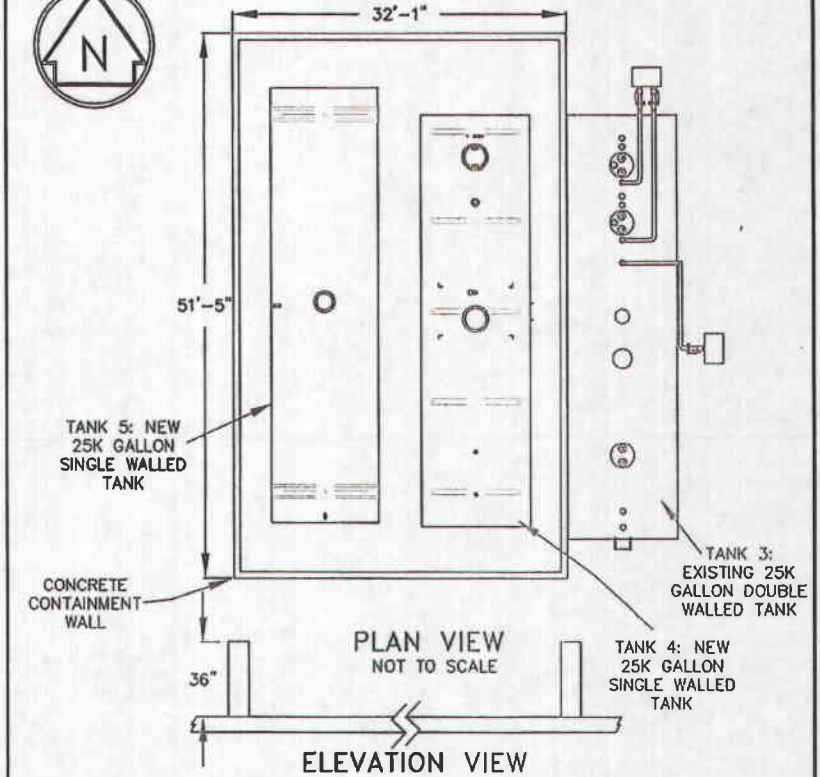


IMPERIAL 3905 KIDRON ROAD LAKELAND FL 33811	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W. LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05-10-11	DOUBLE WALLED TANK 3 CONTAINMENT DETAILS PROJ. NO. 8731 | FIGURE NO. 4



TANK 4
PLAN VIEW

TANK FARM CONTAINMENT DETAIL

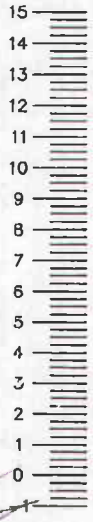


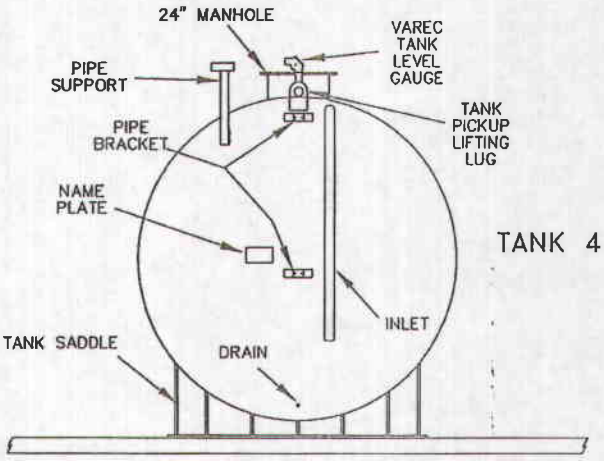
CONTAINMENT VOLUME: 30.83'x50.17'x3'x7.48 GAL/CF = 34.709 GALLONS

TAKE OUT VOLUME:
NEW SINGLE WALLED TANK: (41)(0.5) [10.33/2)^2]x[2 (ARCCOS[[(10.33/2 – (3–0.47)/(10.33/2))]} –SIN [2(ARCCOS{[(10.33/2) – (3–0.47))/(10.33/2)x(7.48)= 4,885 GALLONS DISPLACED

AVAILABLE VOLUME= 34,703 – 4,885 = 29,824 GALLONS

DESIGN CONTAINMENT STRUCTURE FOR FUTURE 25,000 GALLON AST:
CONTAINMENT VOLUME REQUIRED: 25,000 X 1.1 = 27,500 GALLONS
HAVE 2,324 GALLONS SURPLUS

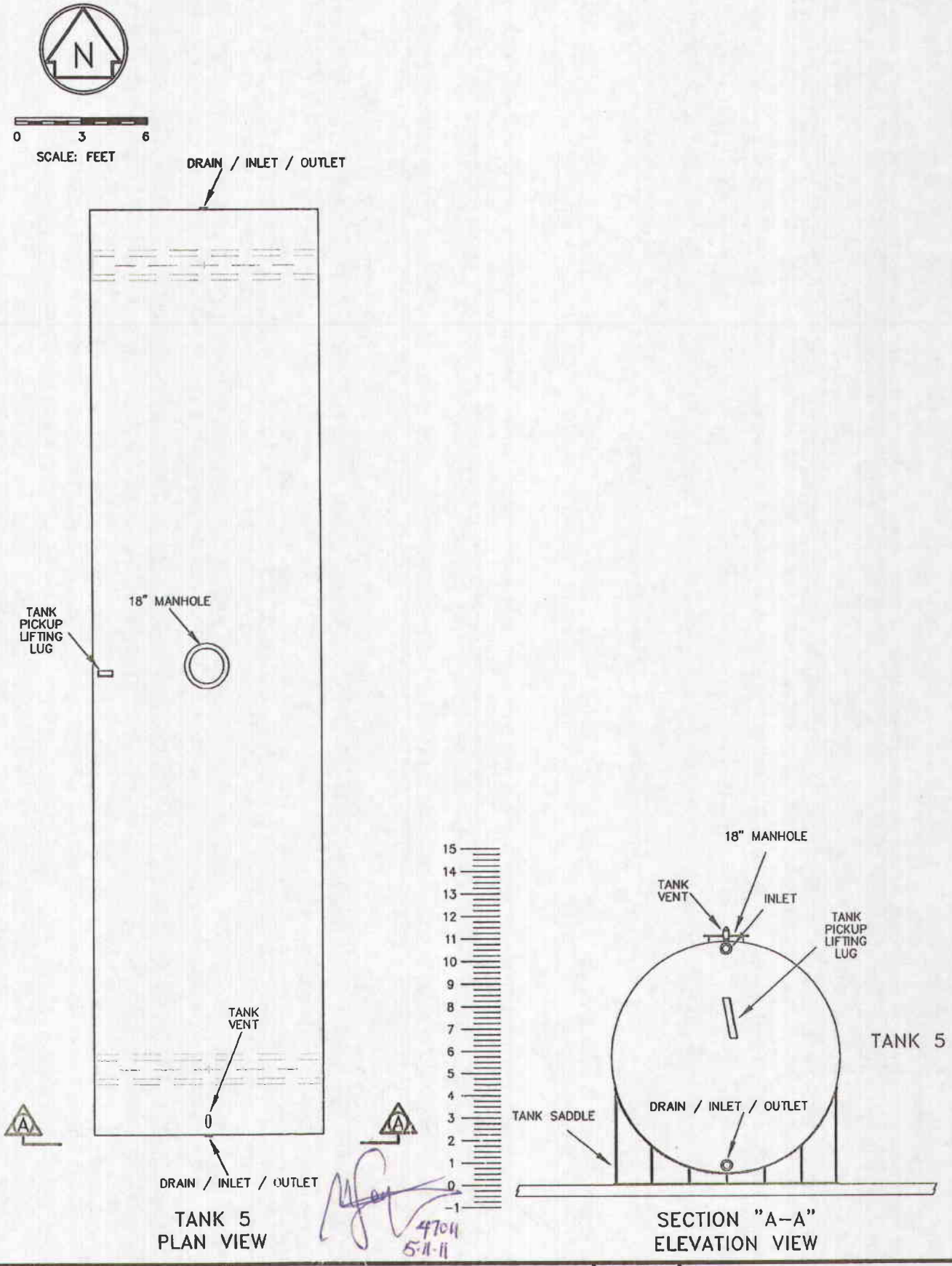




TANK 4

SECTION "A–A"
ELEVATION VIEW

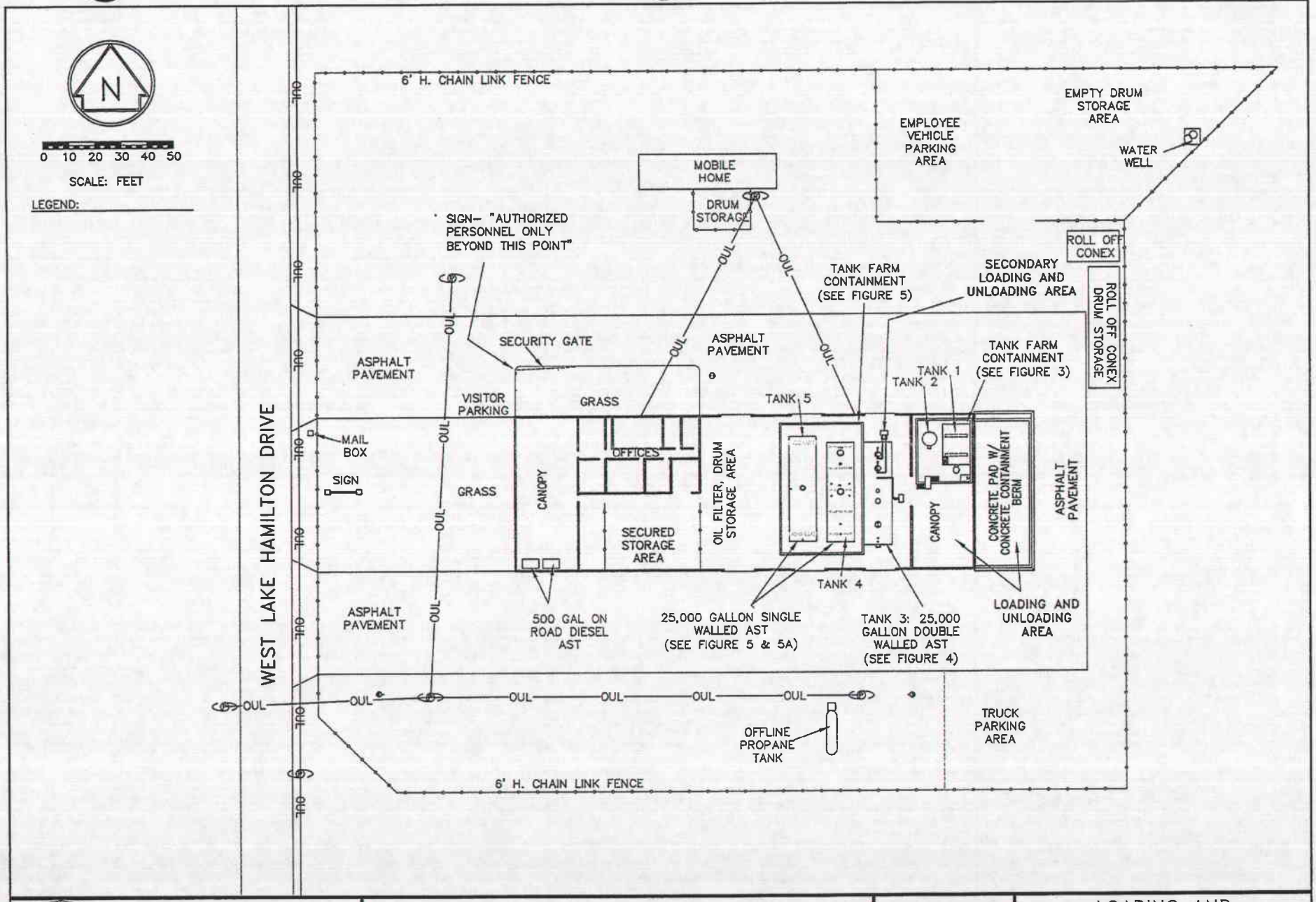
IMPERIAL 3905 KIDRON ROAD LAKELAND FL 33811	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W. LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05–10–11	SINGLE WALLED TANK CONTAINMENT DETAILS PROJ. NO. 8731 | FIGURE NO. 5



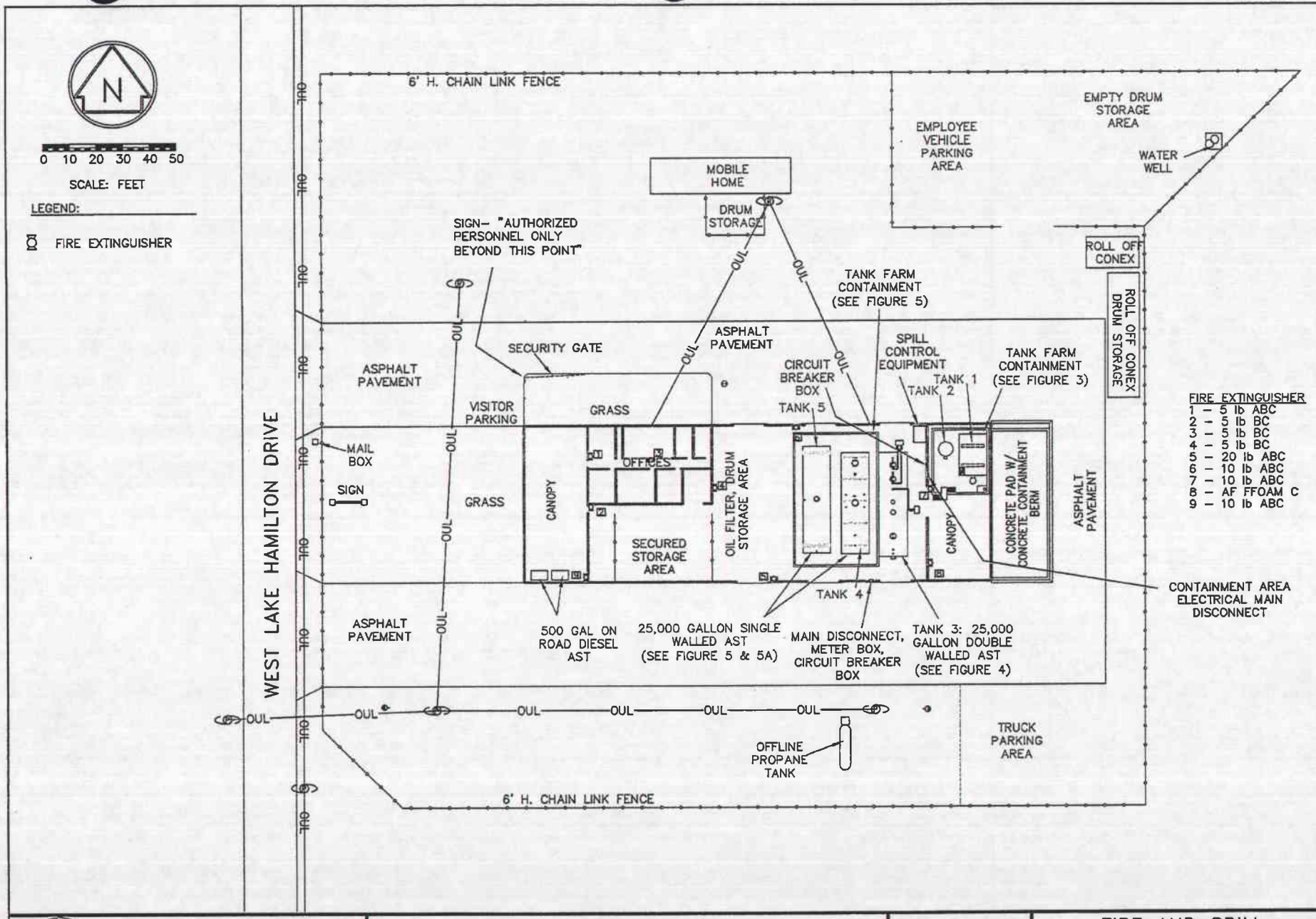
TANK 5
PLAN VIEW

SECTION "A-A"
ELEVATION VIEW

IMPERIAL 3905 KIDRON ROAD LAKELAND FL 33811	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W. LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05-10-11	SINGLE WALLED TANK CONTAINMENT DETAILS PROJ. NO. 8731 | FIGURE NO. 5A



IMPERIAL 3905 KIDRON ROAD, LAKELAND, FL	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05-10-11	LOADING AND UNLOADING AREA PROJ. NO. 8731 | FIGURE NO. 6

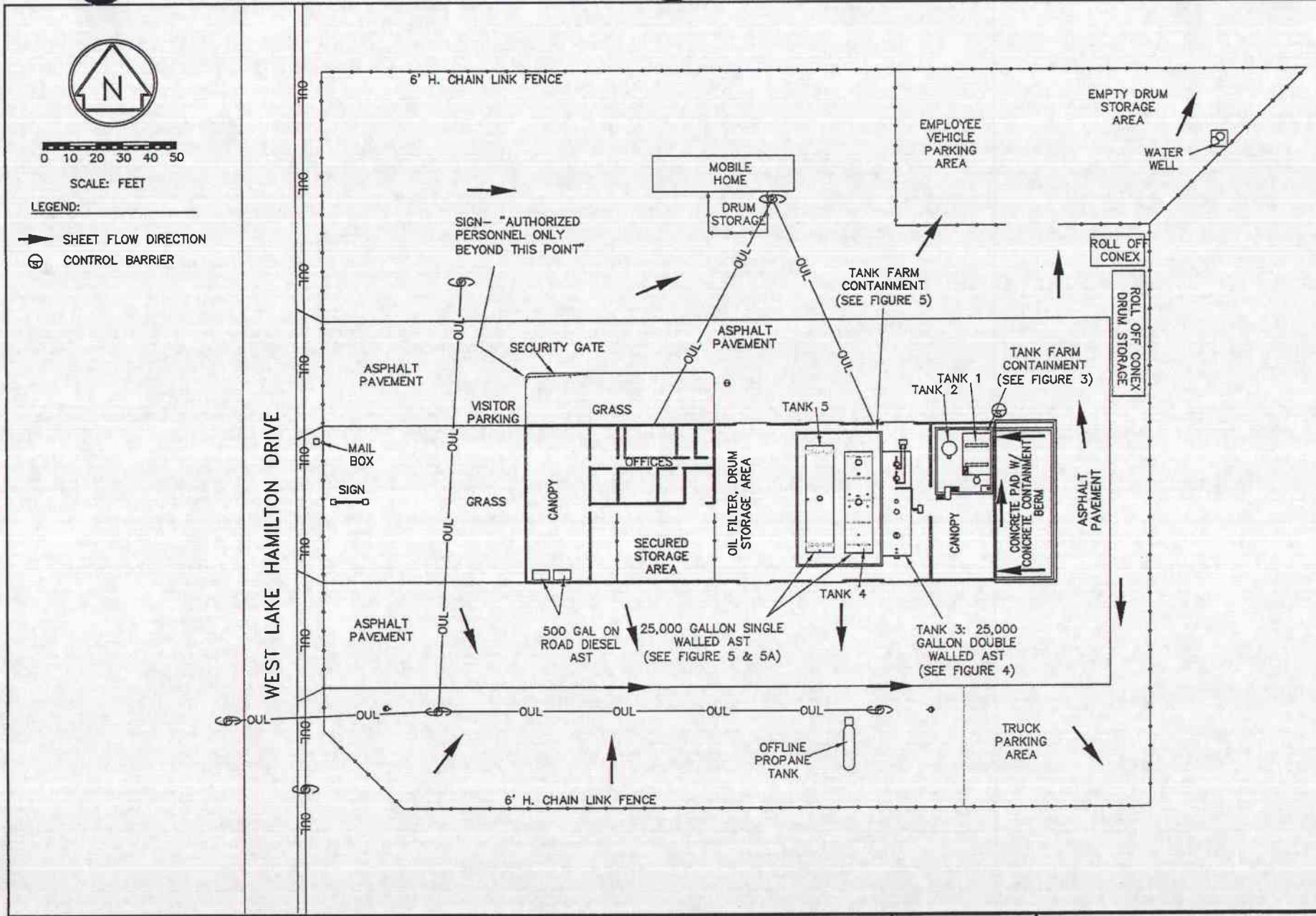


IMPERIAL
3905 KIDRON ROAD, LAKELAND, FL

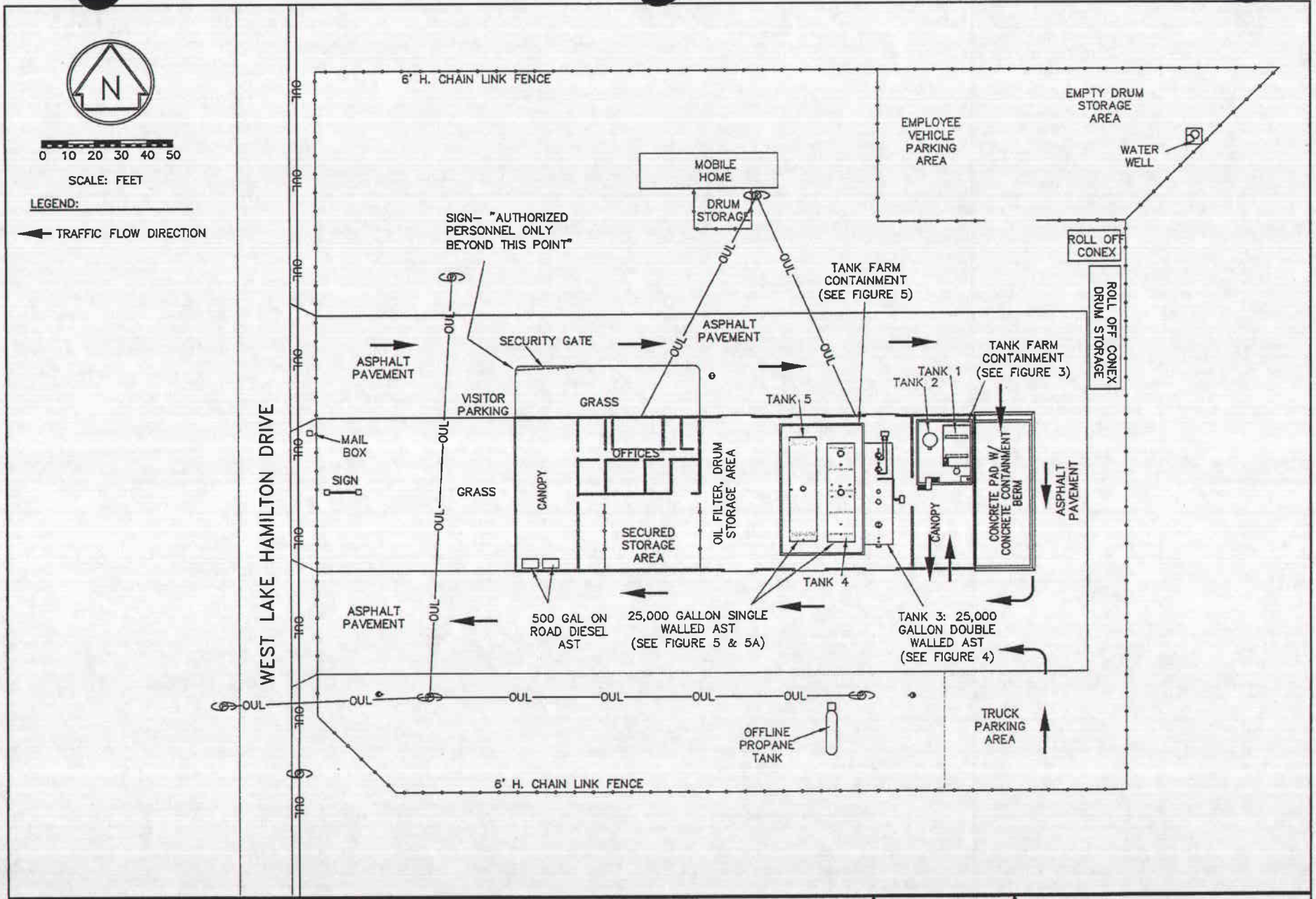
SYNERGY RECYCLING, LLC
U.S. EPA ID NO. FLR 000 053 611
3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881

DATE OF DRAWING
05-10-11

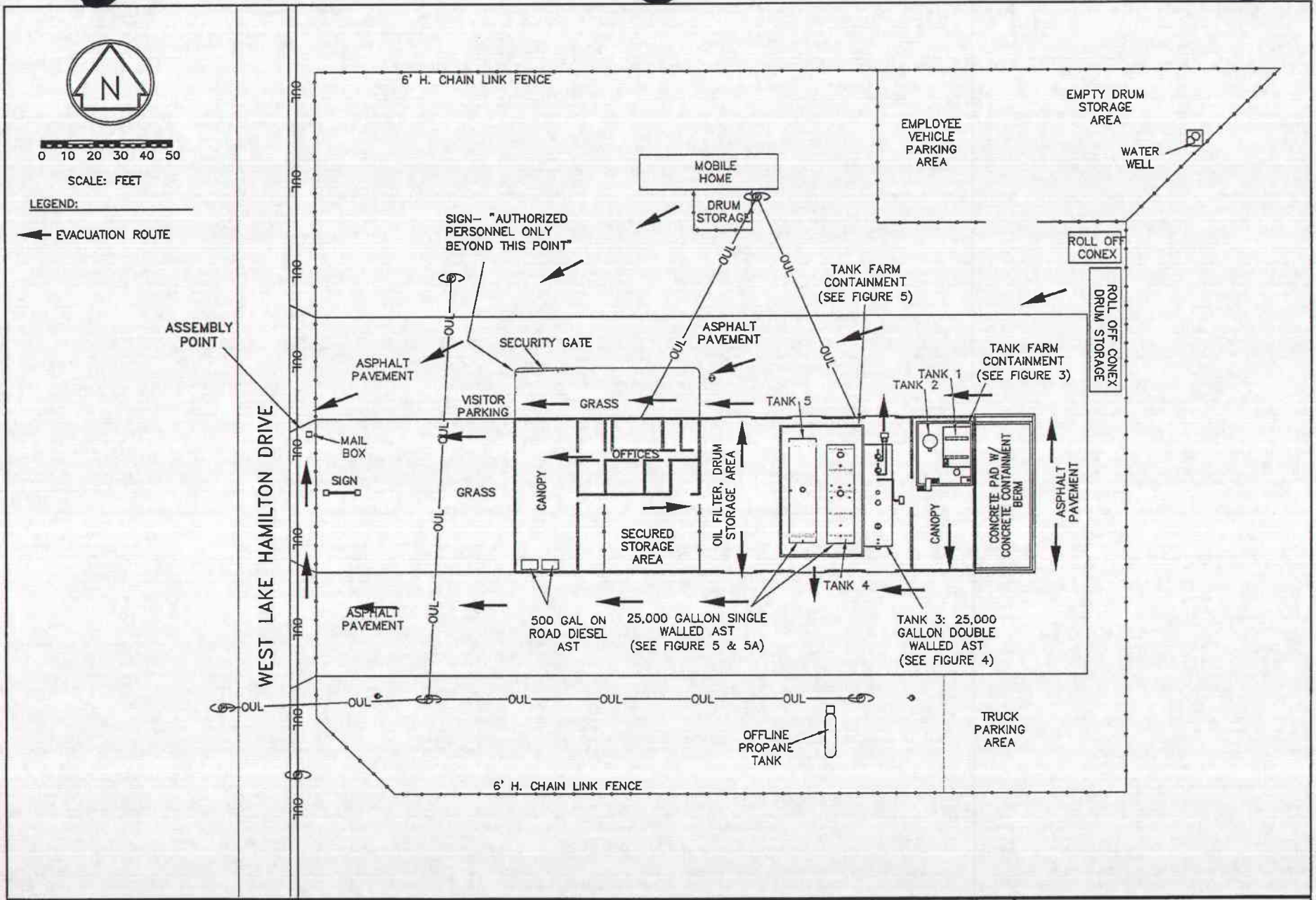
FIRE AND SPILL CONTROL EQUIPMENT
PROJ. NO. 8731 | FIGURE NO. 7



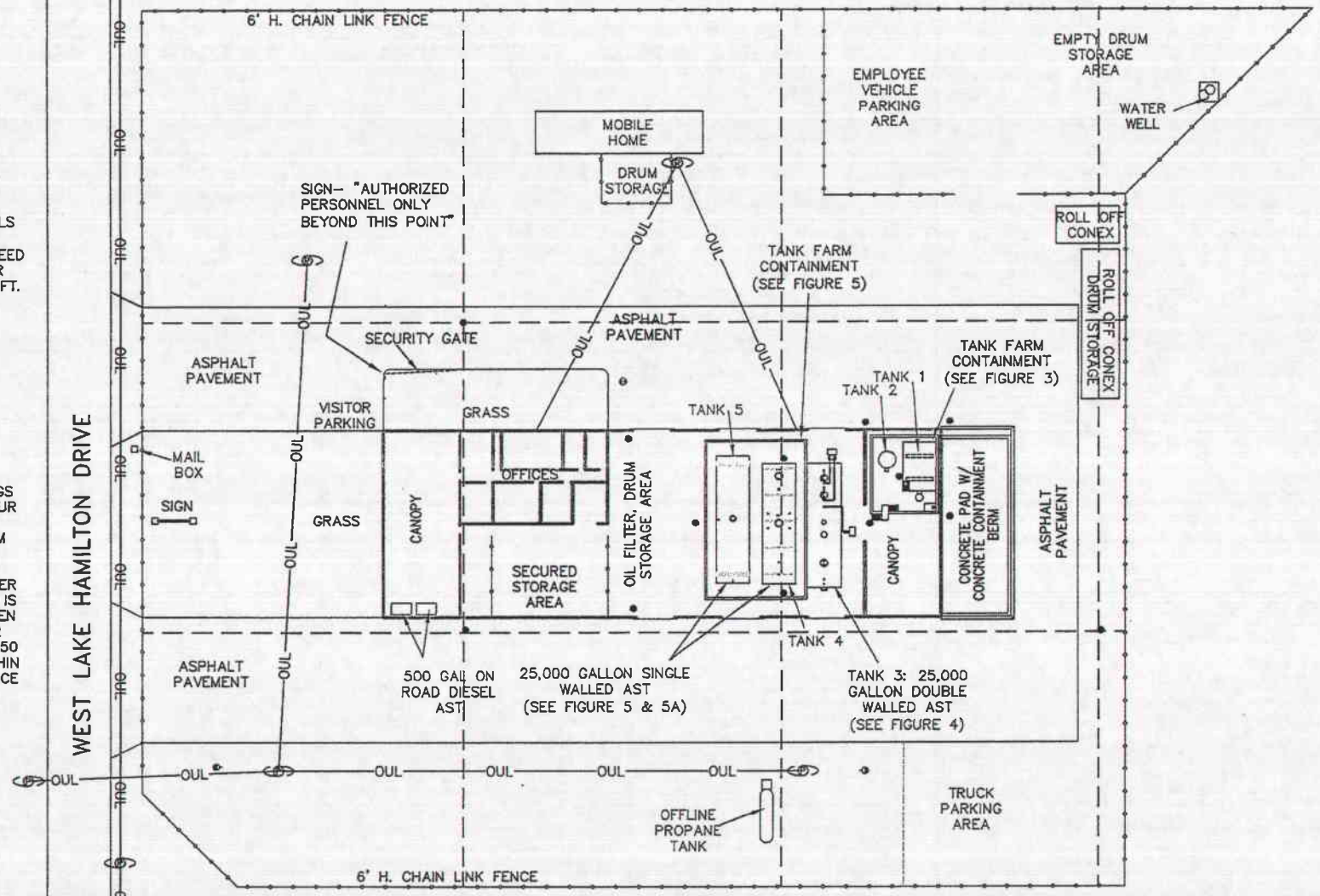
IMPERIAL 3905 KIDRON ROAD, LAKELAND, FL	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05-10-11	STORMWATER DRAINAGE PROJ. NO. 8731 | FIGURE NO. 8



IMPERIAL 3905 KIDRON ROAD, LAKELAND, FL	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05-10-11	TRAFFIC FLOW PROJ. NO. 8731 | FIGURE NO. 9



IMPERIAL 3905 KIDRON ROAD, LAKELAND, FL	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 05-10-11	EVACUATION ROUTES PROJ. NO. 8731 | FIGURE NO. 10

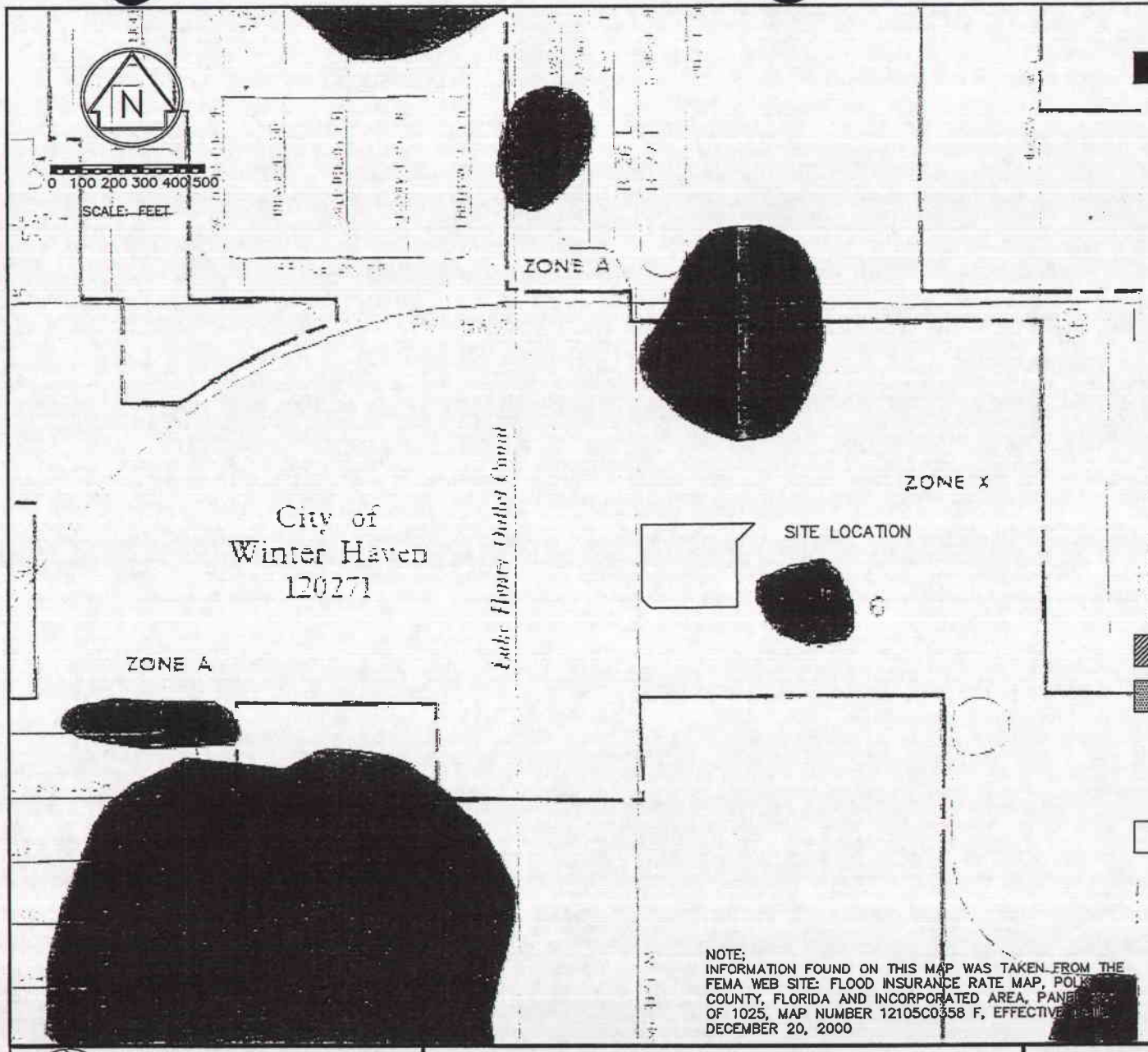


IMPERIAL
3905 KIDRON ROAD, LAKELAND, FL

SYNERGY RECYCLING, LLC
U.S. EPA ID NO. FLR 000 053 611
3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881

DATE OF DRAWING
05-10-11

CLOSURE PLAN
PROJ. NO. 8731 | FIGURE NO. 12



SPECIAL FLOOD HAZARD AREAS INUNDATED BY 100-YEAR FLOOD

ZONE A — NOE BASE FLOOD ELEVATION DETERMINED.

ZONE AE — BASE FLOOD ELEVATION DETERMINED.

ZONE AH — FLOOD DEPTHS OF 1 TO 3 FEET (USUALLY AREAS OF PONDING); BASE FLOOD ELEVATION DETERMINED.

ZONE AO — FLOOF DEPTHS OF 1 TO 3 FETT (USUALLY SHEET FLOW ON SLOPING TERRAIN); AVERAGE DEPTHS DETERMINED. FOR AREAS OF ALLUVIAL FAN FLOODING, VELOCITIES ALSO DETERMINED.

ZONE A99 — TO BE PROTECTED FROM 100-YEAR FLOOD BY FEDERAL FLOOD PROTECTION SYSTEM UNDER CONSTRUCTION; NO BASE FLOOD ELEVATION DETERMINED.

ZONE V — COASTAL FLOOD WITH VELOCITY HAZARD (WAVE ACTION); NO BASE FLOOD ELEVATION DETERMINED.

ZONE VE — COSTAL FLOOD WITH VELOCITY HAXARD (WAVE ACTION); BASE FLOOD ELEVATION DETERMINED.

FLOOD AREA IN ZONE AE

OTHER FLOOD AREAS

ZONE X — AREAS OF 500-YEAR FLOOD; AREAS OF 100-YEAR FLOOD WITH AVERAGE DEPTHS OF LESS THAN 1 FOOT OR WITH DRAINAGE AREAS LESS THAN 1 SQUARE MILE; AND AREAS PROTECTED BY LEVEES FROM 100-YEAR FLOOD.

OTHER AREAS

ZONE X — AREAS DETERMINED TO BE OUTSIDE 500-YEAR FLOODPLAIN

ZONE D — AREAS IN WHICH FLOOD HAZARDS ARE UNDETERMINED, BUT POSSILE

City of Winter Haven
120271

IMPERIAL 3905 KIDRON ROAD, LAKELAND, FL	SYNERGY RECYCLING, LLC U.S. EPA ID NO. FLR 000 053 611 3800 W. LAKE HAMILTON DR., WINTER HAVEN, FL 33881	DATE OF DRAWING 11-3-10	FLOOD INSURANCE RATE MAP PROJ. NO. 8731 | FIGURE NO. 11

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 (Tank3), 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 shall be placed into service upon

Attachment II

Facility Operation

FDEP approval of the Used Oil Permit Modification. 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

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.

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

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, who 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. Thankfully, the USEPA is sensitive to not placing an economic burden on the generator for testing a small quantity.

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 three 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.

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 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.

Attachment IV (continued)

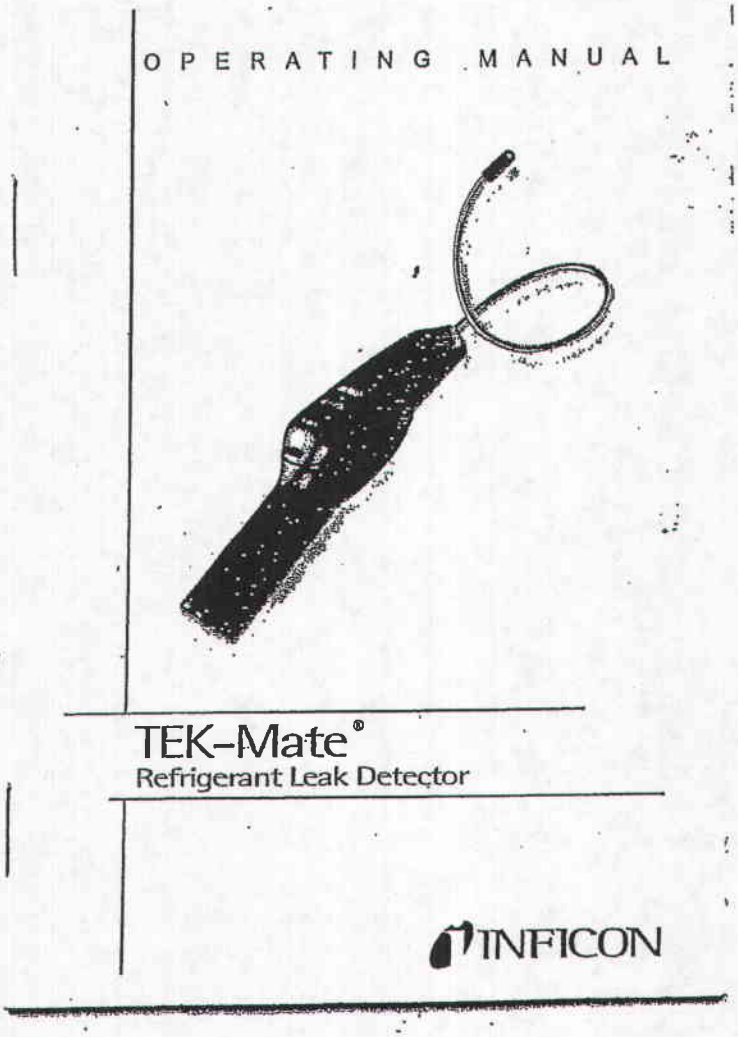
Analysis Plan (continued)

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

The "Sniffer"
(Inficon TEK-Mate Refrigerant Leak Detector)

Manufacturer's Equipment Manual
(12 Pages)



Contents

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

Usage	Indoor 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 °F to + 140 °F (-10 °C to +60 °C)
Humidity	95% RH NC Max.
Altitude	6500' (2000 m)
Power Supply	Two "D" cell alkaline batteries
Battery Life	Approximately 16 hours
Pollution degree	2
Overvoltage category	2
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.
2. Slide the OFF-LOW-HIGH Sensitivity switch to the HIGH position.
3. 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.

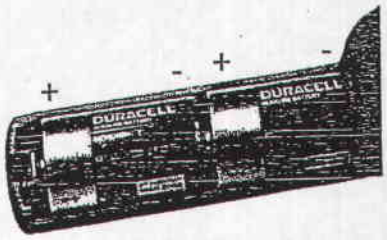
The Inficon TEK-Mate Refrigerant Leak Detector provides similar responses to all CFC's, HCFC's, HFC's and refrigerant blends (i.e. R-404A, R407c) as well as SF6. There is no need to select the refrigerant you're working with.

How to Install the Alkaline Batteries

1. 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.

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.
2. If you are replacing a worn out sensor, remove the worn out sensor by pulling it straight out of the socket and discard it.

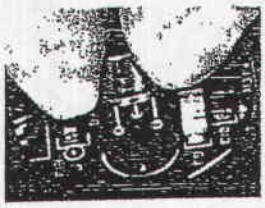
⚠ **WARNING**

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.

5. 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

⚠ **WARNING**

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.

1. 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.
2. Slowly (approximately 1 to 2 inches/second (25 to 50 mm/second)) move the probe past each possible leakage point.

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.

3. 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.
5. 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.

6. 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
1. 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.
	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.

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.

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.

1. 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.
3. 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.

6. 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.

   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.

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.

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

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.

Example-manifests are **attached**.

SYNERGY RECYCLING OF CENTRAL FLORIDA

RECYCLE / TRANSPORTATION RECEIVING MANIFEST

MANIFEST NUMBER 87501

Corporate Mailing Address:
P.O. Box 88
Sharpsburg, Ga. 30277

Facility Address:
3800 Lake Hamilton Drive W.
Winter Haven Fl. 33881
EPA ID # FLR000053611

DEP / Customer #_____

Generator Name

Billing Address (if different from location)

Address

City

State Zip

County

Phone

Description / Classification: Non-Hazardous

☐ Used Oil, Flash Greater than 200 F°
No Placard Required

Quantity of Gallons _____

Halogen Test Method:

☐ Used Antifreeze, Flash Greater than 200 F°
No placard Required

Quantity of Gallons _____

Check Results
INFICON TEK-MATE

☐ Oily Water, Flash Greater than 200 F°
No Placard Required

Quantity of Gallons _____

☐ Above 1000 ppm
☐ Below 1000 ppm

☐ Used Oil Filters, Flash Greater than 200 F°
No Placard Required

Quantity of Drums _____

Dexsil

☐ Above 1000 ppm
☐ Below 1000 ppm

☐ Spent Absorbents, Flash Greater than 200 F°
No Placard Required

Quantity of Drums _____

☐ Other: Specify_____

Special Billing Information or Comments_____

ADDITIONAL DESCRIPTION / SPECIAL HANDLING INSTRUCTIONS:
Used oil is subject to regulation by the Florida DEP Statue 403, Florida Administrative Code 62-710.6000 and The United States EPA 40 CFR Part 279.
Avoid skin & tissue contact. Wear gloves & eye protection. In case of emergency contact the Florida Department of Environmental Protection and Synergy Recycling at (863) 419-0556.

GENERATOR CERTIFICATION
We the generator of this product, hereby certify that we have not mixed any hazardous waste with this product being collected by Synergy Recycling. This product is being transported to Synergy Recycling to be recycled in accordance with all federal, state, and local laws. We the generator also certify that this product does not contain any detectable levels of PCB's (53 Fed. Reg. 24206, June 27, 1988).
I hereby declare that the contents of this shipment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international, national, and state regulations.
Unless I am a conditionally exempt small generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002 (b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.

PRINTED NAME: SIGNATURE: DATE:

TRANSPORTER ACKNOWLEDGEMENT OF RECEIPT OF MATERIALS

PRINTED NAME: SIGNATURE: DATE:

RECEIVING FACILITY ACKNOWLEDGEMENT OF RECEIPT OF MATERIALS

PRINTED NAME: SIGNATURE: DATE:

Discrepancy Indication Space

IN CASE OF EMERGENCY PLEASE CALL (863) 419-0556

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

March 2011
Revision from February, 2009
Revision from March, 2008
Revision from June, 2005

3.14.11

Sealed By:
Michael H. Stillinger
P.E. No. 47011

TABLE OF CONTENTS

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. Garry R. Allen, Operating Partner 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 - Mr. Garry R. Allen Alternate – Mr. Osvaldo Riviera
Section 7.0	Management Approval	The SPCC/Contingency Plan for Synergy Recycling of Central Florida, LLC will implemented as herein described:

Signature: _____
Name: Garry R. Allen
Title: Operating Partner

Signature: _____
Name: Michael H. Stillinger, P.E.
Title: Vice President, Engineering
Imperial Testing

Section 8.0	Oil Spill History	The site has never had a major oil spill. Minor spillage is handled by absorbent pads. All tanks above ground and contained (see attached figures).
Section 9.0	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 been prepared with good engineering practices.

Signature: _____ 3-14-11
Name: Michael H. Stillinger, P.E.
Florida Registration No. 47011

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 Tank	150	1,500
3A	Used Oil/Oily Water/Antifreeze (Double-Walled)		3,500
3B	Used Oil/Oily Water/Antifreeze (Double-Walled)		3,500
3C	Used Oil Tank (Double-Walled)		18,000
4	Used Oil Tank	1,000	25,000
5	Used Oil Tank	1,000	25,000
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. Tanks 4 and 5 shall be placed into service upon FDEP approval of the Used Oil Permit Modification (see **Figure 5**).

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) KNOW ALL EXIT LOCATIONS: 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. R ESPONSIBILITIES:
1. 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**).

person shall prepare a Discharge Reporting Form, in accordance with Rule 62-770.200(16)(49), 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

Polk County Public Health Department - 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. Garry R. Allen Telephone: (863) 419-0556 Mobile: (813) 410-4013
Alternate Responsibility:	Mr. Jeff Englin Telephone: (863) 419-0556 Mobile: (813) 410-4974
Plant Emergency	(863) 419-0556

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	1-404-347-4062 (24 Hour)
State:	State Warning Point	1-800-320-0519 (24 Hour)
	Florida Marine Patrol	1-800-342-5367 (24 Hour)
	Dept. of Environmental Protection	1-813-632-7600 (8 am - 5 pm, M-F)
	Polk County Public Health Dept.	1-863-413-3325 (8 am - 5 pm, M-F)
Local:	Fire Department HazMat	911 (24 Hour)

For Reporting Fires:

Local:	Fire Department HazMat	911 (24 Hour)
Lucerne Park Road Fire Station No. 2		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:

- PetroTech (407) 656-8114
- Oils Unlimited (407) 908-4140
- 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	40lb
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. Seven (7) truck drivers

B. Equipment and materials
   1. One (1) 2" electrically driven gear-type pump (gpm). The electric pump is permanently plumbed into all tanks
   2. One 3000 gallon vacuum truck
   3. Five (5) - 2,000 to 4,500 gallon pump trucks (75 gpm)
   4. Two hundred feet of 3" diameter suction line
   5. Two hundred feet of 2" diameter suction line
   6. One Case - sorbent booms
   7. Two (2) shovels
   8. One (1) wheel barrels
   9. Two (2) hoes
   10. Two (2) rakes
   11. Five (5) bales of 100 count sorbent pads
   12. Compressor (electrical)
   13. 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.

b. 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. Immediate access to a device capable of summoning external emergency assistance in the event only one employee is on the premises.

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 may not 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

b. A description of the emergency response arrangements required in Preparedness and Prevention Plan.

See Section 11.0, 12.0 and 13.0

c. 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).

See Section 14.0.

k. Incidents must be reported to the appropriate agencies.

See Section 14.0.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
STORAGE TANK REGULATION PROGRAM

2008-2009

FACILITY ID: **9802060**
SYNERGY RECYCLING OF CENTRAL FL
3800 W LK HAMILTON RD
WINTER HAVEN FL 33881 POLK COUNTY

****2008-2009 Storage Tank Registration Placard Enclosed ****

SYNERGY RECYCLING

3800 W LAKE HAMILTON RD
WINTER HAVEN FL 33881-

PLACARD NO: **302309**
PLACARD ISSUED: **06/04/2008**
REGISTRATION PAID: **$ 50**

STCM ACCOUNT: 62177

TANK SYSTEMS REGISTERED: 2

STORAGE TANK FACILITY ACCOUNT OWNER: PLEASE RETAIN THE TOP STUB FOR YOUR RECORDS

STORAGE TANK REGISTRATION

This placard certifies that the owner & facility named has complied with the registration requirements for petroleum &/or hazardous substance storage tanks regulated by the FL Department of Environmental Protection. The placard must be placed out of the weather and in plain view of storage tank compliance inspectors entering the facility.

SECONDARY CONTAINMENT INSTALLATION DEADLINES
12-31-2009: Single-wall USTs & UST small diameter piping in contact with the soil must have secondary containment.
01-01-2010: Single-wall field erected ASTs & AST single-wall bulk product piping in contact with the soil must have secondary containment unless deferred by an API 570 Integrity Assessment.

The Department has never issued an extension to an upgrade deadline since the storage tank rules were adopted in 1984. If you have questions about these or other deadlines – or need general technical assistance – consult Rule 62-761, F.A.C., or contact a storage tank inspector from the DEP district office or from the local storage tank program office for your county.

DEPARTMENT OF ENVIRONMENTAL PROTECTION IS ON THE INTERNET
The Web address for DEP is http:\\www.dep.state.fl.us.
You can access the site for Storage Tank Regulation directly by using: http:\\www.dep.state.fl.us/waste/categories/tanks.
Look under the HIGHLIGHTS section to find links to storage tank rules, forms, database reports and other program information.

EMAIL registration-related questions and comments to: TankRegistration@dep.state.fl.us – or telephone (850) 245-8839.
Registration staff members will assist you with your questions and will respond to you by phone or reply to your email address.

The Storage Tank Registration placard below must be posted at the facility.
It must be placed out of the weather and in plain view of inspectors entering the facility.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
STORAGE TANK REGISTRATION PLACARD

2008-2009

FACILITY ID: 9802060

PLACARD NO: 302309
PLACARD ISSUED: 06/04/2008
PLACARD EXPIRES: 06/30/2009

FACILITY: SYNERGY RECYCLING OF CENTRAL FL
3800 W LK HAMILTON RD
WINTER HAVEN FL 33881-
POLK COUNTY

TANK SYSTEMS REGISTERED: 2

FACILITY TYPE: Fuel user/Non-retail

STCM ACCOUNT: 62177
ACCOUNT OWNER: SYNERGY RECYCLING

Mary Jean Yon, Director
Division of Waste Management
Department of Environmental Protection

APPENDIX G
INSPECTION FORMS

WEEKLY INSPECTION REPORT

Jobsite	Yard	Month		Year	

Inspector's Name:			
Inspector;s Title:		Date	
Inspector's Signature:		Time	

Reviewed and approved by:	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	NOTES
1. First Aid Supplies - convenient, adequate.											
2. Excavating/trenching-shoring, underground lines											
3. Employee practices - lifting, safety rules											
4. Floor openings - barricaded, covered, perimeter floor protection.											
5. Housekeeping - debris, fall & fire hazards.											
6. Ladders - safety feet, lashed, sound, base out of 1/4 length of ladder.											
7. Marterial hoist - gates, signals, signs, no riding.											
8. Overhead protection - falling objects - entrances, openings, sidewalks.											
9. Personal protective equipment - hard hat, goggles, subs, employees, footwear.											
10. Shaftway protection - barricades, guard rails.											
11. Stairways - gaurd rails, tread fillers, clean.											
12. Storage of materials - neat, lashed, nails in scrap lumber bent over or removed.											
13. Temporary lighting - stairs, closed areas, condition.											
14. Tools, equipment - guarded, grounded, condition.											
15. Tank and valve check for leaks.											
16. Visual inspection of containment concrete.											
17. Trucks properly placarded and secured.											
18. Fire extinguishers - accessible, adequate pressure.											
19. Fire hoses - accessible, functional											
20. Exits and walkways are marked and clear.											
21. Facility secured against unauthorized entry.											
22. Storage tanks - leaks, corrosion, bulging.											
23. Storage drums - closed, leaks, corrosion, bulging.											
24. Storage Tanks and drums - properly labeled.											
25. Working area perimeter, discolored soil, liquids, stressed vegetation.											

Discharge Report Form

PLEASE PRINT OR TYPE

DEP Form # 62-761.900(1)
Form Title Discharge Report Form
Effective Date: July 13, 1998

Instructions are on the reverse side. Please complete all **applicable** blanks

1. Facility ID Number (if registered):_____ **2. Date of form completion:**_____

3. General information
Facility name or responsible party (if applicable):_____
Facility Owner or Operator, or Discharger: _____
Contact Person:_____ Telephone Number: ( )_____ County: _____
Facility or Discharger Mailing Address: _____
Location of Discharge (street address):_____
Latitude and Longitude of Discharge (if known)_____

4. Date of receipt of test results or discovery of confirmed discharge: _____ month/day/year

5. Estimated number of gallons discharged:_____

6. Discharge affected: [ ] Air [ ] Soil [ ] Groundwater [ ] Drinking water well(s) [ ] Shoreline [ ] Surface water (water body name) _____

7. Method of discovery (check all that apply)

[ ] Liquid detector (automatic or manual)	[ ] Internal inspection	[ ] Closure/Closure Assessment
[ ] Vapor detector (automatic or manual)	[ ] Inventory control	[ ] Groundwater analytical samples
[ ] Tightness test	[ ] Monitoring wells	[ ] Soil analytical tests or samples
[ ] Pressure test	[ ] Automatic tank gauging	[ ] Visual observation
[ ] Statistical Inventory Reconciliation	[ ] Manual tank gauging	[ ] Other _____

8. Type of regulated substance discharged: (check one)

[ ] Unknown	[ ] Used/waste oil	[ ] Jet fuel	[ ] Heating oil	[ ] New/lube oil
[ ] Gasoline	[ ] Aviation gas	[ ] Diesel	[ ] Kerosene	[ ] Mineral acid

[ ] Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives
(write in name or Chemical Abstract Service (CAS) number)_____
[ ] Other_____

9. Source of Discharge: (check all that apply)

[ ] Dispensing system	[ ] Pipe	[ ] Barge	[ ] Pipeline	[ ] Vehicle
[ ] Tank	[ ] Fitting	[ ] Tanker ship	[ ] Railroad tankcar	[ ] Airplane
[ ] Unknown	[ ] Valve failure	[ ] Other Vessel	[ ] Tank truck	[ ] Drum

[ ] Other_____

10. Cause of the discharge: (check all that apply)

[ ] Loose connection	[ ] Puncture	[ ] Spill	[ ] Collision	[ ] Corrosion
[ ] Fire/explosion	[ ] Overfill	[ ] Human error	[ ] Vehicle Accident	[ ] Installation failure

[ ] Other_____

11. Actions taken in response to the discharge: _____

12. Comments: _____

13. Agencies notified (as applicable):

[ ] State Warning Point *1-800 320-0519*	[ ] National Response Center *1-800-424-8802*	[ ] Florida Marine Patrol *(800) 342-5367*	[ ] Fire Department. _____	[ ] DEP (district/person) [ ] County Tanks Program

To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.

_____
Printed Name of Owner, Operator or Authorized Representative, or Discharger

_____
Signature of Owner, Operator or Authorized Representative, or Discharger

Oil spills to navigable waters of the United States, and releases of reportable quantities of CERCLA hazardous substances must be reported within one hour to the National Response Center or the Florida Marine Patrol. Reports to the National Response Center of oil spills to navigable waters need not be repeated to any other federal, state, or local agency. Conditions at the site that do not involve spills to navigable waters of the United States, or CERCLA hazardous substances, that pose an immediate threat to human health or the environment, must be immediately reported to the State Warning Point or the Local Fire Department. This form must be submitted for all discharges from facilities with storage tank systems, and at other sites, in accordance with Chapters 62-761 and 62-770, F.A.C. Chapter 62-761 and 62-770, F.A.C., should be consulted for specific reporting requirements.

State Warning Point	*National Response Center*	*Local Fire Department*
1-800-320-0519	*1-(800)-424-8802*	*(obtain local number)*

This form must be used to report any confirmed discharge, or any one of the following from a storage tank system subject to Chapter 62-761, F.A.C., unless the discharge is from a previously-known and reported discharge:

1. Results of analytical or field tests of surface water, groundwater, or soils indicating the presence of contamination by:
   a. A hazardous substance from a UST;
   b. A regulated substance, other than petroleum products; or
   c. Petroleum products' chemicals of concern specified in Chapter 62-770, F.A.C.;
2. A spill or overfill event of a regulated substance to soil equal to or exceeding 25 gallons, unless the regulated substance has a more stringent reporting requirement specified in CFR Title 40, Part 302;
3. Free product or sheen of a regulated substance present in surface water, groundwater, soils, basements, sewers, and utility lines at the facility or in the surrounding area; or
4. Soils stained by regulated substances observed during a closure assessment performed in accordance with Rule 62-761.800, F.A.C.

A copy of this form must be delivered or faxed to the County within 24 hours of the discovery of a discharge, or before the close of the next business day. It is recommended that the original copy be sent in the mail. If the discharge occurs at a county-owned facility, a copy of the form must be faxed or delivered to the local FDEP District office. A discharge of petroleum or petroleum products from a source other than a regulated storage tank system must be reported within one week of discovery in accordance with Rule 62-770.250, F.A.C.

FDEP District Office Addresses:

Northwest District
160 Governmental Center
Pensacola FL. 32501-5794
Phone: 850-595-8360
FAX: 850-595-8417

Northeast District
7825 Baymeadows Way Suite B 200
Jacksonville FL. 32256-7590
Phone: 904-448-4300
FAX: 904-448-4362

Central District
3319 Maguire Blvd. Suite 232
Orlando, FL. 32803-3767
Phone: 407-894-7555
FAX: 407-897-2966

Southwest District
3804 Coconut Palm Dr.
Tampa FL. 33619-8218
Phone: 813-744-6100
FAX: 813-744-6125

South District
2295 Victoria Ave. Suite 364
Ft. Myers FL. 33901-2549
Phone: 813-332-6975
FAX: 813-332-6969

Southeast District
400 N. Congress Ave.
West Palm Beach, FL. 33416-5425
Phone: 561-681-6600
FAX: 561-681-6790

[Effective date of the rule]

DEP Form # 62-761.900(6)
Form Title Incident Notification Form
Effective Date: July 13, 1998

Incident Notification Form

PLEASE PRINT OR TYPE

Instructions are on the reverse side. Please complete all applicable blanks

1. Facility ID Number (if registered):_____ **2. Date of form completion:**_____

3. General information

Facility name:_____
Facility Owner or Operator: _____
Contact Person:_____Telephone number: ( )_____County: _____
Facility mailing address: _____
Location of incident (facility street address):_____
Latitude and Longitude of incident (If known.)_____

4. Date of Discovery of incident:_____**month/day/year**

5. Monitoring method that indicates a possible release or an incident: (check all that apply)

[ ] Liquid detector (automatic or manual)
[ ] Vapor detector (automatic or manual)
[ ] Tightness test
[ ] Pressure test
[ ] Breach of integrity test
[ ] Visual observation
[ ] Groundwater samples
[ ] Monitoring wells
[ ] Internal inspection
[ ] Odors in the vicinity
[ ] Automatic tank gauging
[ ] Manual tank gauging
[ ] Closure
[ ] Inventory control
[ ] Statistical Inventory Reconciliation
[ ] Groundwater analytical samples
[ ] Soil analytical tests or samples
[ ]Other_____

6. Type of regulated substance stored in the storage system: (check one)

[ ] Diesel
[ ] Gasoline
[ ] Heating oil
[ ] Used\waste oil
[ ] Aviation gas
[ ] Jet fuel
[ ] New/lube oil
[ ] Kerosene
[ ] Other _____
[ ] Hazardous substance - includes CERCLA substances, pesticides, ammonia, chlorine, and their derivatives, and mineral acids.
(write in name or Chemical Abstract Service (CAS) number)_____

7. Incident involves or originated from a: (check all that apply)

[ ] Tank [ ] Unusual operating conditions [ ] Dispensing equipment [ ] Pipe [ ] Overfill protection device
[ ] Piping sump [ ] Release detection equipment [ ] Secondary containment system [ ] Other [ ] Dispenser Liners
[ ] Loss of >100 gallons to an impervious surface other than secondary containment [ ] Loss of >500 gallons within secondary containment

8. Cause of the incident, if known: (check all that apply)

[ ] Overfill (<25 gallons) [ ] Spill (<25 gallons) [ ] Theft [ ] Corrosion
[ ] Faulty Probe or sensor [ ] Human error [ ] Installation failure [ ] Other_____

9. Actions taken in response to the incident: _____

_____
_____
_____

10. Comments: _____

_____
_____
_____

11. Agencies notified (as applicable):

[ ] Fire Department. [ ] Local Program [ ] DEP (district/person)

12. To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.

_____ _____
Printed Name of Owner, Operator or Authorized Representative Signature of Owner, Operator or Authorized Representative.

Instructions for completing the Incident Notification Form

This form must be completed to notify the County of all incidents, or of the following suspected releases:

1. A failed or inconclusive tightness, pressure, or breach of integrity test,
2. Internal inspection results, including perforations, corrosion holes, weld failures, or other similar defects that indicate that a release has occurred.
3. Unusual operating conditions such as the erratic behavior of product dispensing equipment, the sudden loss of product from the storage tank system, or any unexplained presence of water in the tank, unless system equipment is found to be defective but not leaking;
4. Odors of a regulated substance in surface or groundwater, soils, basements, sewers and utility lines at the facility or in the surrounding area;
5. The loss of a regulated substance from a storage tank system exceeding 100 gallons on impervious surfaces other than secondary containment, driveways, airport runways, or other similar asphalt or concrete surfaces;
6. The loss of a regulated substance exceeding 500 gallons inside a dike field area with secondary containment; and
7. A positive response of release detection devices or methods described in Rule 62-761.610, F.A.C., or approved under Rule 62-761.850, F.A.C. A positive response shall be the indication of a release of regulated substances, an exceedance of the Release Detection Response Level or a breach of integrity of a storage tank system.

If the investigation of an incident indicates that a discharge did not occur (for example, the investigation shows that the situation was the result of a theft or a malfunctioning electronic release detection probe), then a letter of retraction should be sent to the County within fourteen days with documentation that verifies that a discharge did not occur. If within 24 hours of an incident, or before the close of the County's next business day, the investigation of the incident does not confirm that a discharge has occurred, an Incident Report Form need not be submitted.

A copy of this form must be delivered or faxed to the County within 24 hours of the discovery of an incident, or before the close of the next business day. It is recommended that the original copy be sent in the mail. If the incident occurs at a county-owned facility, a copy of the form must be faxed or delivered to the local DEP District office.

DEP District Office Addresses:

Northwest District
160 Governmental Center
Pensacola FL. 32501-5794
Phone: 850-595-8360
FAX: 850-595-8417

Northeast District
7825 Baymeadows Way Suite B 200
Jacksonville FL. 32256-7590
Phone: 904-488-4300
FAX: 904-488-4366

Central District
3319 Maguire Blvd. Suite 232
Orlando, FL. 32803-3767
Phone: 407-894-7555
FAX: 407-897-2966

Southwest District
3804 Coconut Palm Dr.
Tampa FL. 33619-8218
Phone: 813-744-6100
FAX: 813-744-6125

South District
2295 Victoria Ave. Suite 364
Ft. Myers FL. 33901-2549
Phone: 813-332-6975
FAX: 813-332-6969

Southeast District
400 N. Congress Ave.
West Palm Beach, FL. 33416-5425
Phone: 561-681-6600
FAX: 561-681-6790

(02/01/98)

Florida Department of Environmental Protection
Twin Towers Office Bldg.•2600 Blair Stone Road•Tallahassee, Florida 32399-2400

DEP Form # 62-761.890(10)(C)
Form Title Containment and Integrity Plan Certification Form
Effective Date July 13, 1998
DEP Application No._

Containment and Integrity Plan Certification Form

Use this form to notify the Department of Environmental Protection of:

1. Establishment of the Containment and Integrity Plan.
2. Certification of secondary containment according to Rule 62-761.890(7), F.A.C.
3. Recertification of above times.

Mail to the DEP District Office in your area.

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

I hereby certify or recertify that the tanks covered under following plans (check appropriate blocks)

☐ Containment and Integrity Plan ☐ Certification of Secondary Containment

comply with the requirements of Rule 62-761.890(7), F.A.C.

_____
Signature

_____
P.E. Registration Number, State of Florida

_____
Name (Type or Print)

_____
Date

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
904-483-8300

Northeast District
7825 Baymeadows Way, Suite B 200
Jacksonville, Florida 32256-7577
904-448-4300

Central District
3319 Maguire Blvd. Suite 232
Orlando, Florida 32803-3767
407-894-7555

Southwest District
3804 Coconut Palm Dr.
Tampa, Florida 33619
813-744-6100

South District
2295 Victoria Ave., suite 364
Fort Myers, Florida 33901
813-332-6975

Southeast District
1900 S. Congress Ave. Suite A
West Palm Beach, Florida 33416
407-433-2650

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 **5** 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.

3.14.11

Michael H. Stillinger Date
Senior Project Engineer
Imperial Testing Laboratories
3905 Kidron Rd., Lakeland, FL 33811
Tel: (941) - 647-2877
Florida Registration No. 47011

Containment Volume:

			Outside Dimensions
Width	30.83	feet	32.08
Length	50.17	feet	51.42
Height	3.00	feet	36 inches
Total Volume	34,709	gallons containment volume	

Take Out Tank Volumes:

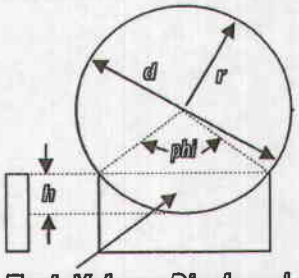
25-kgal Used Oil Tank Volume:

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	15.93	square feet
Displaced Volume:	4,885	gallons displaced by tank in containment structure.

25-kgal Used Oil Tank Volume:

Diameter	10.50	feet
Length	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



Tank Volume Displaced

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

5.11.11
Michael H. Stillinger, P.E. #47011

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

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

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

2. Listing of Tanks

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.

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 62-762, Florida Administrative Code.

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

All sampling methods and analytical methods for the rinsate water are cited in Chapter 62-770, **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 an approved CompQAP plan 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 62-770, Florida Administrative Code, borings will be sampled at one foot intervals to ten (10) feet below land surface (BLS), thereafter at five feet interval to a maximum depth of twenty (20) feet. However, the soil borings will not exceed the water table depth if the water table is less than 20 feet BLS. 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

Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form #62-710.901(7)
Form Title Used Oil Facility Financial Assurance Closing Cost Estimate Form
Effective Date June 9, 2005

Used Oil Processing Facility Closing Cost Estimate Form

Date: May 11, 2011 Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 28°04'42" Longitude: 81°39'39" EPA ID Number: FLR000 053 611

Facility Name: Synergy Recycling of Central Florida, LLC Permit Number: 2972753-HO-004

Facility Address: 3800 West Lake Hamilton Drive, Winter Haven, FL 33881

Mailing Address: same

Contact Person's Name: Mr. Garry R. Allen Phone Number: 863-419-0556

Fax Number: 863-419-0126

Email: gallen@synergyrecycling.org

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

____ Letter of Credit*	____ Performance Bond*	X Guaranty Bond*	*Indicate mechanisms that require use of a Standby Trust Fund Agreement
____ Insurance Certificate	____ Financial Test	____ Trust Fund Agreement	

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

☐ **(a) Inflation Factor Adjustment**

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at http://www.dep.state.fl.us/waste/categories/swfr/

This adjustment is based on the Department approved closing cost estimate dated: _____

_____	X	_____	=	_____
Latest DEP approved Closing Cost Estimate		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Estimate

Signature: _____ Phone: _____

Name and Title: _____ E-Mail: _____

Ify ou have questions concerning this form, please contact the Used Oil Coordinator at the address below, by phone at (850) 245-8755, or by E-Mail at: richard.neves@dep.state.fl.us

Please mail this completed cost estimate to:

Used Oil Permit Coordinator
MS4560
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Please mail a copy of the cost estimate to:

Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
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
1. Decontamination and Disposal Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil tanks, containers, piping, equipment and secondary containment decontamination	Lumpsum	1	$21,250	$21,250
waste characterization	—			
disposal	Transport Costs	1	$2,100	$2,100
b. Wash water waste characterization	Group Analysis	1	$736.77	$736.77
disposal	Gallons	2,595	$0.35	$908.25
c. Sludges/ sediment waste characterization	Sample	7	$736.77	$5,157.38
disposal	Gallons	300	$1.20	$360
d. Used oil filter management waste characterization	Group Analysis	1	$736.77	$736.77
disposal	Ton	6.5	$51.11	$332.59
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipement and secondary containment waste characterization	No cost	—	—	—
disposal	Gallons	3500	$0.35	$1,225.00
f. Mobilization Costs	Personnel and Equipment	1	$2800	$2800
g. other Vacuum Truck	Hours	20	$132.60	$2652.00

Subtotal (1) Decontamination/Disposal: $38,258.76

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 — $ 12,929.88

b. Closure Certification Report — @ 890.63

Subtotal (2) Professional Services: $ 13,820.51

Subtotal of (1) and (2) Above: $ 52,079.27

3. **Contingency (10% of the Subtotal)** $ 5,207.93

Closing Cost Subtotal: $ 57,287.20

TOTAL CLOSING COST: $ 57,287.20

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Financial Assurance Cost Estimates pertaining to the engineering features of the this solid waste management 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 62-701.630 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Financial Assurance Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1of each year and revised,ad justed and updated as required by Rule 62-701.630(4), F.A.C.

Michael A. Stellinger 5.11.11
Signature of Engineer

Michael H. Stellinger, 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 email address

Garry R. Allen
Signature of Owner/Operator

Garry R. Allen, Operating Partner
Owner's Name and Title (please print or type)

863.419.0556
Owner/Operator's Telephone Number

gallen@synergyrecycling.org
Owner/Operator's E-Mail Address

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

Description Number		Description	Unit	Quantity	Unit Cost	Total Cost	Notes
IV.		Recalculate Estimated Closing Cost					
1		Decontamination & Disposal, Costs Broken Down by individual waste stream. If contamination found, the cost estimate must be recalculated to include remediation costs.					
	a	Used Oil Tanks, Containers, Piping, Equipment & Secondary Containment					
		Decontamination	Lump Sum	1	$21,250.00	$21,250.00	Trac Quote
		Waste Charaterization	Lump Sum	1		$0.00	Assume all material recycled.
		Disposal	Transport Cost	1	$2,100.00	$2,100.00	Assume all tanks are recycled, costs related to transport only (Trac Quote).
	b	Washwater Waste Characterization	Group Analysis	1	$736.77	$736.77	Used Oil Group, one sample ($141.53/RCRA Metals; $131.44/8260; $298.24/8270; $98.58/TRPH + 10% accounting & processing)
		Washwater Disposal	Gallons	2595	$0.35	$908.25	Assume 3% of tank size for washwater needed. AquaClean Quote, pick up from site.
	c	Sludges Waste Characterization	Sample	7	$736.77	$5,157.38	One analysis per tank x 4 tanks + 3 compartments.
		Sludges Disposal	Gallons	300	$1.20	$360.00	AquaClean Quote, pick up from site.
	d	Used Oil Filter Waste Characterization	Group Analysis	1	$736.77	$736.77	Used Oil Group, one sample ($141.53/RCRA Metals; $131.44/8260; $298.24/8270; $98.58/TRPH + 10% accounting & processing)
		Used Oil Filter Disposal	Ton	6.5	$51.17	$332.59	
	e	Petroleum Contact Water (PCW) Tanks, Containers, Piping, Equipment & Secondary Containment					
		Waste Charaterization	No cost	1		$0.00	Included in washwater disposal costs.
		Disposal	Gallons	3500	$0.35	$1,225.00	AquaClean Quote, pick up from site.
	f	Mobilization Costs	Lump Sum	1	$2,800.00	$2,800.00	Mobilization of Personnel and Equipment.
	g	Other					
		Vacuum Truck	Hours	20	$132.60	$2,652.00	Port to Port, 1 trip x 12-hrs/trip, AquaClean Rate Quote.
		Subtotal (1) Decontamination / Disposal Cost ($):				$38,258.76	
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 Permit Application	Lump Sum	1	$12,929.88	$12,929.88	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 ($736.77/analysis). Use of core drill included ($200)
	b	Closure Certification Report	Lump Sum	1	$890.63	$890.63	Prepare sign & seal closure report (FDEP Petroleum Program 20% allowance of field work costs).
		Subtotal (2) Professional Services Cost ($):				$13,820.51	
		Subtotal of (1) and (2) Above Cost ($):				$52,079.27	
3		**Contigency (10% of Subtotal)**				$5,207.93	
		TOTAL CLOSING COST:				$57,287.20	

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

Item	Unit Cost	Unit
Used Oil Tanks, Containers, piping, equipment, & secondary containment decontamination	$21,250.00	Lump Sum
Used Oil Tanks, Containers, piping, equipment, & secondary containment disposal	$2,100.00	Transport Cost
Washwater Waste Characterization	$736.77	Group Analysis
Washwater Waste Disposal	$0.35	Gallon
Sludges/Sediment Waste Characterization	$736.77	Group Analysis
Sludges/Sediment Waste Disposal	$1.20	Gallon
Used Oil Filter Management Waste Characterization	$736.77	Group Analysis
Used Oil Filter & Oily/Solid Waste Disposal	$51.17	Ton
PCW Disposal	$0.35	Gallon
Mobilization Costs	$2,800.00	Mobilization of Personnel and Equipment.
Vacuum Truck	$132.60	Hour
Closure Sampling and Analysis Plan Implementation	$12,929.88	Lump Sum, see breakdown
Closure Certification Report	$890.63	FDEP Petroleum Program Allowance for 20% of field work costs

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

Signature of Person Submitting Quote: _____

Name: Michael H. Stillinger

Title: V.P.-Engineering

Date: May 9, 2011

Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form # 62-761.900(2)
Form Title Storage Tank Registration Form
Effective Date July 13, 1998
DEP Application No. _____ (Filled in by DEP)

Storage Tank Facility Registration Form

Submit a completed form for the facility when registration of storage tanks or compression vessels is required by Chapter 376.303, Florida Statutes

Please review *Registration Instructions* before completing the form.

Please check all that apply	[ ] New Registration	[ ] New Owner	[K] New Tanks
	[ ] Facility Info Update/Correction	[ ] Owner Info Update/Correction	[ ] Tank Info Update/Correction

A. FACILITY INFORMATION

County: POLK | DEP Facility ID: FLR 000 053 611 53/9802060

Facility Name: SYNERGY RECYCLING OF CENTRAL FLORIDA, LLC
Facility Address: 3800 West Lake Hamilton Drive City: Winter Haven Zip: 33881
Facility Contact: Garry R. Allen, Operating Partner Business Phone: (863) 419 0556
Facility Type(s): D - Used Oil Processing NAICS Code: _____ Financial Responsibility: 2

24 Hour Emergency Contact: Garry R. Allen Emergency Phone: (813) 410-4013

B. RESPONSIBLE PERSON INFORMATION - Identify individual(s) or Business(es) responsible for storage tank management, fueling operations, and/or cleanup activities at the facility location named above. **Provide additional information in an attachment if necessary.**

Name: Synergy Recycling of Central Florida, LLC	Facility - Responsible Person Relation Type:	Effective Date
Mail address: PO Box 88	[√] Facility Account Owner (pays fees)	
City, ST, Zip: Sharpsburg, GA 30277-0088	Facility Account Owner Information must be provided when the facility contains active or out of service storage tanks on site.	
Contact: Garry R. Allen		
Telephone: (863) 419-0556	STCM Account Number (if known)	62177
Identify other appropriate facility relationships for this party: [X] Facility Owner/Operator [X] Property Owner [X] Storage Tank Owner		

Name:	Other owner, relationship type(s)	Effective Date
Mail address:	[ ] Facility Owner/Operator	
City, ST, Zip:	[ ] Property Owner	
Contact:	[ ] Storage Tank Owner	
Telephone:	[ ] Other:	

C. TANK/VESSEL INFORMATION - Complete one row for each storage tank or compression vessel system located at this facility.

Tank ID	T/V	A/U	Capacity	Installed	Content	Status/Effective Date		Construction	Piping	Monitoring
1	T	A	10,000		L	U		C,P,K	A,B	D,6
2	T	A	1,500		Antifreeze	U		V,P,K	A,B	D,6
3	T	A	1100/350/3500	09/xx/2008	L	U		C,M,P,I	A,B	D,6
4	T	A	25,000	09/xx/2010	L	V		C,P,K	A,B	D,6
5	T	A	25,000	04/18/2011	L	V		C,P,K	A,B	D,6

Certified Contractor (peforming tank (installation) or removal): Cris R. Smith DBPR License No.: CGC 012097

Registration Certification: **To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.**

Garry R. Allen, Operating Partner — Signature — 5-2-2011
Printed Name & Title — Date

DEP 62-761.900(2)

Northwest District	Northeast District	Central District	Southwest District	Southeast District	South District	Marathon Branch Office
160 Governmental Center Blvd.	7825 Baymeadows Way, Suite B200	3319 Maguire Blvd., Suite 232	3804 Coconut Palm Drive	400 North Congress Ave.,	2295 Victoria Ave., Suite 364	2796 Overseas Hwy., Suite 221
Pensacola, FL 32501	Jacksonville, FL 32256	Orlando, FL 32803	Tampa, FL 33619	W Palm Beach, FL 33416	Fort Myers, FL 33901	Marathon, FL 33050
850-595-8360	904-448-4300	407-894-7555	813-744-6100	561-681-6600	941-332-6975	305-289-2310

V - Shall be placed into service upon FDEP Approval of Used Oil Processing Permit Modification, applied for on March 17, 2011.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
STORAGE TANK REGULATION PROGRAM

Copy

2010-2011

FACILITY ID: 9802060
SYNERGY RECYCLING OF CENTRAL FL
3800 W LK HAMILTON DR
WINTER HAVEN FL 33881 POLK COUNTY

**2010-2011 Storage Tank Registration Placard Enclosed **

SYNERGY RECYCLING

3800 W LAKE HAMILTON RD
WINTER HAVEN FL 33881-

STCM ACCOUNT: 62177

PLACARD NO: 345734
PLACARD ISSUED: 06/09/2010
REGISTRATION PAID: $ 100

TANK SYSTEMS REGISTERED: 4

STORAGE TANK FACILITY ACCOUNT OWNER: PLEASE RETAIN THE TOP STUB FOR YOUR RECORDS

STORAGE TANK REGISTRATION

This placard certifies that the owner & facility named has complied with the registration requirements for petroleum &/or hazardous substance storage tanks regulated by the FL Department of Environmental Protection. The placard must be placed out of the weather and in plain view of storage tank compliance inspectors entering the facility.

SECONDARY CONTAINMENT INSTALLATION DEADLINES
12-31-2009: Single-wall USTs & UST small diameter piping in contact with the soil must have secondary containment.
01-01-2010: Single-wall field erected ASTs & AST single-wall bulk product piping in contact with the soil must have secondary containment unless deferred by an API 570 Integrity Assessment.

The Department has never issued an extension to an upgrade deadline since the storage tank rules were adopted in 1984. If you have questions about ...e or other deadlines – or need general technical assistance – consult Rule 62-761, F.A.C., or contact a storage tank inspector from the DEP district ...ce, or from the local storage tank program office for your county.

DEPARTMENT OF ENVIRONMENTAL PROTECTION IS ON THE INTERNET
The Web address for DEP is http:\\www.dep.state.fl.us.
You can access the site for Storage Tank Regulation directly by using: http:\\www.dep.state.fl.us/waste/categories/tanks.
Look under the HIGHLIGHTS section to find links to storage tank rules, forms, database reports and other program information.

EMAIL registration-related questions and comments to: TankRegistration@dep.state.fl.us – or telephone (850) 245-8839.
Registration staff members will assist you with your questions and will respond to you by phone or reply to your email address.

The Storage Tank Registration placard below must be posted at the facility.
It must be placed out of the weather and in plain view of inspectors entering the facility.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
STORAGE TANK REGISTRATION PLACARD
2010-2011

FACILITY ID: 9802060

PLACARD NO: 345734
PLACARD ISSUED: 06/09/2010
PLACARD EXPIRES: 06/30/2011

FACILITY: SYNERGY RECYCLING OF CENTRAL FL
3800 W LK HAMILTON DR
WINTER HAVEN FL 33881-
POLK COUNTY

TANK SYSTEMS REGISTERED: 4

...CILITY TYPE: Collection Station

STCM ACCOUNT: 62177
ACCOUNT OWNER: SYNERGY RECYCLING

Mary Jean Yon, Director
Division of Waste Management
Department of Environmental Protection

Attachment X

Training Requirements

Records are kept by the company Operating Partner 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.

A Guide for Used Oil Transporter Training Programs

PART I Laws and Rules Pertaining to Used Oil Transporters

♦ Chapter 40, Part 279, Subpart E, of the Code of Federal Regulations (C.F.R., U.S. Environmental Protection Agency)

♦ Florida Statutes:

403.767 Certification of used oil transporters

(3) The Department shall adopt rules governing certification, which shall include requirements for the following:

(b) Evidence of familiarity with applicable state laws and rules governing used oil transportation.

♦ Florida Administrative Code (F.A.C.)

62-710.201 Definitions.

...(6)"Used oil transporter" means any person who transports used oil over public highways in shipments of greater than 55 gallons at one time.

62-710.600 Certification of Used Oil Transporters

(2) To become certified and to maintain certification, used oil transporters shall:

(a) Register annually with the Department and comply with the annual reporting and record keeping requirements pursuant to Rules 62-710.500 and 62-710.510, F.A.C.;

(b) Show evidence of familiarity with applicable state laws and rules governing used oil transportation by submitting a training program for approval to the Department which includes provisions for at least the following:

1. Compliance with state and federal rules governing used oil;
2. Proper used oil management practices, including appropriate response action to any release or spill.
3. A detailed description of the company's standard operating procedure for halogen screening at each pick up location. This description shall include instrument specifications and capabilities, calibration methods and frequency, procedures addressing the handling of loads which indicate halogen levels in excess of 1,000 ppm, and record keeping procedures for all loads accepted or refused.
4. An introduction of each new employee to the applicable laws and rules before unsupervised driving of a used oil transportation vehicle; and
5. Documentation that all company personnel handling or transporting used oil have successfully completed the training program. New employees shall complete the training program as soon as possible, but no later than 90 days after beginning employment;

(c) Maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. These records shall be retained for a minimum of three years and available for review by Department personnel during inspections;

(d) Submit to the Department an annual statement in conjunction with the annual registration required under Rule 62-710.500, F.A.C., which states that the training program is still operating and is being adhered to and has been annually reviewed and updated to address changes in regulations which apply to the operation,...

PART II Developing a Used Oil Transporter Training Program

A used oil transportation training manual must be submitted to the Department for evaluation in partial fulfillment of the used oil transporter certification requirements. The following check list will be used to evaluate all training programs. An approved training program is expected to specifically address, but is not limited to, the topics listed on Page 2.

TRANSPORTER TRAINING PROGRAM EVALUATION CHECKLIST

Note: Training programs deemed insufficient by the Department will not be approved until your company is notified and amendments to the training program are accepted and approved. This may delay the certification process. If you have any questions, please contact the Used Oil Recycling Coordinator, MS 4555, FDEP, 2600 Blair Stone Road, Tallahassee, FL; or by phone at (850) 245-8755.

Date Reviewed ___/___/____ Company Name:_____
Action: ____Approved ____Not Approved/reason:_____ **Reviewed by** _____

_____A) Federal rules governing used oil transportation, found in Part 279 of the Code of Federal Regulations. Federal rules relevant to used oil transporters include:

_____1) 40 CFR, Part 279.40, Applicability
_____2) 40 CFR, Part 279.41, Restrictions on transporters.
_____3) 40 CFR, Part 279.42, Notification
_____4) 40 CFR, Part 279.43, Used oil transportation, to include:
_____5) **a detailed spill response protocol**
_____6) 40 CFR, Part 279.44 Rebuttable presumption (SOP for halogen screening, Rule 62-710.600(b)(3))
_____7) 40 CFR, Part 279.45, Used oil storage at transfer facilities
_____8) 40 CFR, Part 279.46, Tracking

_____B) Florida Laws governing pollution and used oil management, found in Chapter 403 of the Florida Statutes (F.S.). State laws relevant to used oil tra nsporters include:

_____1) 403.121, F.S., Damages to Air, Water or Property
_____2) 403.141, F.S., Joint and Several Liability
_____3) 403.161, F.S., Causing Pollution *(careless or reckless; willful; non-compliance)*
_____4) 403.708(1) and (15), F.S., Prohibitions *(Solid Waste, Special Waste)*
_____5) 403.751, F.S., Prohibited Actions *(Used Oil)*
_____6) 403.754, F.S., Registration of Used Oil Handlers
_____7) 403.7545, F.S., Regulation of Used Oil as Hazardous Waste
_____8) 403.767, F.S., Certification of Used Oil Transporters

_____C) Department Rules governing used oil transportation, found in Chapter 62 -710 (Used Oil Management) of the Florida Administrative Code (F.A.C.), to include:

_____1) 62-710.201, F.A.C., Definitions
(in particular: oily wastes [1] and used oil [5])
_____2) 62-710.401, F.A.C., Prohibitions
_____3) 62-710.901(2), F.A.C., Record Keeping Form
_____4) 62-710.500, F.A.C., Registration and Notification
_____5) 62-710.510, F.A.C., Record Keeping and Reporting
_____6) 62-710.600, F.A.C., Certification of Used Oil Transporters
_____7) 62-710.850, F.A.C., Management of Used Oil Filters (if applicable)

_____D) The training materials submitted must also include:

_____1) A document verifying that personnel handling or transporting used oil have successfully completed the training program within 90 days after beginning employment. This document should be maintained in the individual personnel files, be available for review by Department personnel during any inspection, and include a record indicating:

_____**a)** the type of training provided, and
_____**b)** the dated signatures of those receiving and providing the training.

_____2) A statement, filed annually with the Department as part of the registration required under Rule 62-710.500, F.A.C., which states that the training program is still operating and is being adhered to, and which provides an explanation of any modifications to the training program.

_____E) Used Oil Transporter Certificatoin and Training Manual (BFA Custom Publications)

In lieu of preparing your own training manual, you may purchase the Used Oil Transportation Certification and Training Manual which is produced and offered for sale by BFA Custom Publications. This manual has been edited and approved by the Department. Persons who elect to use this manual need only submit the signature pages in the front of the manual to the Department. Contact the Association, in care of Frank Bronstein, Executive Director, 318 Newman Road, Sebring, Florida, 33870; by email at: frank.ess.bee@gmail.com, or by phone at: (863) 655-0691.

Manual Invoice Number _____ **Copyright Date** _____

A Brief Summary of the Rules and Regulations Applicable to a Used Oil Transporter Training Program
2/1/06

Note: This summary is provided in an attempt to simplify some of the language found in the Laws, Rules and Regulations pertaining to the management of used oil in Florida. This summary is incomplete and not comprehensive. Only certain parts of the applicable citations are summarized here. This is not a substitute for and does not replace the actual language found in the Laws, Rules and Regulations cited. For copies of the original documents, please contact the Used Oil Coordinator, MS 4555, FDEP, 2600 Blair Stone Road, Tallahassee, FL, 32399-2400; or phone (850) 245-8755, or visit the Used Oil Recycling Web Page at: http://www.dep.state.fl.us/waste/categories/used_oil/default.htm

A. Federal Rules (Code of Federal Regulations, C.F.R.)

1. 40 CFR, Part 279.40 This section (Subpart E) describes the used oil management standards which are applicable to used oil transporters (persons who transport used oil) and transfer facilities (facilities which store used oil from over 24 hours, but less than 35 days).

2. 40 CFR, Part 279.41 Transporters cannot process used oil.

3. 40 CFR, Part 279.42 Transporters must have an EPA/DEP identification number.

4. 40 CFR, Part 279.43 Transporters must deliver used oil to another transporter, processor or burner which has an EPA/DEP identification number. All discharges of used oil must be managed (**ATTACH YOUR SPILL RESPONSE PLAN WHICH SHOULD INCLUDE ALL EMERGENCY PHONE NUMBERS**).

5. 40 CFR, Part 279.44 The transporter must use either product knowledge or testing to determine whether the halogen content of the used oil to be picked up is above or below 1,000 parts per million.

6. 40 CFR, Part 279.45 Used oil must be stored at a transfer facility which has notified (has an EPA/DEP identification number) and has secondary containment. Used oil cannot be stored at a transfer facility for longer than 35 days.

7. 40 CFR, Part 279.46 Transporters must keep records of all used oil accepted and delivered for three years. The records must include the name, address, EPA/DEP identification number and signature of the person who provided or accepted the used oil, the quantity of used oil handled and the date.

B. Florida Law (Florida Statutes, FS.)

1. 403.121 DEP may recover damages for any injury to the air, waters, or property of the State. DEP may impose a $10,000 penalty for each offense (**each day of violation is a separate offense**).

2. 403.141 Anyone who pollutes may be held jointly and severally liable (anyone involved in the chain of custody, from the generator through the final destination can be held liable for the pollution).

3. 403.161 It is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statements regarding these laws and rules or fail to report discharges. There are three types of violations: a) anyone who willfully pollutes is guilty of a third degree felony, punishable by $50,000 and/or 5 years imprisonment for each offense; b) anyone who pollutes, due to reckless indifference or gross careless disregard, is guilty of a second degree misdemeanor, punishable by $5,000 and/or 60 days in jail for each offense; and c) anyone who fails to comply with any laws or rules is guilty of a first degree misdemeanor, punishable by $10,000 and/or 60 months in jail.

4. 403.708 (1) No person shall deposit any solid waste in or on the land or waters located within the State. **(14)** No person shall dispose of used oil in landfills.

5. 403.751 No person may manage used oil in any manner which endangers public health or welfare. No person may discharge used oil into any storm drain, sewer, septic tank or body of water. No person may mix used oil with solid waste that is to be disposed of in a landfill. No person may mix used oil with a hazardous substance. Used oil shall not

be used for road oiling, dust control, weed abatement or other similar activities that have the potential to harm the environment.

6. 403.754 Used oil transporters and transfer facilities must register annually, keep appropriate records and report to the Department

7. 403.7545 Nothing shall prohibit the Department from regulating used oil as hazardous waste. (If violations occur, and the used oil portion of the mismanagement, spill, or contaminated site is considered a hazardous waste, fines are automatically $50,000 per offense).

8. 403.767 Anyone who transports more than 500 gallons of used oil over public highways must be certified by the Department. Certification includes demonstration of adequate training and insurance.

C. Department Rule 62-710, Florida Administrative Code, (F.A.C.): Used Oil Management

1. 62-710. 201 Training should include definitions of **(1)** oily wastes and **(5)** used oil.

2. 62-710.400 Prohibitions.

3. 62-710.900(2) This Used Oil Record Keeping form, or another form with the same information, must be used and maintained on-site for three years.

4. 62-710.500 Used oil transporters and transfer facilities must register with the Department.

5. 62-710.510 Used oil transporters must, on the appropriate forms, keep records (for three years) and provide an annual report to the Department. Any shipment of used oil which is refused pick-up due to suspected mixing with hazardous waste (halogens above 1,000 parts per million) must be reported to the appropriate District office.

6. 62-710.600 Used oil transporters who transport over 500 gallons per year over public highways must be Certified by the Department and must show evidence of adequate training (to include a company SOP for halogen screening), and $1 million minimum insurance that does not exclude pollution clean up costs.

7. 62-710.850 Persons involved in the management of used oil filters must comply with this section.

Attachment XI

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

1. 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**). 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. 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.
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 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. a. The regular facility operations are addressed in Item 1 of Attachment XI and in **Attachment II**.
   b. Procedures of facility operations are addressed in **Attachment II** and **Attachment III**.
   c. Emergency Response procedures are addressed in the SPCC Plan as **Attachment VII**.
4. In order to comply with 62-701.710(3) Synergy personnel shall proceed with solid waste operations in a well ventilated area and under a roof so there are no Stormwater impacts. Materials (solid and oily waste) handled outside the building for transport are secured in 55-gallon drums.

Attachment XI (continued)

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

5. Transport of materials is typically handled by trucks equipped with a lift gate, which can transport the used oil filters, rags, absorbent pads, booms, air filters and kitty litter in 55-gallon steal drums. Loading and unloading of materials occurs adjacent to the Drum Storage Area, located in the relative center of the building, see **Figure 2** in **Attachment I**. Materials are processed and stored in the Drum Storage Area.
6. Approximately 3600-square feet of area is dedicated for the materials (solid waste) processing and storage inside the building. Used oil filters are recycled. The remaining materials are processed for eventual disposal. Class I type materials are not accepted for processing.
7. The Plan for disposing of unmarketable materials is addressed in Item 1 of this attachment and in **Attachment II**. The materials are transported to the Synergy Recycling Facility in Kingsland Georgia for final processing and disposal.
8. The boundary survey and legal description are provided on **Figure 2** in **Attachment I.** The topographic map is provided on **Figure 1** in **Attachment I**.
9. The processing plan is addressed in **Attachments II** and **III**. Pickup of unauthorized waste is prevented by the Synergy personnel screening materials before picked up from Synergy's customers (generators). All materials scheduled for pickup are visually inspected by Synergy personnel before material transfer for processing.
10. The Closure Plan is included as **Attachment IX**. Non metallic materials shall be handled and disposed of in 55-gallon drums.
11. Financial assurance documentation is provided with the Used Oil Processing Permit Application.
12. Given all solid processing is handled inside a building, the roof of the building provides separation of Stormwater from the processing and storage areas.
13. 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).

Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

DEP Form # 62-701.900(4)
Form Title Application to Construct, Operate or Modify a Waste Processing Facility
Effective Date 05-27-01

DEP Application No. _____ (Filled by DEP)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

APPLICATION FOR PERMIT 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 Rule 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
   - [ ] Materials Recovery Facility:
     - [ ] C&D Recycling
     - [ ] Class III MRF
     - [ ] MSW MRF
     - [✓] Other Describe: Oily/Solid Waste associated with Used Oil Processing Permit.
   - [ ] Volume Reduction Facility
     - [ ] Pulverizer/Shredder
     - [ ] Compactor/Baling
     - [ ] Other Describe: _____

NOTE: C&D Disposal facilities that also recycle C&D, shall apply on DEP FORM 62-701.900(6), F.A.C.

2. Type of application:
   - [ ] Construction/Operation
   - [✓] Operation Without Additional Construction

3. Classification of application:
   - [✓] New
   - [ ] Renewal
   - [ ] Substantial Modification
   - [ ] Intermediate Modification
   - [ ] Minor Modification

4. Facility name: Synergy Recycling of Central Florida, LLC.

5. DEP ID number: 53/9802060, FLR 000 053 661 County: Polk

6. Facility location (main entrance): 3800 West Lake Hamilton Drive, Winter Haven, Florida 33881

7. Location coordinates:

   Section: 06 Township: 28 S Range: 27 E

   UTMs: Zone _____ _____ km E _____ km N

   Latitude: 28 ° 04 ' 42 " Longitude: 81 ° 39 ' 39 "

8. Applicant name (operating authority): Synergy Recycling of Central Florida, LLC

Mailing address: 3800 West Lake Hamilton Drive, Winter Haven, FL 33881
Street or P.O. Box City State Zip

Contact person: Garry R. Allen Telephone: (863) 419-0556

Title: Operating Partner gallen@SynergyRecycling.org
E-Mail address (if available)

9. Authorized agent/Consultant: Imperial Testing Laboratories, Inc.

Mailing address: 3905 Kidron Road, Lakeland, Florida 33811
Street or P.O. Box City State Zip

Contact person: Michael H. Stillinger, P.E. Telephone: (863) 647-2877

Title: Vice President - Engineering mike@imperialtesting.com
E-Mail address (if available)

10. Landowner(if different than applicant): _____

Mailing address: _____
Street or P.O. Box City State Zip

Contact person: _____ Telephone: (___) _____

_____
E-Mail address (if available)

11. Cities, towns and areas to be served: _____

Central Florida

12. Date site will be ready to be inspected for completion: upon permit approval

13. Estimated costs:

Total Construction: $ NA Closing Costs: $ 50,538.26

14. Anticipated construction starting and completion dates:

From: not applicable To: not applicable

15. Expected volume of waste to be received: 0.73 yds^3/day _____ tons/day

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

Receiving, processing and shipping oily/solid waste collected from customers who arrange for pick up of used oil, used oil filters, air & transmission filters, absorbant pads 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 solid waste that is proposed to be collected, stored, processed or disposed of by the facility, a projection of those waste types and quantities expected in future years, and the assumptions used to make the projections (Rule 62-701.710(2)(a), F.A.C.).

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 and wells serving community water supplies on or within 1000 feet of the site (Rule 62-701.710(2)(b), F.A.C.).

3. Provide a description of the operation and functions of all processing equipment that will be used, with design criteria and expected performance. The description shall show the flow of solid waste and associated operations in detail, and shall include (Rule 62-701.710(2)(c), F.A.C.):
   a. Regular facility operations as they are expected to occur;
   b. Procedures for start up operations, and scheduled and unscheduled shut down operations; and
   c. Potential safety hazards and control methods, including fire detection and control.

4. Provide a description of the design requirements for the facility which demonstrate how the applicant will comply with Rule 62-701.710(3), F.A.C.

5. Provide a description of the loading, unloading, storage and processing areas (Rule 62-701.710(2)(d), F.A.C.).

6. Provide the identification and capacity of any on-site storage areas for recyclable materials, non-processable wastes, unauthorized wastes, and residues (Rule 62-701.710(2)(e), F.A.C.).

7. Provide a plan for disposal of unmarketable recyclable materials and residue, and for waste handling capability in the event of breakdowns in the operations or equipment (Rule 62-701.710(2)(f), F.A.C.).

8. Provide a boundary survey, legal description, and topographic survey of the property(Rule 62-701.710(2)(g), F.A.C.).

9. Provide an operation plan which describes how the applicant will comply with Rule 62-701.710(4), F.A.C. (Rule 62-701.710(2)(h), F.A.C.).

10. Provide a closure plan which describes generally how the applicant will comply with Rule 62-701.710(6), F.A.C. (Rule 62-701.710(2)(I). F.A.C.).

11. Unless exempted by Rule 62-701.710(10(a), F.A.C., provide the financial assurance documentation required by Rule 62-701.710(7), F.A.C. (Rule 62-701.710(2)(j), F.A.C.).

12. Provide documentation to show that stormwater will be controlled according to the requirements of Rule 62-701.710(8), F.A.C.

13. Provide documentation to show that the applicant will comply with the recordkeeping requirements of Rule 62-701.710(9), F.A.C.

C. **CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER**

1. Applicant:

The undersigned applicant or authorized representative of Synergy Recycling of Central Florida, LLC. is aware that statements made in this form and attached information are an application for a Solid Waste 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.

Signature of Applicant or Agent

Garry R. Allen, Operating Partner
Name and Title (please type)

gallen@SynergyRecycling.org
E-Mail address (if available)

3800 W. Lake Hamilton Dr.
Mailing Address

Winter Haven, FL 33881
City, State, Zip Code

(863) 419-0556
Telephone Number

Date: February 27, 2009

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, 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.

Signature

Michael H. Stillinger, V.P.-Engineering
Name and Title (please type)

47011
Florida Registration Number
(please affix seal)

3905 Kidron Road
Mailing Address

Lakeland, Florida 33811
City, State, Zip Code

mike@imperialtesting.com
E-Mail address (if available)

(863) 647-2877
Telephone Number

Date: February 27, 2009

PROPERTY ACCESS AGREEMENT

Ashland Inc. ("Licensee") desires to enter onto the property of Patricia A. Castellano Trustee ("Landowner") located at 6211 N. Anderson Road (Facility) for the purpose of carrying out the work set forth in Exhibit A hereto ("Work"). Licensee is required to carry out the Work pursuant to the terms of the Florida Department of Environmental Protection.

In return for Landowner's Agreement to provide Licensee access to the Facility, Licensee hereby agrees to indemnify and hold harmless Landowner, its employees, tenants, agents, successors and assigns, from and against any and all liabilities, claims, penalties, suits and the costs and expenses incident thereto (including costs of defense, settlement and reasonable attorney's fees) which Landowner may hereafter incur, become responsible for or pay out as a result of death or bodily injuries to any person, destruction or damage to any property, caused in whole or in part by the act of Licensee, its employees, agents or contractors in carrying out the Work; provided Landowner shall promptly notify Licensee of any such claim and provides Licensee the opportunity to defend same. Licensee shall have the sole right to defend, settle or compromise such claims.

Landowner, in consideration for the indemnification provided by Licensee, agrees to allow access to Licensee, its employees and contractors, at all reasonable times for the sole purpose of carrying out the Work, for such length of time as may be required for Licensee to comply with requests of the Florida Department of Environmental Protection.

Licensee further agrees to 1) upon Landowner's request, provide copies of all final reports and sampling data generated as a result of the Work; 2) remove all debris and material generated as a result of the Work; 3) return the portion of the Facility used in the Work to the condition it was in immediately prior to the beginning of the Work after the Work has been completed.

Landowner:_____ Date: _____

By: _____

Ashland Inc.:

By: _____ Date: _____

EXHIBIT A

As part of ongoing assessment activities at the Ashland Inc. facility, the Florida Department of Environmental Protection has requested the installation and sampling of one monitor well east of Anderson Road in the vicinity of 6211 N. Anderson Road (see attached Figure). On behalf of Ashland, the monitor well will be installed by ARCADIS and a licensed driller using direct push technology. The time required to install the monitor well is anticipated to be approximately 4 hours. The well will be completed flush to the surrounding ground surface within a steel bolt-down manhole (approximately 8-inches in diameter) and 2-foot by 2-foot concrete pad (see attached construction diagram). After installation, Ashland Inc. will need to access the well on an approximate twice per year frequency for sampling purposes. The time to sample the well is typically 30 to 60 minutes per event.

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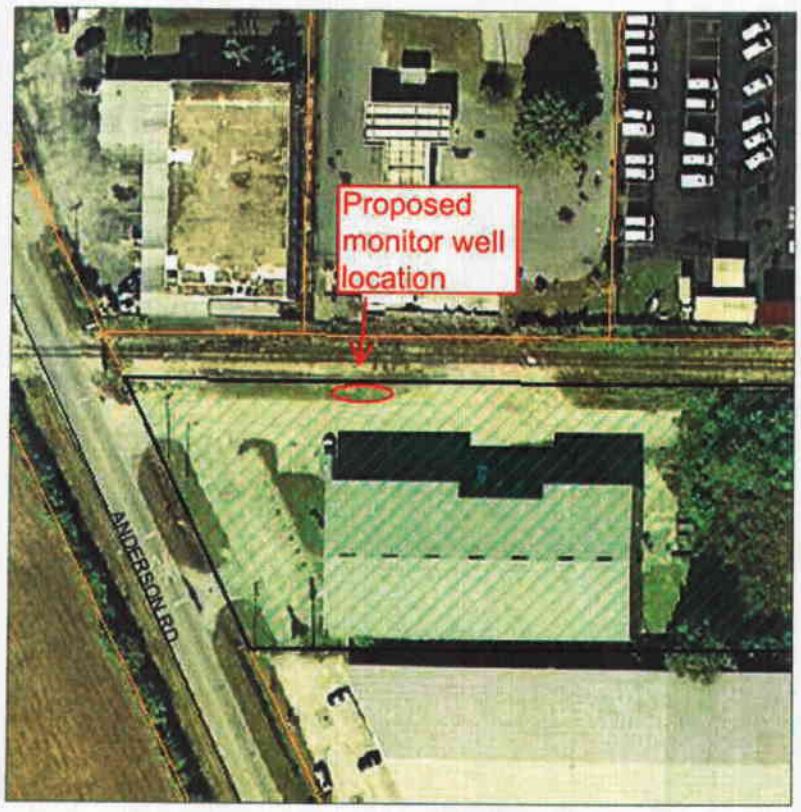
ROB TURNER, C.F.A.
HILLSBOROUGH COUNTY PROPERTY APPRAISER



[VIEW PROPERTY RECORD INFORMATION]

FOLIO:	0280780000
PIN NUMBER:	U-32-28-18-ZZZ-000001-03060.0
OWNER 1:	CASTELLANO PATRICIA A TRUSTEE
ADDRESS:	6211 ANDERSON RD TAMPA
LEGAL DESC:	BDRY AND W 503.78 FT TO BEG LESS N 33 FT FOR RD
DOR CODE:	4830

VALUE SUMMARY:

BUILDING VALUE:	$198,286
EXTRA FEATURE VALUE:	$19,245
LAND VALUE (MARKET):	$143,673
LAND VALUE (AGRI.):	$0
JUST (MARKET) VALUE:	$554,300
ASSESSED VALUE (A10):	$554,300
EXEMPT VALUE:	$0
TAXABLE VALUE:	$554,300

SALES INFORMATION	NEW!
1/1/1974	$36,500.00
12/1/1985	$535,000.00
4/18/2006	$100.00
4/18/2006	$100.00
8/21/2006	$100.00

FOLIO: 0280780000 PIN: U-32-28-18-ZZZ-000001-03060.0 ACREAGE: 0.00

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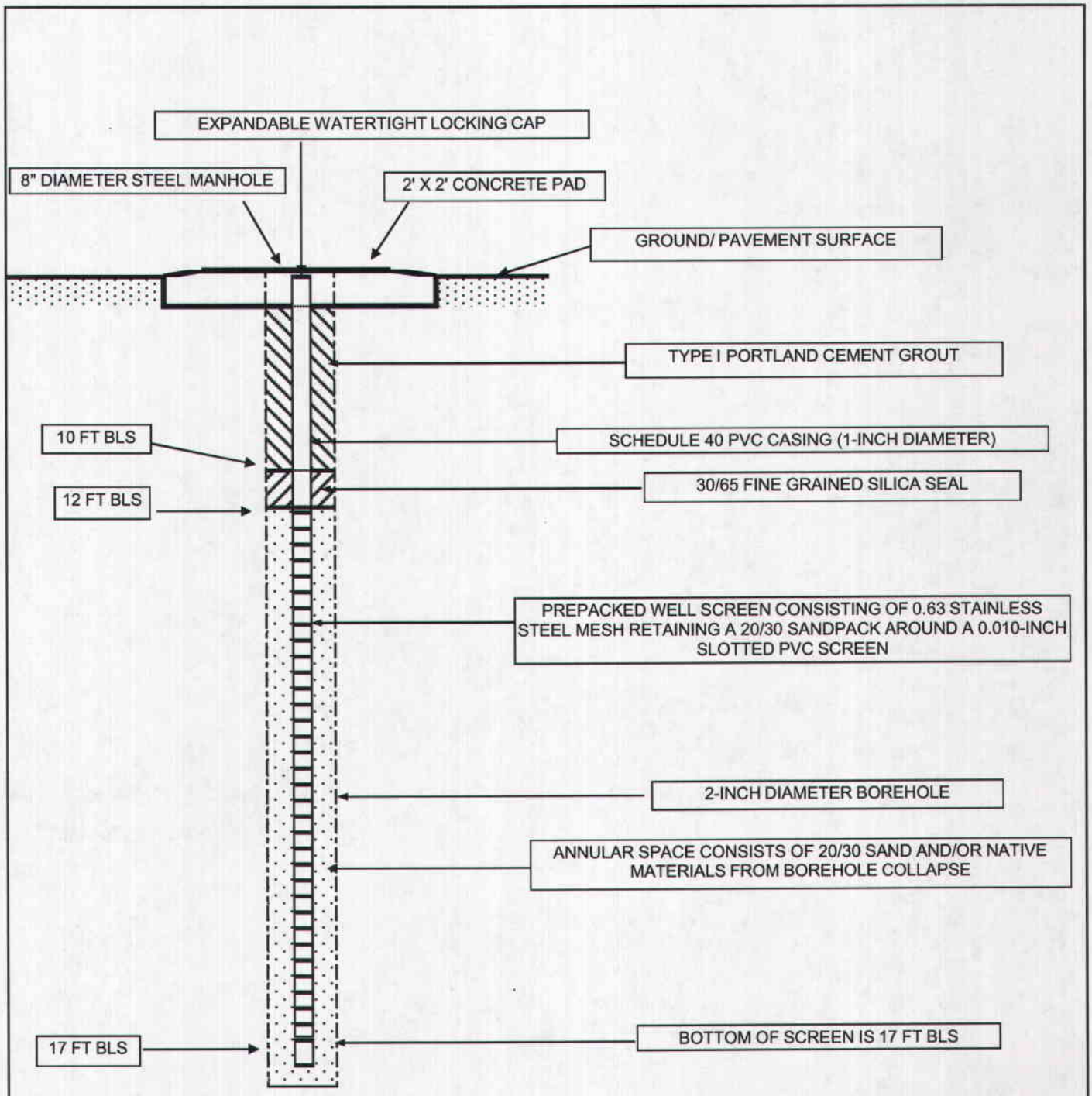

ARCADIS
Infrastructure, environment, buildings

TYPICAL MONITOR WELL SCHEMATIC

FIGURE
2

PROJ\FORMS\FIELD\Typical Monitor Well Figure.xls

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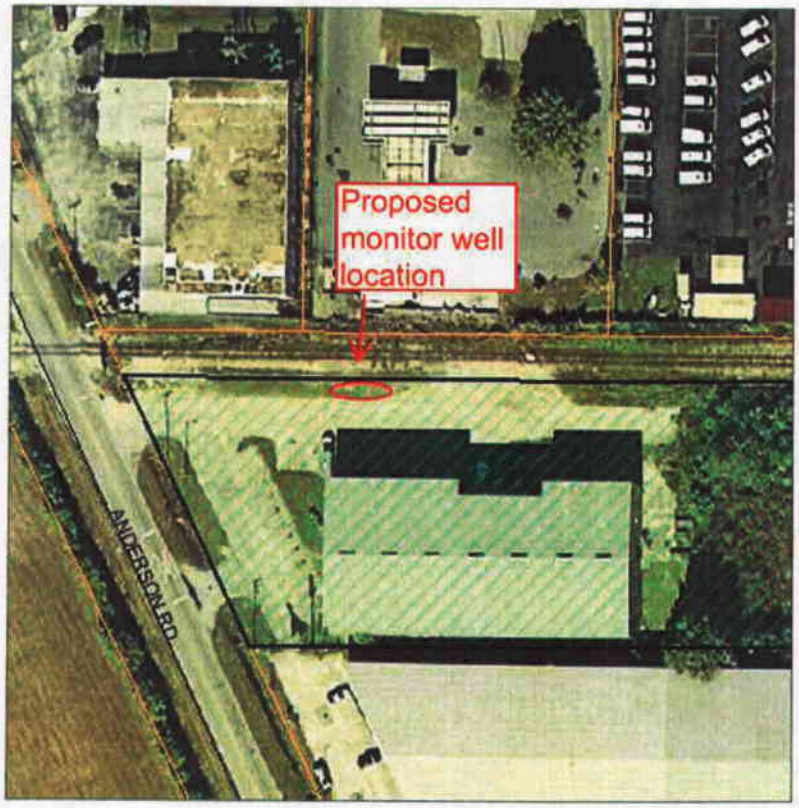

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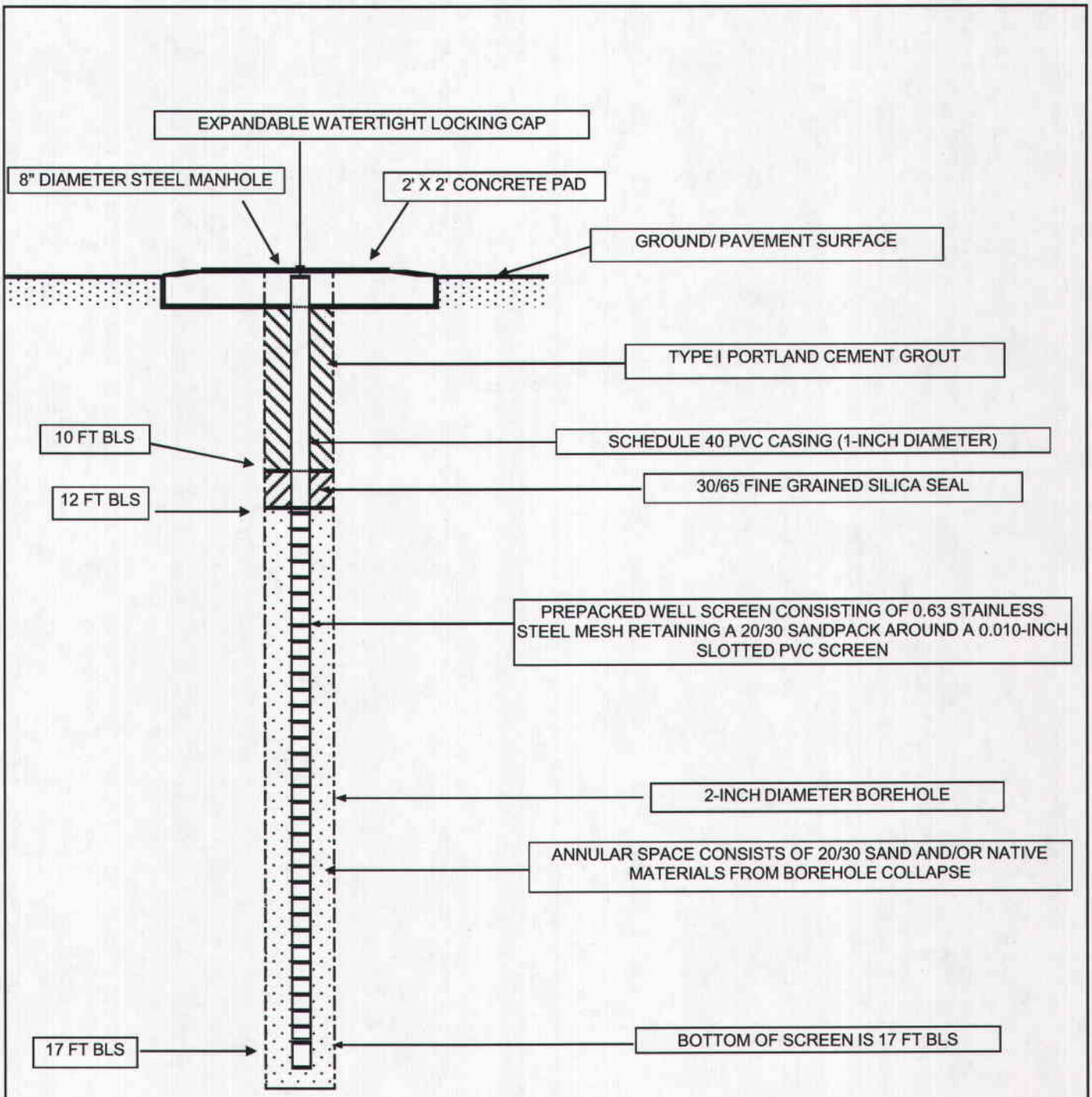

ARCADIS
Infrastructure, environment, buildings

TYPICAL MONITOR WELL SCHEMATIC

FIGURE
2

PROJ\FORMS\FIELD\Typical Monitor Well Figure.xls

ASHLAND TAMPA: JANUARY 13, 2011 TELECONFERENCE CALL

PARTICIPANTS:
Steven G Roach (Ashland)
Merlin Russell (FDEP)
Greg Page (ARCADIS)
James Dregne (FDEP)
Anthony Tripp (FDEP)
Marc Killingstad (ARCADIS)
Brian Burke (ARCADIS)

TOPIC: FDEP has requested development of remedy concurrent with offsite RFI work (remedy must be selected by submittal of next report)

RECENT HISTORY:

- **Feb 2003**: FDEP email to Ashland that surficial aquifer assessment complete enough to move forward with determining technologies for remediation.
- **July 2003**: FDEP states that surficial aquifer appears to be delineated, approves Routine GW Monitoring Plan.
- **April 2005**: CA 750 approval: surficial/Floridan Aquifer delineated, two years of monitoring showing plume stability has been completed.
- **October 2006**: GW F&T Model indicates that pump and treat or 75% source reduction does not result in major reductions in plume longevity or extent compared to natural attenuation.
- **April 2007**: FDEP agrees with GW F&T Model conclusions provided Floridan Aquifer monitoring program and HHRA implemented.
- **May 2007 to Feb 2009**: Heritage Plastics access delays and implementation of Floridan Aquifer investigation.
- **August 21, 2009**: Meeting between Ashland, FDEP, and ARCADIS to present updated GW F&T Model.
- **August 27, 2009**: Draft CMS (URS, 2002) withdrawn.
- **October 2009**: FDEP requests adding perimeter site wells to demonstrate plume stability.
- **November 2009**: Phase IV RFI Addendum: Concludes that requirements of the FDEP conditional approval of January 2000 Phase IV are met. Recommends sampling expanded list of wells in January 2010 to update GW F&T Model.
- **2009 to present**: Conducted ditch evaluation, semi-annual monitoring, access agreement procurement efforts, and installation of offsite wells.

CURRENT SITE STATUS:

Received FDEP review of November 2010 GMR on January 10, 2011.

- Sediment sample in ditch? Ditch shallow, above water table, thus no impacts to soils and sediments likely, CSX approval needed before sampling on their property, process is time intensive.

- Measure wells south of Stanley Chair? These are Theochem wells, sampling could be problematic, water levels possible, access needed first (likely also problematic).

- Move proposed location from Castellano property to north of track or farther east? Wells in these locations would not be optimal for delineation. May expand the number of future restrictive covenants needed? Budget Heading - Air 6217 Anderson

- Hawthorn delineation? Hawthorn confining unit consists of intermittent, apparently disconnected water bearing zones. Difficult to establish gradients and delineate.

PATH FORWARD:

- Response to Comments letter

- Receive FDEP approval of proposed well sampling list

- Perform sampling event 2/7- 2/9/11

- Update model with new data, run remedial scenarios to determine applicability of treatment options or MNA

- Proceed w/ access agreement, install offsite wells

- Continue review of Theochem and Cavalier Packaging sites