Kothur, Bheem

From:

Mike Stillinger [mike@imperialtesting.com]

Sent:

Wednesday, May 11, 2011 5:53 PM

To:

Kothur, Bheem

Cc:

gallen@synergyrecycling.org; Dregne, James

Subject:

Synergy Recycling of Central Florida LLC, FLR 000 053 611; 292753-HO-004; Facility Id No.

53/9802060

Attachments:

Mike Stillinger.vcf; 8731 NOD Response 2011-05-11 Final.pdf

Hello Bheem,

Please find attached our NOD response submittal; also the closure costs have been adjusted up 13.4% from the original amount bonded, changing the lab analysis and washwater costs, even though the market will close the site for the costs as previously submitted. Please let Synergy know if the update costs are acceptable, given the Bond will have to be amended and this previously took a significant amount time. Synergy would like to place their new tanks on-line as soon as humanly possible, given the idle cost and market conditions. Thank you for any review contingency you can provide to alleviate Synergy's burden.

Michael Stillinger

Imperial

863-647-2877



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

May 10, 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 000 053 611; FDEP Permit No. 292753-HO-004
Used Oil Permit Revision 1 Response to April 20, 2011 Notice of Deficiency

Dear Mr. Kothur:

Briefly, on behalf of Mr. Garry Allen, Operating Partner of Synergy Recycling of Central Florida, LLC (Synergy) Imperial Testing Laboratories, Inc. (Imperial) had provided the Department an application for the Used Oil Processing Facility Permit on March 17, 2011. Please consider the following answers to the April 20, 2011 review letter referenced above. For ease of review each comment shall answered in the same order:

General Comments:

- 1. We apologize for the typo on the cover letter, the EPA Id No. was correct on the application, the submitted figures, attachments, closure cost estimate form and calculations.
- 2. The vicinity map had copied lightly; there are no changes in the vicinity map from the initial permit application submittal before the submitted modification.
- 3. At the time of the application Tank 5 (25-kgallon) and the containment structure were proposed. The submitted Figures illustrated the two single walled 25-kgallon tanks (Tanks 4 and 5) being surrounded by the containment structure. Figures have been revised to include Tank numbers.
- 4. See response to Comment 3.
- **5**. See response to Commen t 3.
- 6. Tank 4 had been registered at the time of the application. Tank 5 could not be registered until installed. On May 2, 2011 Synergy submitted an application to register Tank 5. Copies of the Tank registration and application are included for review.
- 7. Given the significant recession that has occurred from 2008 to the present, analytical costs and PCW disposal costs have been reduced by vendors in the market place. The FDEP form does not provide a user friendly format to explain cost derivations. Hence, Imperial had provided a supplement with notes explaining cost derivations. Costs have been adjusted to move the analytical costs to State Funded allowable rates and PCW

Mr. Bheem Kothur, P.E. III US EPA Id. No. FLR 000 053 611, FDEP Permit No. 292753-HO-004 Synergy Recycling of Central Florida, LLC, Winter Haven, Florida May 10, 2011 Page 2

disposal rates have been adjusted from \$0.15 to \$0.35 per gallon. With these changes there is a 13.4-percent increase from costs submitted with the original application when the Bond was recorded. Even though the market place will provide closure services for the cost previously submitted with the application we hope the FDEP will accept the cost revisions provided with this submittal (attached).

Specific Comments:

- 1. A Plan and Elevation View of Tank 5 can now be provided as requested given the formerly proposed tank at the time of the application has been installed (April 18, 2011). In order to enhance Synergy's oil process flexibility, Tanks 4 and 5 will be fitted will valves and hose connections so that the tanks can be filled or emptied at either north or south ends. Again, in order to enhance system process flexibility and efficiency, Synergy intends to use the fill basket strainer nearby Tank 1.
- 2. The secondary containment structure is shown correct on Figure No. 5, containing Tanks 4 and 5 only. The footnote in Attachment VIII was a former consideration, now corrected.
- 3. The intended loading and unloading areas remain the same for Tanks 4 and 5. The primary loading area shall be used to fill or empty Tanks 4 and 5. The secondary loading area shows only for hose connections to the remote fill box to Tank 3.
- 4. See Response 3. The secondary loading area shall not serve as a loading area for Tanks 4 and 5.
- 5. If and when water collects at the northwest corner of the loading / unloading area the collected water is inspected for oil; detected oil is recovered with sorbent material (e.g.: pads) and the remnant water is swept off for evaporation.
- 6. Attachment II Facility Operations, Page 1, Paragraph 4 can now be updated to reflect that Tank 5 was installed on April 18, 2011 and the secondary containment structure was installed on April 23, 2011 (see attached).
- 7. See Response 6 (see attached).
- **8.** Attachment VIII Unit Management Plan Heading shows Containment Structure for Tanks 4 and 5 (see attached).

Mr. Bheem Kothur, P.E. III US EPA Id. No. FLR 000 053 611, FDEP Permit No. 292753-HO-004 Synergy Recycling of Central Florida, LLC, Winter Haven, Florida May 10, 2011 Page 3

On behalf of Synergy Recycling of Central Florida, LLC we hope these responses shall satisfy FDEP's concerns, addressed in FDEP's April 20, 2011 NOD. Please do not hesitate to contact us for any questions.

Respectfully,

Michael H. Stillinger, P.E. No. 47011

/Vice President of Engineering

Attachments

FDEP's April 20, 2011 Notice of Deficiency (Numbered to ease review)
Attachment B to Permit (Tank Table), updated
Attachment I (Figures)
Attachment II
Attachment VII
Attachment VIII

FDEP Form 62-710.01(7) Used Oil Processing Facility Closing Cost Estimate Form Tank Registration for FDEP Facility Id. No. 53/9802060

Mr. Garry Allen, Operating Partner, Synergy Recycling of Central Florida, LLC,
 3800 West Lake Hamilton Drive, Winter Haven, Florida 33881
 Mr. James Dregne, Program Manager, FDEP Southwest District, 13051 N. Telecom
 Parkway, Temple Terrace, Florida 33637-0926
 Project File No. 8731



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 fr. Secretary

April 20, 2011

SENT VIA E-MAIL gallen@synergyrecycling.org

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

RE:

Synergy Recycling of Central Florida, LLC

EPA I.D. No. FLR 000 053 611 Permit Numbers: 292753-HO-004

Used Oil Processing Facility Permit Major Modification

Notice of Deficiency - 1

Dear Mr. Allen:

The Florida Department of Environmental Protection (the Department) has received your permit modification application dated March 14, 2011 and DEP received on March 21, 2011 and reviewed to operate a Used Oil and Material Processing facility at 3800 West Lake Hamilton Dr, Winter Haven, Florida, 33881.

The review of the permit renewal application NOD -1Comments indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies of your written response (two copies to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Southwest District office). If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Mr. Garry Allen April 20, 2011 Page Two

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781, or e-mail: Bheem.kothur@dep.state.fl.us

Sincerely,

Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc: James Dregne, DEP/Tampa District, james.dregne@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Georgiana, Holmes, OGC/Tallahassee, Georgiana.holmes@dep.state.fl.us
Frank Hornbrook, DEP/Tallahassee, frank.hornbrook@dep.state.fl.us
Michael H. Stillinger, Imperial/Lakeland, mike@imperialtesting.com

ATTACHMENT April 20, 2011 Synergy Recycling of Central Florida, LLC Winter Haven, Florida EPA I.D. No. FLR 000 053 611 Permit No. 292753-HO-004 Notice of Deficiency

General Comments:

- 1. Cover Letter, dated March 14, 2011: Please correct the EPA I.D. in this document and future correspondences to read "FLR 000 053 611" instead of "FLR 00 053 661".
- 2. Figure No. 1 Vicinity Map is not legible. Please provide a legible copy.
- 3. Figures No. 2, 5, 6, 7, 8, 9, 10, 12 show a Proposed 25,000 Gallon AST and a Proposed Tank Farm Containment. The figures should be updated to reflect that the proposed AST has been installed and the secondary containment has been constructed and are no longer proposed.
- 4. The proposed secondary containment arrow in Figures No. 2, 6, 7, 8, 9, 10, and 12 does not point to the precise location of the secondary containment. The figures already show secondary containment around the two 25,000 gallon single walled tanks. It is not clear if the proposed secondary containment will be around the two single walled and the double walled tanks or just the single walled tanks
- 5. Attachment B, Tank Table; Site Map, Figure 2 and all other appropriate maps: All tanks shown on figures should have the designated tank number noted on the figure. Please identify the tank numbers to match with the tank table.
- 6. Attachment II, Facility Operation, Paragraph 4, and Page 1 of 2: In September 2010 Synergy has installed an additional 25,000-gallons single walled tank and proposes to install another 25,000-gallons single walled tank. Facility must make sure that these tanks are registered with the County tanks program and submit as built drawings upon installation completion. Facility should not use these tanks until the department approves to use it.
- 7. Attachment IX, Closure Plan dated March 11, 2011; Closure Cost Estimates dated March 14, 2011: The Department approved the facility closure cost estimates on March 15, 2011 for an amount of \$51,044.00 for the year 2011. Facility submitted the revised closure cost estimates for an amount of \$50,966.44 along with this major modification to include 2-25,000-gallons. Facility's closure capacities increased from 36,500-gallons to 86,500.00-gallons. Therefore, facility must revise their closure cost estimate and increase the current approved estimates of \$51,044.00. The submitted estimate of \$50,966.44 and the justification is not acceptable.

Specific Comments:

- 1. Figure No. 5 Single Walled Tank Containment Details: Plain View and Elevation View must show details of both 25,000 gallon AST's. Will the AST's be filled at the north or south ends of the tanks? Where is the fill basket strainer located?
- 2. Figure No. 5 Single Walled Tank Containment Details: The Elevation View shows the secondary containment around Tanks No. 4 and 5. Attachment VIII specifies the secondary containment will be around three tanks. Please correct as necessary.
- 3. Figure No. 6 Loading and Unloading Area: Loading Areas should be renamed, for example Loading/Unloading Area A and Loading/Unloading Area B. This is because the Secondary Loading/Unloading Area is the only loading and unloading area for the 25,000 gallon double walled AST.
- 4. Does the Secondary Loading/Unloading Area serve as the loading and unloading area for the new single walled tanks?
- 5. Figure No. 8 Stormwater Drainage: The figure shows stormwater flowing to the northwest corner of the loading/unloading area for Tanks No. 1 and 2. What happens to the water when it gets to the northeast corner of the containment berm?
- 6. Attachment II Facility Operations. Page 1, Paragraph 4: This paragraph must be updated to reflect that the second AST has been installed. The paragraph should also reflect that the secondary containment has been constructed.
- 7. Attachment VII SPCC Plan. Page 3, Paragraph 3: This paragraph must be updated to reflect that the second AST has been installed. The paragraph should also reflect that the secondary containment has been constructed.
- 8. Attachment VIII Unit Management Plan. Page 3 Heading: Heading states that "Tanks #3 and #4 Containment Structure (Figure 5)", should read "Tanks #3, #4 and #5 Containment Structure (Figure 5)", or "Tanks #4 and #5 Containment Structure (Figure 5)". Please correct accordingly.

ATTACHMENT B TANK TABLE

Tank <u>Number</u>	Tank Capacity gallons	Tank Contents
1	10,000	Oily Water, Used Oil
2	1,500	Spent Antifreeze
3-a	18,000	Used Oil
3-ь	3,500	Used Oil, Oily Water, Spent Antifreeze
3-е	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.

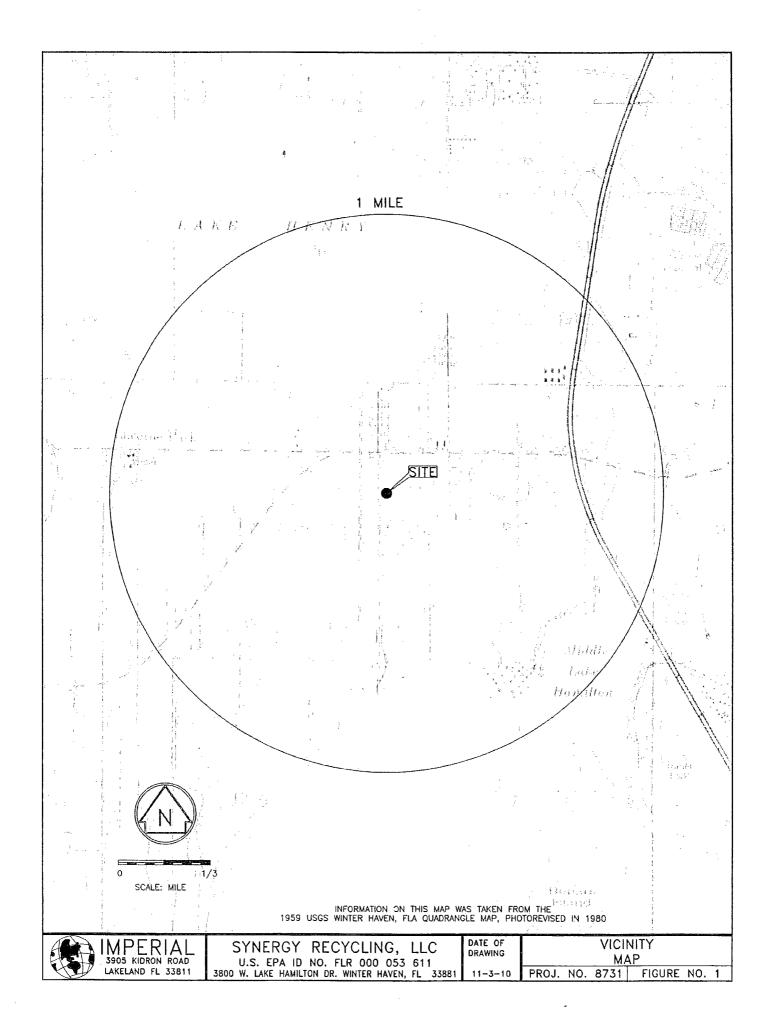
Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. 292753-HO-004

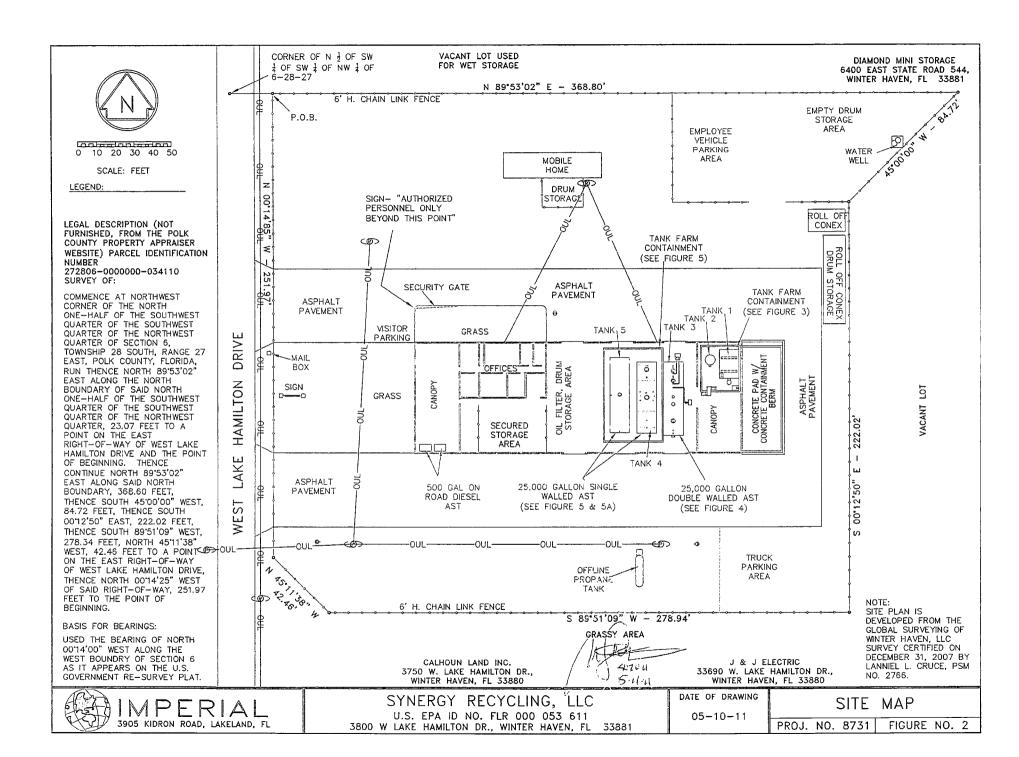
Revision 1 Section I May 10, 2011 Page 1 of 1

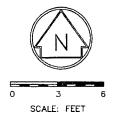
Attachment I

Facility Figures and Illustrations

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







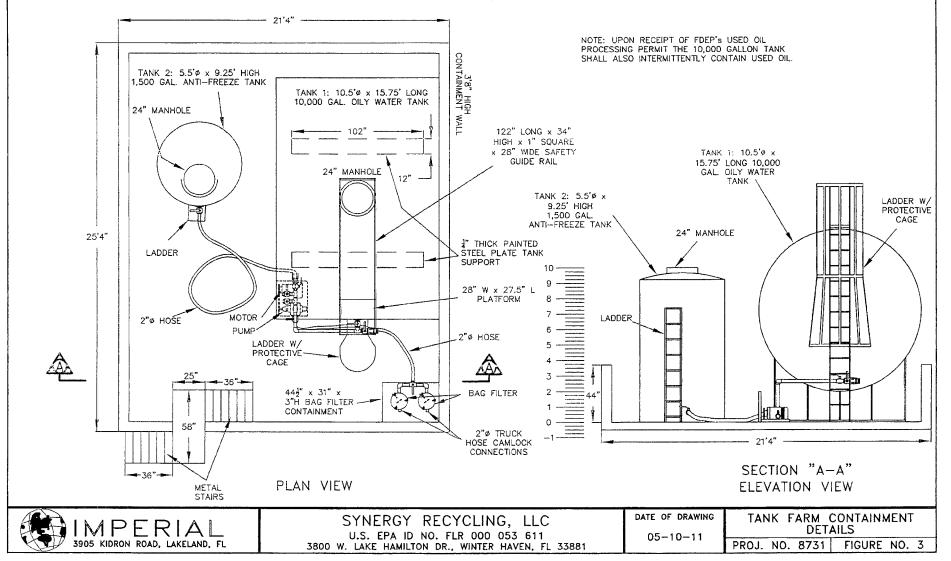
CONTAINMENT VOLUME: 20.08' x 24.08' X 3.67' X 7.48 GAL/CF. = 13,226 GALLONS

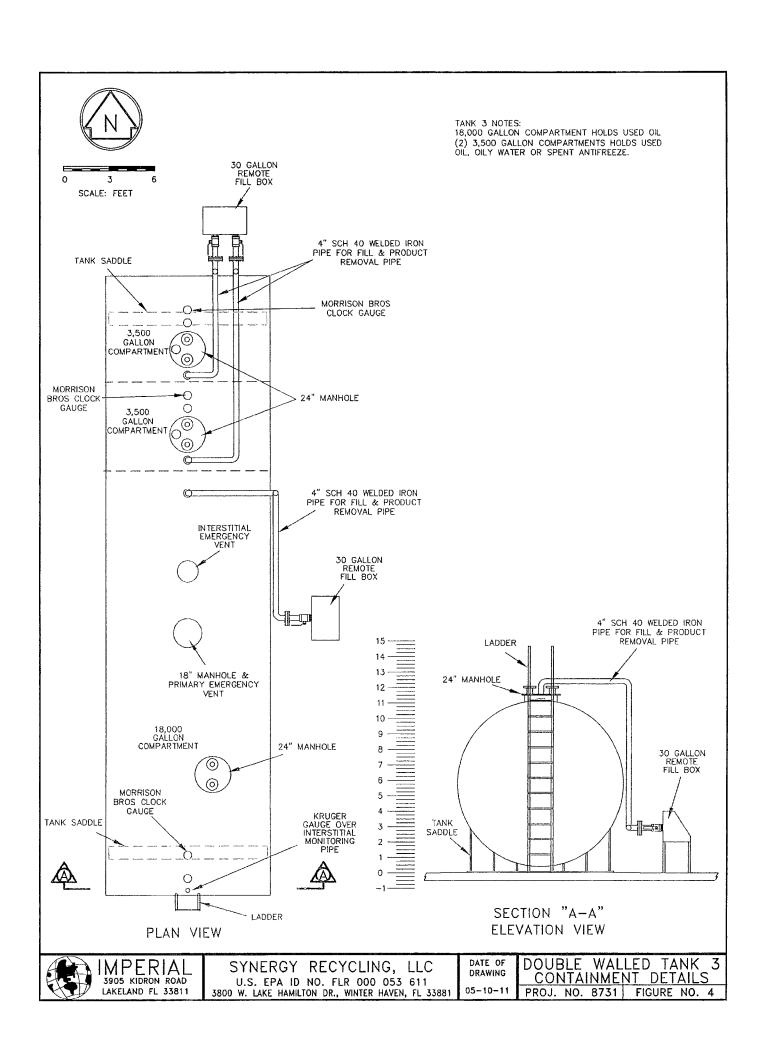
TAKE OUT VOLUME: ANTIFREEZE TANK: P1/4(5.5)(5.5)(3.67)(7.48) = 652 GALLONS DISPLACED

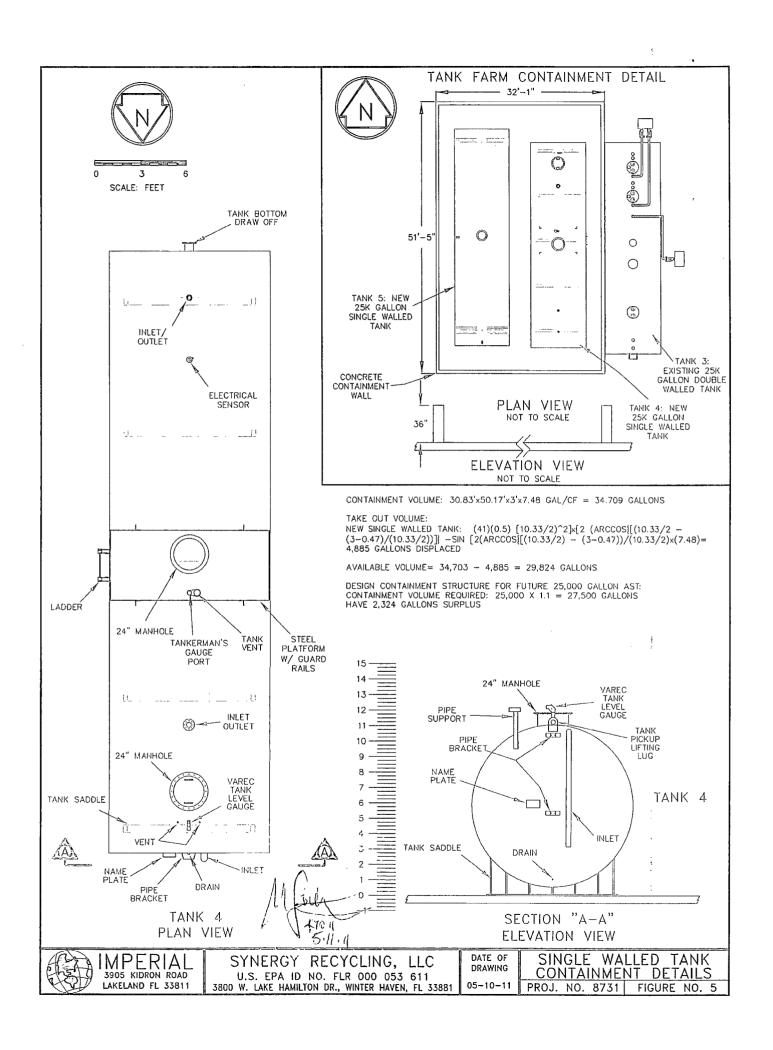
OILY WATER TANK: $(15.75)(0.5)[(10.5/2)^2]$ [2 $(ARCCOS\{[10.5/2) - (3.67-2)]/(10.5/2)\}$ - SIN [2(ARCCOS $\{[(10.5/2) - (3.67-2)]/(10.5/2)\}]$] × (7.48) = 1,041 GALLONS DISPLACED

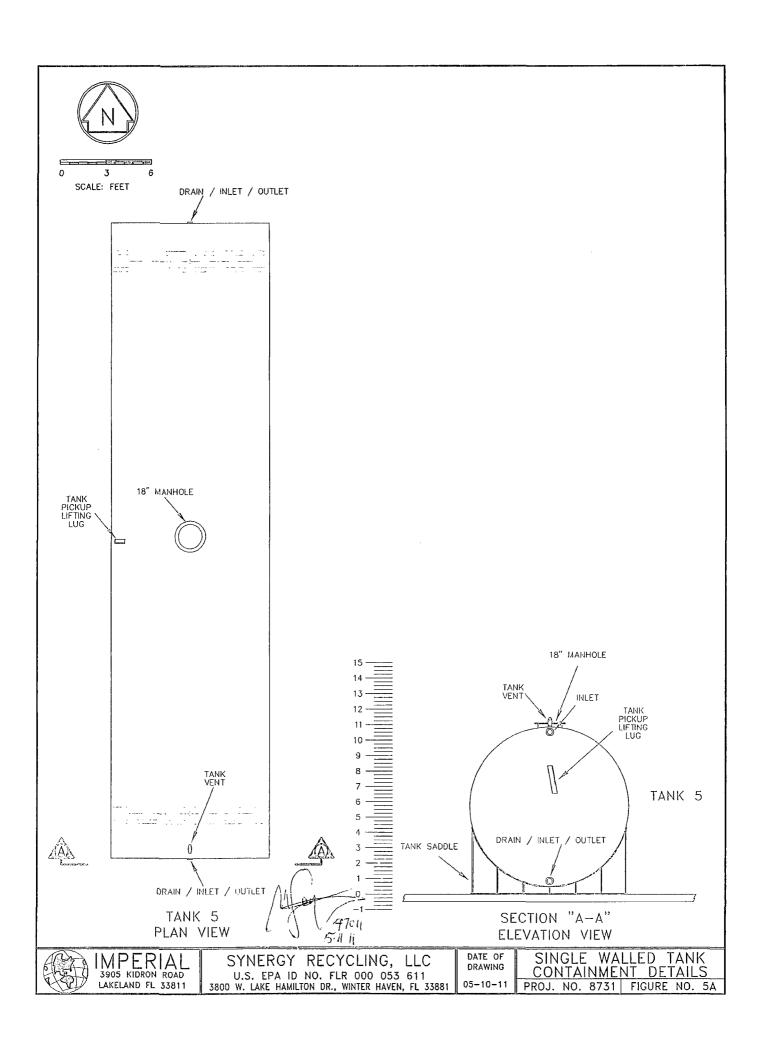
AVAILABLE VOLUME = 13.266 - [652+1041] = 11.573 GALLONS CONTAINMENT VOLUME REQUIRED: $10,000 \times 1.1 = 11,000$ GALLONS; HAVE 573 GALLONS SURPLUS

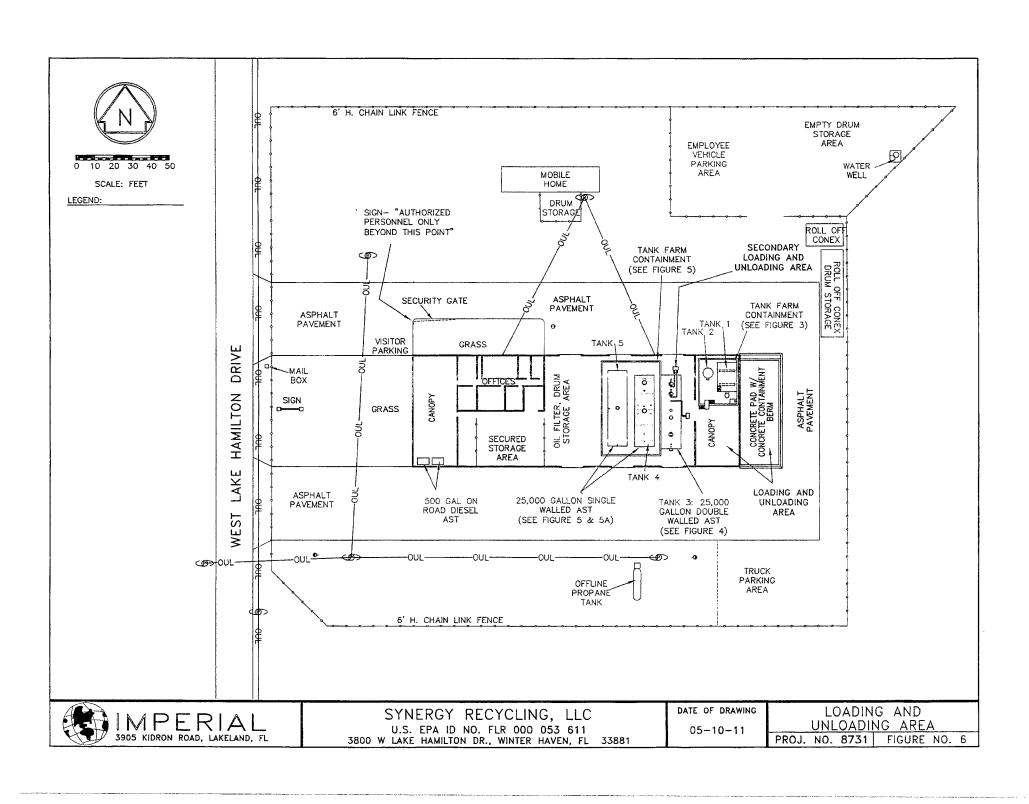
NOTE: CONTAINMENT VOLUME REQUIRED IS 110% OF LARGEST TANK VOLUME IN CONTAINMENT STRUCTURE

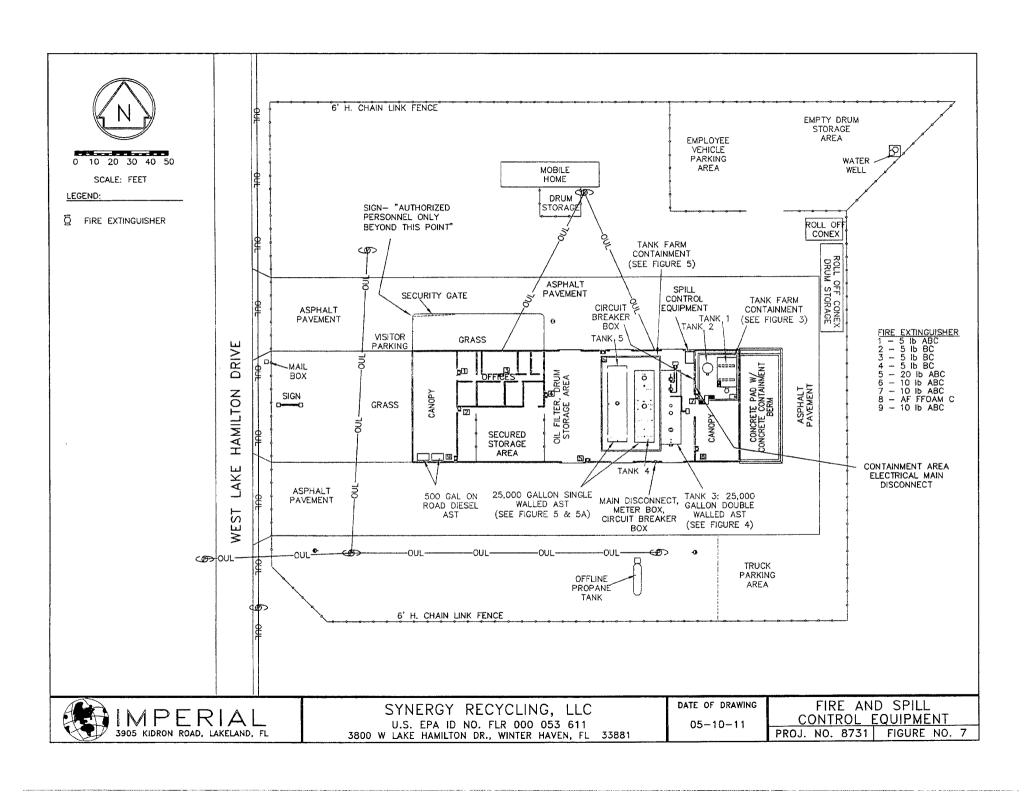


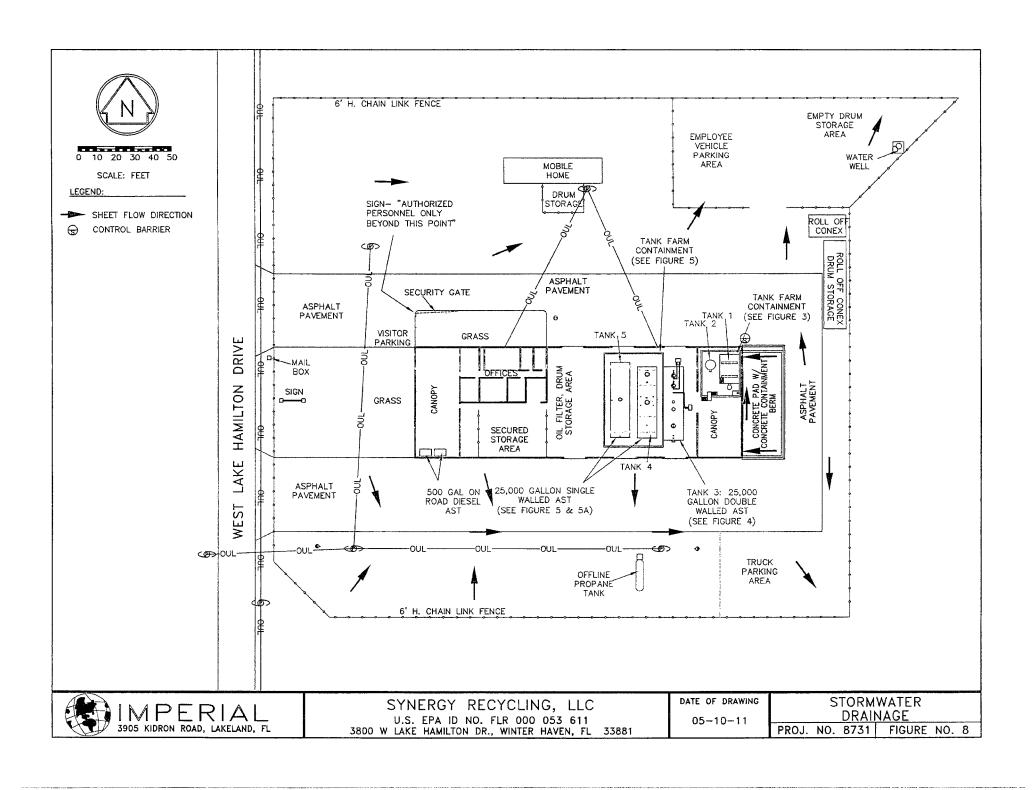


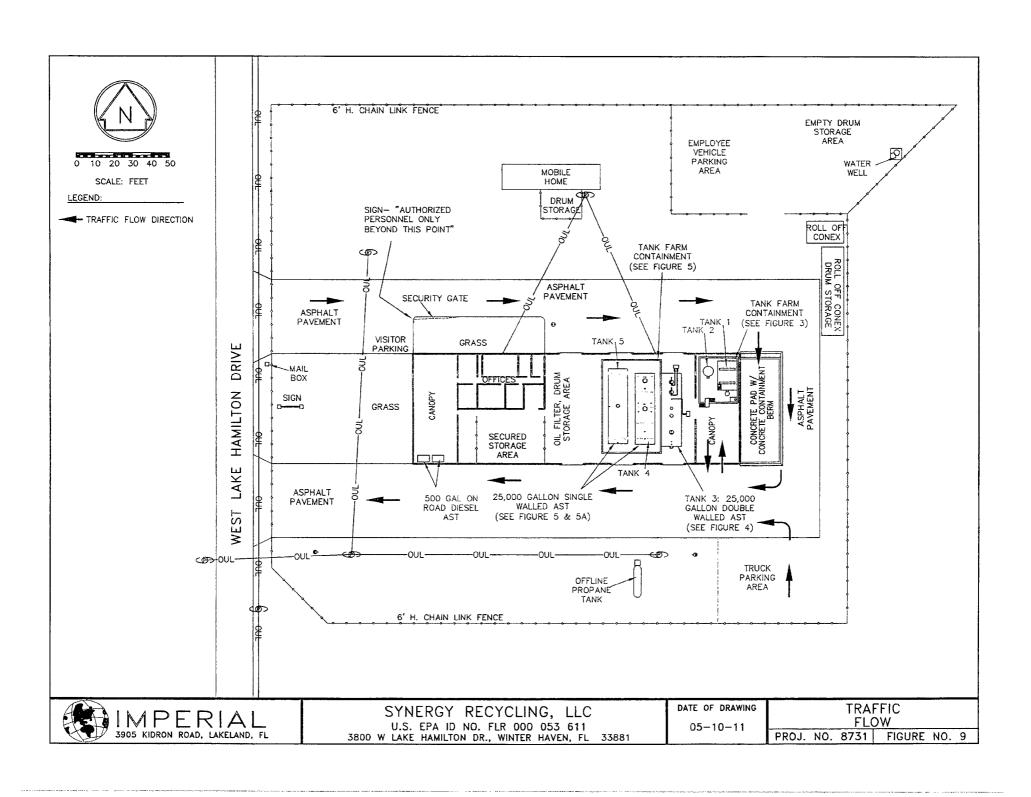


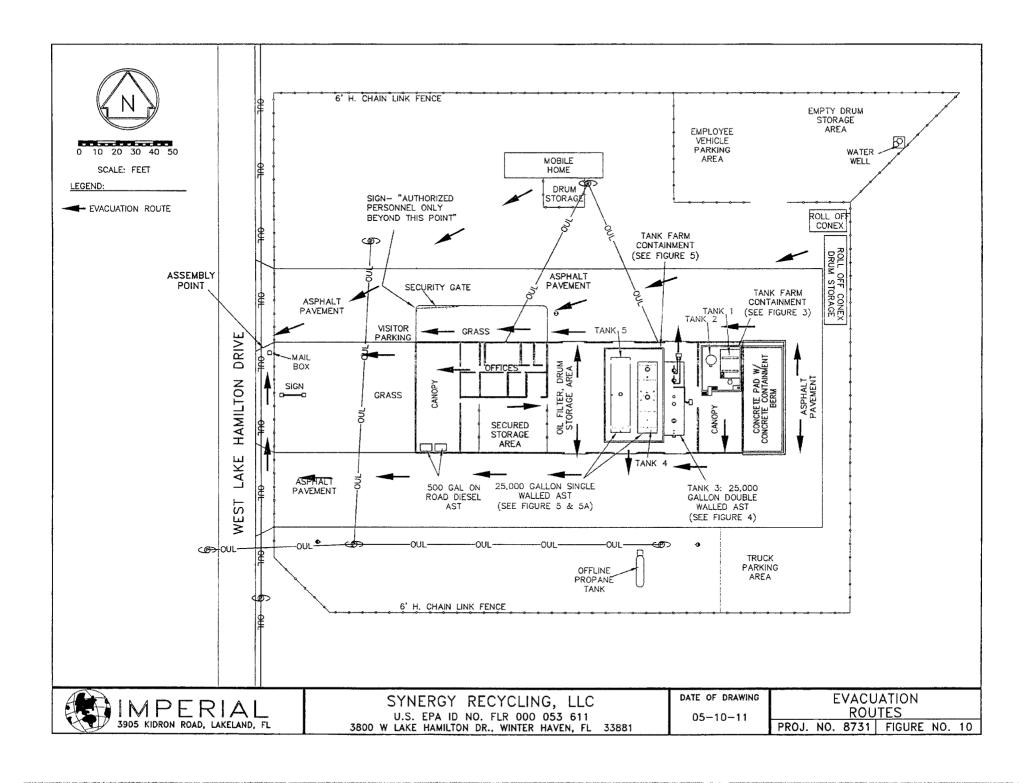














0 10 20 30 40 50

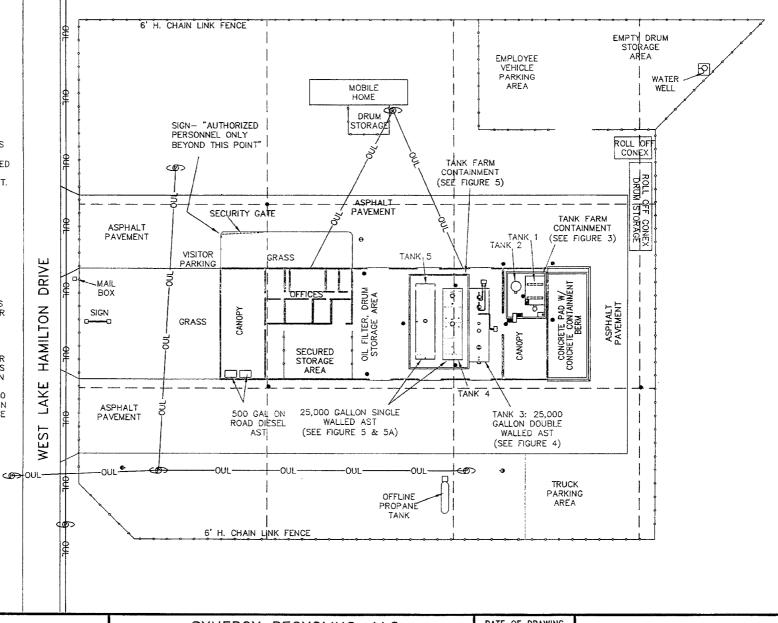
SCALE: FEET

LEGEND:

• SOIL BORING FOR OVA ANALYSIS OF (1) FT. INCREMENTS TO 10 FT. BLS THEREAFTER (5) FT. INCREMENTS NOT TO EXCEED 20 FT. BLS OR TO WATER TABLE IF LESS THAN 20 FT. BLS.

CLOSURE NOTES:

SITE IS SEPARATED INTO A
100 FEET GRID SOIL BORINGS
WILL BE CORED AT THE FOUR
CORNERS AND RELATIVE
CENTER OF THE TANK FARM
AND OIL FILTER STORAGE
AREA. THE STATISTICALLY
SIGNIFICANT MINIMUM NUMBER
OF RANDOM SOIL SAMPLES IS
THREE; CONSEQUENTLY GIVEN
A TOTAL POSSIBLE NUMBER
OF SIX SAMPLE POINTS, A 50
PERCENT COVERAGE IS WITHIN
THE 95 PERCENT CONFIDENCE
INTERVAL

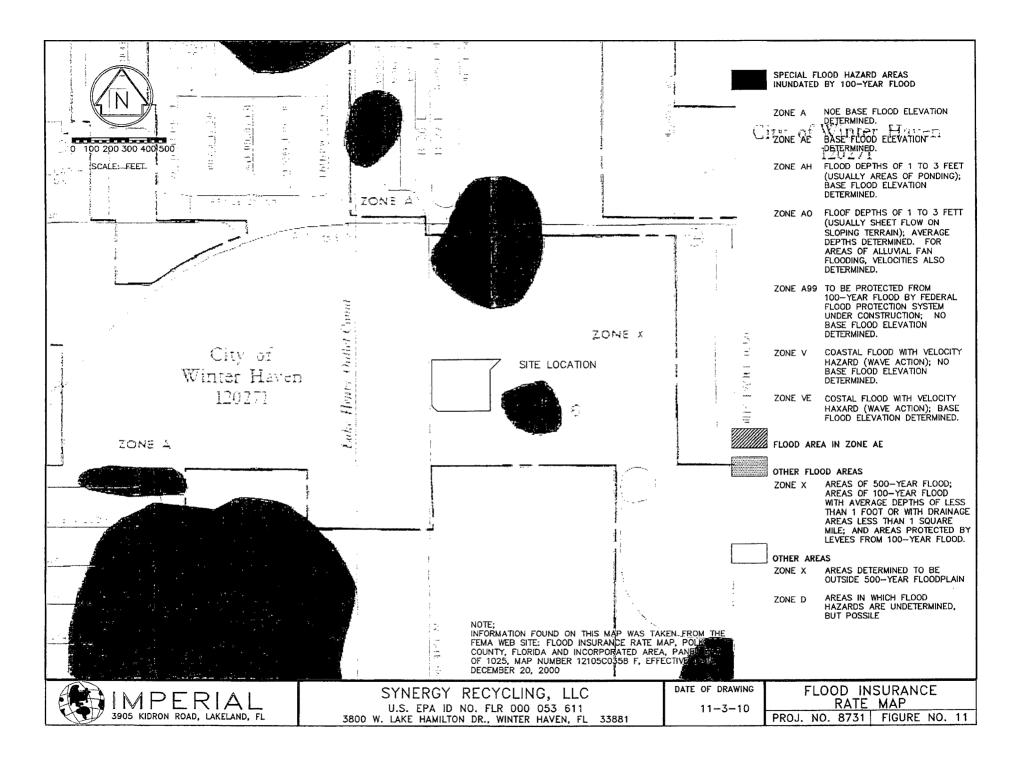




SYNERGY RECYCLING, LLC
U.S. EPA ID NO. FLR 000 053 611
3800 W LAKE HAMILTON DR., WINTER HAVEN, FL 33881

O5-10-11

CLOSURE PLAN
PROJ. NO. 8731 FIGURE NO. 12



Synergy Recycling of Central Fla. LLC. 3800 West Lake Hamilton Drive, Winter Haven, FL 33881 U.S. EPA No. FLR 000 053 611 Operation Permit Application No. H053-Pending Revision 1 Section II May 4, 2011 Page 1 of 2

Attachment II

Facility Operation

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

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

Synergy uses one 10,000-gallon above ground storage tank for processing oily water (or PCW, petroleum contact water); one 1,500-gallon above ground storage tank for bulking antifreeze for recycling. 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. The 10,000-gallon tank 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, 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 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.

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	Antifreeze Tank	150	1,500
3A	Used Oil/Oily Water/Antifreeze (I	Oouble-Walled)	3,500
3B	Used Oil/Oily Water/Antifreeze (I	Oouble-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 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.

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

Revision 1 Section VIII May 10, 2011 Page 3 of 3

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

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:

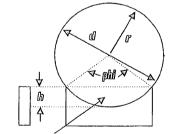
For Horizontal Tanks, calculations are:

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



Tank Volume Displaced

Michael H. Stillinger, P.E. #47011

Sallell



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

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

Used Oil Processing Facility Closing Cost Estimate Form

Date: May	11,2011		Date of DEP A		
I. GENERAL IN	FORMATION:	Latitude: 28°04'42' Long	gitude:8 <u>/13913</u>	99 EPA ID Number:F <u>IK</u>	2000 053 611
Facility Name: \$\square{1}\$	grergy Recy	cling of Central Flor	ida, Hac	Permit Number: 2	972753-40·004
Facility Address:	3800 West.	Lakettamilton Dr. Ve	, Winter Ho	iven, FL 3388	
Mailing Address	Jame				
Contact Person's	s Name: <u>Mr.</u>	Garry R. Aller	1	Phone Number: 863-41 Fax Number: 863-41	19-0556
Email: <u>AMe</u>	n Osynero	gyreeycling.org		Fax Number: <u>また3・4</u> ,	19.6/26
		RANCE DOCUMENT (C			
Letter of	Credit*	Performance Bor	nd* <u>K</u>	_ Guaranty _. Bond*	*Indicate mechanisms that
Insuranc	e Certificate	Financial Test		Trust Fund Agreement	require use of a Standby Trust Fund Agreement
1. Select one of (a) Inflat Inflation adjustm and no changes inflation factor is Department of C annual Deflator is Financial Coordi	the methods of ion Factor Adju ent using an inf have occurred i derived from th ommerce in its by the Deflator f nator at (850) 2	cost estimate adjustment ustment lation factor may only be a in the facility operation wh ie most recent Implicit Pric survey of Current Busines or the previous year. The	made when a Enich would nece be Deflator for ss. The inflation inflation factor ine at http://www.	Department approved closing signification to the compartment approved closing signification to the compartment approved closing from a signification and the compartment of the compartm	ng cost estimate exists closure plan. The olished by the U.S. ing the latest published the Solid Waste
	·	х	=		-
Latest DEP appr Closing Cost Est		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Es	timate
Signature:			Phon	e:	and the same of th
Name and Title:			E-Mai	l:	
	or by E-Mail at:	richard.neves@dep.state	e.fl.us	Coordinator at the address copy of the cost estimate	
Used Oil Permit MS4560 FDEP 2600 Blair Stone Tallahassee, FL	Road		MS 4565 FDEP 2600 Blair Stor	nancial Coordinator ne Road L 32399-2400	

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

IV. RECALCULATIONS OF CLOSING COSTS

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

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

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL				
 Decontamination and Disposal Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs. 								
Used Oil tanks, containers, piping, equipment and secondary containmen decontamination	t <u>Lumpsum</u>		\$21,250	<u> 121, 250</u>				
waste characterization								
disposal	Transport Costs		\$2,100	\$2,100				
b. Wash water waste characterization	Greup Analysis		A 736,77	4 736.71				
disposal	Gallons	2,595	\$ 0.35	\$ 908.25				
c. Sludges/ sediment waste characterization	Sample		#736.77	\$ <u>5,157.38</u>				
disposal	Gallons	300	\$1.20	\$ 360				
d. Used oil filter management waste characterization	Group Amalycis	/	A 736.77	# 736.77				
disposal	Ten	6,5	\$51.77	\$ 332.59				
e. Petroleum Contaminated Water (P tanks, containers, piping, equipement								
secondary containment waste characterization	No cast							
disposal	Gallons Personnel	3500	\$10,35	A <u>1225.00</u>				
f. Mobilization Costs	Equipment		\$2800_	<u> </u>				
g. other <u>Vacuum Truk</u>	Hours	_20	4/32.00	A 2652.00				
	Subto	tal (1) Deconta	mination/Disposal:	# 38, 258,76				

2. Engineering (on-site inspections and Quality Ass	urance are to be included in this item	n).	
a. Closure sampling and analysis plan implementation as described in the permit application	<	# 12,929,98	
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:	\$57,287.70	
V. CERTIFICATION BY ENGINEER and OWNER/OPE	ERATOR		
This is to certify that the Financial Assurance Cost Estimmanagement facility have been examined by me and for facilities. In my professional judgment, the Cost Estimat liabilities for closing of the facility, and comply with the reconstruction of the facility of Environmental Professional Assurance Cost Estimates shall be su March 1 of each year and revised, ad justed and updated	und to conform to engineering principals tes are a true, correct and complete rep equirements of Florida Administrative Co tection rules, and statutes of the State o bmitted to the Department annually bet	s applicable to such resentation of the financial ode (F.A.C.), Rule 62- f Florida. It is understood tween January 1 and	
Signature of Engineer 5 11.11	Signature of Owner/Operator		Please
Michael H. Shillinge VP Engineering Engineer's Name and Title (please print or type)	Garry R. Allen, Open Owner's Name and Title (please print	ortype)	
Florida Registration Number (please print or type)	B(3 + 49 + 0554) Owner/Operator's Telephone Number		
3905 Killron Road, Locke land, FK 33811 Engineer's Mailing Address	Quiten (a) SUNETA y Te	cycling.org	
S(3, 647.2877 Engineer's Telephone Number			
Anke Windperial testing, com Engineer's email addless			

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

			Abbreviate	d & Summa	rized DEP Forn	1 62-710.901(7) Costs, Effe	ctive 06-09-05
Section Number	escription lumber		Description	Unit	Quantity	Unit Cost	Total Cost	Notes
	ΔΖ	<u> </u>	Recalculate Estimated	Onit	Quantity	Ollik Cost	Total Cost	Notes
IV.	1	Decont	Closing Cost	Broken Down	by individual w	aste stream II	contamination	found, the cost estimate must be recalculated to
		1	remediation costs.					
		a	Used Oil Tanks, Containers, Piping, Equip		ment & Second	ary Containm	ent	
			Decontamination	Lump Sum	1	\$21,250.00	\$21,250.00	Trac Quote
			Waste Charaterization	Lump Sum Transport	1		\$0.00	Assume all material recycled. Assume all tanks are recycled, costs related to
			Disposal	Cost	11	\$2,100.00	\$2,100.00	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		Assume 3% of tank size for washwater needed. AquaClean Quote, pick up from site.
			Washwater Disposal Sludges Waste					
		С	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. Used Oil Group, one sample (\$141.53/RCRA Metals;
			Used Oil Filter Waste	Group				\$131.44/8260; \$298.24/8270; \$98.58/TRPH + 10%
		d	Characterization	Analysis	1	\$736.77	\$736.77	accounting & processing)
1		<u> </u>	Used Oil Filter Disposal	Ton	6.5	\$51.17	\$332.59	
		е	Petroleum Contact Water (PC	CW) Tanks, C	Containers, Pipin	g, Equipment	& Secondary (Containment
			Waste Charaterization	No cost	11		\$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) Decontami	nation / Dis	posal Cost (\$):		\$38,258.76	
	2	Engine	ering (on-site inspections and	Quality Assu	rance are to be	included in th	is item.	Two Person Mobilization to site (\$810.76); Drilling
		a	Closure Sampling and Analysis Plan implementation as described in Permit Application	Lump Sum	1	\$12,929.88	\$12,929.88	setup & utility clearance (\$565.93); Hand auger installation of 13 soil borings (\$236.65 / boring; and sampling of each boring for used oil group constituents (\$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) Profe	essional Ser	vices Cost (\$):		\$13,820.51	
			Subtotal of	(1) and (2) A	bove Cost (\$):		\$52,079.27	
	3		Contigency (10% of Subtota	al)			\$5,207.93	
				TOTAL CL	OSING COST:		\$57,287.20	
			!	i				

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

<u>Item</u>	<u>Unit Cost</u>	<u>Unit</u>
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 FDEP Petroleum Program
Closure Certification Report	\$890.63	Allowance for 20% of field work costs

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

Signature of Person Submitting Quote:

Michael H. Stillinger V.P.-Engineering

Date: May 9, 2011



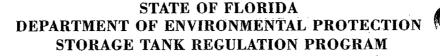
Florida Department of Environmental Protection Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

······
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 Regis	stration Instru	ctions	before completion	ng the form.		
Please check	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 EACH 17V										
A. FACILITY INFORMATION County: POLK DEP Facility ID: FLR 000 053 G/I										
	0:	INFR	LV PECL	1011116 6	ELENT	PAI	FINRINA	5	3/9862	2060
Facility Name	:		DY KICKY	CLINE C	TCKNI	<u> </u>	- FROIGION	LLC	<i>i</i> 2	2001
Facility Addre	Facility Name: SYNERGY RECVILING OF CENTRAL FLORIDA, LLC Facility Address: 3800 West Luke Hamilton Drive City: [Winter Haven Zip: 3388] Facility Contact: Giarry R. Allen, Operating Partner Business Phone: (863) 419 0556 Facility Type(s): D-Used 0.7 Fricessing NAICS Code: Financial Responsibility: 2									
Facility Conta	ict: 💆	ary K	1. HILH 1 ()	peraring	rarther		Busine:			1000
Facility Type(s). <u>ル</u> ー	- Usea	UIT FACESS	NAI	CS Code:		Financi	ial Responsibility: _	2	
11			Garry 1					y Phone: <u>&3</u>	410.5	4013
								torage tank manag iment if necessary		ing operations, and/or
Name: Syn	egy	Reunch	ing of Cent	roll Toricla	LLC		Facility - Respo	nsible Person Rela	tion Type:	Effective Date
Mail address:	201	00	rg, GA	7 757 12 50	·		[1 Facility	Account Owner (p	ays fees)	
City, ST. Zin:	Chr	00	ca C.A.	30777	OORR		Facility Account	Owner information	must be pr	ovided when the
Contact:	311/4	D 1	19 5 6171 .	202160	700B		·	s active or out of se	•	
Telephone:	1011 -		31(1)					Number (if know		62177
			relationships for	this party:	I M. Facility O	_t πerlΩn	i	•	<u> </u>	ank Owner
identify office	appropri	ale racinty	1 Clasionships to	tins party.	[] raciity of		[2] 110	perty Owner [/	Otorage	ank Owner
Name:							Other owner, re	lationship type(s)		Effective Date
Mail address:							[] Facility O	wner/Operator		
City, ST, Zip:							[] Property	Owner		
Contact:							[] Storage]	Tank Owner		
Telephone:				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			[] Other:			
C. TANK/VES	SSEL IN	ORMATIC	DN - Complete	one row for e	ach storage to	ank or c	compression ves	sel system located	d at this fa	cility.
Tank ID	T/V	A/U	Capacity	Installed	Content	Status	/Effective Date	Construction	Piping	Monitoring
1	$\mathcal{T}_{\mathcal{I}}$	Α	10,000		\mathcal{L}_{co}	Ų		C,P,i	AB	P, ψ
2	T.	A.	18100/3520/3500	AST done	Antifreeze	U		Y.P.K	AG	Die
<u>3</u>	1	A	25,00	07/201200	7	V		CMIBI	AR	124
	7	分	25,00	04/18/2011		v		C. KR	AB	15:6
	<u> </u>	1	L	[L	L			
Certified Con-	tractor (n	eformina t	ank installation	or removal): (THIS RUSI	with		DBPR Licens	e No.: <i>C6</i>	C012097
			L							•
Registration	Certifica	ation:				ill infor	ration submitted	d on this form is tr	ue, accura	te, and complete.
GAFFE	1 K.	TILM,	Operation	4 Partner			M un	<u> </u>	2,8	1- 4011
Printed Nam	e & Title	,	′ (∫ Sig:	nature *	/	()		Date	
DEP 62-761.900(: Northwest Distri		Northe	east District	Central District	Southwes	t District	Southeast Dis	trict South Dis	trict	Marathon Branch Office
160 Governmen	ntal Center E	Blvd. 7825 E Suite f	Baymeadows Way, B200	3319 Maguire E Suite 232	lvd., 3804 Coc	onut Palm	Drive 400 North Car	ngress Ave., 2295 Victo Suite 364	oria Ave.,	2796 Overseas Hwy., Suite 221
Pensacola, FL 850-595-8360		Jackso 904-4	onville, FL 32258 18-4300	Orlando, FL 3: 407-894-7555	813-744-6	3100	W Palm Beach 561-681-6600	h, FL 33416 Fort Myers 941-332-6		Marathon, FL 33050 305-289-2310
V-Sha Mo	u be g	places cation	linto se 1, applien	mice up	an FDE	17, A	proval of 2011.	Used Oil	Process	ing Permit





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

PLACARD NO:

3800 W LAKE HAMILTON RD

PLACARD TSSUED.

06/09/2010

REGISTRATION PAID:

\$ 100

WINTER HAVEN FL 33881-

STCM ACCOUNT: 62177

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 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

9802060 FACILITY ID:

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:

FACILITY TYPE: Collection Station

STCM ACCOUNT: 62177

ACCOUNT OWNER: SYNERGY RECYCLING

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