

Thursby, Kim

From: Montinique Buquoi <Mbuquoi@SynergyRecycling.org>
Sent: Tuesday, December 10, 2019 12:10 PM
To: Thursby, Kim; EPaul@Synergyrecycling.org; Epost HWRS
Cc: Smith, Michell M.; Walker, Kim (Waste); White, John; Jarmolowski, James; Financial Assurance Working Group; McBride, Ashanti; mike.stillinger@imperialtesting.com; Kothur, Bheem
Subject: RE: Synergy Recycling of Central Florida; FLR 000 053 611;First Request for Additional Information (RAI)

Good afternoon

Message received

Thank You

Montinique

From: Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Sent: Tuesday, December 10, 2019 9:37 AM
To: 'EPaul@Synergyrecycling.org' <EPaul@Synergyrecycling.org>
Cc: Smith, Michell M. <Michell.M.Smith@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; White, John <John.White@dep.state.fl.us>; Jarmolowski, James <James.Jarmolowski@dep.state.fl.us>; 'mbuquoi@synergyrecycling.org' <mbuquoi@synergyrecycling.org>; Financial Assurance Working Group <Financial.Assurance.Working.Group@dep.state.fl.us>; McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>; 'mike.stillinger@imperialtesting.com' <mike.stillinger@imperialtesting.com>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: Synergy Recycling of Central Florida; FLR 000 053 611;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Michell Mason Smith
Environmental Administrator
Hazardous Waste Program & Permitting



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

December 10, 2019

Elliott Paul, Managing Member
3800 West Lake Hamilton Drive
Winter Have, Florida 33881
Epaul@synergyrecycling.org

Re: First Request for Additional Information (RAI)
Polk County – Hazardous Waste
Facility Name: Synergy Recycling of Central Florida
Facility ID: FLR 000 053 611
Current Permit Number: 292753-005-HO & 292753-006-SO
DEP Application Number: 292753-007-HO and 292753-008-SO

Dear Mr. Paul:

Thank you for your application for Renewal for the above referenced Facility. The Department has assigned DEP Application No. 292753-007-HO and 292753-008-SO to the application. A Department staff review of the application and supporting documentation submitted on November 26, 2019, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800(3), Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, January 8, 2020, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Bheem.kothur@floridadep.gov. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to

Bheem.kothur@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Bheem R. Kothur, P.E., by telephone at 850-245-8781 or by e-mail at Bheem.kothur@floridadep.gov.

Sincerely,

A handwritten signature in blue ink that reads "Michell Mason Smith". The signature is fluid and cursive, with the first name "Michell" being the most prominent.

Michell Mason Smith, Administrator
Hazardous Waste Program and Permitting

MS/bk

Attached: List of Requested Information

cc:

John White, DEP Central District, john.white@floridadep.gov

James Jarmolowski, DEP Headquarters, james.jarmolowski@floridadep.gov

Montinique Buquoi. Synergy Recycling of Central Florida, mbuquoi@synergyrecycling.org

Financial Assurance Working Group, DEP Headquarters,
financial.assurance.working.group@florida.gov

Ashanti McBride, DEP OGC, ashanti.mcbride@floridadep.gov

Michael H. Stillinger, P. E., Imperial Testing and Engineering, Inc.
mike.stillinger@imperialtesting.com

Attachment: List of Requested Information

Facility Name: Synergy Recycling of Central Florida, LLC

Facility ID: FLR 000 053 611

Current Permit Numbers: 292753-HO-005 and 292753-006-SO

DEP Application Numbers: 292753-007-HO and 292753-008-SO

Waste Processing Facility Permit Renewal Application Review Comments

1. The renewal application for a material processing facility has been reviewed with respect to the applicable requirements in 62-701.710, F.A.C. The following comments are provided:
 - a. The application form 62-701.900(4) was not properly completed. Please revise the application pursuant to Rule 62-701.710(2)(a), F.A.C. as follows:
 - i. A. General Information, Item 2, Type of Application, Page 1 of 4: No box was checked. While the Department understands that the application is for continued operation without additional construction, please check the appropriate box.
 - ii. A. General Information, Item 3, Classification of Application: The hard copy of the application box was checked. However, the electronic version of the application of box was not checked. While the Department understands that the application is for renewal of an operation permit. please review and check the box as appropriate.
 - iii. Section A, Item 7, Location Coordinates: No information was provided for the "Datum", "Coordinate Method", "Collected by" or "Company/Affiliation". Please review and provide these items as appropriate.
2. To meet the requirements of 62-701.710(2)(b), F.A.C., Attachment XI, Item 2 referenced Figure 1 and Figure 2 in Attachment I of the Used Oil Application. These figures do not meet all of the specific requirements in 62-701.710(2)(b), F.A.C. Please submit a single site plan which shows the facility location, total acreage of the site, and other relevant features such as water bodies, or wetlands within 200 feet of the site, and potable wells within 500 feet of the site, and has a scale not greater than 200 feet to one inch. Rule reference: 62-701.710(2)(b), F.A.C.
3. Attachment XI, electronic document page 97, Item 5, indicated that record keeping forms were provided in Attachment VI of the Used Oil Processing Application. Review of Attachment VI indicated that the record keeping forms were not provided as indicated. Please provide a copy of the applicable record keeping forms. Rule reference: 62-701.710(2)(e) and 62-701.710(8)(a), F.A.C.

Used Oil Processing Permit Renewal Application Review Comments:

4. Used Oil Processing Facility Permit application, Part I, A. General Information, and Page 1 of 8: Facility Location, Item 7 is missing. Please review and revise as appropriate.
5. B. Site Information, Item 1, Facility Location, Page 2 of 8: UTM# Information is incomplete. Please review and revise as appropriate.

6. C. Operating Information, Items 7 through 10, Page 4 of 8: Please review all Attachments and revise as appropriate. Also, add an Item 11, "Closure Cost Estimates" to the Used Oil Permit application as an Attachment XII and revise all Attachments throughout the Application.
7. Attachment B, Tank Table, Section 10-0, Spill Prevention Analysis Plan, and Page 3 of 17: Please review the tank numbers, contents and their capacities and be consistent throughout the document.
8. General Comment: Please provide separate Attachment A, Site Map on 8.5"X11" Page, (pdf) so that it can be easily inserted into the draft Permit. Also, Attachment B, Separate Tank Table, on a separate Page(pdf), so that this can be easily inserted into the draft permit.