



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Synergy Recycling of Central Florida LLC
On-Site Inspection Start Date: 05/07/2021 **On-Site Inspection End Date:** 05/07/2021
ME ID#: 47082 **EPA ID#:** FLR000053611
Facility Street Address: 3800 W Lake Hamilton Dr, Winter Haven, Florida 33881-9262
Contact Mailing Address: 3800 W Lake Hamilton Dr, Winter Haven, Florida 33881-9262
County Name: Polk **Contact Phone:** (954) 616-4103

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Used Oil:** Off-Spec, Oil Filters, Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Processor Facility
Routine Inspection for VSQG (<100 kg/month) Facility
Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon Lenhart, Inspector
Other Participants: Leslie Pedigo, Environmental Consultant; Jeff Englin, General Manager

LATITUDE / LONGITUDE: Lat 28° 4' 42.4848" / Long 81° 39' 38.0584"

NAIC: 562119 - Other Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

The Florida Department of Environmental Protection ("Department") conducted a routine hazardous waste compliance evaluation inspection at Synergy Recycling of Central Florida ("Synergy") used oil processing facility on May 7, 2021. The facility has been inspected by the Department numerous times in the past, most recently on March 25, 2019. Synergy has two operating permits: 292753-007-HO and 292753-008-SO, both of which were issued on January 30, 2020 and expire on January 26, 2025. Mr. Jeff Englin, General Manager, assisted Department inspectors throughout the inspection.

Process Description:

Synergy's operating permit includes conditions for used oil processing, used oil filter storage, and solid waste material processing. Route drivers pick up and deliver used oil, used oil filters, oily water, used antifreeze, oily rags, and other oil contaminated debris to the facility daily. Hours of operation include 7 AM to 5 PM, Monday through Friday. The facility is on City of Winter Haven water and sewer. Used oil from independent used oil transporters is not accepted by the facility. The facility no longer ships any used oil by rail. Synergy operates nine collection trucks which have approximately 3,600-gallon tanks and a drum corral which can store up to fourteen drums of waste. Additionally, the facility has five 7,000-gallon tankers which are used to ship collected used oil to Synergy's refinery in Kingsland, Georgia (EPA IS #GAR000048009); one haz-mat certified truck, and three approximately 3,000-gallon vacuum trucks which service oil-water separators. Oily water from the oil-water separators is sent to Cliff Berry, Inc., while grit and other waste generated from servicing the oil-water separators is disposed of using Liquid Environmental Solutions, Cliff Berry, Inc., or Universal Environmental Solutions, LLC in Tampa. Synergy has approximately twenty-five employees including five drivers that haul loads to Synergy's refinery in Georgia, nine drivers that pick up from customers, two drivers for the vacuum trucks, and one driver

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who is used as needed.

Synergy has five regulated aboveground storage tanks (ASTs). Tank three is a 25,000-gallon, double-walled tank that is split into three compartments (3a, 3b, and 3c) used for the storage of used oil, used antifreeze, and used oil, respectively. Tanks one, two, four, and five are used for the storage of used oil and are in concrete secondary containment. Tank two is rarely used. The tanker truck loading and unloading area is bermed.

There is an open mechanic's bay on the west side of the building, under an overhang. This is used for routine maintenance of Synergy's vehicles. A 30-gallon, Purewash Systems Parts Washer was located in this area. Filters are cleaned using diesel fuel in the onsite parts washer. Spent diesel fuel from this process is mixed in with the used oil sent for processing.

The clean used oil filters are taken to US Foundry in Miami. At the time of the inspection, there were several used oil filter bins, properly labeled with the words "used oil filter" and located inside the warehouse on impervious concrete floor.

Dexsil Q-1000 kits are used to determine the halogen content when used oil is picked up from Synergy's clients. The API method is used to determine water content of used oil. Additional used oil testing is conducted when loads are received by Synergy's processing facility in Kingsland Georgia. The results of the halogen and water content are recorded.

Spill kits and fire extinguishers were onsite. Uniforms are laundered by Cintas.

The contingency plan including arrangements made with local authorities was on site for review and appeared to be complete. Training records were current and available for review. Used oil acceptance and delivery records were reviewed and appear to be complete. As per their permit, daily inspections of the aboveground storage tanks must be conducted. These inspections are documented once per week. The inspection records were available for review at the time of the inspection, and there did not appear to be any deficiencies in the records. Used oil testing records were available for review at the time of the inspection.

Synergy has not transported hazardous waste, nor stored hazardous waste on site since the previous compliance evaluation inspection

PHOTO ATTACHMENTS:

Used oil tanks in secondary containment



Bermed area where tankers load and unload



Conclusion:

At the time of the inspection, Synergy Recycling of Central Florida, LLC was operating in compliance with rules and regulations applicable to Used Oil Transporter, Used Oil Transfer, and Used Oil Processor facilities.

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1.0: Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

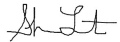
Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			✓

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Shannon Lenhart**Principal Investigator Name**Environmental Specialist**Principal Investigator Title****Principal Investigator Signature**FDEP-SWD**Organization**05/27/2021**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**FDEP-SWD**Organization**Jeff Englin**Representative Name**General Manager**Representative Title**Synergy Recycling of Central
Florida, LLC**Organization**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:**Approver:** Michael C Lynch**Inspection Approval Date:**06/01/2021