



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

FACILITY INFORMATION:

Facility Name: Synergy Recycling of Central Florida LLC

On-Site Inspection Start Date: 06/21/2023

On-Site Inspection End Date: 06/21/2023

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

County Name: Polk

Contact Phone: (561) 523-4719

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **TSD:** Operating Non-Commercial TSD **Used Oil:** Off-Spec, Oil Filters, Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Mollie Enck, Environmental Consultant

Other Participants: Leslie Pedigo, Environmental Consultant, Alex White, Terminal Manager, Ricardo Soler, Director

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

NAIC: 562119 - Other Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

Synergy Recycling of Central Florida LLC (Synergy) was inspected on June 21, 2023, by the Florida Department of Environmental Protection (Department) to determine the facility's compliance with state and federal hazardous waste regulations. The facility initially notified as a Used Oil Handler on February 23, 1999 under the name Necessary Services. The facility re-notified as a Used Oil and Used Oil Filter Transporter, a Used Oil and Used Oil Filter Transfer Facility on June 29, 2005 under the name On Time Environmental Services, Inc. On April 30, 2008, the facility re-notified as Synergy Recycling of Central Florida, LLC. Synergy most recently re-notified June 9, 2023; this notification included notifying as a Very Small Quantity Generator (VSQG) of hazardous waste. The facility has been inspected by the Department numerous times in the past, most recently on May 7, 2021. Alex White, Terminal Manager and Ricardo Soler, Director assisted Department inspectors at the inspection.

Permits/Registrations:

- Permit number 292753-007-HO issued on January 30, 2020, and expire on January 26, 2025.
- Permit number 292753-008-SO issued on January 30, 2020, and expire on January 26, 2025.
- Used Oil/Used Oil Filter Transporter, Used Oil/Used Oil Filter Transfer Facility, Used Oil Processor, Used Oil Marketer, and Used Oil Collection Facility registration issued on June 12, 2023 and expires on June 30, 2024.

Process Description:

Synergy's operating permits include 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 previously was not accepted by the facility, however a recent permit change now allows the facility to accept 55-gallons at a time. The facility no longer ships any used oil by rail.

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Synergy operates ten collection tank trucks each of which have approximately 3,600-gallon tanks and a drum corral which can store up to fourteen drums of waste. Additionally, the facility has four 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. or Aqua Clean, 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 four drivers that haul loads to Synergy's refinery in Georgia, ten drivers that pick up from customers, two drivers for the vacuum trucks, and one driver who is used as needed.

Synergy has five regulated aboveground storage tanks (ASTs). Tanks one, two, four, and five are used for the storage of used oil and are in concrete secondary containment. 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. Tank two is rarely used. The tanker truck loading and unloading area is bermed.

Previously there was an open mechanic's bay on the west side of the building, under an overhang; this area is now used for storage. The facility is planning to enclosed this area in the near future and re-purpose it into a training area. A 30-gallon, Purewash Systems Parts Washer was located in this area, which is not currently in use. A used oil spilled near the overhang located on the west side of the building was observed during the inspection.

Used oil filters are picked up in 55-gallon drums. When they arrive at the facility, warehouse staff, ensured that they are closed and in good condition. If needed, the used oil filters are transferred to suitable drums for storage at the facility. Stored drums are then consolidated and loaded onto trucks for shipment. Used oil filters are taken to facilities located in Kingsland, Georgia; Denton, Texas; or Ocala, Florida. At the time of the inspection, there were several used oil filter drums, properly labeled with the words "used oil filter" and located inside the warehouse on impervious concrete floor.

Dexsil Q-1000 kits are currently being used to determine the halogen content when used oil is picked up from Synergy's clients. The TIF8900 Combustible Gas Detector devices are going to be used in the future once transportation staff have been trained on the use of the device. The API method is used to determine water content of used oil on-site. Additional used oil testing is conducted when loads are received by Synergy's processing facilities in Kingsland, Georgia; Denton, Texas; or Ocala, Florida. The results of the halogen and water content are maintained on-site.

Spill kits and fire extinguishers were located throughout the facility. Uniforms are laundered by Cintas.

RECORDS

- The contingency plan including arrangements made with local authorities was on site for review and appeared to be complete. Emergency response arrangements were made with Winter Haven Police Department, Winter Haven Fire Department, Winter Haven Hospital, and Clean Harbors on January 25, 2023.
- Training records were current and available for review. Training is conducted on a computer-based system which is called Learning Management System (LMS).
- 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; no deficiencies were noted.
- Used oil testing records were available for review at the time of the inspection.

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

New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	279.45(h), 279.45(h)(1), 279.45(h)(2), 279.45(h)(3), 279.45(h)(4)
Explanation:	At the time of the inspection, there was used oil spilled near the overhang located on the west side of the building.

As required by: 40 CFR 279.45(h)(1-4): Upon detection of a release of used oil to the environment that is not subject to the requirements of part 280, subpart F of this chapter and which has occurred after the effective date of the recycled used oil management program in effect in the State in which the release is located, the owner/operator of a transfer facility must perform the following cleanup steps: (1) Stop the release; (2) Contain the released used oil; (3) Clean up and manage properly the released used oil and other materials; and (4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

Corrective Action:	The facility is required to clean up the used oil spill and ensure that clean up materials are properly managed and if needed any containers are repaired or replaced. Photo documentation of the cleaned up spill shall be provided to the Department within seven days.
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Photo Attachments:**Used Oil Spill**

Conclusion:

At the time of the inspection, Synergy Recycling of Central Florida, LLC was not operating in compliance with rules and regulation 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.

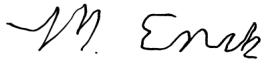
Note: Checklist items with shaded boxes are for informational purposes only.

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

Mollie Enck**Principal Investigator Name**Environmental Consultant**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**07/13/2023**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Alex White**Representative Name**Terminal Manager**Representative Title**Synergy**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.

Ricardo Soler**Representative Name**Director**Representative Title**Synergy**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:**Warren McNelley**Inspection Approval Date:**07/14/2023