

Thursby, Kim

From: Tripp, Anthony
Sent: Tuesday, February 26, 2008 8:26 AM
To: Thursby, Kim; Epost HWRS
Subject: FW: Receipt acknowledgement

Kim,
Here is the receipt for Raider Environmental Services e-post of January 22, 2008.

Anthony Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

From: steve@raiderenvironmental.com [mailto:steve@raiderenvironmental.com]
Sent: Monday, February 18, 2008 1:28 PM
To: Tripp, Anthony
Subject: RE: Receipt acknowledgement

yes i have received, you should already have revised copy.

Thanks, Steve

----- Original Message -----

Subject: Receipt acknowledgement
From: "Tripp, Anthony" <Anthony.Tripp@dep.state.fl.us>
Date: Mon, February 18, 2008 7:41 am
To: <steve@raiderenvironmental.com>

Dear Mr. Obst:

An e-mail was sent to your address on January 22, 2008 by:

Epost HWRS

From :

Tim Bahr

Environmental Administrator

Hazardous Waste Regulation

Department of Environmental Protection

E-Mail Address: epost_hwrs@dep.state.fl.us

[<mailto:epost_hwrs@dep.state.fl.us>](mailto:epost_hwrs@dep.state.fl.us)

This e-mail contained an attached document related to Deficiencies in your December 07, 2007 permit application. The above e-mail is an official document from the Department and as such requires confirmation that it was delivered.

I understand that there are numerous reasons why an acknowledgement was not received by the Department. All I am asking is that you now provide that acknowledgement by replying to this e-mail, confirming that you did receive the e-mail of January 22, 2008.

The e-post process is new for the Department. Thank you for your patience in helping us to incorporate this new process into our system.

Sincerely,

Anthony Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Thursby, Kim

From: Epost HWRS
Sent: Tuesday, January 22, 2008 8:08 AM
To: steve@raiderenvironmental.com
Cc: Kantor, Karen E.; Winston, Kathy; steve.brown@dep.state.fl.us; Raoul.Clarke@dep.state.fl.us; Wick, Fred; Posner, Augusta; Martin, Lee; johnmjonespe@sbcglobal.net; Bahr, Tim; Prusty, Rabin; Kothur, Bheem
Subject: Raider Environmental Services, Inc.;FLR 000 143 891;284932-HO-001;Notice of Deficiency
Attachments: 1-22-08-Raider Permit Application NOD.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. 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.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

Tracking:

Recipient	Delivery	Read
steve@raiderenvironmental.com		
Kantor, Karen E.	Delivered: 1/22/2008 8:08 AM	
Winston, Kathy	Delivered: 1/22/2008 8:08 AM	Read: 1/22/2008 8:36 AM
steve.brown@dep.state.fl.us	Failed: 1/22/2008 8:08 AM	
Raoul.Clarke@dep.state.fl.us		
Wick, Fred	Delivered: 1/22/2008 8:08 AM	
Posner, Augusta	Delivered: 1/22/2008 8:08 AM	Read: 1/22/2008 12:50 PM
Martin, Lee	Delivered: 1/22/2008 8:08 AM	
johnmjonespe@sbcglobal.net		
Bahr, Tim	Delivered: 1/22/2008 8:08 AM	
Prusty, Rabin	Delivered: 1/22/2008 8:08 AM	Read: 1/23/2008 7:35 AM
Kothur, Bheem	Delivered: 1/22/2008 8:08 AM	
Clarke, Raoul	Delivered: 1/22/2008 8:08 AM	Read: 1/22/2008 8:44 AM
Register, Harold		Read: 1/22/2008 8:16 AM



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

January 22, 2008

SENT VIA E-MAIL

steve@raiderenvironmental.com

Mr. Steve Obst, Owner
Raider Environmental Services, Inc.
4103 NW 132nd Street
Opa Locka, Florida 33054

RE: Raider Environmental Services, Inc.
EPA ID Number: FLR 000 143 891
Permit Number: 284932-HO-001
Notice of Deficiency

Dear Mr. Obst:

The Florida Department of Environmental Protection (Department) has received your new permit application dated December 7, 2007 to operate a Used Oil Processing Facility at 4103 NW 132nd Street, Opa Locka, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed summary. 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 (two copies to Tallahassee and one copy to West Palm Beach district office) of your written response within 30 days of receipt of this notice. If you cannot submit 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. Steve Obst, Owner
January 22, 2008
Page Two

Should you like to arrange a meeting or if you have any questions, please contact Rabin Prusty at (850) 245-8780 or via e-mail: rabin.prusty@dep.state.fl.us.

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp

Enclosure

cc: Karen Kantor, DEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
Kathy Winston, DEP/West Palm Beach, kathy.winston@dep.state.fl.us
Steve Brown, DEP/West Palm Beach, steve.brown@dep.state.fl.us
Raoul Clarke, DEP/Tallahassee, raoul.clarke@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Augusta Posner, DEP/Tallahassee, augusta.posner@dep.state.fl.us
Lee Martin, DEP/Tallahassee, lee.martin@dep.state.fl.us
John M Jones, Jones Ecosystem Management, johnmjonespe@sbcglobal.net

ATTACHMENT
January 18, 2008
Raider Environmental Services, Inc.
EPA I.D. No. FLR 000 143 891
Notice of Deficiency

General Comments

- 1. Registration:** The facility is required to register by filing an application and/or registration fee as a transporter with the Hazardous Waste Management Section. For further details, please contact Richard Neves at (850) 245-8755 or via e-mail: rick.neves@dep.state.fl.us .

The application addressed used parts washer and spent solvent. Spent solvent is waste, not product and typically Hazardous Waste, thus HW Transporter certification, if stored >24 hrs and/or 10 days or less is a HW transfer facility in accordance with Chapter 62-730.170 and 62-730.171. Please revise the document as appropriate.

- 2. Facility ID:** The Department has issued a Site I.D. No.: FLR 000 143 891 for the facility. Please revise the application including this facility I.D. as appropriate.
- 3. Facility Drawing:** The drawing provided with the application is not signed and sealed. Please provide a Facility Drawing certified by a Florida registered Professional Engineer.
- 4. Site Map and Tank Table:** Please provide a site map (8 ½" x11") in electronic format (PDF) identifying all tanks and also a tank table (8 ½ "x11") in electronic format (PDF). Please send the map and tank table via e-mail, so that the map and tank table can be attached to the permit. Also include hard copies of the map and tank table with your response.
- 5.** Please also provide a large site map identifying the locations of used filters storage, used parts washer solvents storage, absorbents, used antifreeze and antifreeze-water mixtures, used oil tanks and drums, and roll-off containers.
- 6.** Please revise the entire application and resubmit as a standalone document.

Specific Comments

- 7. Section 3:** As per Parts 270.14(b), 264.13(b)&(c) and 268.7, please specify the method will be used to prescreen for PCBs. Please also describe the methods will be used for the minimum fingerprinting parameters for used oil. Please revise the application as appropriate.

Field Testing: Pursuant to Chapter 62-710.600(b)(3), What kind of meter will be used for halogen screening. Please revise the application as appropriate.

Prior to pickup, all used oil must be screened to ensure halogens are <1000 ppm in accordance with 40 CFR Part 279.44. Please revise the paragraph as appropriate.

In accordance with Parts 270.14(b), 264.13(b) & (c), and 268.7, the facility should specify specifics on field SOPs for pH sampling for truck and drum pre-sampling at the terminal. What analyses and test methods will be performed on individual Drums - Non-Hazardous Solid Waste and Multiple Drums from Same Source - Non-Hazardous Solid Waste? Please revise the application as appropriate.

In accordance with Parts 270.14(b), 264.13(b) & (c) and 268.7, please indicate analyses and test methods for Used Oil/Oily Water prior to Unloading, Drum Loads prior to Unload, and Wastewaters prior to Unload.

8. **Attachment 4:** In accordance with Parts 270.14(b), 264.13(b) & (c) and 268.7, how often (or after what quantity) sludge residue be tested and what methods will be used for the parameters for tank cleaning. Please describe and expand the last paragraph.
9. **Attachment 6, Contingency Plan:** Pages are numbered 9-1, 9-2 should be 6-1, 6-2, etc.

In accordance with Part 264.55, please specify whether emergency coordinator will be allowed to allocate funds for emergency response if it is beyond facility's capabilities. Please revise the application as appropriate.

10. **Preparedness and Prevention Section:** There is no list of emergency equipment indicating locations, descriptions, or capabilities. Please revise the application as appropriate.

On page 9-5: 1) should read "in the event" not "in the even". Please correct the page as appropriate.

On page 9-6: The FDEP's address in West Palm Beach should read

400 N. Congress Ave., Ste 200
West Palm Beach, FL 33401

There should be nothing in there about Temple Terrace, FL 33637. Please delete this line.

11. Attachment 8, Closure Plan: Under Used Oil Management, Process Description, the first line should read Raider's Environmental Services, Inc. not Ricky's Oil Services, Inc. Please revise as appropriate.

Under facility Closure Procedures - 3) should read "Pressure wash rinsing" not "Pressure wash rising." Please correct the spelling.

Please revise and resubmit the closure cost estimates.

12. Security: Issue of surveillance, signage, barriers, etc., per Parts 264.14 & 270.14(b)(4) should be addressed in the application. Please revise the application as appropriate.

13. In accordance with Part 270.14(b)(8)(v), in the Contingency Plan, the facility should describe personal protective equipment for emergency response. Please revise the application as appropriate.

14. In accordance with Parts 270.14(b)(5) and 264.15(a) & (b), concerning general facility inspections, only container and tank inspections are discussed, nothing is mentioned about monitoring equipment, security devices, testing of necessary communications or alarm systems, fire protection equipment and decontamination equipment. Please revise the application as appropriate.