



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

FACILITY INFORMATION:

Facility Name: Raider Environmental Services

On-Site Inspection Start Date: 04/15/2010

On-Site Inspection End Date: 04/15/2010

ME ID#: 83539

EPA ID#: FLR000143891

Facility Street Address: 4103 NW 132nd St, Opa Locka, Florida 33054-4510

Contact Mailing Address: 4103 NW 132nd St, Opa Locka, Florida 33054-4510

County Name: Miami-Dade

Contact Phone: (305) 994-9949

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Maddie Gierczak, Environmental Specialist; Brandon Dow, VP\General Manager;
Steve Obst, President

LATITUDE / LONGITUDE: Lat 25° 53' 41.924" / Long 80° 15' 51.6958"

SIC CODE: 4959 - Trans. & utilities - sanitary services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Raider Environmental Services (RES) has been in operation at this location since November of 2008, and currently operates a Used Oil Processing Facility under Department permit # HO13-284932-001, expiration October 13, 2013. RES is a hazardous waste transporter, as well as, a transporter, processor, and marketer of used oil and used oil filters. The facility also processes oily water from tank bottoms and ships' bilges. RES is situated in a zoned industrial area and encompasses 1.55 acres. The facility has 18 full time employees and is on city water and sewer. Inspectors from the Department and Miami-Dade County Department of Environmental Resources Management (DERM) performed the inspection.

Process Description:

The facility has three vacuum trucks, one of which is a Vactor, used for dry product such as fly ash. The facility has five tankers, one of which is a 6000-gallon vacuum truck, and the rest of the tankers have 7000-gallon capacities and are used for the transport of both used oil and oily water. The facility has four tractor trailers, one of which is a truck designed for picking up rollovers and the other three are for used oil collection. For hazardous waste transport, the facility uses its' two box trucks and there is also a box trailer, which is generally used in emergency response situations.

Inspection Date: 04/15/2010

The tank farm consists of 14 tanks total. The tank farm is still under construction and per the permit, the tank farm will eventually have 24 tanks altogether. All tanks are to be constructed within the facility's secondary containment. At the time of the inspection, there were eleven tanks in service, tank numbers eight to eleven were mislabeled as "Used Oil", when actually they contained diesel fuel.

Inside the secondary containment area and next to the blowby from the heater was a one-third full drum of used oil which was open and unlabeled. This was corrected immediately. Also noted in the secondary containment area were two five-gallon buckets half full of used oil. These were also removed immediately and poured into the screening area for used oil.

In an area where used oil filters containers for delivery to customers are usually stored were several poly drums and some 275-gallon totes. All these containers were empty; however, several of the drums did not have bungs. A facility representative explained that all these containers were going to be cut up and disposed since they were no longer useful. The inspector reminded RES that they need to make sure the containers were empty before shredding as the ones without bungs could contain oily water.

In the middle of the yard between the secondary containment and the used oil filters container storage area was the used oil filters rolloff which was not labeled. Lined up alongside of the rolloff were used oil filter containers waiting to be emptied into the rolloff, all of these were properly labeled.

The facility representative gave the inspectors an overview of how both used oil and oily water are processed through the plant. Heat, emulsifiers and caustics are used in the oily water processing, while the used oil is processed using flocculants and acids. One observation made by the inspectors was that next to the DAF unit was the spigot used for effluent testing and under this spigot was an open, unlabeled five-gallon bucket. It was removed immediately. The DERM representatives informed the inspectors that in July of 2009 an effluent sample taken by them revealed benzene levels above the acceptable limits. DERM took samples that day, as well; however, sample results have not yet been reported.

Record Review

The following deficiencies were noted in the facility's Contingency Plan (CP): The emergency contacts page needed updating; emergency coordinators' home addresses were not included, and the numbers for the closest fire and police station and also the closest hospital were listed as 911 instead of the actual local number; Department's Southeast District phone number was incorrect; the location of emergency equipment was missing. It was noted that the tank diagram provided in the CP did not match the actual facility. The facility could not demonstrate that the CP had been distributed to local authorities. The facility could not produce a copy of their "Annual Used Oil Report", which is due to Tallahassee on March 1st of every year. A review of the company's hazardous waste manifest revealed RES had two manifests for which they had no returned signed copies. All other records reviewed i.e.; permit, closure plan, and acceptance and delivery records were in order.

New Potential Violations and Areas of Concern:

Transporters Checklist

Type:	Violation
Rule:	263.20
Question Number:	1.40
Question:	Do the manifests contain at least:
Explanation:	The facility did not have return signed copies for manifest numbers

Inspection Date: 04/15/2010

000466867JJK and 000466872.

Corrective Action: Please provide the Department with return signed copies for the aforementioned manifest.

Used Oil Processor

Type: Violation
Rule: 62-710.850(5)(a)
Question Number: 28.90
Question: Are the filters stored in above ground containers which are (All of the following checkboxes must be checked for this question to be marked Ok, otherwise this question must be marked as Not Ok.):
Explanation: The used oil filter rolloff was not properly labeled.
Corrective Action: Violation was corrected during inspection.

Type: Violation
Rule: 62-710.850(4)(c)
Question Number: 28.120
Question: Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records?
Explanation: Facility has not yet submitted their annual report for last year.
Corrective Action: Please provide district with copy of annual report when submitted.

Type: Violation
Rule: 279.54(f)
Question Number: 28.190
Question: Are ASTs, UST tank fill lines and containers labeled "used oil"?
Explanation: One 55-gal drum near the oil burner was not covered or labeled, also there were several 5 gal buckets around facility open and unlabeled.
Corrective Action: Violations were corrected on site.

Type: Violation
Rule: 279.52(a)(6)
Question Number: 28.300
Question: Has the facility made emergency response arrangements with the following:
Explanation: The facility can't prove emergency arrangements with local authorities.
Corrective Action: After Contingency Plan update, redistribute to appropriate authorities, provide proof of distribution.

Inspection Date: 04/15/2010

Type: Violation
Rule: 279.52(b)(2)
Question Number: 28.340
Question: Does the plan include the following?
Explanation: Facility's Contingency Plan did not include address for primary and secondary coordinators, the emergency notification list has 911 instead of local numbers, tank diagram has tanks numbered wrong, FDEP number should be (561)681-6600, and finally, equipment list needs to indicate location of equipment.
Corrective Action: Please update appropriate pages of Contingency Plan and provide to Department.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 263.20		04/15/2010	The facility did not have return signed copies for manifest numbers 000466867JJK and 000466872.
Used Oil Processor 62-710.850(5)(a)		04/15/2010	The used oil filter rolloff was not properly labeled.
62-710.850(4)(c)		04/15/2010	Facility has not yet submitted their annual report for last year.
279.54(f)		04/15/2010	One 55-gal drum near the oil burner was not covered or labeled, also there were several 5 gal buckets around facility open and unlabeled.
279.52(a)(6)		04/15/2010	The facility can't prove emergency arrangements with local authorities.
279.52(b)(2)		04/15/2010	Facility's Contingency Plan did not include address for primary and secondary coordinators, the emergency notification list has 911 instead of local numbers, tank diagram has tanks numbered wrong, FDEP number should be (561)681-6600, and finally, equipment list needs to indicate location of equipment.

Areas of Concern

No Areas of Concern

Conclusion:

The facility was out of compliance at the time of the inspection. The facility was given 30 days to return to compliance.

Inspection Date: 04/15/2010

Inspection Date: 04/15/2010

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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kathy R. Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

4/15/2010

DATE

Maddie Gierczak

INSPECTOR NAME

Environmental Specialist

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Brandon Dow

REPRESENTATIVE NAME

VP\General Manager

REPRESENTATIVE TITLE**REPRESENTATIVE SIGNATURE**

Raider Environmental

ORGANIZATION

4/15/2010

DATE

Steve Obst

REPRESENTATIVE NAME

President

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Raider Environmental

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.