



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Raider Environmental Services Inc
On-Site Inspection Start Date: 08/27/2010 **On-Site Inspection End Date:** 08/27/2010
ME ID#: 94423 **EPA ID#:** FLR000167023
Facility Street Address: 10407 US Highway 41 N, Palmetto, Florida 34221-8724
Contact Mailing Address: 4103 northwest 132nd st, Opa Locka, Florida 33054
County Name: Manatee **Contact Phone:** (305) 994-9949

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III
Other Participants: Brandon G. Dow, CHMM, Branch Manager

LATITUDE / LONGITUDE: Lat 27° 36' 30.2231" / Long 82° 32' 27.9909"

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

TYPE OF OWNERSHIP: Private

Introduction:

Raider Environmental Services, Inc., (Raider) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal used oil transporter regulations. Raider notified the Department of its used oil transporter activities in April 2010. The inspector was accompanied throughout the inspection by Brandon Dow, the Branch Manager. This was the first inspection of the facility by the Department's Hazardous Waste Section.

Process Description:

Raider is a registered and certified used oil and used oil filter transporter. Raider transports used antifreeze, used oil and used oil filters to its processing facility in Opa Locka, FL. The facility is on Manatee County water and sewer systems and consists of a small office building and a large yard. There are currently five employees, four of whom are drivers. Mr. Dow currently divides his time between this facility and the one in Opa Locka. There are currently no storage tanks in use at this location, although Mr. Dow stated that Raider intends to obtain a used oil processing permit for this location in the future. Currently the facility has two pump trucks, one temp vacuum truck on loan from the Opa Locka facility, three tanker trailers and one box trailer. Required transporter insurance is now provided through ACE American Insurance Company.

During the yard inspection, five large, and one small, steel ASTs were observed near the rear of the property. Mr. Dow said they had been obtained for processing used oil in the future. Currently, however, the facility was still in the planning stage and the property was being evaluated by a landscaping engineer with regards to stormwater and eventually processing equipment and layout. The only other things noted in the yard were two tanker trailers, two pump trucks and a box trailer. There is also an empty containment dike and a concrete slab from the previous occupant.

The interior of the box trailer was examined and found to contain used oil filters. One of the drums was observed to be improperly labeled. Mr. Dow, who had been conducting DOT training

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when the inspector arrived, later used the drum as a training tool when the training resumed after the inspection.

One of the pump trucks was randomly selected and inspected. The driver, Susan Machado, was available to answer questions. The truck is equipped with emergency response equipment, such as reflective triangles and absorbent pads and clay. Also present were some Dexsil test kits, as well as a halogen sniffer, and Ms. Machado appeared to be familiar with its operation.

When asked about whether the facility was a used oil and / or used oil filter transfer facility, Mr. Dow explained the current facility operations. He stated that until the end of June, for the most part, the facility was transporting to Opa Locka daily. Then after June 25th, trucks would go out in the morning, return in the afternoon with a partially full tank and then park. In the morning, the truck would again leave on its run and return with a full tank that is transferred to a tanker trailer and then driven to Opa Locka. On rare occasions, the pump truck(s) may be on site for a second night, but he believed it was still less than 24 hours overall storage. He was asked about weekends, and stated that the tanker always left on Fridays to deliver to Opa Locka.

Based on this conversation, the inspector told Mr. Dow that the facility is probably a transfer facility, especially if his tanker driver got sick, and would therefore need to provide secondary containment for any used oil being temporarily stored at the facility. He explained that he had originally discussed being a transfer facility with someone in Tallahassee and was told that since he had no tanks, he could not be a transfer facility, and when he described his operations, he was told that under the scenario described above, the used oil was still in transit.

At the time of the inspection, there were only a few records available for inspection, and those were all inbound /acceptance records. The rest of the records are kept at Mr. Dow's main office, which is at the Opa Locka facility. An appointment was made to review the remaining records on September 17, 2010. Thirty-one used oil acceptance and delivery records were randomly selected from June 2010 to the present, as well as records of used oil filter transport. The forms are two-part and include both the acceptance record from the generator and the subsequent delivery record from the processing facility. The records contain all the required information. The only problem noted was several used oil filter records with halogen results recorded. All the records were from the same driver, and Mr. Dow said he would provide additional training to the driver.

Only three records could be found that indicated used oil was stored on site over night. For these three records, used oil was picked up at one facility on April 5, 2010, and two facilities on April 6, 2010, and in all three cases, delivered to Opa Locka on April 7, 2010. It was pointed out that the records did not quite match the scenario Mr. Dow originally described. Mr. Dow's explanation was that the described scenario was his understanding of what actually occurred, but that currently, he was only at the facility a couple of times a week so it may not have been accurate.

Mr. Dow stated that after the date of the inspection, the facility had returned to mandatory daily transportation, but he was planning on becoming a transfer facility and complying with those rules, including installing secondary containment. He indicated that he had already submitted the Notification Form, and this was subsequently confirmed by the inspector. Mr. Dow plans on installing a containment area where the concrete slab is already located. He is having an engineer design something that will provide 110% the capacity of his tanker truck and that can be driven into and out of. Until that time, he will continue to transport daily to Opa Locka.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type:	Violation
Rule:	62-710.850(5)(a)
Explanation:	At the time of the inspection, there was one drum of used oil filters observed at the facility that was not correctly labeled. (corrected)

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Corrective Action: After the inspection, the facility used the improperly labeled drum as a tool in its DOT training session, which was ongoing during the inspection. The drum was discussed and labeled during that training session.

Type: Area Of Concern

Rule: 279.45(d)

Explanation: The facility notified as a transfer facility in September 2010 and intends to comply with applicable rules.

Corrective Action: Until the facility has installed adequate secondary containment for its used oil truck(s), it must ensure that shipments of used oil are not held for more than 24 hours.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
62-710.850(5)(a)	Checklist Independent Violations	08/27/2010	At the time of the inspection, there was one drum of used oil filters observed at the facility that was not correctly labeled. (corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
279.45(d)	Checklist Independent Areas of Concern	08/27/2010	The facility notified as a transfer facility in September 2010 and intends to comply with applicable rules.

Conclusion:


Based on the observation made during this inspection, the facility was not operating in compliance with rules governing used oil filter transporters. The facility has since returned to compliance. Additionally, the facility intends on becoming a used oil and used oil filter transfer facility, but is still in the process of installing secondary containment. Until that time, it must ensure that shipments are not held for more than 24 hours.

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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. 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.

Kelly M. Honey _____ PRINCIPAL INSPECTOR NAME	Environmental Specialist III _____ PRINCIPAL INSPECTOR TITLE
 _____ PRINCIPAL INSPECTOR SIGNATURE	FDEP _____ ORGANIZATION
	10/6/2010 _____ DATE

Brandon G. Dow, CHMM _____ REPRESENTATIVE NAME	Branch Manager _____ REPRESENTATIVE TITLE
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NO SIGNATURE _____ REPRESENTATIVE SIGNATURE	Raider Environmental Services, Inc. _____ ORGANIZATION
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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.