



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

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**FACILITY INFORMATION:**

**Facility Name:** Raider Environmental Services

**On-Site Inspection Start Date:** 03/14/2011

**On-Site Inspection End Date:** 03/14/2011

**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:**

Complaint Inspection for Used Oil Processor facility

Complaint Inspection for Used Oil Transporter facility

Complaint Inspection for Transporter facility

Complaint Inspection for Used Oil Transfer Facility

Complaint Inspection for Non-Handler facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: 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 numbers 284932-HO-001 and 284932-SO-002, 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 25 full time employees and is on city water and sewer.

**Process Description:**

The facility has four vacuum trucks, one of which is a Vactor, used for dry product such as fly ash. The facility has four 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 rollofs and the other three are for used oil collection. For hazardous waste transport, the facility uses a box truck and there is also a box trailer, which is generally used for emergency response situations.

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 new tanks are to be constructed within the facility's secondary containment. At the time of the inspection, all of the existing tanks

Inspection Date: 03/14/2011

were in service; tank number five which contained used oil was not labeled.

Inside the secondary containment area and behind the cooker was a large puddle of used oil that was coming from a leaking valve associated with the cooker. In the middle of the yard where the used oil filter containers are stored were at least three drums labeled as non-regulated solid waste (dirt) that actually contained used oil filters. There were also at least two containers in this area that were open. The inspector reminded RES that they need to make sure the used oil filter containers are closed and protected from the elements to avoid a discharge of oily water to the ground.

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 use in the oily water processing, while the used oil is processed using flocculants and acids.

#### Record Review

The following deficiencies were noted in the facility's Contingency Plan (CP): The emergency contacts page needed updating; the secondary emergency coordinators' information 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. The facility had not been maintaining a general facility inspection log that met the requirements of 40 CFR Part 279.52(a). All of the facilities acceptance and delivery logs were not available for review immediately as the facility had recently lost their EHS officer and also was in the process of converting to a new database. These documents were produced in a timely matter. All other records reviewed i.e.; manifests, the permit, training records, and the closure plan were in order.

A file review performed on the facility revealed that financial assurance had never been established and annual closure cost estimates and adjustment had not been made. Also, the facility had not submitted "as built" for the addition of five new tanks as required by their permit

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

##### 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: There were at least three drums of used oil filters in the used oil filter storage area that needed proper labeling.  
Corrective Action: Please send picture of used oil filter containers properly labeled.

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Type: Area Of Concern  
Rule: 279.54(c)  
Question Number: 28.180  
Question: Are containers provided with secondary containment consisting of walls and floor at a minimum?  
Explanation: Facility had some leakage from the heat exchanger inside the secondary containment.  
Corrective Action: Please send picture showing area has been cleaned up.

Inspection Date: 03/14/2011

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Type: Violation  
Rule: 279.54(f)  
Question Number: 28.190  
Question: Are ASTs, UST tank fill lines and containers labeled "used oil"?  
Explanation: Tank # 5 was not properly labeled.  
Corrective Action: Please send picture showing tank #5 has been properly labeled.

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Type: Violation  
Rule: 279.52(a)(1)  
Question Number: 28.210  
Question: Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment?  
Explanation: Facility did not have a general facility inspection log that meets the standards of 40 CFR Part 279.52.  
Corrective Action: Please establish a log that meets the appropriate standards, keep log for three weeks and send copies to Department.

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Type: Violation  
Rule: 279.52(b)(2)  
Question Number: 28.340  
Question: Does the plan include the following?  
Explanation: Secondary emergency coordinator information needs to be updated.  
Corrective Action: Please update all relevant pages of Contingency Plan with new secondary emergency coordinator information. Supply copies to Department. Correction were provided on site.

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**Checklist Independent Potential Violations and Areas of Concern**

Type: Violation  
Rule: 62-710.800(6)  
Explanation: The facility has not had Financial Assurance since it began operations and is still out of compliance with this requirement of their permit.  
Corrective Action: Provide the Department with proof of Financial Assurance and continue providing proof to the the Department that the facility's FA is being maintained annually and has been updated to include new closure cost estimates.

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Type: Violation

Inspection Date: 03/14/2011

Rule: 62-710.800(2)

Explanation: Per the facility's permit, Part IV - Tanks and Container Conditions - Condition (11): "As built" drawings for any tanks added subsequent to the original application should be submitted to the Department within 30 days of construction. In the tank table for the original application, nine tanks were specified and drawings were provided. Inspections of the facility on 4/15/2010 and 3/14/2011 revealed that additional tanks had been added for which "as built" drawings were not submitted. On 3/16/2011, an email was sent to RES specifically requesting the "as built" drawings be submitted for all tanks not in the original application.

Corrective Action: Please submit to the Department "as built" drawings for all tanks not included in the original permit.

### Summary of Potential Violations and Areas of Concern:

#### Potential Violations

Rule Number	Area	Date Cited	Explanation
Used Oil Processor			
62-710.850(5)(a)		03/14/2011	There were at least three drums of used oil filters in the used oil filter storage area that needed proper labeling.
279.54(f)		03/14/2011	Tank # 5 was not properly labeled.
279.52(a)(1)		03/14/2011	Facility did not have a general facility inspection log that meets the standards of 40 CFR Part 279.52.
279.52(b)(2)		03/14/2011	Secondary emergency coordinator information needs to be updated.
Checklist Independent Violations			
62-710.800(6)		03/14/2011	The facility has not had Financial Assurance since it began operations and is still out of compliance with this requirement of their permit.
62-710.800(2)		03/14/2011	Per the facility's permit, Part IV - Tanks and Container Conditions - Condition (11): "As built" drawings for any tanks added subsequent to the original application should be submitted to the Department within 30 days of construction. In the tank table for the original application, nine tanks were specified and drawings were provided. Inspections of the facility on 4/15/2010 and 3/14/2011 revealed that additional tanks had been added for which "as built" drawings were not submitted. On 3/16/2011, an email was sent to RES specifically requesting the "as built" drawings be submitted for all tanks not in the original application.

#### Areas of Concern

Rule Number	Area	Date Cited	Explanation
Used Oil Processor			

Inspection Date: 03/14/2011

Rule Number	Area	Date Cited	Explanation
279.54(c)		03/14/2011	Facility had some leakage from the heat exchanger inside the secondary containment.

**Conclusion:**

An exit interview was conducted at the conclusion of the inspection which addressed the potential violations listed above. The facility was not in compliance at the time of the inspection. The facility was given 21 days to return compliance.

Inspection Date: 03/14/2011

**Signed:**

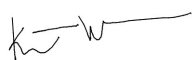
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection 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**

3/16/2011

**DATE**

Steve Obst

**REPRESENTATIVE NAME**

President

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Raider Environmental Services

**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.