

From: Dan Berler [dan@raiderenvironmental.com]
Sent: Friday, October 19, 2012 5:31 PM
To: Winston, Kathy
Subject: RE: Status of Letter response to address inspection requests - almost complete except for certified letter receipts
Attachments: 2012 Oct 19 Draft SPCC and Contingency Plan.docx; 2012 Oct 4 Joey Betancourt - CDL license.pdf; 2012 Mar 31 Joey Betancourt H&S Certs.pdf; Attach 3B 2012 Reciept for Fire Extinguishers.pdf; Attach 3A 2012 Reciept for Fire Extinguishers.pdf; Used Oil and Waste Analysis Plan.pdf

Hi Kathy,

I have attached a number of items for your review including:

- A draft of the newly revised SPCC/Contingency Plan with the
 - phone number to the closest hospital
 - list of the emergency equipment, locations and capabilities
- Joey Bentancourt's Commercial Driver's License and training certifications including HAZWOPER
- Fire Extinguisher Records
- Waste Analysis Plan
- Photos are attached to following emails because of data transfer limitations

Regards,

Dan

From: Winston, Kathy [<mailto:Kathy.Winston@dep.state.fl.us>]

Sent: Thursday, October 18, 2012 2:05 PM

To: 'Dan Berler'

Subject: RE: Status of Letter response to address inspection requests - almost complete except for certified letter receipts

Dan, That will be fine. However; go ahead and send me everything that you already have including the revised Contingency Plan. This way I can show good faith effort on your part. I will insert this email into the documents for this inspection to show that I approved the extension for the certified mail receipts. Thanks for your quick response in this matter and I will be looking forward to your response.

Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).

From: Dan Berler [<mailto:dan@raiderenvironmental.com>]

Sent: Thursday, October 18, 2012 10:10 AM

To: Winston, Kathy

Subject: Status of Letter response to address inspection requests - almost complete except for certified letter receipts

Hi Kathy,

Following up on my voice message, I decide to revise the SPCC/Contingency Plan because the information was dated and the report needed to be better organized. I am finishing up the revised plan today and will be ready to email you the letter report with the required information tomorrow with the exception of the certified mail receipts to prove that the revised SPCC/Contingency plan has been mailed to the required institutions. Can you extend the deadline for the receipt of the certified mail receipts one (1) week until November 1, 2012? I can email you the letter report less the receipts tomorrow, unless you would like me to wait until I receive the receipts. Let me know what you would prefer.

Regards,

Dan

Dan Berler, Ph.D., P.G.

Raider Environmental Services Got Oil?

4103 NW 132nd Street

Opa Locka, Florida 33054

Cell: 305-528-0959

Office: 305-994-9949 Fax: 305-681-6175

Email: dan@raiderenvironmental.com

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PREPAREDNESS AND PREVENTION CONTINGENCY PLAN WITH INCLUDED SPILL PREVENTION CONTROL & COUNTERMEASURES PLAN (SPCC)

RAIDER ENVIRONMENTAL FACILITY (FLR 000 143 891)

**4103 NORTHWEST 132ND STREET
OPA LOCKA, FL 33054**

Location: 25°53'41" North, 80°15'51" West

Telephone Number: (305) 994-9949

24 Hour Emergency Response Number: (877) 316-0633

Mailing Address

**4103 NORTHWEST 132ND STREET
OPA LOCKA, FL 33054**

Revised: October 2012

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1. INTRODUCTION

Raider Environmental Services, Inc. (Raider) operates a non-hazardous waste facility on 1.22 acres of land in Miami-Dade County. The facility is located at 4103 Northwest 132nd Street, Opa Locka, FL 33054 (Folio 08-2129-000-0140, 25°53'41" North Latitude, 80°15'51" West Longitude). The location of the Facility is shown in Figure 1.

The Facility is fully permitted, registered and licensed with County, State and Federal regulatory agencies for the processing, bulking, treatment and disposal of used oil and the following non-hazardous wastes.

- Petroleum contact water (PCW), oily water and industrial wastewater;
- Used oil filters, and;
- Solid waste.

Mr. Steve Obst, President of Raider, is the person in charge/qualified individual (Primary Emergency Coordinator) of the Facility. He can be reached twenty-four (24) hours a day, seven (7) days a week at (954) 605-6853. The alternate person in charge/alternate qualified individual (Backup Emergency Coordinator) is Mr. Bobby LeClaire. He can be reached at 954 543-2862 twenty-four (24) hours a day, seven (7) days a week. The Facility can be operated twenty-four (24) hours a day, seven (7) days a week as needed.

No spill events have taken place or occurred at the Facility since it was constructed in 2007. The prevention and mitigation of potential of spills and leaks at the Facility have been minimized using a combination of secondary containment areas (SCA)s and inspection and maintenance best practices.

The following document presents a Preparedness and Prevention Contingency Plan in compliance with 40 CFR 265-52 that incorporates a Spill Prevention Control and Countermeasures Plan (SPCC) as required by Florida Statute Title XXIX Public Health Chapter 403.74 Environmental Control pursuant to 40 CFR Part 112. This document has been distributed to the following County and State Compliance Agencies and Individuals.

- Florida Department of Environmental Protection (FDEP)
- Miami-Dade Department of Regulatory and Economic Resources (RER)
- Opa Locka Police Department
- Miami-Dade County Police Department
- Miami-Dade County Fire Department
- Hialeah Hospital
- Steve Obst (President, Raider)
- Bobby LeClaire (Operations Manager, Raider)

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FIGURE 1. LOCATION MAP OF FACILITY AND NEAREST HOSPITAL

2. SECURITY & ON-CALL STATUS

The Facility is completely surrounded with concrete walls and heavy duty fences and gates. The gates are locked when the Facility is not in operation. The Opa Locka Police Department patrols the Facility twenty-four (24) hours a day seven (7) days a week. Facility lighting is maintained and changed when necessary to maximize visibility for the discovery of accidental spills/leaks and prevent acts of vandalism.

The following key personnel have been identified and are available to respond to any situation on an as needed basis 24/7.

- Mr. Steve Obst (President of Raider) at (954) 605-6853
- Mr. Bobby LeClaire (Operations Manager) at 954 543-2862

3. PERSONNEL TRAINING AND DRILLS

Facility operations personnel are taught how to properly operate and maintain equipment to prevent the discharge of used oil, oily-water and wastewater along with applicable pollution control rules and regulations. Operations personnel are additionally provided with periodic spill prevention briefings in order to maintain their familiarity with this plan.

The training of all appropriate personnel in the prompt and effective response to a spill is an important component of the Raider training program. Training is intended to assure that all personnel clearly understand the contents of this plan and their respective roles

Since Raider Environmental Services also offers twenty-four (24) hour, seven (7)-day emergency spill response services, all personnel receive on the job training responding to real spill events. This practical application of oil spill mitigation techniques supplements the OSHA mandated HAZWOPER training..

4. SECONDARY CONTAINMENT AREAS

The Facility consists of five (5) secondary containment areas (SCA-1, SCA-2, SCA-3, SCA-4 and SCA-5) that were designed and constructed to minimize the potential for any leak/spill to impact groundwater resources, soils/sediments or the sanitary sewer system. The minimum containment area volumes were calculated by multiplying the largest tank volume to be contained in each area by a factor of 1.10 (110% of the tank of volume). Figure 2 is provided to show the location of the SCAs at the Facility.

4.1 USED OIL AND WASTE PROCESSING OPERATIONS

The following four (4) primary operations occur within SCAs listed below.

- SCA # 4: Unloading/off-loading and decontamination;
- SCA # 5: Solid waste and used oil filter bulking;
- SCA # 2: Used oil processing and Storage Area for Used Oils and Wastewaters, and;
- SCA #1/SCA # 5: Industrial wastewater pretreatment and storage areas.

SC4 # 4: UNLOADING/OFF-LOADING AND DECONTAMINATION OPERATIONS

Transport vehicles containing used oil, oily water and wastewater are off-loaded and pumped into above ground storage (AST)s located in SCA # 2. Trucks and various sized tanks and containers (e.g., 4,000-gallon vac truck tanks, 6,500-gallon vacuum trailer tanks, 55-gallon drums and 250-gallon totes) are washed and decontaminated. The decontamination water is pumped into storage tanks located in SCA # 2 for treatment and processing and residual solid waste is placed into a 40-yard roll-off located in SC # 5. Treated oil (Fuel Oil) is transferred from SCA # 2 into tanker trailers that are used to transport the Fuel Oil to Raider clients.

SCA # 5: SOLID WASTE AND USED OIL FILTER BULKING

Drummed (generally 55-gallons in volume) solid waste, oil filters, wastewaters (industrial and oily) and used oil are unloaded from vehicles and stored prior to being emptied. The solid waste is emptied and bulked into a 40-yard roll-off that is covered whenever it rains or prior to the end of daily operations. The used oil and wastewater are pumped into ASTs located in SCA # 2.

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FIGURE 2. SECONDARY CONTAINMENT AREAS

SCA # 2: USED OIL PROCESSING AND STORAGE AREA FOR USED OILS AND WASTEWATERS

Used oil is filtered and treated (primarily to remove suspended solids and water) and recycled into Fuel Oil for sale to Raider clients. Oily water separated from the used oil during treatment operations is stored in a vertical AST prior to being conveyed to the industrial pretreatment wastewater component of the Facility in SCA # 1 and SCA # 3.

Bypass valves were not incorporated into any part of the used oil processing system in order to prevent any accidental spills of used oil or wastewaters outside of SCA # 2. Any accidental spill or leak within this SCA # 2 will be intercepted by an impermeable concrete sump and pumped back into the used oil processing for treatment.

SCA # 3: INDUSTRIAL WASTEWATER PRETREATMENT AND STORAGE AREA

Wastewater delivered to the Facility and oily-wastewater separated during the treatment and recycling of used oil is treated and disposed into the sanitary sewer system.

SAFE VEHICLE OPERATION

All vehicles entering the Facility are required to be operated by trained and licensed operators. Warning signs will be posted where appropriate.

4.2 STORAGE TANKS

All of the storage tanks at the Facility are above ground. The material composition and design of above ground storage tanks (AST)s and appurtenances are compatible with contained wastes.

The ASTs used to process, treat and store used oil, oily water and industrial wastewater are located in secondary containment areas SCA # 1, SCA # 2, and SCA # 3 (refer to Figure 2). A list of all the Facility ASTs and their contents is provided in Table 1.

Tank integrity inspections are completed for all Facility ASTs on a daily basis. The results of the inspections are recorded and maintained in the Facility office. If a leak is detected, it will be reported and recorded

4.3 PREDICTION OF SPILL BEHAVIOR

Any potential spill/leaks of wastes from ASTs and associated appurtenances will be contained by secondary containment enclosures, sloped surfaces, sumps and

TABLE 1. AST DETAILS AND CONTENTS

Tank #	Date Installed	Size (Gallons)	Construction Material	Contents
1	2007	35,000	Carbon Steel	Oily Water (Influent)
2	2007	35,000	Carbon Steel	Oily Water (Influent)
3	2007	35,000	Carbon Steel	Oily Water (Influent)
4	2007	35,000	Carbon Steel	Oily Water (Influent)
5	2007	25,000	Carbon Steel	Used Oil / Oily Water
6	2007	25,000	Carbon Steel	Used Oil / Oily Water
7	2007	25,000	Carbon Steel	Used Oil Processing
8	2007	3,000	Carbon Steel	Heater Fuel/Oil
9	2007	3,000	Carbon Steel	Used Oil Processing
10	2007	6,000	Carbon Steel	Used Oil Processing
11	2007	6,000	Carbon Steel	Used Oil Processing
12	2007	3,000	Carbon Steel	Carbon Polishing Tank
13	2007	20,000	Fiberglass	Equalization
14	2007	20,000	Fiberglass	Process Water
15	2007	20,000	Fiberglass	Effluent Water
16	2011	27,000	Carbon Steel	Used Oil Processing
17	2011	15,000	Carbon Steel	Air Stripper Effluent
18	2011	15,000	Carbon Steel	Air Stripper Effluent
19	2011	15,000	Carbon Steel	Treatment Effluent for Testing
20	2011	15,000	Carbon Steel	Treatment Effluent for Testing

containment trenches. Refer to Figure 2 for locations of secondary containment features within the Facility.

4.4 SPILL DIVERSION AND RETENTION PONDS

No diversion or retention ponds exist at the Facility.

4.5 SPILL AND STORMWATER DISPOSAL

A fleet of vacuum tank trucks, mobile Frac tanks and tanker trailers are stored, maintained and operated out of the Facility. One (1) vacuum tank truck is restricted to the Facility for the cleanup of any accidental spills or leaks that could occur. All rainwater that accumulates in the SWAs is pumped through an oil-water separator prior to being discharged into Facility's on-site stormwater infiltration system. A description of oil/water separators is provided in Appendix I.

4.6 INSPECTIONS

All USTs along with supports and foundations, piping, joints, valves and bodies are visually inspected by plant employees as a required part of their daily work. All observed defects, leaks and spills are immediately reported to their supervisor. The supervisor will record the reported information and take any corrective action needed to resolve the problem. Supervisors will complete and maintain written records of the following types of visual inspections/measurements completed on a daily basis in addition to the on-going visual inspections by plant employees.

- Tank integrity
- Tank supports and foundations
- Tank volumes based on internal surface float elevations and site gauges

The written inspection/measurement records are maintained in the Facility Office. Appropriate action, repairs and maintenance will be completed immediately on all Facility components observed to be leaking or to have deteriorated

All storage tanks, foundations will be visually inspected by operating personnel as a part of everyday operations. Records of visual inspections will be maintained both at the Facility and communicated to line management for review and incorporated in the operating file.

5. EMERGENCY SPILL RESPONSE PLAN

If a spill occurs within the Facility, Steve Obst (President/Primary Emergency Coordinator, cell: 954 605-6853) and/or Bobby LeClaire (Operations Manager/Back-up Emergency Coordinator, cell: 954 543-2862) will initiate the following Emergency Spill Response Plan sequence of steps and then notify the regulatory agencies listed on page 24 once the situation has been stabilized. The emphasis of the plan is to remain calm and try to get the situation/spill under control as soon as possible.

1. Dial 911 for emergency medical assistance, if you or anyone else has been hurt;
2. Evaluate the degree of contamination to the Facility and estimate the number of gallons spilled. If more than 25 gallons of used oil or other liquids with hazardous constituents is spilled, notify the RER and FDEP using the numbers listed on page 24;
3. Recover as much liquid as possible using the following spill containment procedures and emergency response materials and equipment listed on page 11.

5.1 SPILL CONTAINMENT PROCEDURES

The spill containment and cleanup procedures presented below are function of the spill location within the Facility and the permeability of the spill surface.

ASPHALT AND CONCRETE

1. Use the booms, pads, unconsolidated sorbent particles (e.g., "kitty litter) and sand located in Facility emergency supply location (refer to Table 2 on page 18) to prevent the migration of the spill into the Facility's stormwater infiltration system and onto more permeable surfaces that are not covered with asphalt or concrete on the west and north sides of the Facility.
2. Use the dedicated on-site vacuum truck to remove spill liquids, if the spill is too large for booms:
3. Use sorbent materials and sand to contain and encircle the spill.
4. Layout secured plastic sheeting on an area away from the spill for the temporary storage of used spill-soaked sorbent materials and sand to prevent potential infiltration of liquids into surface imperfections (e.g., cracks) that may exist.
5. Steam or pressure wash the impacted surface to remove spill residue.
6. Once spill has been cleaned up, dispose sorbent materials and sand into the Facility's solid waste roll-off and transfer recovered spill liquids into the wastewater or oil processing systems for treatment and disposal.

TABLE 2. EMERGENCY EQUIPMENT AND SUPPLIES AND CAPABILITIES

Item	Size	Quantity	Capabilities	Location
Pads	17"x19"x3/8"	2000	Sorption	EE&S
Boom	10'x8'	30	Sorption	EE&S
Boom	10'x5'	60	Sorption	EE&S
Rug	36"x300'	2	Sorption	EE&S
Rug	18"x30'	2	Sorption	EE&S
Pillows	9"x15"	10	Sorption	EE&S
Duct Tape Rolls	2"	30	Various	Main Office
Chemical Resistant Gloves	Large	12 dozen	PPE	Main Office, EE&S and ERB
Plastic Sheeting	20'x100'	10 rolls	Impermeable Barrier	EE&S
Bags of Kitty Litter	40 lb	40	Sorption	EE&S
Bags of Sand	40-lb	30	Containment and Sorption	EE&S
Full Face Negative Air Masks	Medium to Large	15	PPE	ERB
Organic Vapor Cartridges		20	PPE	Main Office
Half Face Masks	Medium to Large	10	PPE	EE&S and ERB

TABLE 2. CONTINUED

Self Contained Breathing Apparatuses and air hoses	Medium to Large	2	PPE For use when supplied air is needed	EE&S
Protective Safety Glasses (Clear and Tinted)		30	Eye protection	Office and ERB
Tyvek Suits	Large and XXL	50	PPE	Main Office, EE&S and ERBs
Plastic Bags	33"x60"	700	Containment of solid waste and used PPE and sorbents	EE&S
Pressure Washers		1	1,500 – 2,000 psi	Portable in SCA # 1 and on VAC Trucks
VAC Trucks		6, one (1) dedicated to the Facility	Liquid and semi-solid vacuuming	Facility Parking Lot
VACTOR Truck		1	Soil vacuuming	Facility Parking Lot
Air Lord		1	Ash vacuuming	Facility Parking Lot
Drums	55-gallon	75	Containment of liquids and solids	SCA # 5
Totes	250-gallon	10	Containment of Liquids	SCA # 5

TABLE 2. CONTINUED

Spools of Polypropylene Rope	¼-inch	1	Various	EE&S
Harness and 50-foot tag line	Variable	1	For Elevation work	EE&S
Dexsil Kits		48	Detection of Volatile Halogens	EE&S
Explosimeter /Gas Detectors		4	Detection of explosive levels of gases & O ₂ /CO ₂ /CH ₄ /Sulfide Concentrations for Confined Space Entries	Main Office

Notes:

1. EE&S – Emergency equipment and supplies stored on the second floor of the building in the southeast corner of the Facility where SCA # 1 is. The location is marked as EE & Supplies in Figure 2.
2. ERB – Emergency response bags kept with operating personnel at all times.
3. PPE – Personal Protective Equipment

PERMEABLE SURFACES NOT COVERED WITH ASPHALT OR CONCRETE

1. Obtain earth moving equipment (loader, backhoe, dump truck, etc.) and sand.
2. Determine the direction of the spill flow and excavate a catch basin or deploy a sand berm to contain the flow
3. Pump the contained liquid into the dedicated on-site VAC truck
4. Lay out plastic sheeting on a surface area – preferably impervious - nearby the spill area.
5. Place impacted soils and spent sorbents on the plastic sheeting.
6. Excavate at least one (1) foot of soil below the spill surface or until the soil appears visually clean.
7. Collect samples of the excavation walls and bottom and place them into sample jars for head space analyses.
8. Use an organic vapor analyzer (OVA) to conduct head space analyses.
9. Review the headspace analytical results to determine how much soil to excavate.
10. Collect soil samples for submittal to a NELAC-certified laboratory for analyses of the spill components to confirm that all impacted soils have been removed.
11. Pickup and transport the impacted soil to the Raider Opa-Locka facility for disposal.

5.2 SECURITY AT SPILLS

Security will be maintained by Facility employees during spill response operations. If the spill is significant, Raider will request security assistance from the Opa-Locka police department.

5.3 EMERGENCY COORIDINATOR RESPONSIBILITIES

1. **Activate** Raider Environmental Services Facility alarm/communication system to notify all Facility personnel by:
 - a. Notify Facility personnel by word of mouth
2. **Notify** appropriate State or Local Agencies with designated response roles if their help is needed. In the case of fire or explosion:
 - a. Pull fire alarm pull switch for Plant alarm system. This will notify Plant personnel as well as notify the Alarm Company.

- b. Call 911 to notify the Fire Department.
-
- 3. **Identify** the character, exact-source, amount and extent of any released material. This may be done by observation, review of Facility records and/or chemical analysis.

 - 4. **Access** possible hazards to human health or the environment that may result from the release, fire or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion. If assessment indicates that evacuation of local areas may be advisable, immediately notify appropriate authorities. Be available to help local authorities decide whether local areas should be evacuated.

 - 5. **Notify** immediately the government official designated as the On-Scene Commander of the National Response Center using their twenty-four (24) hour toll free number (800) 424-8802. The report must include:
 - a. Name and telephone number of person reporting;
 - b. Name and address of the Facility
 - c. Time and type of incident (release, fire, etc.)
 - d. Name and quantity of material(s) involved;
 - e. The extent of injuries, if any; and
 - f. The possible hazards to human health, the environment or outside the Facility.
 - g. Wait for the other party to hang up, **do not hang up first**.

 - 6. **Take** all responsible actions necessary to ensure that releases, fires and explosions do not occur, recur or spread to other oil or waste at the Facility.

 - 7. **After** the emergency is over, provide for the recycling, storing or disposal facility of the recovered materials or materials that result from the release, fire or explosion. In affected area(s) of the Facility make sure that no waste or used oil that may be incompatible with the released material is recycled, treated, stored or disposed of until the clean-up procedures are completed. All emergency equipment listed in this contingency plan need to be cleaned and fit for its intended use before operations are resumed.

8. **Notify** the Regional Administrator and appropriate State and Local Authorities that the Facility is in compliance with 40 CFR Part 279.52 before resuming operations in the affected area(s) of the Facility.
9. **Note** in the operating record the time, date and detail of any incident that requires implementing this Contingency Plan.
10. **Submit** a written report within fifteen (15) days after the incident to the Regional Administrator. The report must include:
 - a. Name, address and telephone number of the Owner or Operator;
 - b. Name, address and telephone number of the Facility;
 - c. Date, time and types of incident (release, fire, etc.)
 - d. Name and quantity of materials involved;
 - e. The extent of injuries, if any;
 - f. An assessment of actual or potential hazards to human health or the environment outside of the Facility, where applicable; and
 - g. Estimated quantity and disposition of recovered material that resulted from the incident.
 - h. The name and telephone number of the person or persons to be contacted for more information

6. EMERGENCY RESPONSE CONTACTS AND ARRANGEMENTS

Fire Department: Miami-Dade Fire Department (911, 786 331-4800)

Personnel from the responding station toured Raider Environmental Services Facility and are acquainted with the Facility operations and layout. The fire station has a key to the fire box located at the entrance gate.

Police Department: Miami-Dade Police Department (911, 305 476-5423)

Uniformed personnel have been acquainted with the Facility layout and are familiar with the operations. Police personnel would assume charge of any traffic control issues that should arise in the event of an emergency.

Hospital: Hialeah Hospital (911, 305 823-5000)

Emergency Response Arrangements:

Telephone conversations have been conducted with hospital representatives confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes. Copies of the material safety data sheets for chemicals used in Raider Environmental Services processes are included in the hospital copy of the contingency plan.

TABLE 3. EMERGENCY CONTACT PHONE NUMBERS

Miami-Dade County Fire Department	Emergency	911
	Local	(786) 331-4800
Miami-Dade County Police Department	Emergency	911
	Central Office	(305) 476-5423
Opa-Locka Police Department	Emergency	911
	Local	(305) 953-2889
Medics Ambulance Service	Emergency	911
	Local	(305) 687-4040
Hialeah Hospital	Local	(305) 693-6100
National Response Center		(800) 424-8802
US EPA – Region IV		(404) 562-8357
Florida Department of Env. Protection	Emergency	(800) 320-0519
	Local	(561) 681-6600
Miami-Dade County RER		(305) 372-6789
Chemtrec		(800) 424-9300
U.S. Coast Guard		(305) 535-8705

TABLE 4. RAIDER EMPLOYEE CONTACT INFORMATION

 COMPANY PHONE LIST			
Name	Title	Home	Cell
Aragon, Vicente	Field Tech - East Coast	(954) 822-8910 ©	
Archer, Tony	Driver - A - East Coast (U/O Driver)	(786) 229-9895 ©	(305) 494-7683
Barrera, Denys	Mechanic	(786) 219-8733 ©	
Bluteau J P	Ops Manager - East Coast		(954) 465-0504
Burden, Darryl	Driver - A - East Coast	(786) 587-3769 ©	(954) 465-1735
Carter-Klein, Judy	Accounts Receivable	(954) 401-2309 ©	
Castillo, Roel (Roy)	Driver - A - West Coast (U/O Driver)		(727) 254-7362
Cevallos, Kathy	A.P./H.R. Manager	(305) 785-7327 ©	(954) 594-4879
Corrales, Pedro	Welder	(786) 232-7506 ©	
Crowley, Rick (Earl)	Driver - A - West Coast (U/O Driver)		(941)549-0618
Dean, Rick	Driver - A - West Coast (U/O Driver)		(941) 586-1760
Dusoc, Eloy	Driver - A - West Coast (U/O Driver)		(941) 549-0615
Hirt, Warren (Pete)	Driver - A - West Coast (U/O Driver)	(772) 485-2091 ©	(772)353-6761
Huff, Avery	Driver - A - East Coast (U/O Driver)	(954) 204-4422 ©	(954) 300-6194
Leclair, Bobby	Field Supervisor - East Coast		(954) 543-2862
Lewis, Clarence	Field Tech - East Coast	(786) 355-8498 ©	
Machado, Tony	U/O Supervisor - West Coast	(727) 224-6295 ©	(941) 961-9862
McIntyre, Kevin	Driver - B - East Coast		(954) 300-9178
Moya, Alex	Driver - A - East Coast (U/O Driver)	(954) 861-8824 ©	(305) 345-4199
Nixon, Stephen	Field Tech - East Coast	(754) 246-6597 ©	
Obst, Steve	President		(954) 605-6853
Obst, Tavia	Controller		(954) 914-8414
Olmeda, Ernesto	Driver - A - East Coast	(305) 244-5648 ©	(954) 393-6140
Open Number			(954) 873-6430
Ponton, Phillip	Field Tech - East Coast	(954) 368-5755 ©	
Pullido, Ivan	Driver - A - East Coast	(786) 537-6164 ©	(954) 529-5257
Richardson, James	Field Tech - East Coast	(954) 638-6936	
Rodriguez, Felix		(863) 844-2271 ©	
Rojas, Luciano	Driver - A - East Coast	(305) 305-3430 ©	(954) 594-4036
Ruiz, Ray	Driver - B - East Coast	(305) 778-5090 ©	(305) 494-6110
Saccarelli, Marc	- East Coast	(561) 674-5471 ©	(954)882-4039
Santana, Lazaro	Water Treatment	(786) 897-2634 ©	
Smith, Andrew	Driver - A - West Coast (U/O Driver)		(863) 205-6863
Stevens, Rick	Oil Processing		(954) 594-7055
Tamayo, Mario	Field Supervisor - West Coast	(941) 623-5849 ©	(954) 275-1778
Tejera, Andres		(954) 391-2237 ©	
Thorton, JB	Driver - A - West Coast (U/O Driver)		(863) 205-6863
Trinka, Kenneth	Driver - A - West Coast	(727)384-0244 ©	(941) 232-8047
Varela, Toni	Administrative Assitant/Oil	(305) 397-4554 ©	

7. GENERAL RESPONSIBILITIES

A. Personnel Assignments

1. Emergency Coordinator

Steve Obst – Leader

Bobby LeClair – Back-Up

2. Communications

Bobby LeClair – Back-Up

Steve Obst – Back-Up

3. Evacuation

Steve Obst – Leader

Bobby LeClair – Back-Up

4. Emergency Situation

Emergency Assessment

i. Bobby LeClair – Back-Up

ii. Steve Obst – Back-Up

Spill Containment

iii. Steve Obst – Leader

iv. Bobby LeClair – Back-Up

5. Emergency Team

Fire Fighting & Spill Containment

v. Steve Obst

6. First Aid

Steve Obst

B. Emergency Procedures & Actions

In the event of an emergency situation the emergency coordinator must be notified immediately. If the emergency coordinator cannot be contacted, secondary contacts are provided, see Appendix A of this attachment.

The emergency coordinator will act according to the following procedures:

1. Determine the nature of the emergency; fire, explosion potential, or spill. Identify the source.
2. The Emergency Response Coordinator (ERC) will conduct the response from the primary Emergency Operations Center (EOC) or Command Post. The primary Command Post is located in the main operations building conference room. The laboratory is designated as the alternate Command Post.
3. Determine whether help is required from outside agencies. Call and inform agencies of the situation and solicit their help if necessary.

If the emergency is within the company's scope of service to respond – in-house personnel will be directed for cleanup. If the emergency is beyond the facility's capability, spill containment procedures will be implemented and the proper authorities notified for response.

4. Determine the nature and quantity of materials involved by:
 - i. physical observation/label identification
 - ii. inventory records
 - iii. chemical analysis and/or material profiles

5. Decide what should be done immediately to keep the situation from worsening:

a. Explosion Hazard

Determine whether any reactive substances in the area need to be relocated. If explosion has occurred which does not result in a fire, remove any hazardous obstacles that can be safely retrieved.

b. Spill

If a spill has occurred; determine the source, contain it by using the emergency equipment and absorbent material and initiating any product transfers that may be deemed necessary to minimize the spill.

Obtain the following information:

- a) the material released
- b) location of the material
- c) quantity of material released
- d) any injury from the release

c. Fire Hazard

If fire has occurred, use the fire extinguishers to control the fire, if possible. Do not attempt to control a blaze that appears to be out of control; rely on the proper authority response. Ensure that all storage areas are accessible to fire fighters. If a fire should break out, concentration will be placed on preventing the fire from spreading. The emergency coordinator will monitor for leaks and pressure build-up while awaiting the proper fire-fighting agency.

d. Inclement Weather

In the event of inclement weather (hurricane, electrical storm, tornado), the Emergency Coordinator will make the assessment of the danger.

If the assessment is severe, the Emergency Coordinator will notify the Communications Leader to cancel the work day. If the assessment is not severe, operations may simply be suspended until the storm passes. The emergency coordinator will give a verbal "All Clear" to employees once the inclement weather had passed. This covers incidents such as thunder storms and sporadic heavy rains which interfere with safe operations. During these times, shelter will be sought in the Facility and offices.

If the work day has not started, the Communication Leader will call the Facility personnel and inform them and then call the main office and inform them.

If the work day is already underway, the Communication Leader will inform the Facility to shut down all operations and then call the main office and inform them.

i. Natural Disaster

As soon as a dangerous situation is assessed, the Emergency Coordinator will be notified. The Emergency Coordinator will decide from the severity of the danger whether to remain in the office or to evacuate.

If evacuation is necessary, then the Emergency Coordinator will announce this to the Communication Leader and/or to the Evacuation Leader. The office will evacuate through the evacuation routes. Evacuation will be done in an orderly manner to the southeast corner of the warehouse and everyone will remain in the southeast corner of the warehouse until the danger has passed.

If the imminent danger does not permit for evacuation, try to inform the Emergency Coordinator, search for an inside corner of a wall away from glass windows and product storage and remain there in a sitting position until the danger has passed.

ii. Hurricanes

All items which are not securely anchored will be moved into the warehouse. These include empty and full containers, all hoses and fittings, wall mounted fire extinguishers units, forklifts, pallets and all other loose objects around the Facility. All empty trailers are to be moved as far away the building as possible. This includes all bulk trailers, box trailers and drum trailers. Secure all plywood sheets and lag bolt into the walls effectively covering window and door openings.

Move as much equipment as possible above ground floor level. An ideal height for water sensitive items is five (5) feet. All mats, antennas or other high flying apparatus should be dismantled and lowered to ground level. Any removable parts should be placed inside the main building warehouse.

All vertical storage tanks should be filled with at least three (3) feet of product or water to keep tanks from lifting off their foundations should the storm-water in the secondary containment area rise a couple of feet during storm.

e. Evacuation Procedure

i. Purpose

Plan for a safe evacuation of an emergency

ii. Responsibilities

The Emergency Coordinator is responsible for implementing the evacuation procedure.

Each employee is responsible for escorting any visitors from his/her work area to the proper exit.

iii. Procedures

The Emergency Coordinator will notify Management in the event an evacuation becomes necessary.

The Emergency Coordinator will order the evacuation and any other actions required.

When an evacuation is announced, stop work. Exit your work area in accordance with the evacuation routes. All employees must leave the Facility unless instructed otherwise by the Emergency Coordinator. Do not run and do not linger in the hallways or doorways.

Each employee must report to his/her Manager once outside the Facility and each Manager must report to the Emergency Coordinator. All personnel must be accounted for.

The Emergency Coordinator will notify the Managers when it is safe to re-enter the Facility. All employees will stay outside the Facility until notified by the Manager it is safe to re-enter.

f. All Clear

- i. Before the facility may be brought back into production following an emergency event, the emergency coordinator must:

Have the facility declared safe for re-entry by any outside organizations responding.

All involved materials must be accounted for and properly stored.

Emergency equipment has been cleaned and is ready for use

NOTE: In the event of an emergency all personnel will discontinue any telephone conversations. Personnel escorting visitors must accompany the visitor to the nearest safe exit. All workstations will be shutdown.

8. REVIEW AND UPDATE OF SPCC & CONTINGENCY PLAN & EMERGENCY PROCEDURESS

This Contingency Plan will be reviewed and immediately amended, if necessary, whenever:

- ✚ Applicable regulations are revised;
- ✚ The Plan fails in an emergency;
- ✚ The Facility changes in its design, construction, operation, maintenance or other circumstances, in a way that materially increases the potential for fires, explosions, releases of used oil or changes in the response necessary in an emergency;
- ✚ The list of emergency coordinators changes; and
- ✚ The list of emergency equipment changes.

APPENDIX A – OIL/WATER SEPARATORS

Oil/water separators are devices commonly used for wastewater discharges. The effluent from oil/water separators is typically discharged to either a sanitary sewer system or a storm sewer. Properly designed, installed and operated, oil/water separators provide a treatment system for handling oily wastewater that prevents the entry of unacceptable levels of contamination to a storm sewer or sanitary sewer.

According to Stoke's Law, a 100-micron diameter oil droplet will rise approximately six (6) inches in water every ten minutes. A 20-micron oil droplet will take over two hours to rise the same distance. Because an oil droplet must rise approximately 48 inches to reach the water surface in a typical gravity – type oil/water separator, smaller droplets may pass through uncollected. Coalescing (binding together) the smaller oil droplets makes them larger and more buoyant, causing them to rise faster. Coalescing oil/water separators may use inclined plates placed within the separation chamber, which provide only a short vertical distance (1/4") for the small droplets to travel before they encounter a fixed surface. Here they can coalesce with other droplets and continue to rise along the plates to the water's surface. Another coalescing method uses a filter made of oleophillic (oil "loving") fibers such as polypropylene. The fine oil droplets attach to the fibers as the wastewater flows through. As the droplets get larger, they become buoyant enough to detach from the fibers and rise to the surface, where they can be collected.

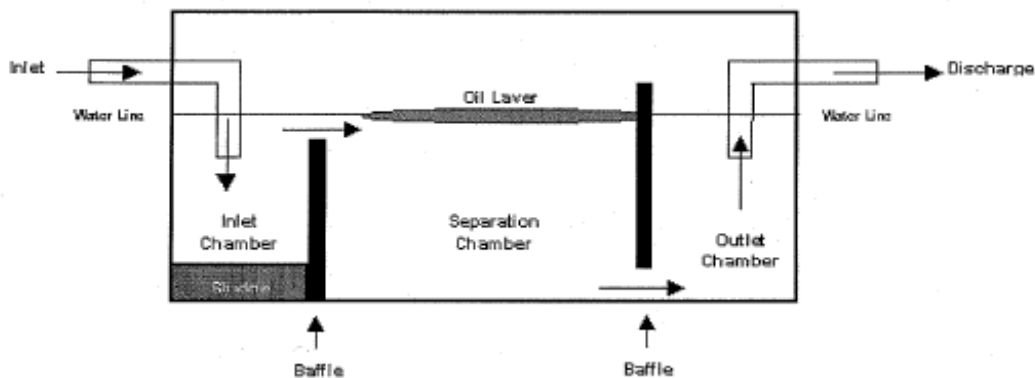


Figure 2. Conceptual Diagram of a Simple Gravity Oil/Water Separator. In a gravity operated O/WS, the oil wastewater is introduced through the system inlet. Water turbulence is calmed in the inlet chamber behind the first baffle, where solids settle out and form sludge on the bottom of the chamber. As the wastewater flows over the first baffle to the middle, or separation, chamber, oil droplets rise to surface and are trapped behind a second, higher baffle, which has an opening along its edge. The remaining water passes under the second baffle into the outlet chamber, where it is diverted to a discharge point. Consequently, solid sludge's can be collected from the bottom of the inlet chamber and oil droplets that accumulate at the water's surface in the separation chamber can be skimmed off or otherwise routed to a separate holding tank.

OPERATIONS AND MAINTENANCE

Eliminate unpermitted pollutants and prohibit discharge of wastewater from industrial operations containing hazardous wastes and heavy metals.

Implement dry cleanup procedures and only use floor drains to carry residual amounts of floating petroleum pollutants. Plug floor drains to oil/water separators that carry industrial wastewater from maintenance shops. Collect, treat and dispose of industrial waste separately.

Establish a primary office of responsibility (to include the functional organization for the management of pollutants discharged and Civil engineering for maintenance of oil/water separators) which understands and has direct control over respective functions.

Remove and test oil/water separator sludge regularly prior to disposal to ensure compliance with sludge disposal requirements. If sludge is hazardous, take immediate actions to identify and eliminate sources of hazardous pollutants. Dispose of sludge as a hazardous waste and retest wastewater from oil/water separator to assure compliance.

GENERAL CONSIDERATIONS

O/WSs are typically very simple devices. However, several factors that could potentially affect safety, efficiency and proper management must be given careful consideration prior to the installation or modification of any O/WS.

Flow Rate

In general, the effectiveness of an O/WS in separating out the oil phase is increased by slower wastewater flow rates into the separator and longer “residence times” (i.e., the period of time that the wastewater remains in the oil/water separator). When the wastewater enters the receiving chamber of the separator, the velocity and turbulence of the fluid is reduced allowing heavier-than-water solids to settle, while larger oil droplets rise to the water’s surface. Further separation continues in the middle chamber (see Figure 2) where smaller droplets of oil rise (more slowly) to the water’s surface and join the larger droplets. The remaining wastewater, once it has passed under the second baffle to the outlet chamber, is discharged (with proper authorization and/or permitting) to a local storm water or sanitary sewer system.

Design Capacity

An O/WS has upper limits to the amounts of oil and sludge that can effectively accumulate while it is in operation. If too much oil accumulates in the receiving and middle chambers, it may flow into the wastewater outlet and end up being discharged to the environment. Proper O/WS design will ensure the separator capacity is sized to meet the needs of the process.

Emulsifying Agents

Detergents and soaps designed to remove oily grime from equipment, weapon systems, vehicles or other components can adversely affect the operation of a gravity O/WS. These types of emulsifying agents are specifically formulated to increase the dispersal of oil into tiny drops in water, which is why they are such good cleaners. When these soapy wastewaters enter the O/WS, it takes significantly longer for the oil to separate, if it can, from the water. Excessive use of detergents can render an O/WS inefficient by completely emulsifying oils into the wastewater stream and allowing it to pass through the system. Low-emulsifying soaps are available that allow oil separation to occur more quickly after the soapy water enters the O/WS. **(NOTE: Personnel must not use low-emulsifying soaps on weapon system components unless they are specifically approved by the weapon system's single manager.)**

Maintenance Practices

The ability of oil/water separators to function properly depends upon the timely performance of required service and maintenance. Oil/water separators must be monitored and maintained by competent personnel who understand how the systems operate. O/WSs should be given the same close attention given to any other important piece of equipment. The operators, users and maintainers of the O/WS must clarify who will be responsible for monitoring, inspecting, maintaining and servicing the system. Frequent inspections should be made of the system and all associated piping, valves, etc. to prevent operational and mechanical failures or inefficiencies. Sludges and oils that are not periodically removed from O/WSs can render it inoperative. Additionally, leaks from oil/water separators can result in environmental pollution, which can trigger costly investigative studies and cleanups. Rigorous implementation of an O/WS inspection and maintenance plan can prevent discharges from the oil/water separator that may contaminate the environment.

Oil/Water Separators Used to Meet SPCC Secondary Containment Requirements

Oil/water separators can be used to meet the SPCC requirements for secondary containment in §§ 112.7(c), 112.7(h)(1), 112.8(c)(2), 112.8(c)(11), 112.12(c)(2) and/or 112.12(c)(11). Additionally, §§ 112.8(b), 112.9(b) and 112.12(b) set forth design specifications and/or drainage associated with secondary containment provisions at the facility. Properly designed, maintained and operated oil/water separators may be used as part of a facility drainage system to meet the secondary containment requirements of the rule.

Standard gravity and enhanced gravity separators or other types of oil/water separators (separator designs may vary), may be used to meet secondary containment requirements. In this application, the separators are expected to have oil and water present in the system when there is oil discharge or oil-contaminated precipitation runoff within the drainage area. Generally, these separators should be monitored on a routine

schedule and collected oil should be removed as appropriate in accordance with procedures in the SPCC Plan.

Many oil/water separators used for secondary containment are installed in areas where they may receive considerable flow from precipitation. If the flow rate exceeds the maximum design rate of the separator, the separator may discharge accumulated oil and/or untreated wastewater; therefore, it may be an inappropriate choice for secondary containment and may result in a discharge to navigable waters and adjoining shorelines. The specifications from the oil/water separator manufacturer outline these and other design factors as important items to consider when specifying the use of a given oil/water separator for a given application. Additionally, the manufacturer specifies the maintenance requirements for these separators that would ensure proper operation of these devices.

When oil/water separators are used to meet SPCC requirements they must be properly operated and maintained to ensure that the unit will perform correctly and as intended under the potential discharge scenarios it is aimed to address (e.g., §§ 112.7(c), 112.8(c)(2) and 112.12(c)(2)). The required oil/water separator capacity should always be available (i.e., oil should not continually accumulate in the separator over a period of time such that the required storage capacity would not be available if an oil release were to occur within the drainage area). The use of oil/water separators as a method of containment may be risky as they have limited drainage controls to prevent a discharge of oil and rely heavily on proper maintenance.

The capacity of an oil/water separator used to meet secondary containment requirements does not count toward a facility's overall storage capacity. Any volume of oil that would flow into the oil/water separator would come from another source within the drainage area that is already generally counted in the facility storage capacity determination. Containers used to store recovered oil after oil/water separation, however, represent additional oil storage and count toward a facility's total storage capacity. These include slop tanks or other containers used to store waste.

BAY AREA TRAINING & CONSULTING

CERTIFIES THAT

JOEY BETANCOURT

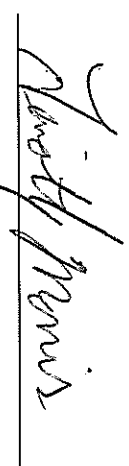
HAS SUCCESSFULLY COMPLETED ALL REQUIREMENTS FOR TRAINING IN

8 HOUR REFRESHER – HAZARDOUS WASTE OPERATIONS & EMERGENCY RESPONSE

29CFR 1910.120

Date: March 31, 2012

Certificate # HAZWOP255



Timothy Morris

Instructor

BAY AREA TRAINING & CONSULTING

CERTIFIES THAT

JOEY BETANCOURT

HAS SUCCESSFULLY COMPLETED ALL REQUIREMENTS FOR TRAINING IN

RESPIRATORY PROTECTION

29CFR 1910.134

Date: March 31, 2012

Certificate # RP055



Timothy Morris

Instructor

BAY AREA TRAINING & CONSULTING

CERTIFIES THAT

JOEY BENTANCOURT

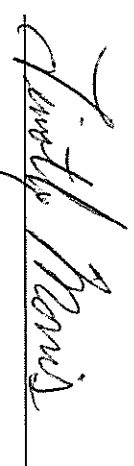
HAS SUCCESSFULLY COMPLETED ALL REQUIREMENTS FOR TRAINING IN

PERMIT REQUIRED CONFINED SPACE ENTRY

29CFR 1910.146

Date: March 31, 2012

Certificate # CS055

A handwritten signature in black ink, appearing to read "Timothy Morris", written over a horizontal line.

Timothy Morris

Instructor

BAY AREA TRAINING & CONSULTING

CERTIFIES THAT

JOEY BENTANCOURT

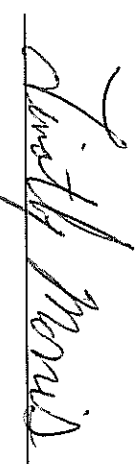
HAS SUCCESSFULLY COMPLETED ALL REQUIREMENTS FOR TRAINING IN

RCRA HAZARDOUS WASTE MANAGEMENT

40CFR 264.16

Date: March 31, 2012

Certificate # HW055



Timothy Morris

Instructor

BAY AREA TRAINING & CONSULTING

CERTIFIES THAT

JOEY BENTANCOURT

HAS SUCCESSFULLY COMPLETED ALL REQUIREMENTS FOR TRAINING IN

HAZARD COMMUNICATION (Right to Know)

29CFR 1910.1200

Date: March 31, 2012

Certificate # HC055



Timothy Morris

Instructor

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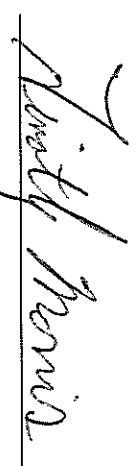
JOEY BENTANCOURT

HAS SUCCESSFULLY COMPLETED ALL REQUIREMENTS FOR TRAINING IN
CONTROL OF HAZARDOUS ENERGY (Lock Out / Tag Out)

29CFR 1910.147

Date: March 31, 2012

Certificate # LOTO005



Timothy Morris

Instructor

BAY AREA TRAINING & CONSULTING

CERTIFIES THAT

JOEY BETANCOURT

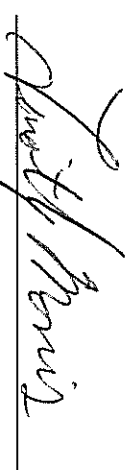
HAS SUCCESSFULLY COMPLETED ALL REQUIREMENTS FOR TRAINING IN

MANAGEMENT OF USED OIL

40CFR 279 / (F.A.C. 62-701 / 62-710)

Date: March 31, 2012

Certificate # MUO055



Timothy Morris

Instructor

Florida *The Sunshine State*
CDL CLASS A
B352-420-78-204-0 ★

JOKABET
BETANCOURT
310 SW 69 TER
PEMBROKE PINES, FL 33023-1161
DOB: 06-04-1978 SEX: M
ISSUED: 04-18-2010 HGT: 5-01
EXPIRES: 06-04-2014
REST
ENDORSE: PX
REPLACED: 05-19-2010

SAFE DRIVER
Operation of a motor vehicle constitutes consent to any sobriety test required by law.

V L A S

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ATTENTION: Accounts Payable

DATE 3/22/2012 SALESPERSON & CELL # Norman Viggiani - 786-247-7380

PHONE # (954) 465-0504 cell. FAX # _____

CONTACT NAME J.P. CELL # _____

JOB SITE Some P.O. # _____

ADDRESS _____

CITY, STATE, ZIP _____

E-MAIL ADDRESS _____

Payment or Terms for this Invoice

NET 10 DAYS	CASH	CREDIT CARD	CHECK	NET 30 DAYS
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3-26-12

PAID
197.60
ck # 6117
3/26/12

Sub Total \$ 180.00

TAX	\$ 12.60
DOT / HAZMAT SURCHARGE	\$ 12.60
TOTAL	\$ 12.60

192.60

NO STATEMENTS WILL BE SENT PLEASE PAY FROM THIS INVOICE CUSTOMER'S SIGNATURE **X**

customer shall be
or not litigation be
RE X

< \$192.60


RAIDER ENVIRONMENTAL SERVICES, INC.

 4103 NW 132ND STREET
 OPA LOCKA, FL 33054


63-215-631

ACH FT 061000104

3/26/2012

 PAY TO THE
 ORDER OF

A-Advanced Fire & Safety, Inc

\$ **192.60

One Hundred Ninety-Two and 60/100*****

DOLLARS

 A-Advanced Fire & Safety, Inc
 22607 S. Dixie Hwy.
 Miami, FL 33170

MEMO

AUTHORIZED SIGNATURE

@00006 1 1 7 @ : 063 10 2 1 5 2 : 1000 1 36 7 1 9 5 1 4 @

RAIDER ENVIRONMENTAL SERVICES, INC.

6117

A-Advanced Fire & Safety, Inc			3/26/2012			
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
3/22/2012	Bill	V1488	192.60	192.60		192.60
				Check Amount		192.60

Check(9514)Suntrust-

192.60

RAIDER ENVIRONMENTAL SERVICES, INC.

6117

A-Advanced Fire & Safety, Inc			3/26/2012			
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
3/22/2012	Bill	V1488	192.60	192.60		192.60
				Check Amount		192.60

Check(9514)Suntrust-

192.60

2:53 PM

04/23/12

Accrual Basis

RAIDER ENVIRONMENTAL SERVICES

Vendor Open Balance

All Transactions

Type	Date	Num	Memo	Due Date	Open Balance	Amount
A-Advanced Fire & Safety, Inc						
Bill	4/10/2012	V1511		4/10/2012	399.83	399.83
Bill	4/23/2012	V1505		4/23/2012	163.71	163.71
Total A-Advanced Fire & Safety, Inc					563.54	563.54
TOTAL					563.54	563.54

PAID
563.54
4/28/2012
check # 6249

NO STATEMENTS WILL BE SENT PLEASE PAY FROM THIS INVOICE CUSTOMER'S SIGNATURE

**RAIDER ENVIRONMENTAL SERVICES, INC.**4103 NW 132ND STREET
OPA LOCKA, FL 33054**SUNTRUST**ACH RT 061000104
63-215-631

4/28/2012

PAY TO THE
ORDER OF

A-Advanced Fire & Safety, Inc

\$ **563.54

Five Hundred Sixty-Three and 54/100*****

DOLLARS

A-Advanced Fire & Safety, Inc
22607 S. Dixie Hwy.
Miami, FL 33170

MEMO

AUTHORIZED SIGNATURE

⑈00006249⑈ ⑆063102152⑆1000136719514⑈

RAIDER ENVIRONMENTAL SERVICES, INC.

6249

A-Advanced Fire & Safety, Inc

4/28/2012

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
4/10/2012	Bill	V1511	399.83	399.83		399.83
4/23/2012	Bill	V1505	163.71	163.71		163.71
				Check Amount		563.54

Check(9514)Suntrust-

563.54

RAIDER ENVIRONMENTAL SERVICES, INC.

6249

A-Advanced Fire & Safety, Inc

4/28/2012

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
4/10/2012	Bill	V1511	399.83	399.83		399.83
4/23/2012	Bill	V1505	163.71	163.71		163.71
				Check Amount		563.54

Check(9514)Suntrust-

563.54

For question or account information
Please call: 305-258-2610
Fax: 305-258-0431
E-mail: info@fireextinguisher.com

INVOICE#	DUE DATE	NEW BALANCE	AMOUNT PAID
V1505	5/12/2012	\$163.71	\$0.00

Add \$20.00 if not paid by due date.

MAIL PAYMENT TO:
22607 S Dixie Hwy
Miami, Fla. 33170



Raider Environmental Services
4103 NW 132 ST
Opa Locka, FL 33054

Street Address
City State Zip

Area code / Phone number
Complete above ONLY if address has changed.

Return this portion with your payment
Make your check payable to: A-ADVANCED FIRE & SAFETY

Statewide Licensed for Fire Extinguishers, Restaurant & Industrial Suppression Systems
Flame Retarding + Emergency & Exit Lighting Service + Hood Cleaning
DOT Retesting Facility for CO2 & Scuba Hydrostatic Testing

Servicing All of South Florida Since 1973

Invoice #
V1505

A-ADVANCED FIRE & SAFETY, INC.

22607 SOUTH DIXIE HWY.

MIAMI, FLORIDA 33170

305-258-2610 FAX (305) 258-0431

Email: info@FireExtinguishers.com

www.FireExtinguishers.com



CUSTOMER ORDER NO. Rai

DATE 4/12/2012 SALESPERSON Norman Viggiano Cell: 305-216-7406

PHONE# 305-994-9949 FAX#

CUSTOMER J.P. Bluteau Cell: 954-543-2862

Email :

Bill To: Raider Environmental Services
4103 NW 132 ST
Opa Locka, FL 33054

ATTENTION: Accounts Payable

Job Site: Raider Environmental Services
4103 NW 132 ST
Opa Locka, FL 33054

TERMS: Net 30 days PO NO.

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1.00	Fire extinguishers annual inspected & certified for 12 month.	\$13.00	\$13.00
1.00	New 10lb Badger ABC fire extinguisher w/ bracket	\$95.00	\$95.00
1.00	New 10lb Heavy Duty Vechicle Bracket	\$45.00	\$45.00
1.00	Service Call		

Stay in Compliance by checking your Fire Extinguishers & Emergency Lighting Monthly per Fire Code

State of Fla. Dealer Lic.# 074630000184

Fla. Syst. Lic.# 064625000385

Customer agrees by accepting all or a portion of the materials, equipment or service listed on this invoice to the following: (i) title to the equipment and materials described herein agreed shall not pass from A-Advanced Fire until all payments hereunder shall have been fully paid in cash by Customer; (ii) upon Customer's failure to pay the full amounts due in the invoice, A-Advanced Fire may retake the equipment or materials; (iii) a service charge of 1 1/2% per month (1.8% per annum) will be charged on unpaid invoice; over 30 days past due; and (iv) Customer shall be responsible for and shall pay any and all attorney's fees incurred by A-Advanced Fire arising out of the enforcement of this invoice, whether or not litigation be brought, or arising from the enforcement of any rights and remedies afforded A-Advanced Fire by Florida statutes.

RETURN CHECK ARE SUBJECT TO A \$25.00 FEE.

A carrying charged of \$20.00 on all invoices over 30 days.

SUBTOTAL	\$153.00
TAX	\$10.71
TOTAL AMOUNT	\$163.71
AMOUNT RECEIVED	\$0.00
BALANCE DUE	\$163.71

Thank you for your business.

IO STATEMENTS WILL BE SENT

PLEASE PAY FROM THIS INVOICE

CUSTOMER SIGNATURE X

Please call: 305-258-2610
Fax: 305-258-0431
E-mail: info@fireextinguisher.com

V1511	5/10/2012	\$394.83	\$0.00
-------	-----------	----------	--------

Add \$20.00 if not paid by due date.

MAIL PAYMENT TO:
22607 S Dixie Hwy
Miami, Fla. 33170



Raider Environmental Services
4103 NW 132 ST
Opa Locka, FL 33054

Street Address
City State Zip
Area code / Phone number
Complete above ONLY if address has changed.

Return this portion with your payment
Make your check payable to: **A-ADVANCED FIRE & SAFETY**

Statewide Licensed for Fire Extinguishers, Restaurant & Industrial Suppression Systems
Flame Retarding + Emergency & Exit Lighting Service + Hood Cleaning
DOT Retesting Facility for CO2 & Scuba Hydrostatic Testing

Servicing All of South Florida Since 1973

Invoice #
V1511

A-ADVANCED FIRE & SAFETY, INC.

22607 SOUTH DIXIE HWY.

MIAMI, FLORIDA 33170

305-258-2610 FAX (305) 258-0431

Email: info@FireExtinguishers.com

www.FireExtinguishers.com



CUSTOMER ORDER NO. **Rai**

DATE **4/10/2012**

SALESPERSON
Norman Viggiano Cell: 305-216-7406

PHONE# **305-994-9949**

FAX#

CUSTOMER **J.P Bluteau**

Cell: 954-543-2862

Email :

Bill To:

Raider Environmental Services
4103 NW 132 ST
Opa Locka, FL 33054

ATTENTION: Accounts Payable

Job Site:

Raider Environmental Services
4103 NW 132 ST
Opa Locka, FL 33054

TERMS: **Net 30 days**

PO NO.

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
3.00	Fire extinguishers annual inspected & certified for 12 month.	\$13.00	\$39.00
1.00	6 year maintenance on 5lb portables fire extinguishers - (recharged)	\$40.00	\$40.00
1.00	New 10lb Badger ABC fire extinguisher w/ bracket	\$95.00	\$95.00
2.00	New 10lb Heavy Duty Vehicle Bracket	\$35.00	\$70.00
1.00	New 10lb Purple K Fire Extinguisher	\$125.00	\$125.00
1.00	Service Call		

Stay in Compliance by checking your Fire Extinguishers & Emergency Lighting Monthly per Fire Code

State of Fla. Dealer Lic.# 074630000184

FIRE EXTINGUISHER TRAINING
FOR EMPLOYEES

HM-126F D.O.T. Requirements
Eq. Serviced Per Fl. Chapter 69A-21

Fla. Syst. Lic.# 064625000385

Customer agrees by accepting all or a portion of the materials, equipment or service listed on this invoice to the following: (i) title to the equipment and materials described herein agreed shall not pass from A-Advanced Fire until all payments hereunder shall have been fully paid in cash by Customer; (ii) upon Customer's failure to pay the full amounts due in the invoice, A-Advanced Fire may retake the equipment or materials; (iii) a service charge of 1 1/2% per month (18% per annum) will be charged on unpaid invoice; over 30 days past due; and (iv) Customer shall be responsible for and shall pay any and all attorney's fees incurred by A-Advanced Fire arising out of the enforcement of this invoice, whether or not litigation be brought, or arising from the enforcement of any rights and remedies afforded A-Advanced Fire by Florida statutes.

RETURN CHECK ARE SUBJECT TO A \$25.00 FEE.

A carrying charged of \$20.00 on all invoices over 30 days.

SUBTOTAL	\$369.00
TAX	\$25.83
TOTAL AMOUNT	\$394.83
AMOUNT RECEIVED	\$0.00
BALANCE DUE	\$394.83
Thank you for your business.	

IO STATEMENTS WILL BE SENT

PLEASE PAY FROM THIS INVOICE

CUSTOMER SIGNATURE X

ATTACHMENT 3

WASTE ANALYSIS PLAN

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Section

1

Introduction

Introduction-Waste Acceptance Plan

Raider Environmental Services Corp. (Raider Environmental Services) accepts used oil, specific non-hazardous wastewaters, used antifreeze, used parts cleaner fluids, used filters, and off-specification fuel products for recycling, and reclamation. The Waste Analysis Plan (WAP) documents the pre-approval and acceptance criteria for all Raider Environmental Services facilities. The primary purpose of this document is to provide guidance to Raider Environmental Services Personnel in the development implementation and adherence to a facility specific WAP

Plan Components

The Plan is composed of the following sections:

- Waste and Product Stream Characterization: presents the procedures, protocols, and methods used to evaluate waste and product streams prior to pick-up, transportation, acceptance, storage, recycling, reclamation, or disposal.
- Acceptance Procedures: presents the procedures, protocols, and methods used to verify that received waste and product streams at transfer terminals and processing plants match the accompanying pre-approval characterizations, shipping documents, pre-acceptance documentation and conforms to regulatory requirements.

Within these sections, the WAP addresses each of the following waste and product streams within the context of industrial streams and crankcase oil sources and terminal versus processing plant operations.

Materials Accepted

Raider Environmental Services accepts certain used oil, non-hazardous wastewaters, used antifreeze, used parts cleaner fluids, used filters, and off-specification products as defined under 40 CFR 261 and 279. All byproducts generated by Raider Environmental Services processes that are determined to be non-recyclable/recoverable are disposed through an approved off-site facility in compliance with all applicable federal, state, and local laws and regulations.

The WAP addresses the following non-hazardous materials recycled, reclaimed, and/or managed by Raider Environmental Services:

Non-Hazardous Wastewater

Both commercial and industrial processes can generate wastewater. Only non-hazardous wastewater streams as defined under 40 CFR 261 and applicable state regulations are accepted. Wastewaters containing used oil are to be considered used oil and not wastewater. Non-hazardous wastewaters are treated and discharged to a wastewater treatment facility under industrial, indirect

- Certification that the information presented is complete and accurate

Non-Hazardous Wastewater

- The generator's name, facility location, EPA Generator ID No. and State Reg. #'s (if applicable)
- EPA and State waste code(s) (if applicable)
- A description of the process generating the stream
- Analysis of the Wastewater by Toxicity Characteristic Leaching Procedure (TCLP)
- RCI (reactivity, corrosivity and ignitability) of the wastewater.
- Physical characteristics of Wastewater (fingerprint)
- Certification by a authorized representative of the generator that the stream is not hazardous; contains no PCBs, no reactive or explosive materials, no radioactive or infectious wastes, or any other constituent that would render the material as non-conforming.
- Certification that categorical pretreatment standards do not apply
- DOT transportation information including, but not limited to the proper shipping name, hazard class, and type of container to be used.
- Certification that the information presented is complete and accurate

Brokered Waste Streams

- The generator's name, facility location, EPA Generator ID No. and State Reg. #'s (if applicable)
- Analytical requirements of the final Treatment, Storage or Disposal Facility (TSDF).
- Physical characteristics of Waste stream (fingerprint)
- DOT transportation information including, but not limited to the proper shipping name, hazard class, and type of container to be used.
- Certification that the information presented is complete and accurate

Off-Specification Fuels-Industrial Sources

- The generator's name and facility location
- A description of the process generating the stream
- Physical characteristics of the product stream (fingerprint)

- Certification by a authorized representative of the generator that the stream is not hazardous; contains no PCBs, no reactive or explosive materials, no radioactive or infectious wastes, or any other constituent that would render the material as non-conforming
- DOT transportation information including, but not limited to the proper shipping name, hazard class, and type of container to be used.
- Certification that the information presented is complete and accurate

Crankcase Used Oil and Commercial Products

- Crankcase used oil, off-specification fuels generated by commercial sources and automotive used antifreeze may be accepted without the completion of a WCF however, the generator shall provide certification that the used oil is non-hazardous by signing a statement to that effect on a Raider Environmental Services bill of lading or manifest.

Re-Characterization and Re-Testing

A generator will need to repeat the characterization procedures to ensure that the analysis is accurate and up-to-date when one of the following occurs:

- The generator ships a non-conforming load to a Raider Environmental Services facility. "A non-conforming load is a shipment that does not significantly match the waste stream's physical and/or chemical characteristics as defined by the generator's original characterization analyses and Waste Characterization Form".
- The generator notifies Raider Environmental Services, or Raider Environmental Services has reason to believe, that the process generating the material to be managed has changed.
- For wastewaters brokered waste streams and solid wastes, (e.g. wastewaters, and absorbents not classified as used oil that are reoccurring waste streams), analytical results must not be older than one year from the date they were completed. At the completion of one year, the generator must provide a letter that certifies that the process generating the waste is unchanged or, perform new testing.

Process Knowledge-Waste Characterization and Rebutting the Hazardous Waste Presumption for Used Oils

Process knowledge requires that the waste generator documents it's knowledge of the origin; the use; the storage; and the potential for contamination adulteration, or activation of the material, which is now considered as "waste". Sources and assurances of "process knowledge" include, but are not limited to:

- Personal and intimate knowledge of the wastes;
- Maintenance of records/logs for inventorying all waste chemicals;
- Possession of the original labeled containers for the chemicals;

- Analytical analyses of the waste.

Raider Environmental Services requires that generator's wishing to use process knowledge in characterizing it's waste, or to rebut the hazardous waste presumption for used oils, the generator must state this claim on its own letterhead prior to Raider Environmental Services accepting that waste for processing. A sample of this letter is attached in the appendix section of this plan. The letter must be attached to a completed WCF if the generator wishes to use process knowledge in meeting the analytical requirements of this plan.

Section

2

Waste and Product Stream Characterization

Waste and Product Stream Characterization

Wastewater, used oil, used filters, brokered wastes and off-specification fuel streams are characterized to:

- Evaluate and comply with applicable federal, state, and local legal and regulatory requirements.
- Identify the presence of possible hazardous constituents or characteristics that might render the materials as "unacceptable" at the earliest possible point in the collection process.
- Provide sufficient data to assure compliant and expeditious reclamation and or recycling of waste and product streams, which will help assure maximum proficiency of our processing facilities.
- Provide assurance to the purchasers of Raider Environmental Services products that they meet product specifications.

Waste Characterization

Representative sampling and laboratory analysis as defined in Federal and State rules must be used to meet pre-acceptance waste analysis requirements. The generators of the following materials must complete a uniquely numbered waste characterization form (WCF) that includes the following laboratory analysis or certification of generator process knowledge of the waste prior to acceptance:

Non-Crankcase Used Oils, Industrial Antifreeze, Industrial Filters and Industrial Absorbents

- The generator's name, facility location, EPA Generator ID No. and State Reg. #'s (if applicable)
- EPA and State waste code(s) (if applicable)
- A description of the process generating the stream
- Physical characteristics of the material (fingerprint)
- Certification by a authorized representative of the generator that the stream is not hazardous; contains no PCBs, no reactive or explosive materials, no radioactive or infectious wastes, or any other constituent that would render the material as non-conforming.
- DOT transportation information including, but not limited to the proper shipping name, hazard class, and type of container to be used.

discharge permits and/or ordinances for final treatment and discharge; or under direct discharge permits.

Industrial and Crankcase Used Oil and Oily-Waters

Industrial oils and oily-waters are those that are typically generated by a process or are associated with an industrial activity. Crankcase used oils are typically generated from commercial, retail sources such as quick-change lube shops generating crankcase oils. All industrial and crankcase used oil and oily-water mixtures as well as all waste oil and waste oil/water mixtures are managed as used oil as defined under 40 CFR 279. Oily-wastes are treated and blended and the resulting on-specification and/or off-specification used oil fuel is sold for energy recovery. Off-specification fuels are reclaimed and sold as blend stocks for fuels.

Used Filters...

Raider Environmental Services accepts non-hazardous metal containing used filters and recycles these materials as scrap metal as defined in 40 CFR 261.1(c)(6); 40 CFR 261.1(c)(10) and, 40 CFR 261.4 (a)(13).

Used Parts Washer Solvents...

Raider Environmental Services collects parts washer fluids and manages those fluids as a commercial product or as fluids that are burned for energy recovery.

Absorbents

Raider Environmental Services accepts non-hazardous oil contaminated absorbents as used oil and some non-hazardous fuel contaminated absorbents as off-specification fuels.

Used Antifreeze and Antifreeze-Water mixtures

Raider Environmental Services accepts non-hazardous used antifreeze and antifreeze-water mixtures for reclamation. Used antifreeze is recycled by distillation into an industrial grade ethylene glycol in compliance with all applicable federal, state, and local laws and regulations.

Off-Specification Products

Raider Environmental Services accepts off-specification fuels for reclamation. These are accepted as off-specification commercial chemical products. Pursuant to 40 CFR 261.33, these off-specification products are reclaimed in a manner consistent with their intended use.

Section

3

WASTE AND PRODUCT STREAM ACCEPTANCE

Waste and Product Stream Acceptance

General Requirements

Waste Approval

Waste approval at a Raider Environmental Services Facility must be made by the Facility's chemist or by a laboratory technician under the supervision of a Raider Environmental Services Chemist.

Pre-Screening Used Oil/Oily Waters for PCBs

At all processing facilities and select terminals (those terminals with the capability of testing for PCBs), all bulk loads and third party loads must be prescreened for PCB's prior to unloading. A site specific SOP must be developed by each facility that encompasses the objectives set forth in this section.

All route oil loads must be unloaded into a day tank (not to exceed 30 thousand-gallon capacity, single tanks at our small terminals must act as day tanks). All route oils that can be sold as fuel, with or without minimal processing, must be sampled separately as they sit, or, they must be unloaded into a separate day tank. The day tank must be locked down until a sample is obtained that indicates that PCB's are below 2 parts per million (BDL). Once determined to be BDL they can be offloaded into our processing tanks.

At small terminals all loads shipped to our processing facilities must be prescreened for PCB's before unloading at a Raider Environmental Services processing facility or prior to being loaded for sale. At larger terminals without testing capabilities, all loads will be stored in day tanks for both bulk and route oils. The day tank will not be released until it is screened for PCBs.

Fingerprinting

Fingerprint sampling ensures that waste arriving on-site is the same waste that was characterized during pre-acceptance. Fingerprint screening compliments other waste acceptance procedures outlined in the WAP, and is not intended to be the only set of parameters for waste acceptance.

Minimum fingerprint parameters for solid waste will be determined on a facility specific basis by the Facilities chemist based in turn on that facility's permit. Minimum fingerprint analysis for used parts cleaner solvents accepted under the Raider Environmental Services reuse program are established below under the heading "Waste Acceptance Criteria-Parts Cleaner Solvent". Minimum fingerprint parameters for used oil will be (facilities may elect to establish additional criteria):

- Percent oil, volume, water content, odor, pH, color, chemical oxygen demand, (COD-aqueous phase only), viscosity and flashpoint.

Field Testing

Prior to pickup ALL used oil must be screened to ensure halogens are not $> 1000 \text{ ppm}$

Crankcase oil, industrial oil or oily water stream that exhibits a non-conforming fingerprint (unusual odor, color, viscosity, volume, etc.) must be tested with a halogen "sniffer" and/or a field halogen test kit (i.e. Dexil Corporation's Chlor-D-Tect or Dexil's HydroChlor-Q test kits). Any stream that fails the halogen meter screen will be tested with a field halogen test kit at the site prior to loading. For used oil's containing greater than 80% oil a Chlor-D-Tect kit must be used. For Used oil containing less than 80% oil a HydroChlor-Q test kit must be used. All oily waters presented for collection must have a field pH test performed prior to loading. Raider Environmental Services "field testing oily waters for pH" SOP will be utilized to perform this function. Any material that fails a chemical test must not be picked up until a retain sample is tested and accepted by a Raider Environmental Services lab. Alternately, a generator may supply certified laboratory results and/or process knowledge sufficient to rebut the hazardous waste presumption as outlined in 40 CFR 279. Such rebuttal using process knowledge must follow the guidance provided in Section 2 of this WAP.

40 CFR 279.44

Sampling

Pre-Sampling

- What happens if sample fails? (presume HLE contamination)
- Samples should be collected in accordance with sampling standard operating procedure, (SOP) written to account for facility specific conditions and materials to be handled. This plan must include a worker health and safety section. Sampling is performed for treatability, waste acceptance and retention. Unless otherwise noted, lab personal or trained plant operator or terminal yard employees responsible for receiving trucks, will collect all samples, and will review all paperwork, associated with waste acceptance.
 - The plant operator or terminal yard employee responsible for sampling must select the sampling equipment and sample containers appropriate for the material in the container to be sampled, as detailed in the SOP.

Route Trucks

- Drivers will collect a retain sample from each customer stop of all used oil fluids including crankcase oil, industrial oils, oily water, and separations fluids.
- A processing or terminal yard employee will collect a retain sample from all commingled bulk loads from each route truck prior to unloading into terminal or plant location
- If the truck retain sample passes all acceptance criteria, individual customer retains may be discarded.
- Truck retain samples will be retained for a period of at least 30 days.
- Retain samples must be stored in a flammable liquids cabinet in a manner compliant with Raider Environmental Services fire prevention practices and local ordinances. Identification numbers on the client site retain sample will correspond to the stop number on the multi-stop manifest, receipt, or bill of lading.

Bulk Trucks

- A processing or terminal yard employee will collect a sample from all bulk loads from each truck prior to unloading into terminal or plant location
- Truck retain samples will be retained for a period of at least 30 days.
- Retain samples must be stored in a flammable liquids cabinet in a manner compliant with Raider Environmental Services fire prevention practices and local ordinances. Identification numbers on the client site retain sample will correspond to the stop number on the multi-stop manifest, receipt, or bill of lading.

Drums and Roll-Off Containers

Drum Storage

Drums will be stored on a drum pad, or equivalent structure, constructed for such purpose. The use and management of the facility's drum pad must in accordance with a written standard operating procedure specific to that facility. Storage of drums generated onsite must also be consistent with the drum accumulation times as set forth in the SOP. Accumulation times are determined by the facility's hazardous waste generator status.

Drum Sampling

Pre-Sampling

- Samples must be collected in accordance with a drum sampling standard operating procedure written to account for facility specific conditions and materials to be handled. This plan must include a worker health and safety section.
- The plant or terminal yard employee responsible for waste acceptance must:
 - Number, or uniquely identify, all drums to be sampled;
 - Review all paperwork; and, verify that there are no discrepancies with existing paperwork.
 - Perform a detailed inspection of individual drums; and,
 - Record all relevant information from drum labels on a drum log, (see appendix A).
- Select the sampling equipment and sample containers appropriate for the material in the drum, as detailed in the SOP.

Used Oil Drums

- Applicable only to drums containing used oil (crankcase used oil, oily waters, industrial used oil, and oily waste materials containing visible free flowing used oil).
- The plant or terminal yard employee responsible for waste acceptance must:
 - Observed each drum for unusual characteristics not associated with used oil, (color, viscosity, odors, trash, paint or other non-used oil waste content). In addition each drum will be screened for halogens using a

halogen meter. Any drum load that exhibits a non-conforming fingerprint and/or fails a halogen meter test will be rejected as nonconforming and set aside on a drum pad for further testing.

- 1-10 drums: Collect a column sample of equal volume from each drum and create a composite sample.
- >10 drums: collect a column sample of equal volume from each drum and create a composite sample from each 10-drum set.
- Composite samples must be screened for total halogens and PCB's. Testing will be performed by a lab chemist or lab technician under the supervision of a lab chemist (or other trained employee).
- Retain sample will be maintained from the composite sample for a period of 30 days.
- Provided the composite sample contains less than 1000-ppm total halogens and less than 2 ppm PCBs each 1-10 drum set sampled may be offloaded into a bulk tank for processing.
- Drum sets of between 1-10 drums with a composite sample that fails for total halogens or PCB's will be set aside at the facilities drum pad for further testing.
- Industrial streams generated by oil and natural gas production and processing or, where required by Federal, State or local regulations, must be screened using a Geiger Counter for Naturally occurring Radioactive Materials (NORM) waste characteristics. If the Counter registers radioactivity than the load must be rejected as non-conforming.

Individual Drums-Non-Hazardous Solid Waste

- Applicable only to Raider Environmental Services facilities with a solid waste processing/transfer permit.
- The plant or terminal yard employee responsible for waste acceptance must collect a column sample of equal volume for pre-acceptance testing and/or treatability.
- All pre-acceptance testing will be in accordance with the facilities solid waste and wastewater discharge permit.
- Testing must be performed by a lab chemist or lab technician under the supervision of a lab chemist (or other trained employee).
- All loads that require pre-approval must be compared to the physical description provided as a fingerprint analysis on the original waste characterization form completed and signed by the generator. If the sample is not consistent with its fingerprint it must be rejected as non-conforming.
- A Retain sample will be maintained for a period of 30 days.
- Industrial streams generated by oil and natural gas production and processing or, where required by Federal, State or local regulations, must be screened using a Geiger Counter for Naturally occurring Radioactive Materials (NORM) waste characteristics. If the Counter registers radioactivity than the load must be rejected as non-conforming.

Multiple Drums from the Same Generator and Source-Non-Hazardous Solid Waste

- Applicable only to Raider Environmental Services facilities with a solid waste processing/transfer permit
- All pre-acceptance testing will be in accordance with the facilities solid waste and wastewater discharge permit
- The plant or terminal yard employee responsible for waste acceptance must:
 - Collect a column sample for pre-acceptance testing
 - 1-10 drums: Collect a column sample of equal volume from each drum and create a composite sample.
 - >10 drums: collect a column sample of equal volume from each drum and create a composite sample from each 10-drum set.
- All pre-acceptance testing will be in accordance with the facilities solid waste and wastewater discharge permit.
- Testing will be performed by a lab chemist or lab technician under the supervision of a lab chemist (or other trained employee).
- All loads that require pre-approval must be compared to the physical description, provided as a fingerprint analysis on the original waste characterization form completed and signed by the generator. If the sample is not consistent with it's fingerprint it must be rejected as non-conforming
- Retain sample will be maintained from the composite sample for a period of 30 days.
- Industrial streams generated by oil and natural gas production and processing or, where required by Federal, State or local regulations, must be screened using a Geiger Counter for Naturally occurring Radioactive Materials (NORM) waste characteristics. If the Counter registers radioactivity than the load must be rejected as non-conforming.

Non-Conforming Materials

In-bound loads deemed inconsistent with the original characterization may be rejected as "non-conforming" by the facility chemist. This determination may be based upon analyses, observations and fingerprinting. A non-conforming load must be logged on a "non-conforming" load log. An example of a non-conforming load log is included in Appendix A.

Once a load is deemed to be "non-conforming", plant and/or laboratory personnel will take the following actions:

- Segregate the load,
- Interview the driver regarding the source of the load, and

- Review the manifest and/or shipping papers.
- The Raider Environmental Services salesperson will contact the generator to discuss non-conforming streams. EH&S will provide technical guidance and assistance as necessary.

Records

Record will be maintained consistent with the record retention policy of Raider Environmental Services.

Shipping Documents

All materials transported from the generating facility/person for processing or transportation must be accompanied by a tracking document (Bill of Lading, multi-stop receipt and/or manifest).

Tracking document must include the following information at a minimum:

- The date and time
- EPA ID number of the generator (crankcase oil, industrial oil and oily water only)
- EPA ID number of the transporter (crankcase oil, industrial oil and oily water only)
- Physical description (oil, water, antifreeze, CCP, etc.)
- Volume of material being shipped

An example of Raider Environmental Services shipping documents are attached in Appendix A.

Acceptance Logs

The terminal/plants will maintain a terminal/processing facility acceptance log that documents, at a minimum, the following information:

- The date and time of the shipment
- Volume of the shipment
- EPA ID number of the generator
- EPA ID number of the transporter
- The flashpoint and halogens test results (crankcase oil, industrial oil and oily water only) and WCF number.
- The pH (all applicable streams with >20% free water)
- Physical description (oil, water, antifreeze, CCP, etc.)
- Freeze point for antifreeze or used glycol

An example log is attached in Appendix A. Each terminal/plant must maintain an acceptance log file.

Non-Conforming Load Logs

If after receipt and analysis, the waste: (a) is not authorized to be handled by Raider Environmental Services; or, (b) is designated as an inappropriate material to be processed; or, (c) the waste is significantly different than the profiled waste, the sales professional responsible for the customer generating the load will contact the generator (or the broker, if applicable) to discuss the discrepancy before other action by Raider Environmental Services. If the Sales professional is not available, laboratory and/or plant management will contact the generator using the generator's contacts as listed on the shipping papers for the load in question.

The terminal/plants will maintain a non-conforming load log that documents at a minimum:

- The date and time
- Reason for non-conforming status
- Action taken

An example non-conforming load log is attached in Appendix A. Each terminal/plant must maintain a non-conforming load log file.

Shipping Report

Facility management, when shipping all product shipments (antifreeze fuel oil or distillate oils) and all inter-company shipments (by and between terminals or terminals and processing plants) will generate a shipping report that documents at a minimum:

- The date and time of the shipment
- Volume of the shipment
- EPA ID number of the generator (crankcase oil, industrial oil and oily water only)
- EPA ID number of the transporter (crankcase oil, industrial oil and oily water only)
- EPA ID number of the Consignee (used oil fuel shipments only)
- The flash and halogens results (crankcase oil, industrial oil and oily water only, terminal may use process knowledge when shipping to a RAIDER ENVIRONMENTAL SERVICES processing facility)
- The pH (all applicable streams with >20% free water)
- Physical description (oil, water, antifreeze, CCP, etc.)

- Freeze Point for antifreeze or used glycol

Waste Acceptance Criteria-at Pickup

The following acceptance protocol must be accomplished prior to accepting materials into a Raider Environmental Services terminal or Processing Facility:

Industrial Used Oil Streams

All industrial used oil / oily water streams must meet the following acceptance criteria prior to, or at pick-up:

- Approved WCF
- A signed manifest or Bill of Lading
- When a driver observes or suspects any unusual characteristics at pickup (e.g. unusual, color, pH, viscosity or obvious odor, etc.), a field chlorine meter test or a halogen meter must be performed and the results recorded on the manifest or Bill of Lading.

Industrial Oily Water, Commercial Oily Water Streams

All industrial and commercial oily water streams must meet the following acceptance criteria prior to, or at pick-up:

- Approved WCF
- A signed manifest or Bill of Lading
- Pass a pH screen as specified in the "Field Screening Oily Waters for pH" SOP
- When a driver observes or suspects any unusual characteristics at pickup (e.g. unusual, color, pH, viscosity or obvious odor, etc.), a field chlorine meter test or a halogen meter must be performed and the results recorded on the manifest or Bill of Lading.

Crankcase Oils

All crankcase oils must meet the following acceptance criteria at pick-up:

- A signed manifest or bill of lading including generator certification of waste characterization
- If a driver observes or suspects any unusual characteristics at pickup (e.g. unusual, color, viscosity or obvious odor, etc.), a field chlorine meter test, (Hydrochlor or Chlor-D-Tect), or Halogen meter, must be performed and the results recorded on the manifest or Bill of Lading.
- If a suspect load fails a field chlorine test or halogen meter at pickup the load is rejected and must not be transferred.

- All drum loads must be correctly labeled as used oil and must also meet all DOT labeling requirements. Drums without a label must not be picked up.

Absorbent and Filters

All absorbent and filter streams must meet the following acceptance criteria prior to, or at pick-up:

- Approved WCF (industrial or non-used oil only) including analytical data or a generator's certified statement of process knowledge
- A signed manifest or bill of lading
- All absorbents, **accepted, as used oil**, must contain visible free flowing oil, absorbents without the presence of visible free flowing oil must be *rejected as non-conforming or brokered as a solid waste. **Absorbents that are not managed as used oil must be managed as a solid waste.***
- All drum loads must be correctly labeled, dependant upon the contents, as a used oil or non-hazardous solid waste and must also meet all DOT labeling requirements. Drums without a label must not be picked up.

Off-specification Fuels and Antifreeze

All industrial off-specification fuels and antifreeze streams must meet the following acceptance criteria prior to pickup

- Approved WCF (industrial generators only) including a generator's certified statement of process knowledge
- A signed bill of lading
- Approved physical description (Odor, pH, Color, COD (Aqueous phase only), Percent Water)
- Off-specification fuel loads generated by oil and natural gas exploration must be screened for NORM waste characteristics using a Geiger Counter.
- All drum loads must be correctly labeled with a proper DOT label. Drums without a label must not be picked up.

Parts Cleaner Solvents

All industrial and commercial used parts Cleaner solvents and or petroleum distillates must meet the following acceptance criteria prior to pickup

- Approved WCF (industrial generators only) including a generator's certified statement of process knowledge.
- A signed bill of lading

- Specific Gravity must be taken and must fall within a normal tolerance range (at 60/60F) of between 0.760 and 0.820
- Prior to pickup the load must not exhibit any unusual odor or color or contain obvious materials not associated with its intended use, (i.e. trash, paint waste, water or solids).
- All drum loads must be correctly labeled with a proper DOT label. Drums without a label must not be picked up.

Waste Acceptance Criteria-Terminals

Used Oil/Oily Waters-Prior to Unloading

- A sample of each truck will be collected for testing and retain sample retention
- Each load will be tested for flash point, pH (if >20% free water), PCBs (except as noted above) and halogens (oil and/or water)
- All loads that require pre-approval must be compared to the physical description provided as a fingerprint analysis on the waste characterization form
- Shipments of bulked used oil from transfer facilities to Processing Facilities will be characterized based on generator knowledge. A shipping report (see attached) will accompany all loads shipped from a Raider Environmental Services terminal to a processing facility

Off-Specification Fuels/Bulk Used Anti-Freeze-Prior to Unloading

- Facility must verify that the load was pre-approved and that a characterization form is on file with the facility
- The sample will be compared to the physical description provided as a fingerprint analysis

Drum Loads-Prior to unloading at a Raider Environmental Services facility

- This section does not apply to drum loads that are unloaded at a customer's site, as part of Raider Environmental Services' crankcase oils and antifreeze route business. See the previous section, *Waste acceptance criteria-at pickup*
- Raider Environmental Services protocol for drum handling and tracking must be followed when drums are handled at any Raider Environmental Services facility
- To be accepted as used oil, **drum loads of oil-contaminated solids must contain visible, free flowing oil**
- All drums of solids, absorbents, spent antifreeze, spent mineral spirits and/or used oil fluids will be sampled for testing
- Facility must verify that the drummed load was pre-approved and that a characterization form is on file with the facility

- The sample will be compared to the physical description provided as a fingerprint analysis
- Prior to processing, used oil recovered from drum loads recovered oil will be screened for halogens and PCB's
- **All unlabeled drums will be considered non-conforming and managed as outlined above**

Waste Acceptance Criteria-Processing Facilities

Used Oil/Oily Waters-Prior to Unloading

- A column sample of each truck will be collected by the plant operator or laboratory personnel for testing and retained by Raider Environmental Services
- Each load will be tested for flash point, pH (if >20% free water), PCBs (except as noted above) and halogens (oil and/or water)
- All loads that require pre-approval must be compared to the physical description provided as a fingerprint analysis on the waste characterization form
- For in-bound bulk loads from a Raider Environmental Services transfer facility, a column sample will be collected and retained by Raider Environmental Services. In addition the load will be prescreened for PCBs
- Third-Party oils will be sampled for testing and retain sample retention. Testing must include flash point, pH (if >20% free water), PCBs and halogens (oil and/or water)
- **All non-conforming loads must be managed as outlined above**

Wastewaters-Prior to Unloading

- A column sample of each truck will be collected by the plant operator or laboratory personnel for testing and retained by Raider Environmental Services.
- Laboratory personnel must verify that the load was pre-approved and that a waste characterization form is on file with the facility
- Laboratory personnel will compared the sample's physical characteristics to the physical description provided on the pre-approved WCF.
- **All non-conforming loads must be managed as outlined above**

Off-Specification Fuels/Bulk Used Anti-Freeze-Prior to Unloading

- Laboratory personnel must verify that the load was pre-approved and that a waste characterization form is on file with the facility
- Laboratory personnel will compared the sample's physical characteristics to the physical description provided on the pre-approved WCF.

- Laboratory personnel will column sample used antifreeze and used glycols and the samples checked for freeze point
- **All non-conforming loads must be managed as outlined above**

Drum Loads-Prior to unloading

- This section does not apply to drum loads that are unloaded at a customer's site, as part of Raider Environmental Services crankcase oils and antifreeze route business. See the previous section, *Waste acceptance criteria-at pickup*
- Raider Environmental Services protocol for drum handling and tracking will be followed when drums are handled at any Raider Environmental Services facility
- To be accepted as used oil, drum loads of oil-contaminated solids must contain visible, free flowing oil
- All drums of solids, absorbents, spent antifreeze, spent mineral spirits and/or used oil fluids will be sampled by the plant operator or terminal yard employee, for testing
- Laboratory personnel must verify that the load was pre-approved and that a waste characterization form is on file with the facility
- Laboratory personnel will compared the sample's physical characteristics to the physical description provided on the pre-approved WCF.
- Prior to processing used oil recovered from drum loads, recovered oil will be column sampled and screened by laboratory personnel for halogens and PCB's
- **All unlabeled drums will be considered non-conforming and managed as outlined above.**





