Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Raider Environmental Services

On-Site Inspection Start Date: 10/04/2012 **On-Site Inspection End Date:** 10/04/2012

ME ID#: 83539 **EPA ID#:** FLR000143891

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

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

County Name: Miami-Dade **Contact Phone:** (305) 994-9949

NOTIFIED AS:

CESQG (<100 kg/month)
Transporter
Used Oil

INSPECTION TYPE:

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

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Marketer facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Dan Berler, EHS manager

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

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

TYPE OF OWNERSHIP: Private

Introduction:

Raider Environmental Services (RES) has been in operation at this location since November of 2008, and currently operates a Used Oil Processing Facility under Department permit #HO13-284932-001, expiration October 13, 2013. RES is a hazardous waste transporter, as well as a transporter, processor, and marketer of used oil and used oil filters. The facility also processes oily water from tank bottoms and ships' bilges. RES is situated in a zoned industrial area and encompasses 1.55 acres. The facility has 40 full time employees and is on city water and sewer.

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

Process Description:

The original tank farm includes twenty tanks currently and of these, four are being used for storage of used oil. They are tank numbers five, six, seven and sixteen. When the inspector went up on the

walk way above the tank farm, it was observed that some of the tank covers were removed. The facility representative indicated that they were cleaning out the tank bottoms on the ones whose manways had been left open.

It was noted that a whole new secondary containment had been built out in front of the processing building. This containment area consisted of four new 20,000 gallon vertical tanks, which are all being used as holding tanks for process water. This containment was observed to contain a significant amount of oily water. This oily water appeared to have resulted from the storage of the connector hoses, used for loading and unloading trucks, which had not been properly drained before being placed in the containment.

Between the process building and the original tank farm was a sloped area used for loading and unloading trucks and also as a truck wash. On the side of this sloped area that was closest to the tank farm were four open and labeled 55-gallon drums. However; the labels on the drums did not match what was found in the drums. The inspector observed what appeared to be PPE in one drum, oily water in another, filters from the strainers in the third drum and a fourth drum which contained solid waste. Also, inside the process building, near the small table used for lab analysis were two open and unlabeled five-gallon buckets. One appeared to contain oily water and the other used oil.

The facility representative gave the inspector an overview of how both used oil and oily water are processed through the plant. Heat, emulsifiers and caustics are use in the oily water processing, while the used oil is processed using flocculants and acids.

Record Review

The following deficiencies were noted in the facility's Contingency Plan (CP): The phone number of the designate hospital was not included and there was no list of emergency equipment onsite, as well as, no information concerning where this equipment was located or its' capabilities. The training records (certificate of most recent HAZWOPER training and DOT training) for Joey Betancourt, a driver for RES, were not available. The facility's waste analysis plan was not available for review. All other records appeared to be in order and were produced in a timely manner. These documents included: all other requested training records, manifests, acceptance and delivery logs for used oil and hazardous waste, general facility inspection logs, and the permit which included the closure plan.

A file review performed on the facility after the inspection revealed that the facility's permit only allowed for 24,000 gallons of used oil storage and with the use of the four tanks mentioned above; the facility was working with an 87,000 gallon capacity. Also, the use of these tanks would require an adjustment to the facility's financial assurance amount.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.52(a)(2)(iii)
Question Number:	28.250
Question:	Is the fire control equipment adequate?
Explanation:	It appeared that the fire extinguishers onsite had not been serviced within the last year.
Corrective Action:	Please provide receipts showing that the fire extinguishers have been serviced within the last year or call for service on the fire extinguishers and provide the receipt from that service to the Department.

Type:	Violation
Rule:	279.52(b)(2)
Question Number:	28.340
Question:	Does the plan include the following?
Explanation:	The facility's Contingency Plan didn't include a list of the emergency response equipment, their locations, and their capabilities.
Corrective Action:	Please provide the Department with a list of emergency response equipment, their locations, and their capabilities. Once you have made the necessary changes to your Contingency Plan, send out the updated pages to your local authorities and provide the the Department with the certified mail receipts.

Type:	Violation
Rule:	279.55(b)
Question Number:	28.400
Question:	Does the processor have a written analysis plan to describing whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification?
Explanation:	The facility's could not produce their waste analysis plan at the time of the inspection.
Corrective Action:	Please provide the Department with the facility's waste analysis plan.

Type:	Violation
Rule:	62-710.600(2)(c)
Question Number:	29.380
Question:	Does the facility maintain training records?
Explanation:	The facility could not provide up-to-date HAZWOPER and DOT training certificates for Joey Betancourt, who is one of their drivers.
Corrective Action:	Please provide the Department with the requested training records for Mr. Betancourt.

Type:	Violation
Rule:	62-710.800(2)
Explanation:	The facility's original permit indicated that used oil would be stored in tanks eight and nine, which have a combined capacity of 24,000 gallons. However, at the time of the inspection, used oil was being stored in tanks five, six, seven and sixteen, which would give the facility a combined capacity of 87,000 gallons.
Corrective Action:	The facility needs to modify the permit to allow for the change in both the tanks that are being used to store used oil and the amount of used oil the facility is allowed to sttore onsite.

Type:	Violation
Rule:	62-710.800(6)
Explanation:	The facility is using three more tanks for storage of used oil than was allowed in the original permit and they have not made an adjustment to their Financial Assurance to account for the closure of these tanks.
Corrective Action:	Please update the facility's Financial Assurance to reflect the additional tanks that will need closure when the facility ceases to exist.

Areas of Concern

Type:	Area Of Concern
Rule:	279.52(a)(1)
Question Number:	28.210
Question:	Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment?
Explanation:	The new containment area, on the opposite side of the processing facility from the old tank farm, was full with oily water. This fluid appeared to have come from connector hoses that were being stored there that hadn't been properly draining after use.
Corrective Action:	Please drain this containment area and provide photos to prove compliance. Also, describe what was done with the fluid that was recovered; when the area was pumped dry.

Type:	Area Of Concern
Rule:	279.54(f)
Question Number:	28.190
Question:	Are ASTs, UST tank fill lines and containers labeled "used oil"?
Explanation:	There were four drums sitting alongside of the sloped loading/unloading area whose labels didn't correspond with the actual content of the containers. Also, inside the processing building and next to the lab bench were two five gallon buckets; one of which appeared to have oily water in it and the other whose contents appeared to be used oil.
Corrective Action:	Please properly label these four drums and provide the Department with photos demonstrating compliance. Please either remove the two five gallon buckets in the lab bench area or properly label them; send pictures showing the containers are labeled or they have been removed from the area.

Type:	Area Of Concern
Rule:	279.52(a)(6)
Question Number:	28.300
Question:	Has the facility made emergency response arrangements with the following:
Explanation:	The facility did not have the phone number of their designated hospital in their

	Contingency Plan.
Corrective Action:	Please add the number of your facility's designated hospital to the emergency phone numbers list in your Contingency Plan.

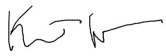
Conclusion:

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

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

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

Kathy R. Winston	Inspector
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
	10/4/2012
PRINCIPAL INSPECTOR SIGNATURE	**DATE**

Supervisor: **Karen Kantor**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.