



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

RAIDER ENVIRONMENTAL, INC. 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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NOV 15 2012

**FL DEP
WEST PALM BEACH**

RECEIVED

NOV 15 2012

FL DEP
WEST PALM BEACH

PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that I have examined the Raider Services. Spill, Prevention, Control & Countermeasure (SPCC) Plan, addressing the Raider Services, Inc. facility located at 4103 NW 32nd Street, Opa Locka, Florida, and being familiar with the provisions of 40 CFR 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

John M. Jones

Printed Name of Registered Professional Engineer


Signature of Registered Professional Engineer

May 1, 2010
Date

50227
Registration

Florida
State

Professional Engineer Seal



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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 (PPCP) 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 County and State agencies and individuals listed in Table 1 as an email and as a hardcopy sent by U.S. Certified Return Receipt Mail. Copies of enclosure letters emailed and sent by U.S. Mail to the recipients listed in Table 1 are provided in Appendix A with the exception of the listed Raider recipients who were provided copies of this document in person. Certified Mail Return Receipts will be provided with each of the enclosure letter copies (except the one sent to Ms. Kathy Winston) in an original version of this document sent to the Florida Department of Environmental Protection. The certified mail return receipts will be provided as proof that each of the following agencies were sent an updated version of this Preparedness and Prevention Contingency Plan.



Raider Environmental Services, Inc. Location and nearest Hospital and Fire Station

- A**  **Raider Environmental Services, Inc. Facility**
Location: South of N.W. 135th Street between Le Jeune Road and the Le Jeune Douglas Expressway at:
4103 N.W. 132nd Street, Opa-Locka, Florida 33054
Toll Free: 877 316-0633
Office: 305 994-9949
www.raiderenvironmental.com
- B**  **Miami-Dade County Fire Rescue Station**
Location: southeast corner of W 119th Street and N.W. 32nd Avenue, Opa-Locka, Florida at:
3190 N.W. 119th Street, Opa-Locka, Florida 33167
Emergency: 911
Office Phone: 786-331-5000
- C**  **Hialeah Hospital**
Location: northwest corner of E. 25th Street/N.W. 79th Street and E. 8th Avenue/North Le Jeune Road at:
651 East 25th Street, Hialeah, Florida 33013
Emergency: 911
Office Phone: 305 693-6100

FIGURE 1. LOCATION MAP OF FACILITY AND NEAREST HOSPITAL AND FIRE STATION

**TABLE 1. RECIPIENTS OF THE FOLLOWING OCTOBER 2012
REVISED PREPAREDNESS AND PREVENTION CONTINGENCY PLAN**
(Plan was delivered to the recipients by email and by U.S. Mail)

Document Recipients	Contact	Phone Number	Email Address
Hialeah Hospital	Ms. Janice Ryan (Administrative Assistant to CFO and COO)	305 693-6100	Janice.ryan@tenethealth.com
Miami-Dade County Fire Department	Captain Tony Trimm	(786) 331-4252	ttrim@miamidade.gov
Miami-Dade County Police Department	Commander Garry F. Jeanniton	(305) 836-8601	gfjeanniton@mdpd.com
Opa-Locka Police Department	Chief Antonio Sanchez	305 953-2889	asanchez@opalockapd.com
Florida Department of Environmental Protection	Ms. Kathy Winston, Environmental Consultant	(561) 681-6756	kathy.winston@dep.state.fl.us
Miami-Dade County Department of Regulatory and Economic Resources (RER)	Mr. Juan Trimble (Pollution Control Inspector)	(305) 372-6509	trimbj@miamidade.gov
Raider Environmental Services, Inc.	Mr. Steve Obst (President) ¹	(305) 994-9949	steve@raiderenvironmental.com
Raider Environmental Services	Mr. Bobby LeClaire (Field Operations Manager) ¹	(305) 994-9949	bobby@raiderenvironmental.com

1 – Revised Preparedness and Prevention Contingency Plan provided directly to recipient.

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.



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 2. 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 B.

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 3. EMERGENCY EQUIPMENT/SUPPLIES, CAPABILITIES & LOCATIONS

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 3. CONTINUED

Item	Size	Quantity	Capabilities	Locations
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

TABLE 3. CONTINUED

Item	Size	Quantity	Capabilities	Locations
Drums	55-gallon	75	Containment of liquids and solids	SCA # 5
Totes	250-gallon	10	Containment of Liquids	SCA # 5
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 COORDINATOR 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) 331-4252)

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) 836-8601)

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, 305 693-6100)

Emergency Response Arrangements:

Telephone conversations were 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 were included in the hospital copy of the original contingency plan.

TABLE 4. EMERGENCY CONTACT PHONE NUMBERS

Miami-Dade County Fire Department	Emergency: 911
	Local Office: (786) 331-4800
Miami-Dade County Police Department	Emergency: 911
	Main Office: (305) 476-5423
Opa-Locka Police Department	Emergency: 911
	Local Office: (305) 953-2889
Medics Ambulance Service	Emergency: 911
	Local Office: (305) 687-4040
Hialeah Hospital	Emergency: 911
	Main Number: (305) 693-6100
National Response Center	(800) 424-8802
US EPA – Region IV	(404) 562-8357
Florida Department of Environmental Protection	State Warning Point (Emergency): (800) 320-0519
	Regional Warning Point (Emergency): (561) 393-5877
	Regional Office: (561) 681-6600
Miami-Dade County RER	County Warning Point (Emergency): (786) 336-6600
	Main Number: (305) 372-6600
Chemtrec	(800) 424-9300
U.S. Coast Guard	305-535-4472 / 4520

TABLE 5. OPA-LOCKA FACILITY CONTACT INFORMATION

NAME	TITLE	HOME	CELL
Aragon, Vicente	Field Technician	(954) 822-8910	
Archer, Tony	Used Oil Driver – Class A	(786) 229-9895	(305) 494-7683
Barrera, Denys	Mechanic	(786) 219-8733	
Berler, Dan	Compliance Manager		(305) 528-0959
Betancourt, Joey	Driver – Class A	(786) 718-5782	
Burden, Darryl	Driver – Class A	(786) 587-3769	(954) 465-1735
Carter-Klein, Judith	Accounts Receivable	(954) 401-2309	
Fundora, Luis	Tire Maintenance	(786) 443-8349	
Graham, Zenobia	A.P./H.R. Administrator		
Huff, Avery	Used Oil Driver – Class A	(954) 204-4422	(954) 300-6194
Leclaire, Bobby	Operations & ER Mgr		(954) 543-2862
Martin, Jesus	Driver – Class B		
Mendoza, Carlos	Used Oil Driver – Class A		
Menendez, Art	Driver – Class A	(786) 444-2088	(954) 558-8295
Moya, Alex	Used Oil Driver – Class A	(954) 861-8824	(305) 345-4199
Nixon, Stephen	Driver – Class A	(754) 246-6597	(954) 559-7960
Obst, Steve	President		(954) 605-6853
Obst, Tavia	Controller		(954) 914-8414
Olmeda, Ernesto	Used Oil Driver – Class A	(305) 244-5648	(954) 393-6140
Perez, Judith	Administrator	(305) 767-9731	
Pullido, Ivan	Driver – Class A	(786) 537-6164	(954) 529-5257
Rojas, Luciano	Driver – Class A	(305) 305-3430	(954) 594-4036

TABLE 5. CONTINUED

NAME	TITLE	HOME	CELL
Ruiz, Ray	Used Oil Collection Services Manger	(305) 778-5090	(305) 494-6110
Santana, Lazaro	Water Treatment Manager	(786) 897-2634	
Stanley, Kelvin	Field Technician	(786) 319-2290	
Stevens, Rick	Oil Processing Manager		(954) 594-7055
Varela, Toni	Administrator/Scheduling	(305) 397-4554	

7. GENERAL RESPONSIBILITIES

7.1 Personnel Assignments

Mr. Obst and Mr. LeClaire have been designated, respectively, as the Leader and Backup Leader for the following emergency responsibilities at the facility.

- Emergency Coordination
- Communications
- Evacuation
- Emergency Assessment
- Spill Containment
- Fire Fighting
- First Aid

7.2 Emergency Procedures & Actions

Mr. Obst, the emergency response coordinator (ERC), will be notified immediately, if an emergency situation develops at the Facility. Mr. LeClaire, the backup emergency response coordinator (BERC), will be contacted immediately, if the primary leader cannot be contacted.

The ERC/BERC will mobilize to the primary Emergency Operations Center (EOC) when an emergency occurs and respond to the situation using the following steps.

1. Determine the type of emergency (e.g., fire, explosion potential, spill).
2. Identify the source and the quantity of materials involved based on:
 - a. Observations
 - b. Labeling
 - c. Inventory records
 - d. Reported analytical information
 - e. Knowledge of the facility
3. Decide if any steps can be taken immediately to keep the situation from worsening (e.g., relocation of reactive materials that have not been impacted to reduce explosion and flammable potentials).
4. Assess whether assistance is required from outside organizations (e.g., Miami-Dade Fire and Rescue, Police).

5. Request **assistance** from authorities, if company personnel do not have the training and/or resources to respond to the emergency.
6. Direct employees to respond directly to the emergency situation (e.g., spill), if outside help is not determined to be needed.

7.3 Response Procedures & Actions to Specific Emergency Types

Spill

1. Find out if anyone has been injured from the spill and if they have, take appropriate actions.
2. Determine the following information about the spill
 - a. Source
 - b. Identity
 - c. Quantity
3. Use emergency equipment and absorbent material to minimize potential off-site migration and impacts to sewers, soils and groundwater.

Fire

The Emergency Response Coordinator (ERC) will determine whether or not the fire is controllable and if the facility is to be evacuated.

Controllable Determination

1. Use fire extinguishers to put out the blaze.

Uncontrollable Determination

1. Notify the Miami-Dade Fire Department and Police Department by dialing 911.
2. While awaiting the arrival of the authorities:
 - a. Ensure the accessibility to the fire location fire fighters.
 - b. Remove materials and equipment from the area that might fuel the fire and cause it to spread.
 - c. ERC monitoring for leaks and pressure build-up in the Facility systems.

Severe Weather/Natural Disasters

The ERC will take the following steps, if severe weather is predicted to impact the Facility.

- Determine the nature and duration of the predicated weather event/natural disaster and if and when an evacuation might be required.
- Preparations
 - Move all:

- Items not securely anchored (e.g., empty and full containers, all hoses and fittings, wall mounted fire extinguishers units, forklifts, pallets and all other loose objects) into the water plant building.
- Empty trailers (e.g., bulk trailers, box trailers, drum trailers, FRAC tanks) as far away from the water plant building and office trailer as possible.
- Water-sensitive items to storage areas that are as high above ground level as possible (i.e., second story storage room of water plant building and inside the office trailer).
- Dismantle and store all equipment (water treatment plant building or office trailer) that is located above ground and is expected to be structurally compromised from strong winds (e.g., antennas, satellite dishes)
- Secure all:
 - All vertical storage tanks with at least three (3) feet of product or water to keep them from lifting off their foundations if storm-water in secondary containment areas rise to a level above ground greater than the bottom of the tanks during a storm.
 - Doorways and windows with plywood sheets that are lag bolted into the walls.
- Cancellation of work
 - Indefinite until the weather (e.g., hurricane) is no longer considered to be a threat to employee safety.
 - Temporary until the weather event (e.g., thunderstorms and sporadic heavy rains) is no longer considered to be threat to employee safety.
 - Communication of Work Cancellations
 - Phone calls to employees at home if work is cancelled before the beginning of the work day at 7 AM.
 - Face to face notification of all employees at the Facility and phone calls to all employees on project work outside of the Facility.
- Shelter Locations
 - Water plant building in the southeast corner of the Facility.
 - Office trailer.
- Return to Work/"All Clear" Notification to all employees that the severity of the weather has abated to a level safe for employees to return to work.

Evacuation

The ERC is responsible for implementing the following evacuation procedures.

- Communication/notification of all personnel.
- Notify all employees to stop all work including telephone conversations and exit the Facility (walk, do not run) along with any non-Raider personnel/visitors, unless instructed otherwise by the ERC.
- Account for the presence of all employees who reported for work that morning. Note: each employee is responsible for immediately reporting to their respective manager once they have left the facility so all employees can be accounted for by the ERC.

Continuation of Facility Operations Following an Evacuation

The ERC must complete the following steps before allowing a resumption of operations at the Facility.

1. Confirmation from authorities that the facility is **safe** for the resumption of operations.
2. Cleaning, replacement and preparation of all equipment and materials used for an emergency response.



8. REVIEW AND UPDATE OF PPCP WITH INCLUDED SPCC

This PPCP with included SPCC will be reviewed and immediately amended, if necessary, whenever the:

- Applicable regulations are revised.
- Plan fails in an emergency.
- Facility design, construction, operation, and maintenance is changed in a way that:
 1. Materially increases the potential for fires, explosions, releases of used oil or industrial wastewater.
 2. Affects the SPCC or emergency response procedures.
- The list of emergency response coordinators changes.
- The list of emergency equipment changes.

**ENVIRONMENTAL SERVICES**

October 29, 2012

Commander Garry F. Jeanniton
 Miami-Dade County Police Department
 2950 Northwest 83rd Street
 Miami, Florida 33147

Via Certified Mail: 7012 1010 0000 5504 3418
 RETURN RECEIPT REQUESTED

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 City, State, ZIP+4[®] *Miami Florida 33147*

PS Form 3800, August 2005

See Reverse for instructions

**Re: Raider Environmental Services, Inc. Updated Preparedness and Prevention
 Contingency Plan with included Spill Prevention Control and Countermeasures
 Plan (SPCC)**

Dear Commander Jeanniton:

An updated version of our Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132nd Street, Miami, Florida 33054 is provided in this enclosure. Please replace all prior versions of the plan with the enclosed one.

If you have any questions, please contact Daniel H. Berler (dan@raiderenvironmental.com; cell: 305 528-0959) or me (steve@raiderenvironmental.com; cell: 954 605-6853).

Sincerely,
 Raider Environmental Services, Inc.

Steve Obst
 President

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Commander Garry F.
 Jeanniton
 Miami-Dade Cty Police Dept
 2950 Northwest 83rd St.
 Miami, Florida 33147*

2. Article Number

(Transfer from service label)

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PS Form 3811, February 2004

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102595-02-M-1540

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- ☐ Agent
☒ Addressee

B. Received by (Printed Name)

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☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes**Raider Environmental Services**4103 Northwest 132nd Street, Opa Locka, FL 33054Dade: (305) 994-9949 Broward: (954) 316-0633 Fax: (305) 681-6175 www.raiderenvironmental.com

**ENVIRONMENTAL SERVICES**

October 29, 2012

Ms. Janice Ryan
 Administrative Assistant to the CFO and COO
 Hialeah Hospital
 651 East 25th Street
 Hialeah, Florida 33013

Via Certified Mail: 7012 1010 0000 5504 3395
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City, State, ZIP+4		Hialeah, FL 33013	
PS Form 3800, August 2006		See Reverse for Instructions	

**Re: Raider Environmental Services, Inc. Updated Preparedness and Prevention
 Contingency Plan with included Spill Prevention Control and Countermeasures
 Plan (SPCC)**

Dear Ms. Ryan:

Following up on our conversation on Friday, October 26, 2012, we have updated the Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132nd Street, Miami, Florida 33054 (provided in this enclosure). Please replace all prior versions of the plan with the enclosed one.

If you have any questions, please contact Daniel H. Berler (dan@raiderenvironmental.com;
 cell: 305 528-0959) or me (steve@raiderenvironmental.com; cell: 954 605-6853).

Sincerely,
 Raider Environmental Services, Inc.

Steve Obst
 President

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
- Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. - Print your name and address on the reverse so that we can return the card to you. - Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature ☒ <i>May</i> ☐ Agent ☐ Addressee B. Received by (Printed Name) C. Date of Delivery B. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No <i>May</i>
1. Article Addressed to: Ms. Janice Ryan Admin Assistant to CFO & COO Hialeah Hospital 651 East 25th Street Hialeah, FL 33013	3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D.
2. Article Number (Transfer from service label) 7012 1010 0000 5504 3395	4. Restricted Delivery? (Extra Fee) ☐ Yes

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**ENVIRONMENTAL SERVICES**

October 29, 2012

Captain Antonio Sanchez
Opa-Locka Police Department
2495 Ali Baba Avenue
Opa-Locka, Florida 33054

Via Certified Mail: 7012 1010 0000 5504 3425
RETURN RECEIPT REQUESTED

Re: Raider Environmental Services, Inc. Updated Preparedness and Prevention Contingency Plan with included Spill Prevention Control and Countermeasures Plan (SPCC)

Dear Captain Sanchez:

An updated version of our Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132nd Street, Miami, Florida 33054 is provided in this enclosure. Please replace all prior versions of the plan with the enclosed one.

If you have any questions, please contact Daniel H. Berler dan@raiderenvironmental.com; cell: 305 528-0959) or me (steve@raiderenvironmental.com; cell: 954 605-6853).

Sincerely,
Raider Environmental Services, Inc.


Steve Obst
President

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
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1. Article Addressed to: <i>Captain Antonio Sanchez</i> <i>Opa-Locka Police Dept.</i> <i>2495 Ali Baba Ave.</i> <i>Opa-Locka, FL 33054</i>		D. Is delivery address different from item 1? ☐ Yes ☐ No If YES, enter delivery address below:	
2. Article Number (Transfer from service label) <i>7012 1010 0000 5504 3425</i>		3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D.	
4. Restricted Delivery? (Extra Fee) ☐ Yes			

PS Form 3811, February 2004

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Raider Environmental Services4103 Northwest 132nd Street, Opa Locka, FL 33054Dade: (305) 994-9949 Broward: (954) 316-0633 Fax: (305) 681-6175 www.raiderenvironmental.com

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City, State, ZIP+4 *Opa-Locka, Florida 33054*

PS Form 3800, August 2005

See Reverse for Instructions

**ENVIRONMENTAL SERVICES**

October 29, 2012

Mr. Juan Trimble
Pollution Control Inspector
Miami-Dade County Department of Regulatory
and Economic Resources
701 Northwest 1st Court
Miami, Florida 33136

Via Certified Mail: 7012 1010 0000 5504 4002
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2012 1010 0000 5504 4002

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Total Postage & Fees	\$ 6.20

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Sent to *Mr. Juan Trimble (Pollution Control Inspector)*
 Street, Apt. No., or PO Box No. *701 N.W. 1st Court*
 City, State, ZIP+4[®] *Miami, Florida 33136*

PS Form 3800, August 2010 See Reverse for Instructions

**Re: Raider Environmental Services, Inc. Updated Preparedness and Prevention
Contingency Plan with included Spill Prevention Control and Countermeasures
Plan (SPCC)**

Dear Mr. Trimble:

An updated version of our Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132nd Street, Miami, Florida 33054 is provided in this enclosure. Please replace all prior versions of the plan with the enclosed one.

If you have any questions, please contact Daniel H. Berler (dan@raiderenvironmental.com;
cell: 305 528-0959) or me (steve@raiderenvironmental.com; cell: 954 605-6853).

Sincerely,
Raider Environmental Services, Inc.

Steve Obst
President

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. - Print your name and address on the reverse so that we can return the card to you. - Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature <i>SH coll</i> ☐ Agent ☐ Addressee B. Received by (Printed Name) <i>SH coll</i> C. Date of Delivery <i>11/3/12</i> D. Is delivery address different from item 1? ☐ Yes ☐ No If YES, enter delivery address below: 3. Service ☒ Certified Mail ☐ Registered ☐ Insured Mail ☐ Restricted Mail ☐ Return Receipt for Merchandise ☐ C.O.D. 4. Restricted Delivery? (Extra Fee) ☐ Yes
1. Article Addressed to: <i>Mr. Juan Trimble Pollution Control Inspector Miami-Dade County Dept. of Regulatory and Economic Resources 701 N.W. 1st Court Miami, Florida 33136</i> 2. Article Number (Transfer from service label) <i>7012 1010 0000 5504 4002</i>	Stamp: MIAMI, FL 33136 NOV 05 2012

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4103 Northwest 132nd Street, Opa Locka, FL 33054Dade (305) 994-9949 Broward: (954) 316-0633 Fax: (305) 681-6175 www.raiderenvironmental.com

**ENVIRONMENTAL SERVICES**

October 29, 2012

Captain Tony Trimm
 North Operations Division
 Miami-Dade Fire Rescue Department
 9300 N.W. 41st Street
 Doral, Florida 33178

Via Certified Mail: 7012 1010 0000 5504 3401
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Street, Apt. No., or PO Box No. 9300 N.W. 41 st Street					
City, State, ZIP+4 Doral, Florida 33178					
PS Form 3811, August 2005 See Reverse for Instructions					

Re: Raider Environmental Services, Inc. Updated Preparedness and Prevention Contingency Plan with included Spill Prevention Control and Countermeasures Plan (SPCC)

Dear Captain Trimm:

An updated version of our Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132nd Street, Miami, Florida 33054 is provided in this enclosure. Please replace all prior versions of the plan with the enclosed one.

If you have any questions, please contact Daniel H. Berler (dan@raiderenvironmental.com; cell: 305 528-0959) or me (steve@raiderenvironmental.com; cell: 954 605-6853)

Sincerely,
 Raider Environmental Services, Inc.

Steve Obst
 President

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. - Print your name and address on the reverse so that we can return the card to you. - Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature ☒ Agent ☐ Addressee B. Received by (Printed Name) ☐ Yes ☐ No C. Date of Delivery D. Is delivery address different from item 1? ☐ Yes ☐ No If YES, enter delivery address below:
1. Article Addressed to: Captain Tony Trimm North Operations Division Miami-Dade Fire Rescue Department 9300 N.W. 41st Street Doral, Florida 33178	3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D.
2. Article Number (Transfer from service label)	4. Restricted Delivery? (Extra Fee) ☐ Yes

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Raider Environmental Services4103 Northwest 132nd Street, Opa Locka, FL 33054

Dade: (305) 994-9949 Broward: (954) 316-0633 Fax: (305) 681-6175 www.raiderenvironmental.com

APPENDIX B – OIL/WATER SEPARATORS

Oil/water separators are devices commonly used for wastewater discharges (Figure 1). 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.

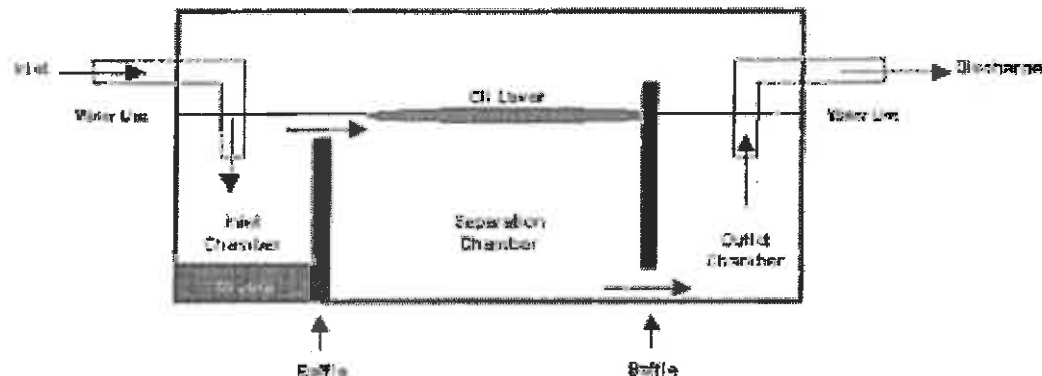


Figure 1. Conceptual Diagram of a Simple Gravity Oil/Water Separator. In a gravity operated OWS, the oil wastewater is introduced through the system inlet. Water turbulence is calmed in the inlet chamber behind the first baffle, where solids settle out and form sludge on the bottom of the chamber. As 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.