Jones Ecosystem Management_____

Mr. Bheem Kothur
Florida Department of Environmental Protection
Hazardous Waste Section
2600 Blair Stone Road
Tallahassee, FL 32399

January 1, 2013

RE: Raider Environmental Services Ten-Day Transfer Facility
Mulberry, Florida
FLR 000 176 271

Dear Mr. Kothur:

Attached please find Raider Environmental Services (RES) response to the e-mail dated August 27, 2912 from Mr. Anthony Tripp. Specific responses are noted as follows:

1. Form 8700-12FL has been modified to reflect modified storage volumes for the containers. The explanation of roll-off management and consolidation is included in the Process Description.
2. The list of waste codes has been removed and the discussion of wastes to be managed has been added to the Comment Section of Form 8700-12FL.
3. Raider anticipates that most of the activity involving hazardous waste will involve only transporting drums to and from the Warehouse. The traffic flow is shown on the Facility Drawing.
4. The Closure Plan has been revised to include only the Closure activities associated with the hazardous waste transfer operation.
5. The Contingency Plan has been revised to include the requested information.
6. A Facility drawing has been provided, with information on pertinent site features as requested.

Please let me know if you require any additional information.

Sincerely,

John M. Jones, P.E.

cc: Steve Obst-Raider

4103 NW 132nd Street
Opa Locka, Florida 33054

Phone: (479) 353-1368
e-mail: johnmjonespe@sbcglobal.net

Facility Operations

Hazardous Waste Transfer Facility Notification

Raider Environmental Services
3555 East State Route 60
Mulberry, Florida 33830

INTRODUCTION

Raider Environmental Services is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater and other products as listed in Attachment A. At the Mulberry facility, containers of hazardous waste are accumulated for shipment in accordance with the standards specified in 62-730.171, F.A.C. The facility is located at 3555 East State Route 60, Mulberry, Florida.

PROCESS DESCRIPTION

Raider Environmental Services operates a waste oil collection; transportation, processing and recycling business with serves a variety of automotive commercial and industrial businesses throughout Florida with operations and management as described in the following:

Types of Products Collected

Automotive, industrial waste oils, as well as oily wastewaters, off-specification diesel fuel, oil filters, oily rags/absorbents, and used automotive coolants are collected. Hazardous wastes, as defined in 40 CFR 261 are collected and transported to the Mulberry facility for accumulation only in accordance with the rules applicable to a 10-day hazardous waste transfer facility.

HAZARDOUS WASTE TRANSFER

Process Description

Raider Environmental Services collects containers of hazardous waste, most commonly in 55-gallon drums. While the facility wishes to accept all EPA hazardous waste codes (except those specifically associated with dioxins), the most common waste codes anticipated are Characteristic wastes with codes: D001 (Ignitable), D002 (Corrosive), D007 (Chromium), and D008 (Lead).

Raider may also transport hazardous waste in roll-off containers. The storage capacity listed in the 8700-12 form includes the capacity for one (1) each forty cubic yard roll-off container.

Containers are held for periods of time not to exceed 10 calendar days and are shipped to permitted facilities with all proper documentation. Accumulating the waste affords Raider both safety and economic benefits by transporting full trailers instead of smaller loads. Logs showing the arrival and departure dates of the containers are maintained at the facility.

Raider may consolidate waste from individual generators by transferring waste from 55-gallon drums into a roll-off container. Only identical waste streams from a single generator will be consolidated. The drums will be opened only to transfer the waste into the roll-off container. No dust-generating waste will be consolidated. Transfer will be accomplished using a fork-lift. Transfer will take place inside the Warehouse Building as shown on the Facility Drawing.

All wastes will be received with the permitted disposal facility shown on the manifest. Raider will not re-manifest waste and will not assume generator status for the wastes.

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

RAIDER ENVIRONMENTAL, INC. FACILITY (FLR 000 176 271)

3555 STATE ROUTE 60 EAST
MULBERRY, FL 33830

Location: $27^0$53'38" North,$81^0$55'32" West

Telephone Number: (863) 425-4411

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

Mailing Address

4103 N.W. 132ND STREET
OPA-LOCKA, FL 33054

Prepared: January 2013

PROFESSIONAL ENGINEER CERTIFICATION

I herby certify that I have examined the Raider Services. Spill, Prevention, Control & Countermeasure (SPCC) Plan, addressing the Raider Services, Inc. facility located at 3555 State Route 60 East, Mulberry, Florida 33830 and being familiar with the provisions of 40 CFR 112, attest that this plan has been prepared in accordance with good engineering practices.

John M. Jones
Printed Name of Registered Professional Engineer

_____
Signature of Registered Professional Engineer

_____	50227	Florida
Date	Registration Number	State

Professional Engineer Seal

Raider
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PLAN REVIEW LOG

By	Date	Activity	PE certification required?	Comments
John M. Jones	June, 2012	Initial Plan	Yes	

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1. INTRODUCTION

Raider Environmental Services, Inc. (Raider) operates a non-hazardous waste facility on 6.39 acres of land in Polk County, Florida. The facility is located at 3555 State Road 60 East, FL 33830 (Parcel 24-30-08-000000-011050, 27°53'38" North Latitude, 81°55'32" West Longitude). The location of the Facility along with the nearest hospital and fire station is shown in Figure 1.

The Raider Mulberry non-hazardous waste operation has the following licenses, certificates and registrations as of December 2012:

- City of Mulberry Occupational License Storage Tank Facility (Polk County; Storage Tank Facility 490020; FLR 000 176 271).
- Used Oil Transporter, Transfer Facility, Filter Transporter and Filter Transfer Facility (FDEP/EPA #: FLR 000176 271).
- Storage Tank Registration Placard #: 402973 (FDEP/EPA #: FLR 000 176 271; STCM Account #: 68633; Facility ID #: 9813440).
- Hazardous Waste Transporter Certificate of Approval (FDEP/EPA #: FLR 000176 271).

Applications for a Used Oil Processing Permit and a ten (10)-day hazardous waste storage permit are in the process of being prepared for submittal to the Florida Department of Environmental Protection (FDEP).

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 at 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 has been in operation. 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. The overall purpose of this plan is to describe engineered structures and developed procedures implemented by Raider to prevent oil discharges from occurring and how to respond in a safe, effective and timely manner if a spill does occur. In addition to

fulfilling requirements of 40 CFR Part 112, this plan is used as a reference for oil storage information and testing records, as a tool to communicate practices to employees regarding the prevention and response to discharges, as a guide to facility inspections and a resource during emergency response operations.

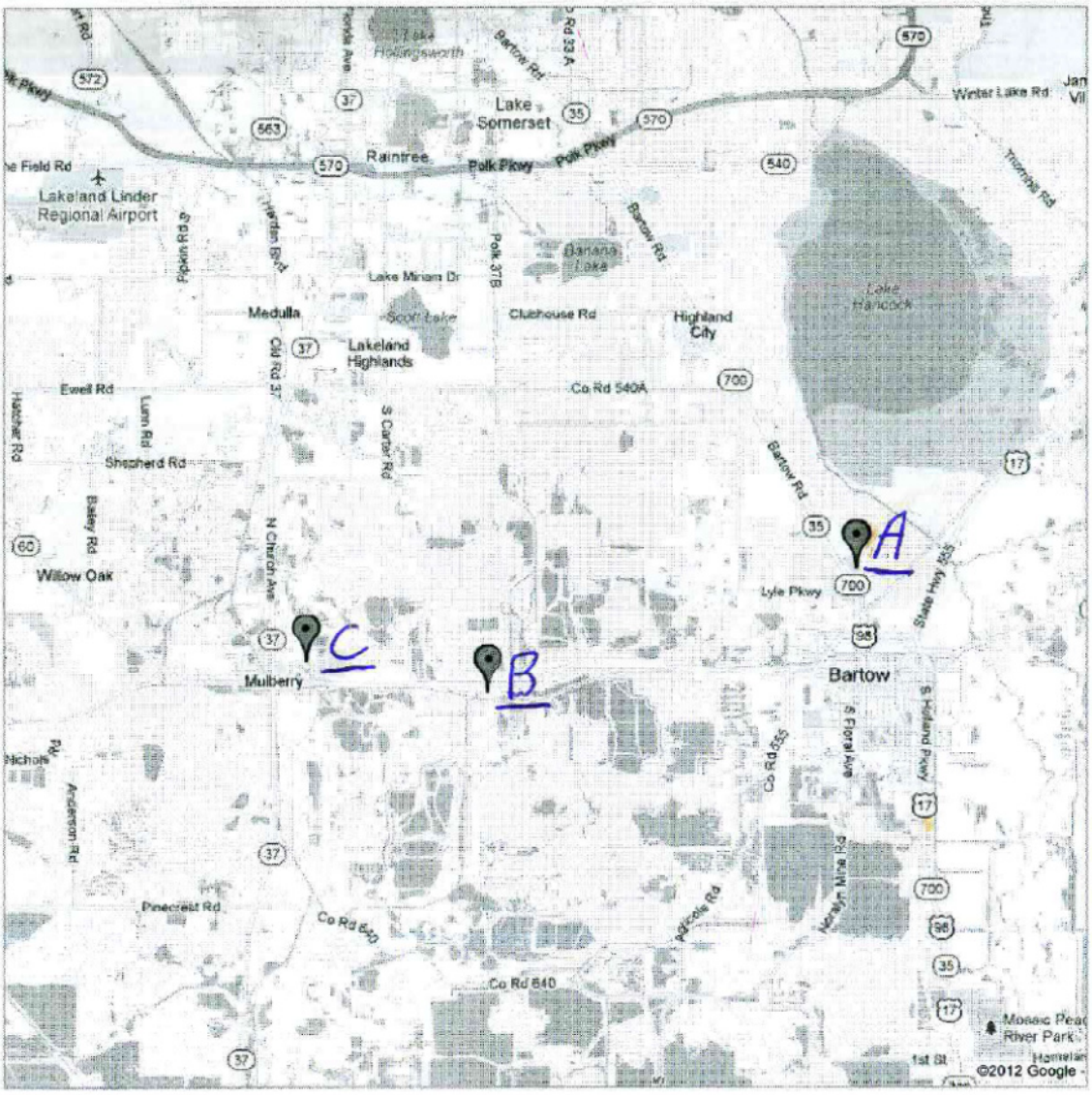
Raider management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix A of this Plan.

This Plan provides guidance on key actions that Raider must perform to comply with the SPCC rule:

- Inspections, tests and evaluations listed in Appendix B that include daily, monthly and annual site inspections (Appendix C, Appendix D and Appendix E respectively).
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan and document them on the log included in Appendix B.
- Immediately report any discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day. The required notification information is presented in Appendix C.
- Submit this plan to the EPA Region 4 Regional Administrator (RA) and the Florida Department of Environmental Protection (FDEP), along with other information as detailed in Appendix C of this plan, if either of the following oil discharges occur from the Facility to navigable waters of the U.S. or adjoining shorelines.
    - More than 1,000 gallons of in a single spill event, or;
    - More than 42 gallons in each of two spill events within any 12-month period.
- Review this plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page on page ii.
- Amend this plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised plan must be recertified by a Professional Engineer (PE) on the certification page on page ii.
- Review and update the plan on an annual basis to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact

information, such as phone numbers. Administrative changes must be documented in the plan review log on page iii of this plan, but do not have to be certified by a PE.

This document was 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. The Certified Mail Return Receipts received by Raider were appended to a copy of each respective enclosure letter copy to provide proof that each of the following agencies were sent this initial Preparedness and Prevention Contingency Plan.



Locations of Closest Hospital and Fire Station to Raider

A — Bartow Regional Medical Center
2200 Osprey Boulevard, Bartow, FL 33831
911, (863) 533-8111

B — Raider Environmental Services, Inc.
3555 State Road 60 E, Mulberry, FL 33830
(863) 425-4411

C — Mulberry Fire Station 720
900 5th Street, Mulberry, FL 33860
(863) 425-9299

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

Raider
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TABLE 1. RECIPIENTS OF THE FOLLOWING DECEMBER PREPAREDNESS AND PREVENTION CONTINGENCY PLAN

(Plan was delivered to the recipients by email and by U.S. Mail)

Document Recipients	Contact	Phone Number	Address	Email Address
Bartow Memorial Hospital	Mr. Carlos Felix (Facilities Director)	(863) 533-8111	2200 Osprey Blvd., Bartow, FL 33831	carlos.felix@hma.com
Polk County Fire Department	Mr. Wesley Hayes (Fire Marshall)	(863) 534-6019; cell: (863) 651-7974	2470 Clower Street, Bartow, FL 33830	wesleyhayes@polkfl.com
Polk County Police Department	Ms. Fay Smith (Communications Manager)	(863) 401-2255	1911 Jim Keene Boulevard, Winterhaven, FL 33880	fsmith@polksheriff.org
Polk County Department of Forestry	Mr. Victor Memmoli	(863) 648-3160	5745 South Florida Avenue, Lakeland, FL 33813	victor.memmoli@freshfromflorida.com
Florida Department of Environmental Protection	Ms. Kathy Winston, Environmental Consultant	(561) 681-6756	Southeast District, Hazardous Waste Compliance/Enforcement, 400 N. Congress Avenue, Suite 200, West Palm Beach, FL 33401-2319	kathy.winston@dep.state.fl.us
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

Raider developed and implemented a security program to minimize the possibility of unauthorized entry to the facility, maximize the personal protection of employees operating the facility and prevent the accidental spill of any oil. The security program components are listed below.

- The entire facility is contained within a limited access fenced area, which is monitored 24 hours per day.
- Concrete masonry unit fencing surrounds the entire site to meet safety and security requirements.
- Facility lighting is adequate to permit surveillance of the facility, discourage vandalism and detect spills during hours of darkness.
- Access into the Facility is only available through the main gate.
- Regular security patrols by facility guards during non-working hours.

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. Kevin McIntyre (Maintenance Manager) at (954) 300-9178
- Ms. Carolyn Moore (Office Manager) at (813) 777-4001

3. PERSONNEL TRAINING AND DRILLS

Facility operations personnel – all HAZWOPER trained - 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.

4. SECONDARY CONTAINMENT AREAS

The Facility consists of one (1) secondary containment area around eight (8) permitted tanks that will be used for the treatment and processing and storage of used oil, the storage of treated and processed oil and the storage of oily-water separated out of the used oil during treatment and processing operations. The containment area was designed and constructed to minimize the potential for any leak/spill to impact groundwater resources and soils/sediments. The minimum containment area volume was calculated by multiplying the largest tank volume to be contained in the area by a factor or 1.10 (110% of the tank of volume). Figure 2 is provided to show the location of the tank containment area at the Facility.

4.1 SAFE VEHICLE OPERATION

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

4.2 STORAGE TANKS

All of the treatment/processing and storage tanks at the Facility are above ground storage tanks (AST)s, which are located in the one (1) secondary containment area depicted in Figure 2. The material composition and design of the (AST)s and appurtenances are compatible with the used oil and oily-water to be contained within the tanks. A list of all the Facility ASTs and their contents is provided in Table 2.

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, recorded and mitigated followed by necessary actions to prevent the leak from occurring again.

4.3 PREDICTION OF SPILL BEHAVIOR

Any potential spill/leaks of wastes from ASTs and associated appurtenances will be contained by the secondary containment tank enclosure and sumps.

4.4 SPILL DIVERSION AND RETENTION PONDS

No diversion or retention ponds exist at the Facility.

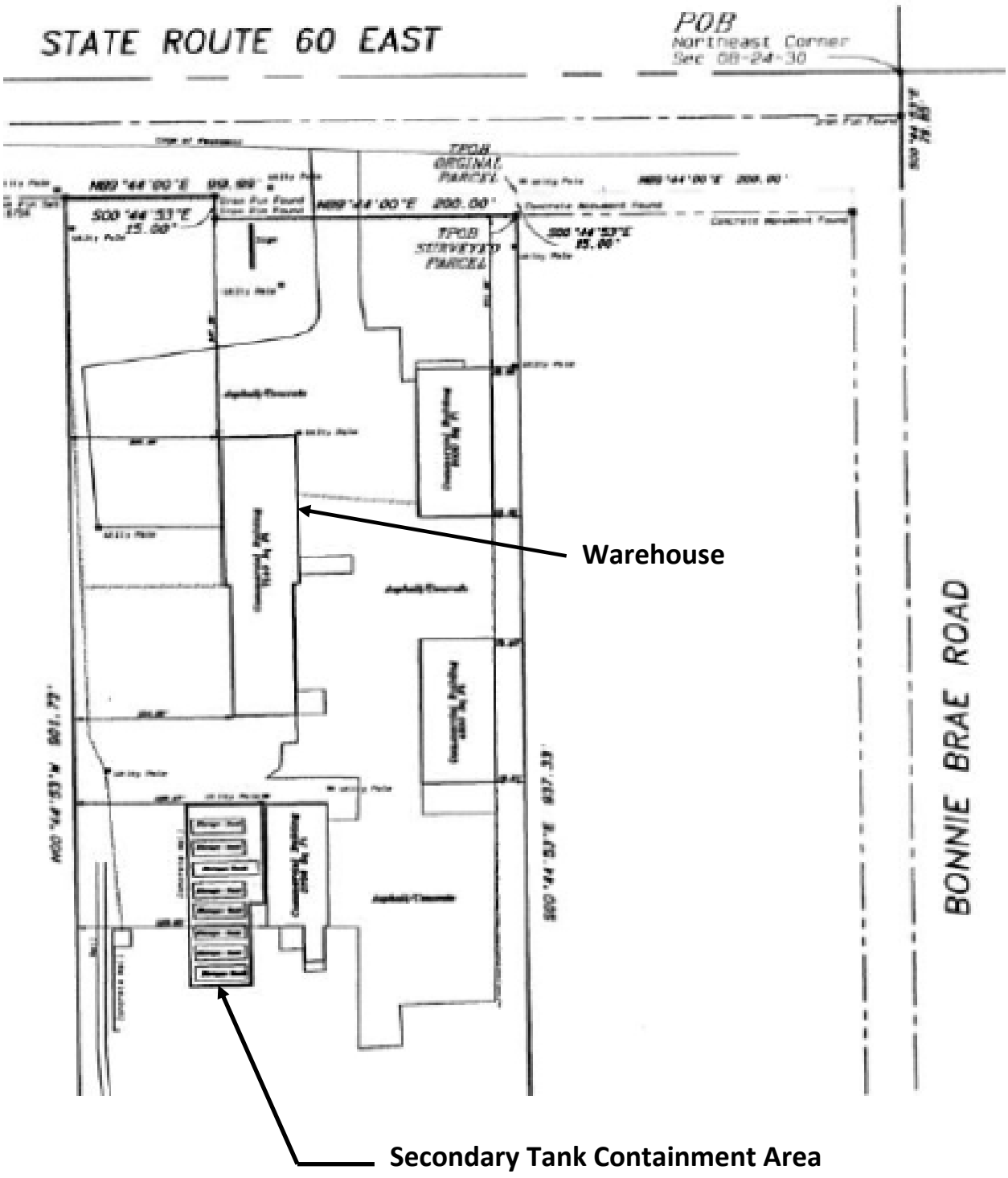

FIGURE 2. SECONDARY CONTAINMENT AREA

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TABLE 2. AST DETAILS AND CONTENTS

Tank #	Date Installed	Size (Gallons)	Construction Material	Contents
1	2012	20,000	Carbon Steel	Virgin Oil
2	2012	20,000	Carbon Steel	Virgin Oil
3	2012	26,500	Carbon Steel	Thermal Treatment Tank
4	2012	20,000	Carbon Steel	Unprocessed Used Oil
5	2012	20,000	Carbon Steel	Oily-Water
6	2012	20,000	Carbon Steel	On Spec # 5 Fuel Oil
7	2012	20,000	Carbon Steel	On Spec # 5 Fuel Oil
8	2012	20,000	Carbon Steel	On Spec # 5 Fuel Oil

4.5 SPILL AND STORMWATER DISPOSAL

All rainwater that accumulates in the secondary tank containment area will be pumped through an oil-water separator prior to being discharged outside of the containment area. A description of oil/water separators is provided in Appendix J.

4.6 INSPECTIONS

All ASTs 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 Kevin McIntyre (Maintenance Manager/Back-up Emergency Coordinator, cell: 954 300-9178) will initiate the following Emergency Spill Response Plan sequence of steps and then notify the regulatory agencies listed on page 19 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 FDEP using the numbers listed on page 19;
3. Recover as much liquid as possible using the following spill containment procedures and emergency response materials and equipment listed on page 12.

5.1 SPILL CONTAINMENT PROCEDURES

The spill containment and cleanup procedures presented below are a 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 the Facility emergency supply location within the Facility’s main office (refer to Table 3 on page 18) to prevent the migration of the spill onto permeable surfaces that are not covered with asphalt or concrete.
2. Use the Facility vacuum truck to remove spill liquids, if the spill is too large for booms.
3. Use loose sorbent materials and sand to surround and contain 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 an appropriate storage tank.

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TABLE 3. EMERGENCY EQUIPMENT & SUPPLIES LOCATED IN THE WAREHOUSE

ITEM	SIZE	QUANTITY	CAPABILITY
Empty drums	55-gallon	2 drums	Containment of contaminated media
Loose sorbent material	40 lb bags	3 bags	Sorption of contaminants
Sorbent pads	17”X19”X3/8”	600 (3 bundles)	Sorption of contaminants
Nitrile Gloves	Large	6 pairs	Chemical protection
Neoprene Gloves	Large	6 pairs	Chemical protection
Vinyl/PVC pull-on overboots	Large	6 pairs	Chemical protection
Non-sparking shovels	Standard	3	Preparation of Berms etc.
Brooms	Standard	3	Sweeping of sorbent materials
Drain seals or mats	Various	2	Prevention of spill migration
Sand bags	50-lb bags	12	Prevention of spill migration
Sorbent Booms	10’X8’	10	Sorption of contaminants
Sorbent Booms	10’X5’	20	Sorption of contaminants
Rug	36”X300’	1	Sorption of contaminants
Rug	18”X30’	1	Sorption of Contaminants
Plastic Sheeting Rolls	20’X100’	3	Impermeable barrier
Full Face Negative Air Mask	Medium to Large	5	PPE
Organic Vapor Cartridges	Standard	10 pairs	PPE
Half Face Masks	Standard	5 pairs	PPE
Protective Safety Glasses	Standard	10	PPE
Tyvek Suits	Large and XXL	25	PPE

Plastic Bags	33”X60”	200	Disposal of used sorbents, PPE and solid waste
VAC truck	Standard	One (1)	Liquid and semi-solid vacuuming

Notes:

1. 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 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 local Mulberry 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: Mulberry Fire Department (911, (863) 401-2255/(863) 425-9299)

Telephone conversations were conducted with fire department personnel confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes.

Police Department: Polk County Police Department (911, (863) 401-2255)

Telephone conversations were conducted with police department personnel confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes.

Hospital: Bartow Regional Medical Center (911, (863) 401-2255/(863) 533-8111)

Telephone conversations were conducted with hospital representatives confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes.

TABLE 4. EMERGENCY CONTACT PHONE NUMBERS

Mulberry Fire Department Station 720, 900 5th Street, Mulberry, FL 33860)	Emergency:	**911**, (863) 401-2255
	Local Office:	(863) 425-9299
Polk County Police Department	Emergency:	**911**, (863) 401-2255
	Main Office:	(863) 401-2255
Polk County Department of Forestry 5745 South Florida Avenue, Lakeland, FL 33813	Emergency:	**911**, (863) 401-2255
	Local Office:	(863) 648-3160
Bartow Regional Medical Center	Emergency:	**911**, (863) 401-2255
	Main Number:	(863) 533-8111
National Response Center	(800) 424-8802	
US EPA – Region IV	(800) 241-1754/(404) 562-8357	
Florida Department of Environmental Protection	State Warning Point (Emergency):	**(800) 320-0519**
	Polk County Warning Point (Emergency):	**(863) 401-2222**
	Regional Office:	(813) 632-7600
Chemtrec	(800) 424-9300	

Raider
ENVIRONMENTAL SERVICES

TABLE 5. MULBERRY FACILITY CONTACT INFORMATION

NAME	TITLE	OFFICE	CELL
Obst, Steve	President		(954) 605-6853
Obst, Tavia	Controller		(954) 914-8414
Moore, Carolyn (Carrie)	Office Manager	(863) 425-4411	(813) 777-4001
McIntyre, Kevin	Maintenance Manager	(863) 425-4411	(954) 300-9178
Corrales, Pedro	Welder	(863) 425-4411	(786) 232-7506
Crowley, Rick	Driver – Class A		(941) 549-0618
De Peralta, Jorge Grave	Oil Driver	(954) 732-5986	(239) 271-7037
Hirt, Warren (Pete)	Box Truck Driver – Class A	(772) 485-2091	(386) 983-3302
Machado, Tony	Used Oil Driver – Class A	(941) 961-9862	(727) 224-6295
Maya, Omar	Used Oil Driver – Class A	(863) 781-9844	(727) 254-7362
Shuman, Bryan	Driver – Class A		(863) 529-6073
Tomayo, Mario	Driver – Class A	(941) 623-5849	(954) 275-1778

7. GENERAL RESPONSIBILITIES

7.1 Personnel Assignments

Mr. Obst and Mr. McIntyre 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. McIntyre, 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., Mulberry Fire Department and Polk County Police Department).

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 Mulberry Fire Department and Polk County 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 monitors 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 Warehouse as possible.
        - Water-sensitive items to storage areas that are as high above ground level as possible.
    - Dismantle and store all equipment in the Warehouse 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
    - Warehouse of the Facility.
- 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.

APPENDIX A –SUBSTANTIAL HARM DETERMINATION

Facility Name: Raider Environmental Services, Inc.

Facility Address: 3555 State Route 60 East
Mulberry, Florida 33830

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? NO

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area? NO

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? NO

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? NO

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? NO

APPENDIX B – INSPECTION AND TESTING PROGRAM

Facility Component	Action	Frequency/Circumstances
Aboveground container	• Test container integrity • Combine visual inspection with another testing technique (e.g., non-destructive shell testing). • Inspect outside of container for signs of deterioration and discharges.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Container supports and foundation	Inspect container's supports and foundations.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Liquid level sensing devices (overfill)	Test for proper operation.	Monthly
Effluent treatment facilities	Detect possible system upsets that could cause a discharge.	Daily, monthly
All aboveground valves, piping, and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly

APPENDIX C – DAILY INSPECTIONS

A designated Raider employee performs a thorough visual inspection of the facility during each day of operation. The inspection involves observations of tanks/piping/valves for any damage or leakage, staining or accumulation of oil in secondary containment area, and soils that have become stained or discolored or accumulate more than normal amounts of water in diked and bermed areas.

APPENDIX D – MONTHLY INSPECTIONS

APPENDIX D.1 Inspection Elements

Inspections cover the following key elements.

- Observations of the exterior of:
  - Aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
  - Portable containers for signs of deterioration or leaks.
  - Tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vents for obstructions and proper operation.
- Verification of the proper functioning of overfill prevention systems.
- Checking the inventory of emergency response spill/discharge equipment and restocking as needed.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Raider President. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery. The monthly inspection to be used by Raider is provided in Appendix C.2 below.

Written monthly inspection records are signed by the RAIDER President and maintained with this plan for a period of three (3) years.

APPENDIX D.2 Monthly Inspection Checklist

The following inspection record must be completed *each month* except the month in which an annual inspection is performed. Further description and comments must be added on a separate sheet of paper and attached to the record, if necessary. Any checklist item that receives "yes" as an answer must be described and addressed immediately.

MONTHLY INSPECTION CHECK LIST

	Y*	N	Description & Comments
Storage tanks			
Tank surfaces show signs of leakage			
Tanks are damaged, rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Level gauges or alarms are inoperative			
Vents are obstructed			
Secondary containment is damaged or stained			
Water/product in interstice of double-walled tank			
Piping			
Valve seals, gaskets, or other appurtenances are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Unloading and transfer equipment			
Loading/unloading rack is damaged or deteriorated			
Connections are not capped or blank-flanged			
Secondary containment is damaged or stained			
Berm drainage valve is open or is not locked			
Oil/water separator			
Oil/water separator > 2 inches of accumulated oil			
Oil/water separator effluent has a sheen			
Security			
Fencing, gates, or lighting is non-functional			
Pumps and valves are locked if not in use			
Response Equipment			
Response equipment inventory is complete			

Date: _____ **Signature**:_____

APPENDIX E – FACILITY INSPECTION TO BE CONDUCTED IN JUNE OF EACH YEAR

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. The annual inspection complements the monthly inspection described above and is performed in June of each year using the checklist provided in Appendix E.1 below.

The annual inspection is preferably performed after a large storm event in order to verify the imperviousness and/or proper functioning of drainage control systems such as the dike, rollover berm, control valves, and the oil/water separator.

Written annual inspection records are signed by the RAIDER President and maintained with this plan for a period of three (3) years.

APPENDIX E.1 Inspection Checklist to be Completed in June of Each Year

	Y*	N	Description & Comments
Storage tanks			
Tank surfaces show signs of leakage			
Tank is damaged, rusted, or deteriorated			
Bolts, rivets, or seams are damaged			
Level gauges or alarms are inoperative			
Piping			
Valve seals or gaskets are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Out-of-service pipes are not capped			
Warning signs are missing or damaged			
Unloading and transfer equipment			
Fuel dispenser filters clogged (reduced fuel flow)			
Fuel dispenser strainers clogged			
Connections are not capped or blank-flanged			
Rollover berm is damaged or stained			
Berm drainage valve is open or is not locked			
Drip pans have accumulated oil or are leaking			
Oil/water separator			
Oil/water separator > 2 inches of accumulated oil			
Oil/water separator effluent has a sheen			
Security			
Fencing, gates, or lighting is non-functional			
Pumps and valves are not locked (and not in use)			
Response equipment			
Response equipment inventory is incomplete			

- *Any item that receives “yes” as an answer must be described and addressed immediately.
- The RAIDER President must sign the annual inspection record, which must be maintained with this plan for a period of three years.
- Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet.

Date: _____ Signature of Raider President: _____

APPENDIX F – RECORD OF ANNUAL DISCHARGE BRIEFINGS AND TRAINING

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

APPENDIX G – NOTIFICATIONS OF ANY SIZE DISCHARGE

Provide the following information to the National Response Discharge Center (1-800-424-8802).

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

APPENDIX H – NOTIFICATIONS FOR OIL DISCHARGES GREATER THAN 1,000 GALLONS

This appendix presents the agencies required to be notified immediately and within sixty days of a spill greater than 1,000 gallons.

APPENDIX H.1 Immediate Notifications

The following agencies must be notified immediately in the order presented.

- Bartow Regional Medical Center: 911, if anybody is injured
- Local fire or police department: 911
- National Response Discharge Center: 1-800-494-8802
- Southern Waste Systems (SWS): 954-957-7271, if cleanup help is needed

The above contact information is posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance building, and at the unloading area).

Provide the following information to the notified agencies.

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

A discharge notification form is provided in Appendix C.2 below to assist with the reporting of the required information.

APPENDIX H.2 Discharge Notification Form

Part A: Discharge Information	
Person who Notified the Agency:	
Company Name: Raider Environmental Services, Inc.	
Address: 3555 East State Route 60, Mulberry, Florida 33830	
Telephone: 863-425-4411	
Owner/Operator: Steve Obst	
Primary Contact: Carolyn Moore	
Type of Material Released/Discharged:	Discharge Date (Time):
Quantity Released/Discharged:	Discovery Date (Time):
Quantity Released/Discharged to a waterbody:	Discharge Duration:
Location/Source:	
Number and Types of Injuries (if any)	
Affected media (e.g., air, groundwater, surface water, stormwater sewer, POTW, oil-water separator)	
Danger or threat posed by the release or discharge:	
Part B: Information Received from Notified Agency	
Agency Notified:	Person Spoken To:
Information/Directions Received from Agency :	

* The POTW should be notified of a discharge only if oil has reached or threatens sewer drains that connect to the POTW collection system.

APPENDIX H.3 60-Day Notifications

The following information must be submitted to the EPA Regional Administrator and to FDEP within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence;
- Other pertinent information requested by the Regional Administrator.

A standard report form for submitting the information to the EPA Regional Administrator and to FDEP is provided below in Appendix C.4.

APPENDIX H.4 Agency Notification Standard Report

Agency Notification Standard Report

Facility:	*Raider Environmental Services, Inc.*
Owner/operator:	Steve Obst
Name of person filing report:	
Location:	3555 State Road 60 East, Mulberry, FL 33830
Maximum storage capacity:	
Daily throughput:	
Nature of qualifying incident(s):	

Description of facility (attach maps, flow diagrams, and topographical maps):
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:

Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:
Additional preventive measures taken or contemplated to minimize possibility of recurrence:

Other pertinent information:

APPENDIX I – COPIES OF ENCLOSURE LETTERS

APPENDIX J – 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.

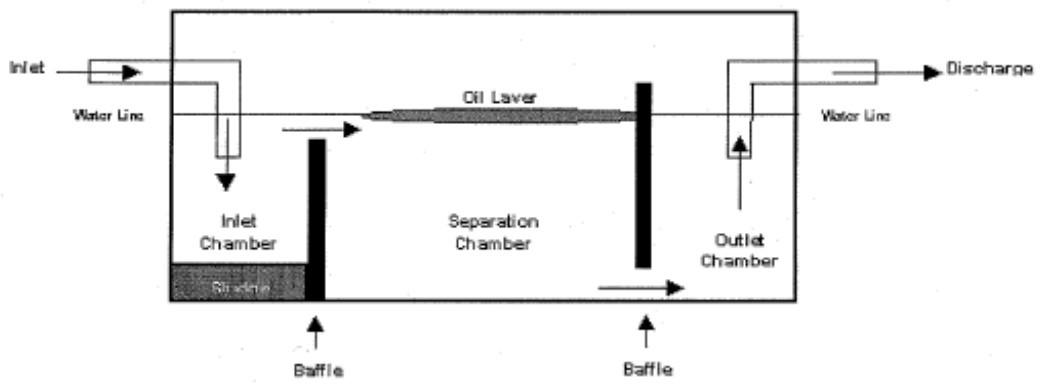


Figure 1. Conceptual Diagram of a Simple Gravity Oil/Water Separator. In a gravity operated O/WS, the oil wastewater is introduced through the system inlet. Water turbulence is calmed in the inlet chamber behind the first baffle, where solids settle out and form sludge on the bottom of the chamber. As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

APPENDIX J.1 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.

APPENDIX J.2 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.

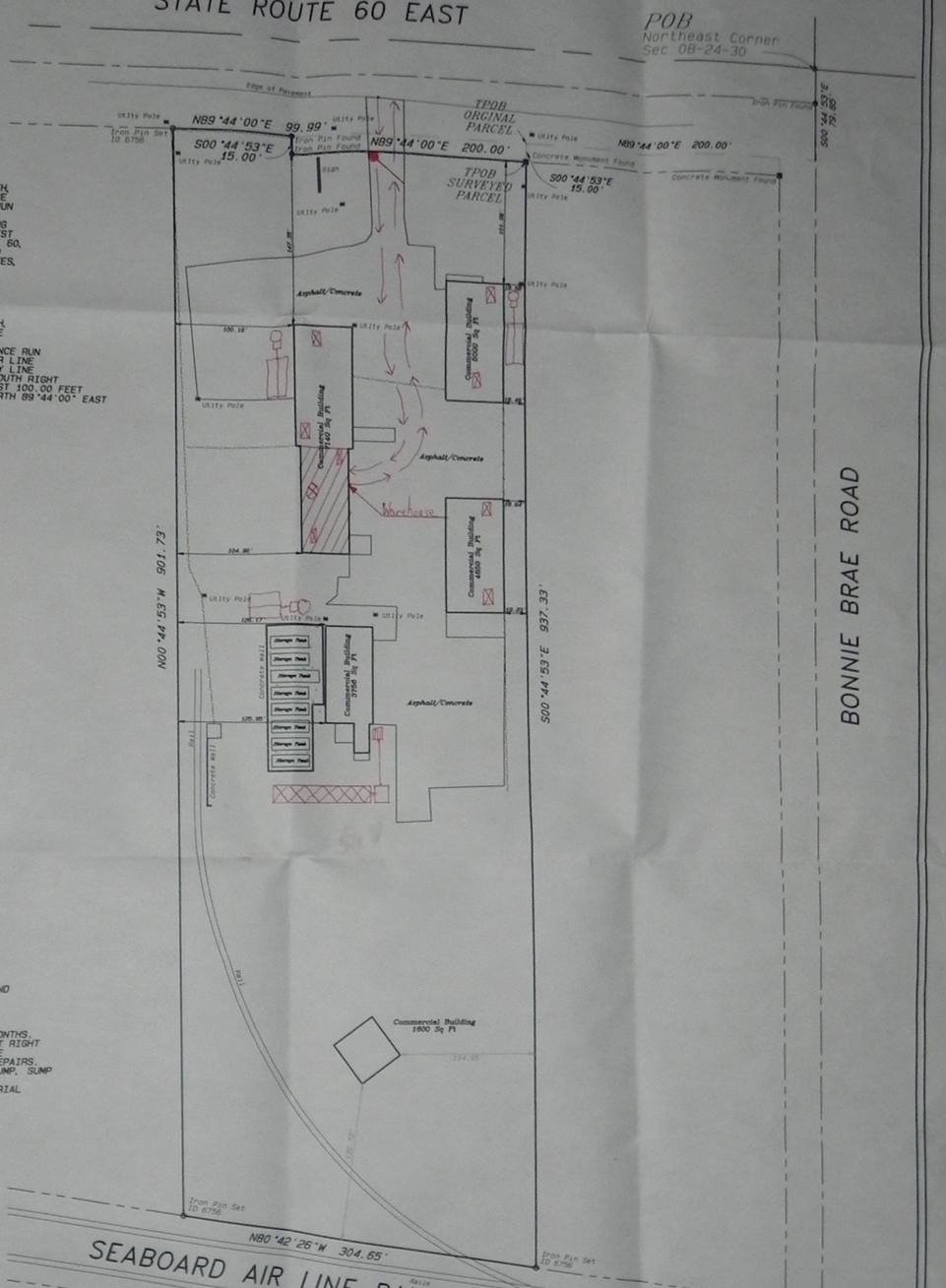
When oil/water separators are used to meet SPCC requirements they must be properly operated and maintained to ensure that the unit will perform correctly and as intended under the potential discharge scenarios it is aimed to address (e.g., §§ 112.7(c), 112.8(c)(2) and 112.12(c)(2)). The required oil/water 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.

APPENDIX K – DIRECTIONS TO THE BARTOW REGIONAL MEDICAL CENTER

MAP OF SURVEY
ALTA/ACSM LAND TITLE SURVEY OF

PART OF SECTION 8
TOWNSHIP 30 SOUTH, RANGE 24 EAST
POLK COUNTY, FLORDA



DESCRIPTION (AS RECORDED IN OR 7610, PG 1208)

BEGIN AT THE NORTHEAST CORNER OF SECTION 8, TOWNSHIP 30 SOUTH, RANGE 24 EAST, AND RUN SOUTH 0°44'53" EAST 79.85 FEET, THENCE SOUTH 89°44' WEST 258.00 FEET FOR A POINT OF BEGINNNG; THENCE RUN SOUTH 0°44'53" EAST 852.33 FEET TO THE RIGHT OF WAY LINE OF SAID RIGHT OF WAY LINE RAILROAD, THENCE NORTH 80°42'26" WEST ALONG SAID RIGHT OF WAY LINE 304.65 FEET, THENCE NORTH 0°44'53" WEST 901.73 FEET TO THE SOUTH RIGHT OF WAY LINE OF STATE ROAD NO. 60, THENCE NORTH 89°44' EAST 300 FEET TO POINT OF BEGINNNG; ALSO KNOWN AND DESCRIBED AS LOTS 4, 5, AND 6 , OF RIDGEWOOD ESTATES, LESS RIGHT OF WAY FOR STATE ROAD NO. 60.

DESCRIPTION (ASSURVEYED)
BEGIN AT THE NORTHEAST CORNER OF SECTION 8, TOWNSHIP 30 SOUTH, RANGE 24 EAST, AND RUN SOUTH 0°44'53" EAST 79.85 FEET, THENCE SOUTH 89°44'00" WEST 258.00 FEET TO A POINT; THENCE RUN SOUTH 0°44'53" EAST 15.00 FEET TO THE PONT OF BEGINNING, THENCE RUN SOUTH 0°44'53" EAST937.33 FEET TO A POINT ON THE SEABOARD AIR LINE RAILROAD, THENCE NORTH 80°42'26" WEST ALONG SAID RIGHT OF WAY LINE 304.65 FEET, THENCE NORTH 0°44'53" WEST 901.73 FEET TO THE SOUTH RIGHT OF WAY LINE OF STATE ROAD NO. 60, THENCE NORTH 89°44'00" EAST 100.00 FEET TO A POINT, THENCE SOUTH 0°44'53" EAST 15.00 FEET, THENCE NORTH 89°44'00" EAST 200.00 FEETTO POINT OF BEGINNNG;

SURVEY NOTES:

1. ALL BEARINGS AND STREET RIGHT OF WAYS ARE BASED ON RECORDED DEED.
2. SURVEYOR DID NOT ABSTRACT PROPERTY. SURVEY BASED ON LEGAL DESCRIPTION OBTAINED FROM COUNTY RECORDS
3. NOTHING IN THOIS SURVEY IS INTENDED TO EXPRESS AN OPINION REGARDING OWNERSHIP OR TITLE.
4. THE WORD CERTIFY IS UNDERSTOOD TO BE AN EXPRESSION OF PROFESSIONAL JUDGEMENT BY THE SURVEYOR, WHICH IS BASED ON HIS BEST KNOWLEDGE, INFORMATION AND BELIEF.
5. SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.
6. THIS SURVEY IS BEING PROVIDED SOLEY FOR THE USE OF THE CURRENT PARTIES AND THAT NO LICENSE HAS BEEN CREATED, EXPRESS OR IMPLIED. TO COPY THE SURVEY EXCEPT AS NECESSARY IN CONJUNCTION WITH THE ORIGINAL TRANSACTION.
7. NO REPRESENTATION IS MADE FOR THE ACCURACY OR COMPLETENESS OF SAID THIRD PARTY INFORMATION. THIS FIRM IS NOT AN EXPERT IN THE INTERPRETATION OF COMPLEX ZONING ORDINANCES; COMPLIANCE IS BEYOND THE SCOPE OF THIS SURVEY. ANY USER OF SAID INFORMATION IS URGED TO CONTACT THE LOCAL AGENCY DIRECTLY.
8. ALL AREAS IN RECIPROCAL EASEMENT AGREEMENTS (REAs) HAVE BEEN DENOTED ON THE SURVEY. THE LIMITS OF ANY OFFSITE APPURTENANT EASEMENTS ARE ALSO SHOWN ON THE SURVEY. THE LIMITS OF AND REAs OF OFFSITE APPURTENANT AND BENEFICIAL EASEMENTS TO THE LAND SUBJECT TO THE SURVEY ARE REPORTED, INCLUDING THE LOCATION OF ALL BUILDINGS, PARKING SPACES, AND OTHER IMPROVEMENTS ON THOSE LANDS.
9. THERE IS NO OBSERVABLE EVIDENCE OF EARTH MOVING WORK, BUILDING CONSTRUCTION, OR BUILDING ADDITIONS IN RECENT MONTHS.
10. THERE IS NO OBSERVABLE EVIDENCE OF CHANGES IN STREET RIGHT OF WAY LINES EITHER COMPLETED OR PROPOSED. NO OBSERVABLE EVIDENCE OF RECENT STREET OR SIDEWALK CONSTRUCTION OR REPAIRS.
11. THERE IS NO OBSERVABLE EVIDENCE OF SITE USED AS A DUMP, SUMP OR LANDFILL.
12. THERE IS NO OBSERVABLE EVIDENCE OF CEMETERIES OR BURIAL GROUNDS ON SITE.
13. THERE ARE NO MARKED (PAINTED) PARKING SPACE

Legend

- Fire Extinguisher
- Spill Kit
- Gate
- Drums & Roll-Off Containers
- Route for Hazardous Waste Transport within the Facility
- Catch Basin
- Exfiltration Trench
- Septic Tank
- Leaching Field

N

GRAPHIC SCALE 1"= 50'
0 50 100 150 200

RECEIVED
NCRA
JAN 04 2013
Hazardous Waste Regulation

THE UNDERSIGNED, BEING A REGISTERED SURVEYOR IN THE STATE OF FLORIDA CERTIFIES TO (A) RAIDER ENVIRONMENTAL SERVICES, INC., ITS SUCCESSORS AND ASSIGNS, (B) SUNTRUST BANK, ISAOA/ATIMA, (C) OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY, (D) RAY A. SCHLICHTE, JR., P.A.:

I HEREBY CERTIFY THAT THIS SURVEY WAS PREPARED BY ME OR UNDER MY SUPERVISION IN ACCORDANCE WITH THE "MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/ACSM LAND TITLE SURVEYS" JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS IN 2011 AND INCLUDES ITEMS 1, 2, 3, 4, 6, 7A, 8, 11A, OF TABLE A THEREOF AND, TO THE EXTENT POSSIBLE, SHOWS THE LOCATION OF ALL SETBACK LINES PURSUANT TO ITEM 6 OF TABLE A. PURSUANT TO THE ACCURACY STANDARDS AS ADOPTED BY ALTA AND NSPS AND IN AFFECT ON THE DATE OF THIS CERTIFICATION, UNDERSIGNED FURTHER CERTIFIES THAT IN MY PROFESSIONAL OPINION, AS A LAND SURVEYOR REGISTERED IN THE STATE OF FLORIDA, THE RELATIVE POSITION ACCURACY OF THE SURVEY DOES NOT EXCEED THAT WHICH IS SPECIFIED THEREIN.

DANNY L. WILSON STATE OF FLORIDA PSM NO. 6756 DATE

REVISION	DATE
1 ADDED CERTIFICATION	01/01/2012
2 ADDED CONCRETE PAD (SHADED)	05/30/2012
3 ADDED STORAGE TANKS & CONCRETE WALLS	09/06/2012
4	
5	

Job No. 111221-2	FIELD DATE: 12/28/2011
Scale 1"= 50'	P. B.
Section 8	PAGE
Township 30 South	REVISED
Range 24 East	DRAWN DLW
	CHECKED BY

WILSON SURVEYING
SURVEYING & MAPPING
1187 Tahiti Circle Davenport, FL 33897
Telephone (407) 865-7618
e-mail: wilsonfl@aol.com

ALTA/ACSM SURVEY
RAIDER ENVIRONMENTAL

SHEET 1 OF 1 SHEETS

OR COMPLETENESS OF SAID THIRD PARTY INFORMATION. THIS FIRM IS NOT AN EXPERT IN THE INTERPRETATION OF COMPLEX ZONING ORDINANCES. COMPLIANCE IS BEYOND THE SCOPE OF THIS SURVEY. ANY USER OF SAID INFORMATION IS URGED TO CONTACT THE LOCAL AGENCY DIRECTLY.

8. ALL AREAS IN RECIPROCAL EASEMENT AGREEMENTS (REAs) HAVE BEEN DENOTED ON THE SURVEY. THE LIMITS OF ANY OFFSITE APPURTENANT EASEMENTS ARE ALSO SHOWN ON THE SURVEY. THE LIMITS OF AND REAS OF OFFSITE APPURTENANT AND BENEFICIAL EASEMENTS TO THE LAND SUBJECT TO THE SURVEY ARE REPORTED. INCLUDING THE LOCATION OF ALL BUILDINGS, PARKING SPACES, AND OTHER IMPROVEMENTS ON THOSE LANDS.

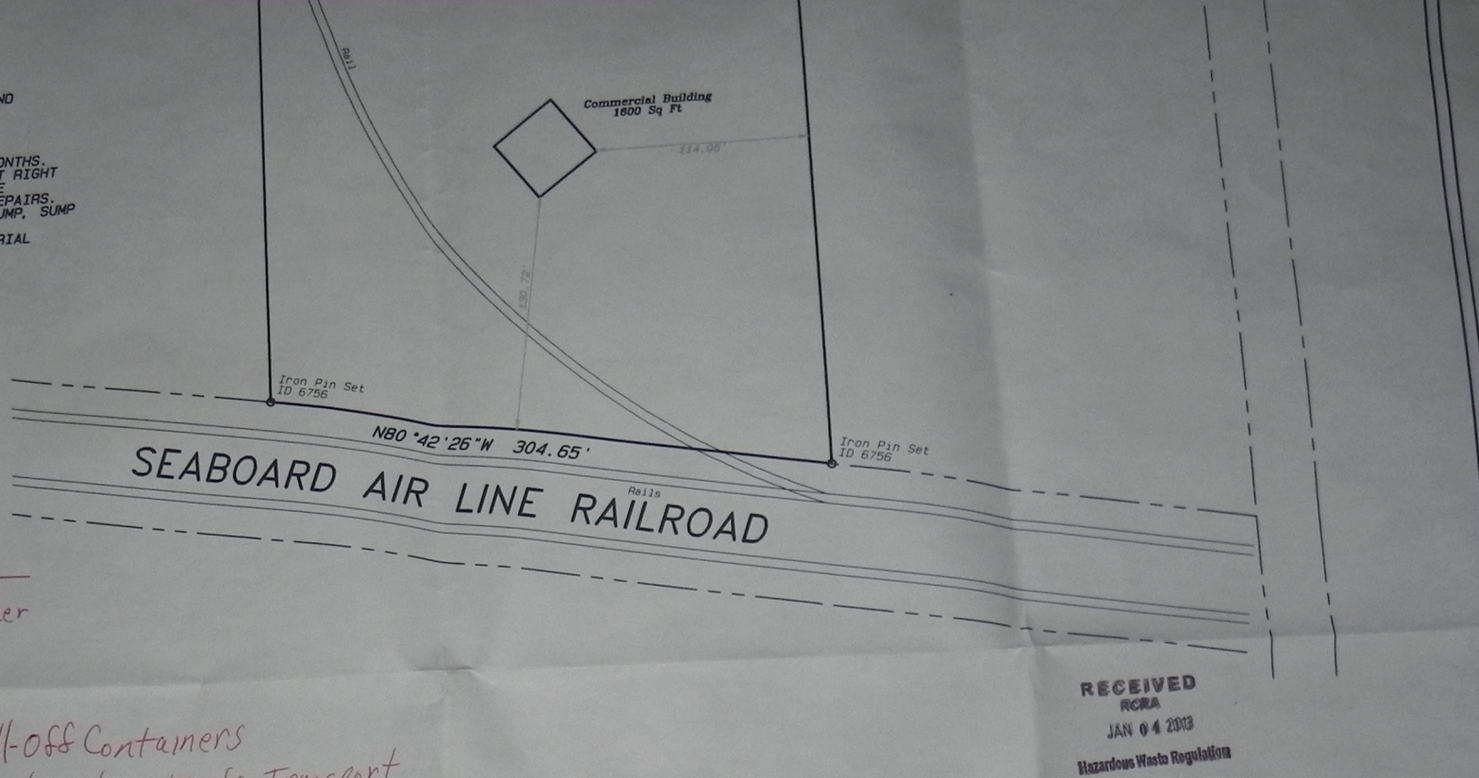
9. THERE IS NO OBSERVABLE EVIDENCE OF EARTH MOVING WORK, BUILDING CONSTRUCTION, OR BUILDING ADDITIONS IN RECENT MONTHS.

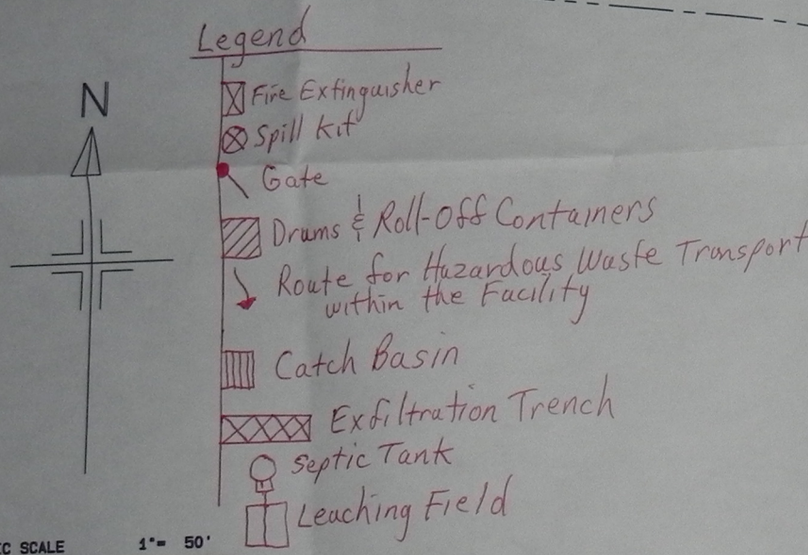
10. THERE IS NO OBSERVABLE EVIDENCE OF CHANGES IN STREET RIGHT OF WAY LINES EITHER COMPLETED OR PROPOSED. NO OBSERVABLE EVIDENCE OF RECENT STREET OR SIDEWALK CONSTRUCTION OR REPAIRS.

11. THERE IS NO OBSERVABLE EVIDENCE OF SITE USED AS A DUMP, SUMP OR LANDFILL.

12. THERE IS NO OBSERVABLE EVIDENCE OF CEMETERIES OR BURIAL GROUNDS ON SITE.

13. THERE ARE NO MARKED (PAINTED) PARKING SPACE





RECEIVED
RCRA
JAN 04 2013
Hazardous Waste Regulation

GRAPHIC SCALE 1"= 50'

0 50 100 150 200

ABBREVIATIONS

NTS	- NOT TO SCALE	FCM	- FOUND CONCRETE MONUMENT	P.B.	- PLAT BOOK		
E.P	- EDGE OF PAVEMENT	SCM	- SET CONCRETE MONUMENT	D.B.	- DEED BOOK		
⊕	- FIRE HYDRANT	F.I.R.C.	- FOUND IRON ROD AND CAP	O.R.	- OFFICIAL RECORDS		
☼	- LIGHT POLE	F.I.R.	- FOUND IRON ROD	BK	- BOOK		
⊙	- POWER POLE	S.I.R.	- SET IRON ROD	PG	- PAGE	LB	- LICENSED BUSINESS
TB	- TELEPHONE BOX	S.I.R.C.	- SET IRON ROD AND CAP	SEC	- SECTION	℄	- CENTERLINE
EB	- ELECTRIC BOX	P.O.C.	- POINT OF COMMENCEMENT	TWP	- TOWNSHIP	EL	- ELEVATION
EM	- ELECTRIC METER	P.O.B.	- POINT OF BEGINNING	RNG	- RANGE	MH	- MANHOLE
	- PALM	P.P.	- FOUND PIPE	COR	- CORNER	CMP	- CORRUGATED METAL PIPE
	- PINE	F.N&D	- FOUND NAIL AND DISK	N	- NORTH	RCP	- REINFORCED CONCRETE PIPE
	- OAK	FND	- FOUND	S	- SOUTH	MES	- MITERED END SECTION
	- MAGNOLIA	(M)	- FIELD MEASUREMENT	E	- EAST	F.F.E.	- FINISHED FLOOR ELEVATION
	- SHRUB	(C)	- CALCULATED MEASUREMENT	W	- WEST	PP	- POWER POLE
	- ANCHOR	(P)	- PLAT MEASUREMENT	R/W	- RIGHT OF WAY	Δ	- DELTA OR CENTRAL ANGLE
MH	- MANHOLE	EL	- ELEVATION	℄	- CENTERLINE	PRM	- PERMANENT REFERENCE MONUMENT
	- GATE VALVE	Δ	- CENTRAL ANGLE, DELTA	R	- RADIUS		

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DANNY L. WILSON STATE OF FLORIDA PSM NO. 6756 DATE

WILSON SURVEYING
SURVEYING & MAPPING
1167 Tahiti Circle Davenport, FL 33897
Telephone (407) 362-7018
e-mail: wilsurv@aol.com

NOT VALID WITHOUT RAISED SEAL

DANNY L. WILSON PSM 6756

ALTA/ACSM SURVEY

RAIDER ENVIRONMENTAL

Job No. 111221-2	FIELD DATE: 12/26/2011	
Scale 1"= 50'	F.B.:	
Section 8	PAGE:	
Township 30 South	REVIEW:	
Range 24 East	DRAWN: DLW	
	CHECKED BY:	

REVISION	
1 ADDED CERTIFICATION	01
2 ADDED CONCRETE PAD (SHADED)	05
3 ADDED STORAGE TANKS & CONCRETE WALLS	06
4	
5	

SHEET 1 OF 1 DRAWING

DESCRIPTION (AS RECORDED IN OR 7610, PG 1208)

BEGIN AT THE NORTHEAST CORNER OF SECTION 8, TOWNSHIP 30 SOUTH, RANGE 24 EAST, AND RUN SOUTH 89°44'53" EAST 79.85 FEET; THENCE SOUTH 0°44'53" WEST 258.00 FEET TO A POINT OF BEGINNING; THENCE SOUTH 0°44'53" EAST 952.33 FEET TO THE RIGHT OF WAY LINE OF SEABOARD AIR LINE RAILROAD; THENCE NORTH 80°42'26" WEST ALONG SAID RIGHT OF WAY LINE 304.65 FEET; THENCE NORTH 0°44'53" WEST 901.73 FEET TO THE SOUTH RIGHT OF WAY LINE OF STATE ROAD NO. 60, KNOWN AND DESCRIBED AS LOTS 4, 5, AND 6 OF RIDGEWOOD ESTATES, LESS RIGHT OF WAY FOR STATE ROAD NO. 60.

DESCRIPTION (ASSURVEYED)

BEGIN AT THE NORTHEAST CORNER OF SECTION 8, TOWNSHIP 30 SOUTH, RANGE 24 EAST, AND RUN SOUTH 0°44'53" EAST 79.85 FEET; THENCE SOUTH 89°44'00" WEST 258.00 FEET TO A POINT OF BEGINNING; THENCE SOUTH 0°44'53" EAST 952.33 FEET TO A POINT ON THE SEABOARD AIR RAILROAD; THENCE NORTH 80°42'26" WEST ALONG SAID RIGHT OF WAY LINE 304.65 FEET; THENCE NORTH 0°44'53" WEST 901.73 FEET TO THE SOUTH RIGHT OF WAY LINE OF STATE ROAD NO. 60; THENCE NORTH 89°44'00" EAST 200.00 FEETTO POINT OF BEGINNING.

SURVEY NOTES:

1. ALL BEARINGS AND STREET RIGHT OF WAYS ARE BASED ON RECORDED DEED.
2. SURVEYOR DID NOT ABSTRACT PROPERTY. SURVEY BASED ON LEGAL DESCRIPTION OBTAINED FROM COUNTY RECORDS
3. NOTHING IN THOIS SURVEY IS INTENDED TO EXPRESS AN OPINION REGARDING OWNERSHIP OR TITLE.
4. THE WORD CERTIFY IS UNDERSTOOD TO BE AN EXPRESSION OF PROFESSIONAL JUDGEMENT BY THE SURVEYOR, WHICH IS BASED ON HIS BEST KNOWLEDGE, INFORMATION AND BELIEF.
5. SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY. USE OF THE CURRENT PARTIES AND THAT NO LICENSE HAS BEEN CREATED, EXPRESS OR IMPLIED. TO COPY THE SURVEY EXCEPT AS NECESSARY IN CONJUNCTION WITH THE ORIGINAL TRANSACTION.
6. THIS SURVEY IS BEING PROVIDED SOLEY FOR THE
7. NO REPRESENTATION IS MADE FOR THE ACCURACY OR COMPLETENESS OF SAID THIRD PARTY INFORMATION. THIS FIRM IS NOT AN EXPERT IN THE INTERPRETATION OF COMPLEX ZONING ORDINANCES; COMPLIANCE IS BEYOND THE SCOPE OF THIS SURVEY. ANY USER OF SAID INFORMATION IS URGED TO CONTACT THE LOCAL AGENCY DIRECTLY.
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INTRODUCTION

Raider Environmental Services is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater and other wastes. At the Mulberry facility, containers of hazardous waste are accumulated for shipment in accordance with the standards specified in 62-730.171, F.A.C. The facility is located at 3555 East State Route 60, Mulberry, Florida. The following Closure Plan has been prepared for Raider Environmental Services pursuant to the permitting requirements set forth in Rule 62-710.800(9)(a), Florida Administrative Code (FAC). A copy of this Closure Plan will also be maintained on file at the Raider Environmental Services facility, in accordance with the record keeping requirements set forth in Rule 62-710.510(4), FAC

PROCESS DESCRIPTION

Raider Environmental Services operates a waste oil collection; transportation, processing and recycling business with serves a variety of automotive commercial and industrial businesses throughout Florida. This document deals with the proposed hazardous waste operations.

Types of Products Collected

Hazardous waste products, as defined in 40 CFR 261 are collected and transported to the Mulberry facility for only consolidation in accordance with the rules applicable to a 10-day hazardous waste transfer facility.

HAZARDOUS WASTE TRANSFER

Process Description

Raider Environmental Services collects containers of hazardous waste, most commonly in 55-gallon drums. While the facility wishes to accept all EPA hazardous waste codes (except those specifically associated with dioxins), the most common waste codes anticipated are Characteristic wastes with codes: D001 (Ignitable), D002 (Corrosive), D007 (Chromium), and D008 (Lead).

Containers are held for periods of time not to exceed 10 calendar days and are shipped to permitted facilities with all proper documentation. Consolidating the waste affords Raider both safety and economic benefits by transporting full trailers (or roll-off containers) instead of smaller loads. Logs showing the arrival and departure dates of the containers are maintained at the facility.

FACILITY CLOSURE PROCEDURES

In the event that the Raider Environmental Services facility is closed, steps will be taken to ensure that: (1) there will be no need for further facility maintenance; (2) hazardous waste constituents will not contaminate surface or groundwater; (3) secondary containment and ancillary equipment including the storage area for drums will be emptied, cleaned and decontaminated, and all materials removed and managed.

The above requirements will be met by closing the hazardous waste storage area and assessing the site. These activities will include:

1. Notification of Polk County and FDEP at least 30 days prior to closure of the hazardous waste storage area.

2. Shipment of all containers of hazardous waste to permitted facilities.

3. Pressure wash rinsing of all containment areas and the storage area.

4. A representative sample of the rinse water will be sampled and analyzed for hazardous constituents based on the material that was managed in the hazardous waste storage area. Raider will prepare a proper demonstration that the constituents analyzed for include all those included in 40 CFR 264 Appendix IX that were transferred through the facility. The rinse water will be managed in accordance with all applicable regulations.

5. In the event there is evidence of spillage or contamination outside the containment area, representative soil samples in the suspected area will be taken. In addition, groundwater contamination assessment and possibly remedial activities will be conducted in accordance with Rule 62-780, FAC.

A closure certification report will be submitted to certify closure was completed in accordance with the closure plan. Soil sample locations will be identified and FDEP approval for the sampling locations will be obtained prior to implementing the sampling plan. All liquid and soil samples will be analyzed for the same constituents as those managed at the 10-day hazardous waste transfer facility.