

Thursby, Kim

From: John Jones [johnmjonespe@sbcglobal.net]
Sent: Friday, February 22, 2013 1:54 PM
To: Epost HWRS
Subject: Re: Raider Environmental Services - Mulberry (FLR000176271) Permit Application Request for Additional Information

I have received the document.

From: Epost HWRS <EpostHWRS@dep.state.fl.us>
To: "steve@raiderenvironmental.com" <steve@raiderenvironmental.com>
Cc: "Bahr, Tim" <Tim.Bahr@dep.state.fl.us>; "Goddard, Charles" <Charles.Goddard@dep.state.fl.us>; "johnmjonespe@sbcglobal.net" <johnmjonespe@sbcglobal.net>; "Knauss, Elizabeth" <Elizabeth.Knauss@dep.state.fl.us>; "Miller, Randy J." <Randy.J.Miller@dep.state.fl.us>; "Bejnar, Tor" <Tor.Bejnar@dep.state.fl.us>; "Kothur, Bheem" <Bheem.Kothur@dep.state.fl.us>; "Tripp, Anthony" <Anthony.Tripp@dep.state.fl.us>
Sent: Fri, February 22, 2013 11:41:14 AM
Subject: Raider Environmental Services - Mulberry (FLR000176271) Permit Application Request for Additional Information

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

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



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
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TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

February 22, 2013

SENT VIA E-MAIL

steve@raiderenvironmental.com

Mr. Steve Obst, President
Raider Environmental Services, Inc.
3555 E SR 60
Mulberry, Florida 33860

RE: Raider Environmental Services, Inc.-Mulberry Facility
EPA I.D. No. FLR 000 176 271
Permit Number: 0316140-HO-001
New Used Oil Processing Facility Permit Application
Request for Additional Information

Dear Mr. Obst:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated January 18, 2013 and received on January 18, 2013 to operate a Used Oil Processing Facility in Mulberry, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

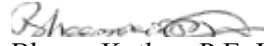
The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit one hard copy and one electronic copy response to the Tallahassee Solid and Hazardous Waste Regulation Section, and one hard copy to the Southwest District Office. If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Mr. Steve Obst, President
February 22, 2013
Page Two

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: Bheem.kothur@dep.state.fl.us

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc:

Elizabeth Knauss, FDEP/Southwest District, elizabeth.knauss@dep.state.fl.us
John Jones, johnmjonespe@sbcglobal.net
Randy Miller, DEP/Tallahassee, randy.j.miller@dep.state.fl.us
Tor Bejnar, FDEP/Tallahassee, tor.bejnar@dep.state.fl.us

ENCLOSURE

Raider Environmental Services, Inc. Facility
Used Oil Processing Facility I.D.: FLR 000 176 271
Operating Permit No.: 0316140-HO-001
First Request for Additional Information
February 22, 2013

SPECIFIC COMMENTS: Application Form for a Used Oil Processing Facility Permit

1. Florida DEP Application, Form # 62-710.901(6), A.1. General Information, Page 8: Facility permit is not issued. Please delete the permit expires date of "June 30".
2. Florida DEP Application, Form # 62-710.901(6), B.1- Site Information, Page 9: The facility latitude and longitude should identify with degrees symbols and directions ("N" and "W" respectively). Please review and update the entry as appropriate.
3. Florida DEP Application, Form # 62-710-901(6), B.2 – Site Information, Page 9; Attachment 6, Section 1- Introduction, First Sentence: Please verify the facility size (area in acres) and be consistent whether the area is 6.99 or 6.39 acres?. Please review and revise as appropriate.
4. Attachment 1, Used Oil Treatment Processing Description, The Last Sentence: The used oil is tested per Raider's permit requirements and sold to customers. Please clarify which lab is performing the analysis and whether that lab is a NELAC certified laboratory.
5. Attachment 6, Preparedness and Prevention Contingency Plan with Included Spill Prevention Control & Countermeasures Plan (SPCC), Page ii: Professional Engineer Certification is not completed. Please sign and seal as appropriate and resubmit this page.
6. Attachment 6, Preparedness and Prevention Contingency Plan with Included Prevention Control & Countermeasures Plan (SPCC), Section 1- Introduction, Fourth Paragraph, Page 1: Primary Emergency Coordinator of the facility and the Backup Emergency Coordinator of the facility is listed as Steve Obst and Kevin McIntyre (not Tony Machade), respectively. The primary and backup emergency coordinators must reside somewhere near the facility. Steve Obst does not live near this facility and therefore, cannot serve as an emergency coordinator. Please revise your list of emergency coordinators appropriately. In addition to their phone numbers you also need to provide their addresses.
7. Attachment 6, Appendix J- Oil/Water Separators, Page 48: Facility has described about the oil water separator. Please review these activities and revise the figures as appropriate.

8. Attachment 6, Section 4- Secondary Containment Area, Page 8; Attachment 7, Unit Management Plan: Please provide the secondary containment calculations for the storage tank area. The containment has sufficient capacity greater than 110% of the volume of the largest tank. These calculations need to be certified by a professional engineer registered in the state of Florida.
9. Attachment 8, Closure Plan, Facility closure Procedures, Page 3: The reference of above ground tank Rule should be "Rule 62-762", F.A.C. not "Rule 62-761", F.A.C. Please review and revise as appropriate and throughout the document. Also provide the closure schedule.
10. Attachment 8, Closure Plan, Closure Cost Estimate, Page 4, Used Oil Processing Facility Closure Cost Estimate Form: The facility has a total of six (6) tanks with a total capacity of 126,500 gallons of used oil to dispose when the facility closes. For the closure cost estimate it is assumed that all used oil related tanks are full and require disposal by a third part. Therefore, it appears that the submitted closure cost estimates with an amount of \$19,800.00 is insufficient to close the facility by a third party. The revised closure cost estimate could be as high as \$50,000-\$60,000 with the similar in storage capacities and number of tanks according to our e-mail to you dated February 04, 2013. The permit application cannot be considered complete until financial assurance has been established for an approved closure cost estimate. Please review and revise the estimate as appropriate.

GENERAL COMMENTS:

1. The Facility needs to submit a revised site map in an electronic format (pdf preferred) so that this map can be inserted into the permit.
2. The Facility needs to submit a used oil tank table including type of tank (vertical, horizontal), tank size (diameter), contents, tank installed date, in an electronic format (pdf preferred) so that this can be inserted into the permit.
3. The facility Form 8700-12FL-Florida Notification of Regulated Waste Activity, C. Used Oil Activities: This form indicates that the facility is also a Used Oil Filter Transfer Facility. Please indicate on a site map where these activities take place.
4. Any oily wastes or sludge generated at the facility that cannot be managed for energy recovery, a hazardous waste determination will be conducted and the materials will be managed in accordance with 40 CFR Part 279.10 (c) and (e).
5. Facility Diagram: Facility diagram is not readable. Please provide a bigger Facility diagram (24"x36") including the Emergency Evacuation Routes, Tank Sizes, Tank Capacities, Tank Piping, Eye Wash Locations, etc. This diagram should also show the location of emergency equipment.

6. Attachment 6, Facility Figure 1 and 2, Pages 4 and 9 Respectively: The Figures are not readable. Please review and provide with better figures.
7. Attachments 1, 2, 4, 5, 7, and 9: Please paginate all these attachments as appropriate.
8. Tank Installation: Facility installed used oil tanks in the year 2012. Therefore, facility must submit as-built drawings and the drawings need to be certified by a professional engineer registered in the State of Florida.
9. Solid Waste Permit Application: According to your e-mail dated January 29, 2013, indicates that the facility does want to store solid waste at the Mulberry facility. If this is the case you must submit the solid waste permit application DEP Form 62-701.900(4), F.A.C., with a permit fee of \$2,000.00. Please address and identify non-hazardous and solid waste activities conducted at the site and address the quantities of solid waste stored on site at any given time per day and per month. Please disregard this comment if you decide not to apply for this type of permit.