

## **SOLID WASTE CLOSURE PLAN INTRODUCTION**

Raider Environmental Services is a company engaged in the collection, transport, storage and processing of used oil, oily wastewater, and solid wastes. At the Opa Locka facility, containers of solid waste are accumulated for shipment or consolidated per the Operating Plan. The facility is located at 4103 NW 132<sup>nd</sup> Street, Opa Locka, Florida 33054. The following Closure Plan has been prepared for Raider Environmental Services pursuant to the requirements set forth in Rule 62-701.710(6), Florida Administrative Code (FAC). A copy of this Closure Plan will also be maintained on file at the Raider Environmental Services facility.

## **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 solid waste operations.

## **SOLID WASTE OPERATIONS**

Solid waste may be received at the facility in either drums or roll-off containers. The waste is unloaded at the solid waste storage area as shown in the site diagram. Secondary containment is provided by asphalt curbs inside the storage building.

Typically, the solid wastes are generated by either remediation activities, site investigations, or industrial processes. Raider requires the generator to perform waste characterization or utilize process knowledge to demonstrate that the waste is not hazardous, as defined in Florida Administrative Code 62-730. The wastes may also be oily wastes associated with used oil activities.

The quantities of waste received daily will vary between zero (0) and thirty (30) tons. Since the processes generating the waste are episodic, it is impractical to calculate daily averages.

Raider may either ship the wastes directly to a permitted disposal or recycling facility, or perform one or more of the following operations prior to disposal:

1. Consolidation: In the case where waste is received in 55-gallon drums, Raider may choose to combine the contents of the drums into a roll-off container. Drums will be opened only while the transfer is taking place. Empty drums will be cleaned and managed as empty containers.
2. Solidification: If the solid waste contains liquids or is a sludge that would not pass the Paint Filter test, solidification agents (absorbents, cement, sawdust, clay,

etc.) may be mixed with the waste. Mixing will be accomplished in the roll-off container using a backhoe or other similar equipment. The additives will be blended at a rate that minimizes dust generation. All workers will wear the appropriate Personal Protective Equipment, including respiratory protection.

### **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 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 Dade County and FDEP at least 30 days prior to closure of the solid waste storage area.
2. Shipment of all containers of solid 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 solid waste storage area. 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 in the solid waste area.

## **Process Description for Solid Waste Management**

Raider Environmental Services

Opa Locka, Florida

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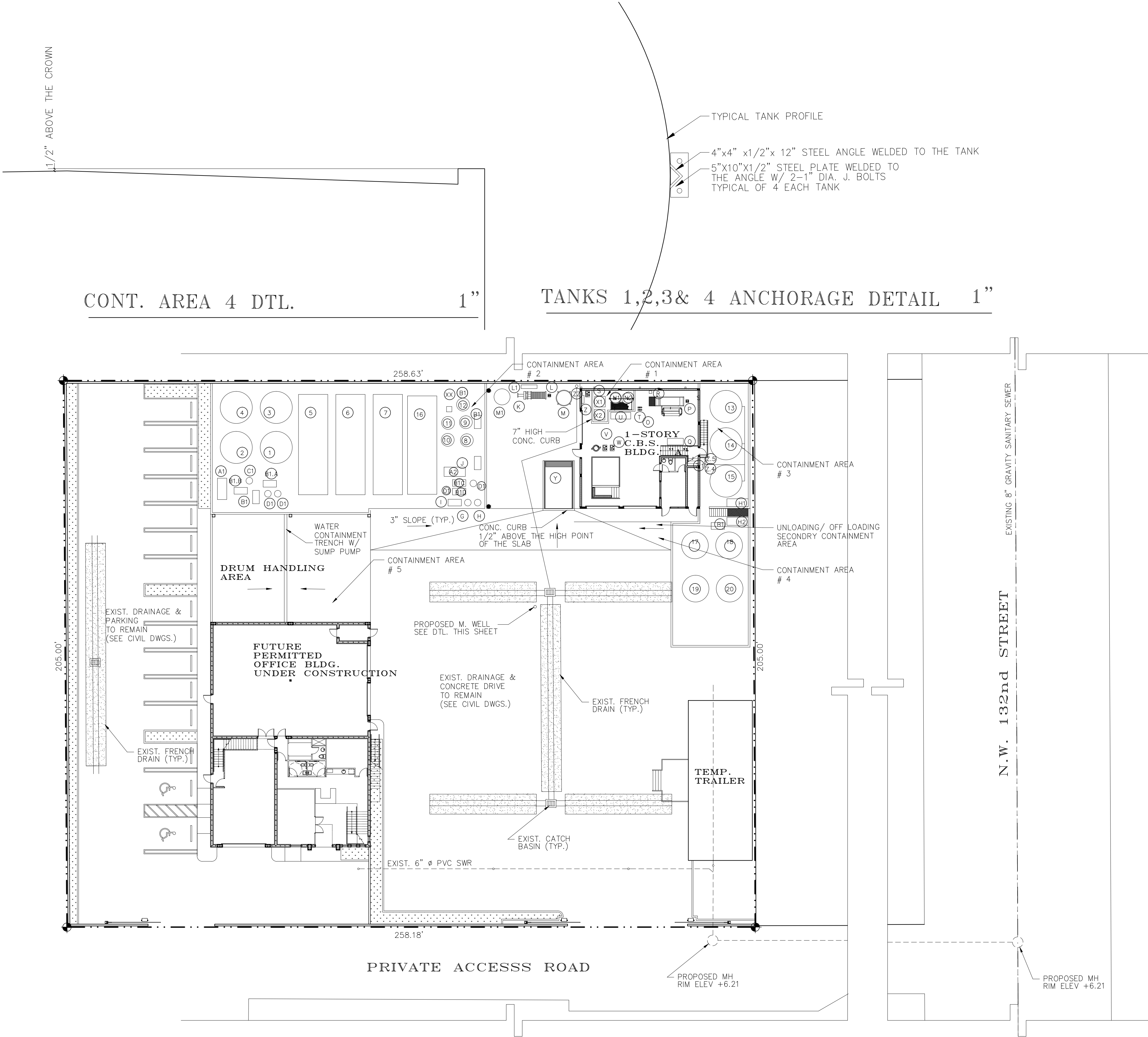
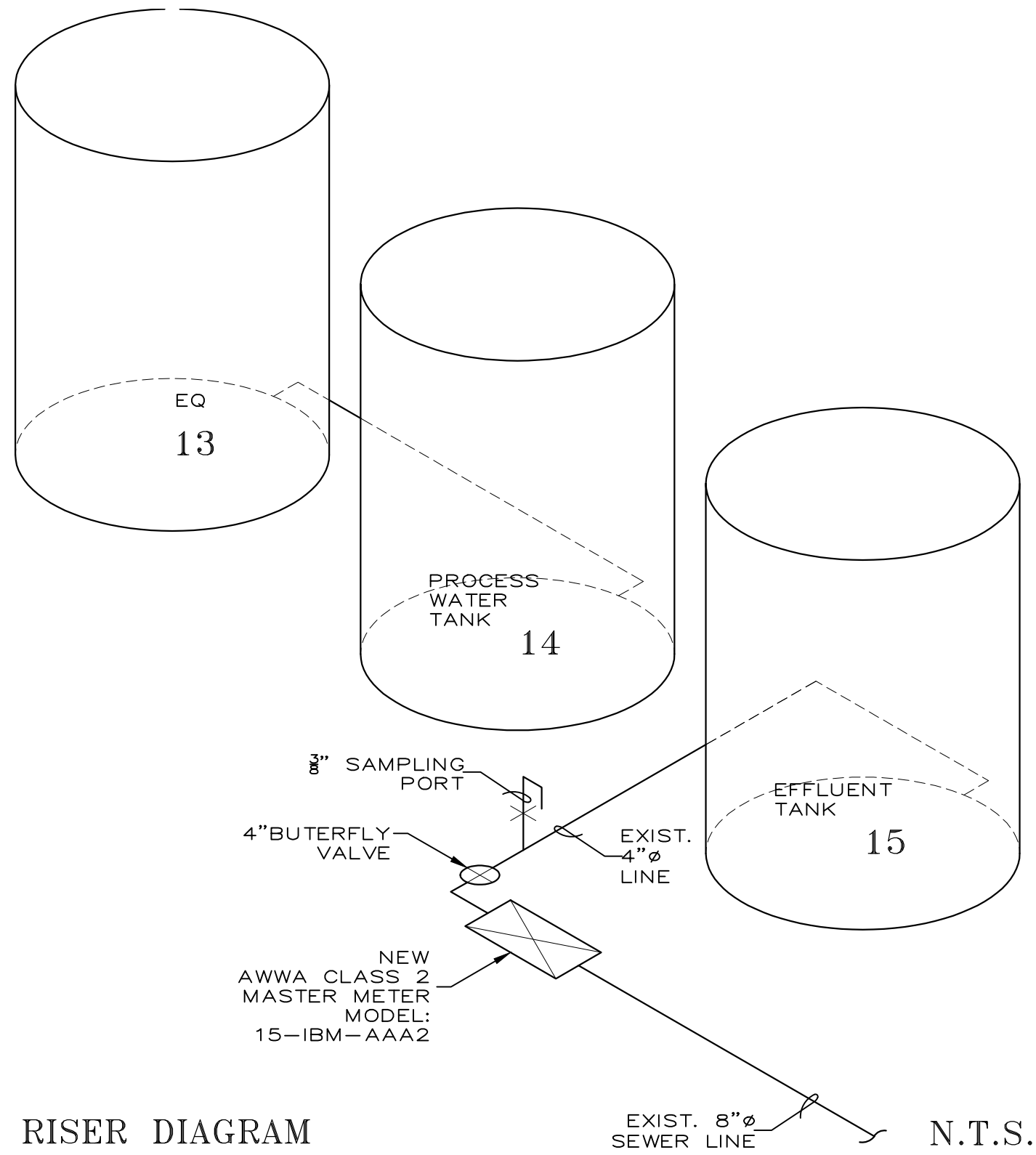
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The maximum time that materials will be stored is 30 days.

The maximum amount of solid waste stored at the facility, including treated material, will be 40 tons.

Wastes leaving the facility will either be recycled for energy recovery or disposed of in a landfill. All shipments will be sent to facilities fully permitted to accept the types of wastes shipped.

EXISTING EQUIPMENT LEGEND	
1	35,000 GAL. CARBON STEEL TANK (USED OIL)
2	35,000 GAL. CARBON STEEL TANK (USED OIL)
3	35,000 GAL. CARBON STEEL TANK (USED OIL)
4	35,000 GAL. CARBON STEEL TANK (USED OIL)
5	25,000 GAL. CARBON STEEL TANK (USED OIL)
6	25,000 GAL. CARBON STEEL TANK (PETROLEUM CONTACT WATER)
7	25,000 GAL. CARBON STEEL TANK (USED OIL PROCESS TANK)
8	3,000 GAL. CARBON STEEL TANK (HEATER FUEL/ OIL TANK)
9	3,000 GAL. CARBON STEEL TANK (USED OIL PROCESS TANK)
10	6,000 GAL. CARBON STEEL TANK (USED OIL PROCESS TANK)
11	6,000 GAL. CARBON STEEL TANK (USED OIL PROCESS TANK)
12	3,000 GAL. CARBON STEEL TANK (CARBON POLISH TANK)
13	20,000 GAL. FIBERGLASS TANK (EQUALIZATION TANK)
14	20,000 GAL. FIBERGLASS TANK (PROCESSED WATER TANK)
15	20,000 GAL. FIBERGLASS TANK (EFFLUENT WATER TANK)
G	20" Ø BASKET STRAINER #1
H	20" Ø BASKET STRAINER #2
I	4" Ø RECEIVING TRANSFER PUMP #1
J	4" Ø RECEIVING TRANSFER PUMP #2
K	15 C.FEET FILTER PRESS
L	2" Ø DIAPHRAGM SLUDGE TRANSFER PUMP #1
M	2,850 GAL. CONE BOTT. SLUDGE TANK
N1	1,000 GAL. (POLY) CLAY MIXING TANK
N2	1,000 GAL. (POLY) POLYMER MIXING TANK
O	DIFFUSED AIR FLOATATION UNIT
P	2" Ø DIAPHRAGM SLUDGE TRANSFER PUMP #2
Q	30 H.P. SCREW TYPE COMPRESSOR
R	ELECTRONIC FLOW METER
S	3" Ø TRANSFER PUMP #1
T	POLYMER TRANSFER PUMPS
U	DRUM CONTAINMENT
V	3" Ø TRANSFER PUMP #2
W	3" Ø TRANSFER PUMP #3
Y	TRUCK WASH OUT AREA
Z	CONTROL PANEL
Z.1	SAMPLING POINT
Z.4	AFFLUENT METER
Z.5	POINT OF DISCHARGE
A1	HEATER
A2	HEATER
B1	PUMP
B1.A	PUMP INBOUND
B1.B	PUMP OUTBOUND
B1.C	PUMP INBOUND
B1.D	PUMP OUTBOUND
C1	SHAKER
D1	FILTER
H1	STRIPPER
H2	STRIPPER
M1	CONDENSER (3,000 GAL. CARBON STEEL TANK)
X1	CHEMICAL TOTE 250-350 GAL. (COAGULANT)
X2	CHEMICAL TOTE 250-350 GAL. (COUSTIC)
XX	2" SUBMERSIBLE PUMP FOR CONTAINMENT WATER
ZZ	DOWNSPOUT
NEW EQUIPMENT LEGEND	
L1	OIL WATER SEPERATOR
16	27,000 GAL. USED OIL PROCESS TANK
17	15,000 GAL. CARBON STEEL TANK (AIR STRIPPER EFFLUENT)
18	15,000 GAL. CARBON STEEL TANK (AIR STRIPPER EFFLUENT)
19	15,000 GAL. CARBON STEEL TANK (TREATED EFFLUENT FOR TESTING)
20	15,000 GAL. CARBON STEEL TANK (TREATED EFFLUENT FOR TESTING)
A2	HEATER
SP1	SAMPLING POINT 1
SP2	SAMPLING POINT 2
SP3	SAMPLING POINT 3
SP4	SAMPLING POINT 4



### SITE PLAN

#### NOTE:

1. REFER TO SITE DEVELOPMENT PLAN BY ALBERTO A. DOMINGUEZ FOR SET BACKS, STORM WATER MANAGEMENT, SITE DETAILS, PARKING REQUIREMENTS AND ALL OTHER CONSTRUCTION OUTSIDE THE BUILDING.
2. PROPERTY WALLS AND FENCE UNDER A SEPERATE PERMIT, AND THEY ARE NOT PART OF THIS DOCUMENTS.
3. THIS IS ONLY AN EQUIPMENT LAYOUT, FATHI ARCHITECTS, INC. TAKES NO RESPONSIBILITY FOR THE INSTALLATIONS AND/OR INSPECTION OF THE EQUIPMENTS, OWNER TAKES FULL RESPONSIBILITY FOR THE SAME.
3. ALL TANK'S VENTS ARE OVER 12'-0" HEIGHTS.



SEAL  
ASGHAR J. FATHI, R.A.  
AR0016049

CONSULTANT:

PROJECT:  
**PROPOSED WAREHOUSE FOR:**  
**RAIDER ENVIROMENTAL SERVICES, INC.**  
**4103 N.W. 132<sup>nd</sup> ST.**  
**OPA-LOCKA, FLORIDA**

OWNER:  
Mr. STEVE OBST

ADDRESS:  
4401 PETERS ROAD  
PLANTATION, FLORIDA 33317

PHONE:  
305 994 9949

REVISIONS	DATE	BY
△ BUILDING DEPARTMENT	12/11/07	A.R.O.
△ CLIENT	10/07/09	R.R.

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DATE:	12/02/05
SCALE:	AS SHOWN
DRAWN:	R.R.
CHECKED:	A.F.
COMMISSION NO.:	25005
SHEET	
A — O	
SHEET NO.	OF





# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

DEP Form #: 62-701.900(4), F.A.C.

Form Title: Application to Construct, Operate, or  
Modify a Waste Processing Facility

Effective Date: August 12, 2012

Incorporated in Rule: 62-701.710(2), F.A.C.

## APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

**GENERAL REQUIREMENT:** Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with subsection 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

Please Type or Print in Ink

### A. GENERAL INFORMATION

1. Type of facility (check all that apply):

☐ Transfer Station:

☐ C&D

☐ Class III

☐ Class I

☐ Other Describe: \_\_\_\_\_

☐ Materials Recovery Facility:

☐ C&D Recycling

☐ Class III MRF

☐ Class I MRF

☐ Other Describe: \_\_\_\_\_

☒ Other Facility That Processes But Does Not Dispose Of Solid Waste On-Site:

☐ Storage, Processing or Disposal for Combustion Facilities (not addressed in another permit)

☒ Other Describe: Solid waste management at Used Oil Processor

NOTE: C&D Disposal facilities that also recycle C&D shall apply on DEP Form 62-701.900(6), F.A.C.

2. Type of application:

☒ Construction/Operation

☐ Operation without Additional Construction

3. Classification of application:

☒ New

☐ Substantial Modification

☐ Renewal

☐ Intermediate Modification

☐ Minor Modification

4. Facility name: Raider Environmental Service, Inc.

5. DEP ID number: \_\_\_\_\_ County: Miami-Dade

6. Facility location (main entrance): 4103 NW 132nd Street, Opa Locka, Florida 33054

Northwest District  
160 Government Center  
Pensacola, FL 32501-5794  
850-595-8300

Northeast District  
7777 Baymeadows Way W, Ste 100  
Jacksonville, FL 32256-7590  
904-256-1700

Central District  
3319 Maguire Blvd, Ste 232  
Orlando, FL 32803-3767  
407-897-4100

Southwest District  
13051 N Telecom Pkwy  
Temple Terrace, FL 33637  
813-632-7600

South District  
2295 Victoria Ave, Ste 364  
Fort Myers, FL 33901-3881  
239-344-5600

Southeast District  
400 North Congress Ave  
West Palm Beach, FL 33401  
561-681-6600

7. Location coordinates:

Section: 29 Township: 52 S Range: 41E  
Latitude: 25 ° 53 ' 38 " Longitude: 80 ° 15 ' 59 "  
Datum: \_\_\_\_\_ Coordinate Method: \_\_\_\_\_

Collected by: \_\_\_\_\_ Company/Affiliation: \_\_\_\_\_

8. Applicant name (operating authority): Raider Environmental Services, Inc.

Mailing address: 4103 NW 132nd Street Opa Locka FL 33054

Street or P.O. Box City State Zip

Contact person: Steve Obst Telephone: (305) 994-9949

Title: President steve@raiderenvironmental.com

E-Mail address (if available)

9. Authorized agent/Consultant: Jones Ecosystem Management

Mailing address: 4103 NW 132nd Street Opa Locka FL 33054

Street or P.O. Box City State Zip

Contact person: John M. Jones Telephone: (479) 353-1368

Title: Professional Engineer johnmjonespe@sbcglobal.net

E-Mail address (if available)

10. Landowner (if different than applicant): \_\_\_\_\_

Mailing address: \_\_\_\_\_  
Street or P.O. Box City State Zip

Contact person: \_\_\_\_\_ Telephone: (\_\_\_\_) \_\_\_\_\_

\_\_\_\_\_  
E-Mail address (if available)

11. Cities, towns and areas to be served: Southeast Florida

12. Date site will be ready to be inspected for completion: August 1, 2013

13. Estimated costs:  
Total Construction: \$ 15,000.00 (Solid Waste) Closing Costs: \$ 53,000 (Total facility)

14. Anticipated construction starting and completion dates:  
From: August 1, 2012 To: August 15, 2012

15. Expected volume of waste to be received: Variable yds<sup>3</sup>/day \_\_\_\_\_ tons/day \_\_\_\_\_



16. Provide a brief description of the operations planned for this facility: Solid wastes will be accepted in either 55-gallon drums or roll-off containers. Wastes may be consolidated for shipment.  
Solidification to allow placement in landfills may be performed. All wastes will be shipped to permitted facilities for disposal.

**B. ADDITIONAL INFORMATION**

Please attach the following reports or documentation as required.

1. Provide a description of the operation of the facility that shall include (62-701.710(2)(a), F.A.C.):
  - a. The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed;
  - b. The expected daily average and maximum weights or volumes of materials to be managed or processed;
  - c. How the materials will be managed or processed;
  - d. How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas;
  - e. The types of equipment that will be used;
  - f. The maximum time materials will be stored at the facility;
  - g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and
  - h. The expected disposition of materials after leaving the facility.
2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (62-701.710(2)(b), F.A.C.).
3. Provide a boundary survey and legal description of the property (62-701.710(2)(c), F.A.C.).
4. Provide a construction plan, including engineering calculations, that describes how the applicant will comply with the design requirements of subsection 62-701.710(3), F.A.C. (62-701.710(2)(d), F.A.C.).
5. Provide an operation plan that describes how the applicant will comply with subsection 62-701.710(4), F.A.C. and the recordkeeping requirements of subsection 62-701.710(8), F.A.C. (62-701.710(2)(e), F.A.C.).
6. Provide a closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C. (62-701.710(2)(f), F.A.C.).
7. Provide a contingency plan that describes how the applicant will comply with subsection 62-701.320(16), F.A.C. (62-701.710(2)(g), F.A.C.).
8. Unless exempted by subparagraph 62-701.710(1)(d)1., F.A.C., provide the financial assurance documentation required by subsection 62-701.710(7), F.A.C. (62-701.710(2)(h), F.A.C.).
9. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)
10. Provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a waste processing facility (62-701.710(2), F.A.C. and 62-701.320(7)(g), F.A.C.)



C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of Raider Environmental Services, Inc.

is aware that statements made in this form and attached information are an application for a Solid Waste

                                 Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.

  
Signature of Applicant or Agent  
Steve Obst, owner  
Name and Title (please type)  
steve@raiderenvironmental.com  
E-Mail address (if available)

4103 NW 132nd Street  
Mailing Address  
Opa Locka, FL 33054  
City, State, Zip Code  
(305) 994-9949  
Telephone Number  
4/25/2013  
Date

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this waste processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.

  
Signature  
John M. Jones  
Name and Title (please type)  
50227  
Florida Registration Number  
(please affix seal)

4103 NW 132nd Street  
Mailing Address  
Opa Locka, FL 33054  
City, State, Zip Code  
johnmjonespe@sbcglobal.net  
E-Mail address (if available)  
(479) 353-1368  
Telephone Number  
8/19/2013  
Date

**Raider Used Oil Tank Summary**  
**Opa Locka Florida Facility**  
 FLR 000143891

<b>Tank Number</b>	<b>Capacity (gallons)</b>	<b>Construction</b>	<b>Installed Date</b>	<b>Contents</b>
1	35,000	Carbon Steel	June, 2007	Used Oil
2	35,000	Carbon Steel	June, 2007	Used Oil
3	35,000	Carbon Steel	June, 2007	Used Oil
4	35,000	Carbon Steel	June, 2007	Used Oil
5	25,000	Carbon Steel	June, 2007	Used Oil
6	25,000	Carbon Steel	June, 2007	Used Oil
7	25,000	Carbon Steel	June, 2007	Used Oil Process Tank
9	3,000	Carbon Steel	June, 2007	Used Oil Process Tank
10	6,000	Carbon Steel	June, 2007	Used Oil Process Tank
11	6,000	Carbon Steel	June, 2007	Used Oil Process Tank
16	27,000	Carbon Steel	August, 2011	Used Oil Process Tank
<b>Total Capacity</b>	<b>257,000</b>			

**Notes:**

1. Storage Tank Contents vary based upon market.



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

**RAIDER ENVIRONMENTAL, INC. FACILITY (FLR 000 143 891)**

4103 NORTHWEST 132<sup>ND</sup> 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 132<sup>ND</sup> STREET  
OPA LOCKA, FL 33054

**Revised: October 2012**

## 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 32<sup>nd</sup> 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

*John M. Jones*  
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 132<sup>nd</sup> 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.

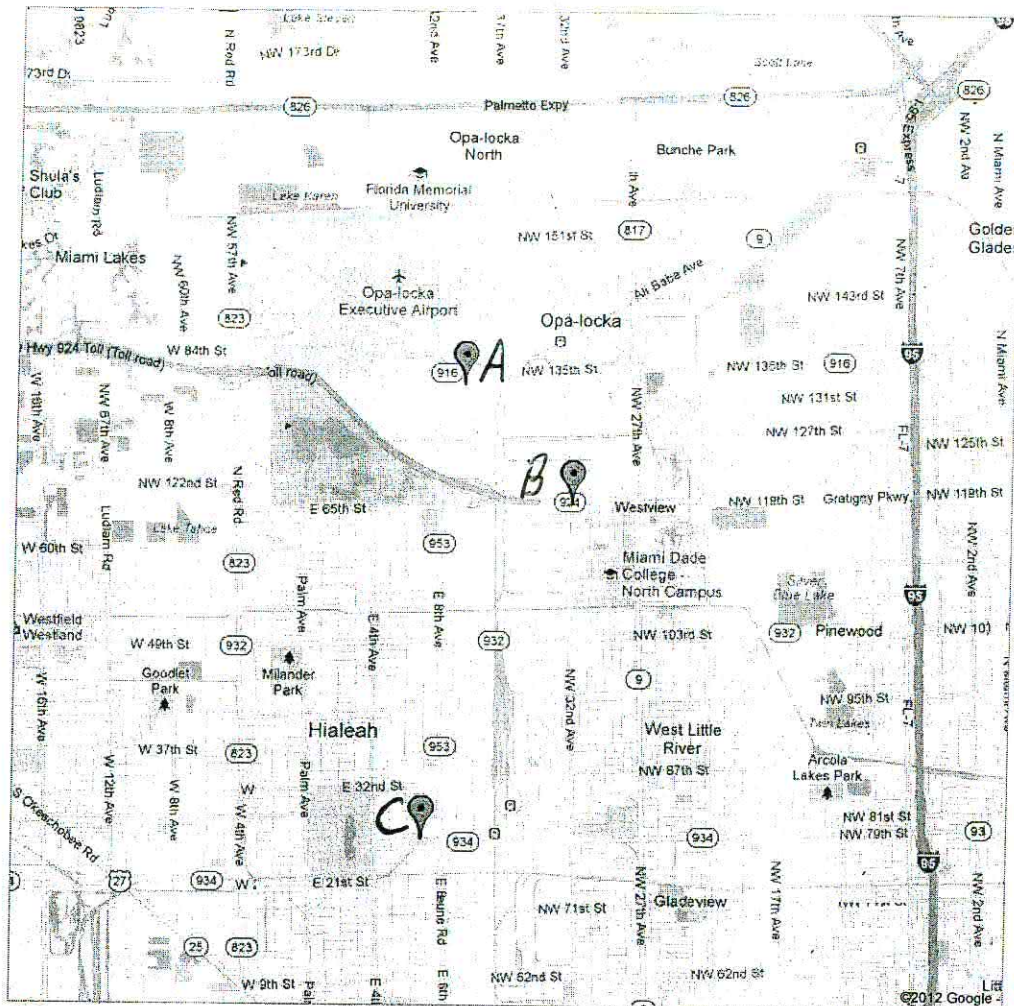
- Petroleum contact water (PCW), oily water and industrial wastewater;
- Used oil filters, and;
- Solid waste.

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](http://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)

<b>Document Recipients</b>	<b>Contact</b>	<b>Phone Number</b>	<b>Email Address</b>
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) <sup>1</sup>	(305) 994-9949	steve@raiderenvironmental.com
Raider Environmental Services	Mr. Bobby LeClaire (Field Operations Manager) <sup>1</sup>	(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**

<b>Tank #</b>	<b>Date Installed</b>	<b>Size (Gallons)</b>	<b>Construction Material</b>	<b>Contents</b>
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 <sub>2</sub> /CO <sub>2</sub> /CH <sub>4</sub> /Sulfide Concentrations for Confined Space Entries	Main Office

**Notes:**

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



## PERMEABLE SURFACES NOT COVERED WITH ASPHALT OR CONCRETE

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

## 5.2 SECURITY AT SPILLS

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

## 5.3 EMERGENCY COORIDINATOR RESPONSIBILITIES

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



- b. Call 911 to notify the Fire Department.
3. **Identify** the character, exact-source, amount and extent of any released material. This may be done by observation, review of Facility records and/or chemical analysis.
4. **Access** possible hazards to human health or the environment that may result from the release, fire or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion. If assessment indicates that evacuation of local areas may be advisable, immediately notify appropriate authorities. Be available to help local authorities decide whether local areas should be evacuated.
5. **Notify** immediately the government official designated as the On-Scene Commander of the National Response Center using their twenty-four (24) hour toll free number (800) 424-8802. The report must include:
  - a. Name and telephone number of person reporting;
  - b. Name and address of the Facility
  - c. Time and type of incident (release, fire, etc.)
  - d. Name and quantity of material(s) involved;
  - e. The extent of injuries, if any; and
  - f. The possible hazards to human health, the environment or outside the Facility.
  - g. Wait for the other party to hang up, **do not hang up first**.
6. **Take** all responsible actions necessary to ensure that releases, fires and explosions do not occur, recur or spread to other oil or waste at the Facility.
7. **After** the emergency is over, provide for the recycling, storing or disposal facility of the recovered materials or materials that result from the release, fire or explosion. In affected area(s) of the Facility make sure that no waste or used oil that may be incompatible with the released material is recycled, treated, stored or disposed of until the clean-up procedures are completed. All emergency equipment listed in this contingency plan need to be cleaned and fit for its intended use before operations are resumed.

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

## **6. EMERGENCY RESPONSE CONTACTS AND ARRANGEMENTS**

Fire Department: Miami-Dade Fire Department (911, (786) 331-4252)

*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**

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

**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
Leclair, 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**

<b>NAME</b>	<b>TITLE</b>	<b>HOME</b>	<b>CELL</b>
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.



## **APPENDIX A – COPIES OF ENCLOSURE LETTERS**



# ENVIRONMENTAL SERVICES

October 29, 2012

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

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

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Restricted Delivery Fee (Endorsement Required)	
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Sent To: Commander Garry F. Jeanniton (AP/Alce) Street, Apt. No., or PO Box No. 2950 N.W. 83 <sup>rd</sup> Street City, State, ZIP+4 Miami, Florida 33147	
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 Commander Jeanniton:

An updated version of our Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132<sup>nd</sup> 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](mailto:dan@raiderenvironmental.com); cell: 305 528-0959) or me ([steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com); cell: 954 605-6853).

Sincerely,  
Raider Environmental Services, Inc.

Steve Obst  
President

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Commander Garry F. Jeanniton Miami-Dade Cty Police Dept 2950 Northwest 83<sup>rd</sup> St. Miami, Florida 33147</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label) 7012 1010 0000 5504 3418</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540	

### Raider Environmental Services

4103 Northwest 132<sup>nd</sup> Street, Opa Locka, FL 33054

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



**ENVIRONMENTAL SERVICES**

October 29, 2012

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

Via Certified Mail: 7012 1010 0000 5504 3395  
 RETURN RECEIPT REQUESTED

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Total Postage & Fees	\$ 6.20
Sent To: Ms. Janice Ryan, Hialeah Hospital	
Street, Apt. No., or PO Box No.: 651 East 25 <sup>th</sup> Street	
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. 132<sup>nd</sup> 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](mailto:dan@raiderenvironmental.com); cell: 305 528-0959) or me ([steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com); cell: 954 605-6853).

Sincerely,  
 Raider Environmental Services, Inc.

Steve Obst  
 President

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>May</i></p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p> <p><i>May</i></p>
<p>1. Article Addressed to:</p> <p>Ms. Janice Ryan          Admin Assistant to CFO +          COO          Hialeah Hospital          651 East 25<sup>th</sup> Street          Hialeah, FL 33013</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number          (Transfer from service label)</p> <p>7012 1010 0000 5504 3395</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

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**Raider Environmental Services**4103 Northwest 132<sup>nd</sup> Street, Opa Locka, FL 33054

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





**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. 132<sup>nd</sup> 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](mailto:dan@raiderenvironmental.com); cell: 305 528-0959) or me ([steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com); cell: 954 605-6853).

Sincerely,  
Raider Environmental Services, Inc.

Steve Obst  
President

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>		<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <b>J. ORTIZ</b> C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>	
1. Article Addressed to: <b>Captain Antonio Sanchez Opa-Locka Police Dept. 2495 Ali Baba Ave. Opa-Locka, FL 33054</b>		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Transfer from service label) <b>7012 1010 0000 5504 3425</b>		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

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Here

Sent To **Captain Antonio Sanchez (Opa-Locka)**  
Street, Apt. No.,  
or PO Box No. **2495 Ali Baba Avenue**  
City, State, ZIP+4 **Opa-Locka, Florida 33054**

PS Form 3800, August 2006

See Reverse for Instructions

**Raider Environmental Services**

4103 Northwest 132<sup>nd</sup> Street, Opa Locka, FL 33054

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





**ENVIRONMENTAL SERVICES**

October 29, 2012

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

Via Certified Mail: 7012 1010 0000 5504 4002  
RETURN RECEIPT REQUESTED

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Return Receipt Fee (Endorsement Required)	1.15
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Total Postage & Fees	\$ 6.20
Postmark Here	
Sent To: Mr. Juan Trimble (Poll. Ctrl. Inspector RER)	
Street, Apt. No., or PO Box No.: 701 N.W. 1st Court	
City, State, ZIP+4: Miami, Florida 33136	
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 Mr. Trimble:

An updated version of our Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132<sup>nd</sup> 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](mailto:dan@raiderenvironmental.com)); cell: 305 528-0959) or me ([steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com)); cell: 954 605-6853).

Sincerely,  
Raider Environmental Services, Inc.

Steve Obst  
President

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature X <i>SH Coll</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery <i>IF 9/12</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>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></p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. </p>
<p>2. Article Number (Transfer from service label) <i>7012 1010 0000 5504 4002</i></p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

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102595-02-M-1540

4103 Northwest 132<sup>nd</sup> Street, Opa Locka, FL 33054

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





# ENVIRONMENTAL SERVICES

October 29, 2012

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

Via Certified Mail: 7012 1010 0000 5504 3401  
RETURN RECEIPT REQUESTED

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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.20
Sent To: Captain Tony Trimm (NO Fire Rescue Dept)	
Street, Apt. No., or PO Box No. 9300 N.W. 41 <sup>st</sup> Street	
City, State, ZIP+4 Doral, Florida, 33178	
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 Captain Trimm:

An updated version of our Preparedness and Prevention Contingency Plan with included SPCC for our Facility located at 4103 N.W. 132<sup>nd</sup> 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](mailto:dan@raiderenvironmental.com); cell: 305 528-0959) or me ([steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com); cell: 954 605-6853)

Sincerely,  
Raider Environmental Services, Inc.

Steve Obst  
President

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature: <i>Steve Obst</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name): <i>Steve Obst</i></p> <p>C. Date of Delivery: <i>11/1</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to: <i>Captain Tony Trimm North Operations Division Miami-Dade Fire Rescue Department 9300 N.W. 41<sup>st</sup> Street Doral, Florida 33178</i></p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.         </p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540	

### Raider Environmental Services

4103 Northwest 132<sup>nd</sup> Street, Opa Locka, FL 33054

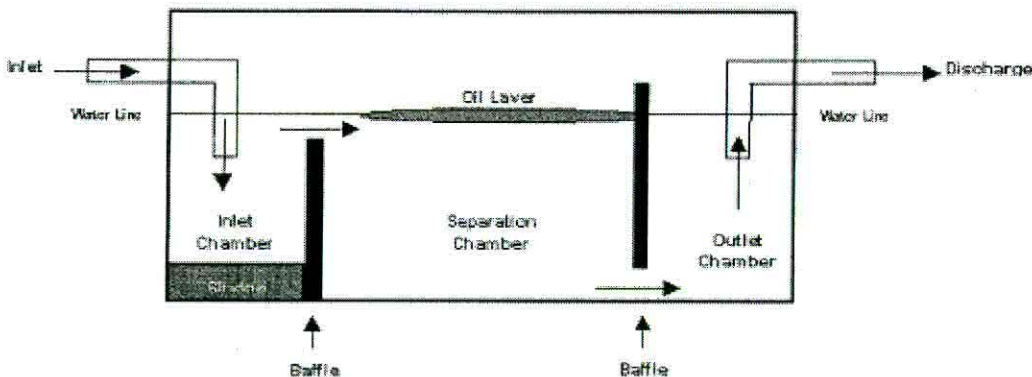
Dade: (305) 994-9949 Broward: (954) 316-0633 Fax: (305) 681-6175 [www.raiderenvironmental.com](http://www.raiderenvironmental.com)



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



## **OPERATIONS AND MAINTENANCE**

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

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

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

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

## **GENERAL CONSIDERATIONS**

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

### **Flow Rate**

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

### **Design Capacity**

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



## **Emulsifying Agents**

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

## **Maintenance Practices**

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

## **Oil/Water Separators Used to Meet SPCC Secondary Containment Requirements**

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

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



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

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

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

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

**Jones Ecosystem Management**\_\_\_\_\_

Mr. Bheem Kothur, P.E.  
Florida Department of Environmental Protection  
2600 Blair Stone Road MS 4560  
Tallahassee, FL 32399-2400

August 20, 2013

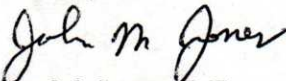
RE: Raider Environmental Services Major Permit Modification  
EPA ID number FLR 000143891

Dear Mr. Kothur:

Attached please find applications for the renewal of the Used Oil Processing permit and the Solid Waste Permit for the Raider Environmental Services Used Oil Processing facility located in Opa Locka, Florida. Also enclosed are checks for \$2,000.00 for the Used Oil Processing permit fee and \$1,000.00 for the Solid Waste fee.

Thank you for your assistance. If you need any additional information, please contact me at (479) 353-1368.

Sincerely,

  
John M. Jones, P.E.

cc: Steve Obst-Raider Environmental;



# USED OIL PROCESSING FACILITY PERMIT APPLICATION

## Part I

TO BE COMPLETED BY ALL APPLICANTS (*Please type or print*)

### A. General Information

1. New \_\_\_\_\_ Renewal ☒ Modification \_\_\_\_\_ Date current permit expires 10/13/13

2. Revision number \_\_\_\_\_

3. NOTE: Used Oil Processors must also meet all applicable subparts, (describe compliance in process description for applicable standards) if they are:

- ☐ Generators (Subpart C of Part 279)  
☒ Transporters (Subpart E)  
☐ Burners of off-spec used oil (Subpart G)  
☒ Marketers (Subpart H)  
☐ are disposing of used oil (Subpart I)

4. Date current operation began: 10/13/2008

5. Facility name: RAIDER ENVIRONMENTAL SERVICES INC

6. EPA identification number: FLR 000143891

8. Facility mailing address:  
4103 NW 132ND STREET OPA LOCKA FL 33054  
Street or P.O. Box City State Zip Code

9. Contact person: STEVE OBST Telephone: (305) 681 4825  
Title: PRESIDENT Email: STEVE@RAIDERENVIRONMENTAL.COM

Mailing Address:  
4103 NW 132ND STREET OPA LOCKA FL 33054  
Street or P.O. Box City State Zip Code

10. Operator's name: RAIDER ENVIRONMENTAL SERVICES, INC Telephone: (305) 681 4825  
Mailing Address:  
4103 NW 132ND STREET OPA LOCKA FL 33054  
Street or P.O. Box City State Zip Code

11. Facility owner's name: RAIDER ENVIRONMENTAL SERVICES, INC Telephone: (305) 681 4825  
Mailing Address:  
4103 NW 132ND STREET OPA LOCKA FL 33054  
Street or P.O. Box City State Zip Code

12. Legal structure:  
☒ Corporation (indicate state of incorporation) FLORIDA  
☐ Individual (list name and address of each owner in spaces provided below)  
☐ Partnership (list name and address of each owner in spaces provided below)  
☐ Other, e.g., government (please specify) \_\_\_\_\_



If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County DADE State \_\_\_\_\_

Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_

Street or P.O. Box \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_

Street or P.O. Box \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_

Street or P.O. Box \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_

Street or P.O. Box \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

13. Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased \_\_\_\_\_ years  
☐ presently leased; the expiration date of the lease is: \_\_\_\_\_

If leased, indicate: Land owner's name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Street or P.O. Box \_\_\_\_\_ City OPA LOCKA State FL Zip Code 33054

14. Name of professional engineer JOHN JONES Registration No. 50227

Mailing Address: \_\_\_\_\_

4103 NW 132ND STREET \_\_\_\_\_ City OPA LOCKA State \_\_\_\_\_ Zip Code \_\_\_\_\_

Street or P.O. Box \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Associated with: \_\_\_\_\_

## B. SITE INFORMATION

1. Facility location:

County: DADE

Nearest community: OPA - LOCKA

Latitude: 25°53'38"N Longitude: 80°15'59"W

Section: 29 Township: 52 S Range: 41 E

UTM # \_\_\_\_\_

2. Facility size (area in acres): 1.22

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

The facility's detailed process description is labeled as Attachment \_\_\_\_\_

**C. OPERATING INFORMATION**

1. Hazardous waste generator status (SQG, LQG, Etc.) CE SQ G

2. List applicable EPA hazardous waste codes:

D001, D006, D007, D008, D018 - TANK BOTTOMS MAY  
BE CHARACTERISTIC

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment 1

4. A detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. [See item four (4), page four (4) of the instructions.]

The facility's detailed process description is labeled as Attachment 2

5. The following parts of the facility's operating plan should be included as attachments to the permit application. [See item five (5), page four (4) of the instructions.]

a. An analysis plan which must include:

- (i) a sampling plan, including methods and frequency of sampling and analyses;
- (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
- (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment provided the lots are discreet units) to include: metals and halogen content

The analysis plan is labeled as Attachment 3

b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

Sludge, residue and byproduct management description is labeled as Attachment 4

c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

The tracking plan is included as Attachment 5

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. [See item six (6), page five (5) of the instructions.]

The preparedness and prevention plan is labeled as Attachment 6



7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. [See item seven (7), page five (5) of the instructions.]

The contingency plan is labeled as Attachment 6

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment 7

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. [See item nine (9), page six (6) of the instructions.]

The closure plan is labeled as Attachment 8

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. [See item ten (10), page seven (7) of the instructions.]

A description of employee training is labeled as Attachment 9



# APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

## PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

### Form 62-710.901(6) Operator Certification

Facility Name: RAIDA ENVIRONMENTAL EPA ID# FLR 000143891

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative\*



Steve Obst  
Name and Title (Please type or print)

Date: 8/20/13 Telephone: (305) 681-6203

\* If authorized representative, attach letter of authorization.

# APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

## PART II - CERTIFICATION

### Form 62-710.901(6) Facility Owner Certification

Facility Name: RAIDER ENVIRONMENTAL EPA ID# FLA000143891

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection.

Signature of the Operator or Authorized Representative\*



STEVE OAST PRESIDENT  
Name and Title (Please type or print)

Date: 8/19/13 Telephone: (305) 681-6203

\* If authorized representative, attach letter of authorization.



# APPLICATION FROM FOR A USED OIL PROCESSING PERMIT


## PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: RAIDER ENVIRONMENTAL EPA ID# FLR000143891

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described.

Signature of the Operator or Authorized Representative\*



STEVE OBST PRESIDENT  
Name and Title (Please type or print)

Date: 8/19/13 Telephone: (305) 681-6203

\* If authorized representative, attach letter of authorization.

# APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

## PART II - CERTIFICATION

Form 62-710.901(6) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62 - 4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

\_\_\_\_\_ Initial Certification      X \_\_\_\_\_ Recertification

1. DEP Facility ID Number: FLR000143891 2. Tank Numbers: T-1 THRU T-20

3. Facility Name: RADER ENVIRONMENTAL SERVICES INC

4. Facility Address: 4103 NW 132ND ST OPA LOCKA, FL 33054

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature

John M. Jones

Name (please type)

JOHN M. JONES

Florida Registration Number:

50227

Mailing Address:

4103 NW 132ND ST

Street or P. O. Box

OPA LOCKA

FL

33054

City

State

Zip

Date:

8/19/13 Telephone (407) 353-1368

[PLEASE AFFIX SEAL]



BAIET Process Description

DETAILED Process Description

WASTE ANALYSIS Plan

SLUDGE MANAGEMENT Plan

TRACKING Plan

POEAREDNESS, SOC, AND  
CONTINGENCY PLANS

CONTINGENCY  
UNIT MANAGEMENT Plan

CLOSURE Plan

TRAINING Plan

10

9

8

7

6

5

4

3

2

1

**RAIDER ENVIRONMENTAL SERVICES, INC.  
OPA LOCKA FLORIDA**

**ATTACHMENT 2**

**DETAILED PROCESS DESCRIPTION**

**December, 2012**



### Executive Summary

Raider Environmental Service, Inc. (Raider) proposes to construct a facility to treat industrial waters. When feasible, petroleum-based contaminants will be recovered from the wastewaters and recycled. The aqueous portion of the treated wastewaters will meet all Miami-Dade County Sewer Discharge Standards (effective 03/16/2004). The treated effluent will be discharged to the Miami-Dade industrial sewer system for subsequent treatment at the Virginia Key Publicly Owned Treatment Works (POTW). The design basis for the treatment facility is 50,000 gallons per day. By offering commercially available treatment services to the industrial sector, Raider Environmental Services will contribute to the environmental well-being of Miami-Dade County.

### Sources of Wastewater

Raider currently offers wastewater collection and transportation services to industrial clients in South Florida. Typically, Raider collects Petroleum Contact Water (PCW, as defined and regulated under Rule 62-740, Florida Administrative Code), oily water from petroleum-based processes, and industrial wastewaters from manufacturing facilities. Since the materials collected are regarded as wastewaters, the composition of the material varies based upon the process generating the waste. Typically, the water will contain recoverable amounts of petroleum byproducts, inert solids (such as soil and clay) and trace amounts of metal contaminants.

### Composition of Streams to be Pretreated

Attachment 1 contains typical analyses for the major types of waste streams to be accepted and treated at the Raider facility. It should be noted that these analyses are not represented to be all-inclusive, but merely examples of wastewaters that have been accepted and treated at other commercial facilities in South Florida. The analyses include:

1. Petroleum Contact Water.
2. Oily water from various sources.
3. Grey water.
4. Industrial wastewater.

The overall composition of the waste stream to be pretreated will vary depending upon the quantities of the various wastewaters accepted.

Since Raider intends to accept a variety of wastes, it will comply with the requirements of 40 CFR Part 437, Subpart D. The management of used oil will comply with the requirements of 62-710, F.A.C. The treatment processes described in this report (Filtration, flocculation, density separation, thermal treatment, dissolved air flotation (DAF), air stripping, and carbon absorption) will meet "equivalent standards". Table 1 describes the subcategories to be treated and the treatment processes to be used for each subcategory. The treatment processes are selected based upon Raider's knowledge of the characteristics of the various waste streams and industry experience regarding the effectiveness of the equipment and processes to be installed at the Raider facility. Effectiveness of the removal will be demonstrated by self monitoring data [per 437.2(h)] collected after start-up of the facility.

<b>Subpart/Description (40 CFR 437)</b>	<b>Treatment Processes Used</b>
Subpart A- Metals, Treatment and Recovery	Flocculation, Filtration, Dissolved Air Flotation
Subpart B – Oils Treatment and Recovery	Skimming, Dissolved Air Flotation, Thermal Treatment, Density separation
Subpart C – Organics Treatment and Recovery	Skimming, Dissolved Air Flotation, Thermal Treatment, Air Stripping, Carbon Absorption

**Table 1**  
**Treatment Processes for Subparts A,B, and C**

Process Description

In order to effectively treat the wastewater streams, Raider will use the following sequential steps:

1. Influent storage and equalization.
2. Skimming.
3. Dissolved Air Flotation.
4. Sludge storage and dewatering.
5. Air Stripper
6. Activated Carbon Treatment.
7. Effluent storage.
8. Discharge to sewer system.
9. Used Oil Treatment

Influent storage and equalization

Raider will follow a Waste Analysis Plan (WAP) to determine what wastewaters are acceptable for treatment, recycling, and discharge. The WAP is provided in other sections of this application. Wastewater is received via vacuum trucks or tank trailers and off-loaded into one of nine (9) equalization tanks. A list of the tanks, their capacities, and materials of construction is included as Attachment 2. The total storage capacity of 240,000 gallons (influent only) allows Raider operators to stabilize the flow rate to the treatment facilities and minimize rapid variations in concentrations of contaminants.

Dissolved Air Flotation Process

In order to remove contaminants and reduce Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD), Raider will utilize a Dissolved Air Flotation (DAF) unit. DAF is a well-known, accepted method of water treatment throughout the industry. The process consists of three primary steps: (1) Generation of micro-bubbles of air in the wastewater stream, (2) Attachment of contaminants to the micro-bubbles, and (3) Flocculation of the contaminants and removal from the water flow. Raider will construct a DAF unit supplied by Martint Environmental, an engineering and equipment firm from Chilhowie, Virginia. Drawings of the equipment and installation are included with the permit application package. The wastewater is passed through a recirculation loop designed to vary pressure and create micro-bubbles in the stream. Flocculants are also



introduced into the recirculation loop at various locations. The combined activity of the flocculants and the micro-bubbles results in removal of contaminants. The flocculated particles rise to the surface of the DAF flotation cell and form a sludge blanket. As the sludge blanket thickens, it is scraped off and transferred to a sludge holding tank.

#### Air Stripper and Activated Carbon Polishing

In order to insure that the treated water meets DERM Chapter 24 requirements, an additional "polishing" step will be done. The water will be introduced into an air stripping column. The water will be introduced into the top of a packed column. A countercurrent stream of air (CFM) will be blown through the base of the column. Any trace amounts of volatile compounds will be removed by the air stream. Air stripping is used extensively throughout South Florida and is an accepted treatment method for removal of volatiles from contaminated water.

In addition, the water will be sent through an activated carbon bed. Micron-sized pores in the carbon granules trap residual compounds. Activated carbon treatment will be a further assurance that the treated effluent will meet all discharge standards.

#### Treated Effluent Storage

The treated effluent will be transferred to a holding tank (Designated at T-011). The 20,000 gallon tank will serve as a "buffer" in the event of a process upset. If a process upset occurs, the Raider operator may choose to shut down the treatment process and hold the effluent until assurance that the treated material meets discharge standards is provided. The effluent storage tank may be recycled through the process if deemed necessary.

#### Discharge to Sewer

After it has been demonstrated that the effluent meets the discharge standards, it is pumped through a flow meter to the sewer discharge. A sampling point is provided so that discharge samples may be taken as required by regulatory agencies. The location of the sampling point and the flow meter are shown on Drawing Z.1.

#### Polymer Containment, Mixing and Metering

The large storage and equalization capacity for influent allows Raider to regulate the flow to the DAF unit and provide a constant flow rate. Polymers are injected into the flocculator at a rate proportional to the wastewater feed rate. The coagulant feed is provided from 1000-gallon capacity tanks with mixers and progressive cavity chemical feed pump. The flocculent is fed from a 1000-gallon tank with mixer and progressive cavity chemical feed pump.

#### Sludge Storage and Dewatering

Sludge from the DAF unit sump is transferred to a 4,500-gallon cone bottom sludge holding tank. The sludge is pumped through a 10 cubic foot recessed plate filter press. Solids which are removed from the press are characterized and managed in accordance with all applicable regulations. It is anticipated that the sludge will be non-hazardous and sent to a lined landfill.

#### Used Oil Management

Hydrocarbons, primarily oil, generated from treatment of the water will be managed as used oil, as defined in 62-710, F.A.C. In addition, Raider may accept used oil directly from generators or transporters. When received directly, the oil will be subject to the provisions of the Used Oil Waste Analysis Plan.

#### Spill Containment and Management

Any material spilled during loading, unloading, or processing operations will be contained within the tank containment area. The secondary containment area dimensions are 100 feet long x 48 feet wide x 16 inches high. The total volume containment capacity is 47,750 gallons. The largest process tank contains 35,000 gallons. The containment capacity is therefore 136% of the largest tank. Any spillage collected inside the containment area will be collected in sumps and transferred to the equalization tanks for treatment.

Rainwater collected inside the containment area will be examined for the presence of a sheen. If no sheen exists, the uncontaminated rainwater will be pumped outside the secondary containment area.

There are no floor drains located in the treatment area building.

A Slug Discharge Control Plan is included in this application.

#### Hazardous Chemicals List

Raider management has reviewed the "List of Toxic Chemicals Regulated by E.P.A.", as supplied in the information from DERM. Raider does not use any of chemicals included in the list. In some instances, Raider Environmental will use limited quantities of dilute muriatic acid and sodium hydroxide for pH adjustment in the process tanks. Material Safety Data Sheets for the chemicals Raider proposes to use are included with this application. The MSDS sheets will serve as proof that the facility does not use the chemicals from the list.



## **Used Oil Treatment Processing Description**

Raider collects used oil from a variety of sources, including automotive repair shops, service stations, and utility companies. The oil is typically mixed with water, in concentrations ranging from 6% to 15%. In order to make the used oil viable as a replacement fuel, it is necessary to reduce the water content. Raider utilizes a variety of treatment options, the most frequently used of which are thermal treatment and chemical treatment.

In the case of thermal treatment, the oil is delivered to the Raider facility by bulk trucks and placed into storage tanks. Since the density of the used oil is less than that of water, limited separation occurs in the storage tank. Water is periodically drained from the bottom of the tanks and treated in the Raider permitted water treatment facility. The used oil is then transferred to a thermal treatment process tank. This vessel contains coils which are heated using a thermal treatment fluid from a gas-fired burner. The used oil and water mixture is heated to a temperature of 110-180 degrees Fahrenheit. At the elevated temperature, the difference in density between the used oil and the water is increased, making removal of the water phase more efficient. Water is removed from the bottom of the tank, leaving clean used oil to be transferred to a Clean Used Oil Tank. The clean used oil is tested per Raider's permit requirements and sold to customers.

Chemical treatment of used oil accomplishes the same goal of reducing the water content by a different method. After the used oil is placed in a storage tank, proprietary chemicals are introduced into the tank and the tank circulated. The proprietary chemicals are hydrophilic and extract water from the mixture. After the tank has circulated for a period of time, the circulating pumps are stopped and the mixture allowed to stand. The water collects at the bottom of the tank and is removed. The used oil is tested per Raider's permit requirements and sold to customers.

## **RAIDER ENVIRONMENTAL WASTE ANALYSIS PLAN USED OIL TESTING**

This section of the manual is to comply with 40CFR 279.55. This analysis plan will describe the procedures that will be used to comply with the analysis requirements of 40 CFR279.53 (rebuttal presumption for used oil) and to 279.72 (specifications for used oil) when applicable.

### **Route Drivers:**

1-When a driver reaches any destination or any customer location on a route, the driver must first attempt to park his vehicle in an area that will not disturb the business flow of traffic in and out of the customer's station or facility.

2-Before the driver attempts to check the tank or pump the customer's tank, the driver must seek out the contact person that is listed on his route sheet or the person in charge and inform the customer that they are to check the amount of used oil in their used oil storage tank and pump it if necessary.

If the customer informs the driver that it not a good time, the driver must then inform the customer of our next scheduled route for his facility and that there may be a possible off route pick-up charge if they need to be picked up prior to the next scheduled service. The driver should then notify dispatch of any problems.

3-After the driver has checked with the contact person at each facility, and has been approved to service the facility; the driver will then follow these pick-up procedures:

A-The driver will stick the customers tank and determine by the size of the tank and the amount of oil projected to be at the stop, which is listed on the drivers route sheet, to determine whether the customer needs to be pumped or not.

B-If the driver determines that the customer's tank needs pumping, the driver will then use a halogen sniffer to sniff the air space of the storage tank or use the top to bottom sampling method that consist of a small pipe with a check valve on the end that allows the operator to sample the tank from top to bottom. This is a sample method that has been shown to be equivalent to that in (APPENDIX 1 of 40CFR 261 and 260.20 and 260.21). The driver will then run the halogen sniff test on the oil to determine whether the oil is contaminated with any halogenated solvent.

This halogen sniff test consist of a halogen leak detector device that will be used to determine the presence of halogens. The driver must calibrate the sniffer using a calibration standard on each day.

(Raider's Compliance and Transportation Management staff does training on calibration).

If the sniff test fails, the driver will run a second test using the Dexsil Chlor-D-Tech Q4000 test kit to determine whether the used oil is over a 1000 ppm halogen. If this kit test fails, the driver



is required to inform the customer that a halogenated waste may have been mixed with the used oil. If there are multiple containers and further kit tests are needed to determine the source of contamination or if only part of the used oil might not be contaminated with halogens.

#### **40 CFR 279.55(ii)**

This test will be done and these procedures shall be followed on every pick-up of used oil and shall be done on site at the generator's location.

#### **40 CFR 279.55 (iii)**

This test method is approved by EPA and listed as EPA SW-846 Method Number 9077.

If the oil fails the Dexsil Kit Test, showing the presence of halogens over 1000ppm, the driver will then inform the customer that his oil is presumed to be contaminated with a hazardous waste and must be regulated as a hazardous waste. Or, rebut the presumption and provide an analysis to prove otherwise. If the customer wants to rebut the assumption that hazardous waste has been mixed with the used oil in question, the driver should then take a top to bottom sample of the used oil and label the sample. Then the sample must be brought back to the plant with a completed manifest where the customer was charged for the GC Analysis. The sample should be submitted to RES's lab to be sent out to a third party lab for the GC analysis.

(Note: the GC Analysis results should be attached to the Customer's manifest when billed)

If the customer does not desire us to have the GC analysis run on his used oil, the driver must then instruct the customer to get in contact with our office for assistance in disposing of the used oil that is contaminated with a hazardous waste. After notifying the customer of the condition of his used oil under hazardous waste regulations, the driver will also be required to immediately notify our office and let management know what customer on his route has failed the Dexsil Test Kit analysis, also, if there were any other problems or information that may be helpful to management as we assist the customer in disposing of his potential hazardous waste.

C- Any customers that fail our halogen analysis that does not rebut the presumption by the GC analysis or other acceptable rebuttal options must be reported to State regulatory agency.

#### **40 CFR 279.53 (Rebuttal Presumption)**

If the customer chooses to rebut the presumption under 279.53, it will be the policy of Raider Environmental Services, Inc. to use an analytical method from SW-846, Edition III to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in APPENDIX VIII of 40 CFR 261. The Gas Chromatography method will be the method Raider Environmental Services will use when rebutting such presumption.

If the customer chooses to exempt any halogenated waste mixed with the used oil by way of the conditionally exempt small quantity generator rules at 40 CFR 261.5, the customer must provide

Raider Environmental Services, Inc. with a written and signed certification that the generator has generated less than 100kg of hazardous waste during the previous and current calendar month.

Prior to pick up, the President of Raider or his designee must approve acceptance of any material under this exemption.

D- IF the used oil that is tested passes the analysis showing that the amount of halogen is under 1000ppm, the driver will then stick his truck tank and look on his chart that shoes how many gallons per inch goes in his truck, and then proceed to pump the customer's tank calculating the gallons going into the tank truck with the chart that each driver has on board his vehicle.

The customer must certify that there has not been any hazardous waste mixed into the waste water/antifreeze being disposed of. The wastewater will usually be picked-up at the time of normal used oil service.

Wastewater and antifreeze should be tested with the halogen sniffer using the same procedures as used oil. If this testing fails, drivers should report to Raider Environmental Services, Inc. management for further instruction.

If the driver is operating one of the multi compartment trucks, the water/antifreeze can be pumped on the spot. However, the driver should always let the customer know that water is present. The driver should also assist the customer in locating the source of the water to avoid future contamination.

E-After the driver has pumped the used oil from the customers storage tank, the driver will determine the amount of gallons that he pumped by measuring the tanker truck before and after pumping, using the tank chart to calculate correct gallons. The driver will then fill out a used oil pick-up manifest, taking the data off his route sheet, filling the manifest out completely. The driver must be sure to check the box showing that the used oil being picked-up was under 1000 ppm halogen.

The purpose of this documentation is to have proper records for any state or federal regulatory inspections that may occur in the future. After the customer has signed the pick-up manifest, the driver will leave the top original copy with the generating facility and proceed on to his next route stop.

(Be sure that the tanker dome lid is closed and secured between stops)

F-After the driver has run his route and he has a full truckload of use oil ready to be unloaded, the driver will proceed to the unloading facility designated by management.

G- The plant will then take the composite sample of each tank compartment of the used oil collected and the drivers detailed truck report to the plant lab and the driver will report to the office. The following test shall be performed on each incoming truckload shipments of used oil to Raider Environmental Services, Inc. plant facility.

### **Test Method**

Halogen (SW-846 9077 or 9075)

Water Distillation

Flash Point ASTM closed cup)

PCB's GC (batched sample)

If the sample fails the halogen test then to rebut the presumption under 279.53 it will be the policy of Raider Environmental Services, Inc. to use an analytical method from SW-846, Edition III to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in APPENDIX VIII of 40 CFR part 261. This used oil should be segregated until testing and approval of results is completed.

The gas Chromatography method will be the method Raider Environmental Services, Inc. will use when rebutting such presumption. Only the President of Raider or his designee can approve other rebuttal options.

These are the basic procedures for our analysis plan. There may be changes from time to time, however all changes to Raider Environmental Services, Inc. plan must be approved by the President or his designee prior to changes being made.

If the President or his designee are not available to approve a shipment prior to rebuttal, then management should segregate material for testing, using his or her best judgment. But all incoming used oil must be tested at our plant facility before a shipment of used oil is accepted and unloaded.





**RAIDER ENVIRONMENTAL SERVICES, INC.**  
**OPA LOCKA FLORIDA**

**ATTACHMENT 5**

**TRACKING PLAN**

**December, 2012**

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## **ATTACHMENT 5 TRACKING PLAN**

Raider Environmental Services maintains records of all materials transported from and received at the Raider facility for a minimum of three years. Incoming materials (used oil, oily water, oily wastes, antifreeze, PCW, and industrial wastewater) are tracked by completion of Daily Route Logs (completed by driver) and Permanent Daily Report Sheet.

Each driver must submit a "Daily Route Log" to accompany the bill of ladings and/or manifests. Bill of Ladings and/or manifests are in accordance with the requirements specified in 40 CFR 279.56(a). The corresponding information is then entered into the facility's "Permanent Daily Report". Bill of ladings and manifests will be kept on site and are filed by driver, by month at the facility. On occasion, an independent used oil hauler may deliver materials to the facility. A manifest is generated for each independent hauler and the information is entered into the electronic "Oil Purchase" spreadsheet (hardcopy generated weekly).

The "Permanent Daily Report" information is maintained at the Opa Locka facility. The total volumes collected by Raider are added directly to the "Weekly Used Oil Collection Report." Copies of the reports generated on a weekly basis will be retained at the facility for at least three years. Copies of the "Daily Route Log", "Permanent Daily Report", and the "Weekly Used Oil Collection Report" are included as part of this section.

Tank inventory records are filed daily. These records are also retained for a three-year period. Analytical results performed by an independent laboratory to verify the on-specification claim will be maintained until closure of the facility, in accordance with 40 CFR 279.57. Analyses concerning rebuttal materials (materials that did not meet the waste acceptance procedure requirements) will also be maintained in accordance with 40 CFR 279.57. Reports and records concerning the implementation of the contingency plan will be maintained for the life of the facility.



**RAIDER ENVIRONMENTAL SERVICES, INC.**

**OPA LOCKA FLORIDA**

**ATTACHMENT 7**

**UNIT MANAGEMENT DESCRIPTION**

**December, 2012**

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## UNIT MANAGEMENT PLAN

If a container holding waste is not in good condition (e.g. severe rusting, apparent structural defects) or if it begins to leak, Raider personnel will transfer the waste from this container to a container that is in good condition. At least weekly, Raider personnel inspect areas where containers are stored, looking for leaking containers, and for deterioration of containers. Raider maintains aisle space (at least 24 inches) to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

All of Raider's aboveground storage tanks are located within a containment area. The containment system is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the material is removed. The containment system has sufficient capacity greater than 110% of the volume of the largest container. The precipitation, which enters the tank storage area and the secondary containment area, is pumped into the onsite water storage tanks for treatment.

All aboveground used oil process and storage tanks are properly labeled with the words "Used Oil." All tanks at Raider are steel aboveground storage tanks equipped with overfill protection. All oil piping is aboveground so there is no contact with the soil.

Any new aboveground storage tanks constructed of steel will meet or exceed the requirements found in UL No. 142, API Standard No. 620, API Standards No. 650, API Standard No. 12B, API Standard No. 12D, or API Standard No. 12F.

Raider inspects the aboveground tanks and piping for leaks as part of a release detection-monitoring program. At least once a month, RAIDER personnel inspect the exterior of each tank and the secondary containment area for wetting, discoloration, blistering, corrosion, cracks, or other sign of structural damage or leakage.

In the event any component of Raider's storage tank system is discovered to have discharged or contributed to the discharge of a pollutant, Raider personnel will isolate that component from the system, if possible, and not utilize that component until it is correctly repaired or replaced. If the storage tank system or any component of the system cannot be operated in compliance with Chapter 62-762 F.A.C., the storage tank system will not be operated until the component has been repaired or replaced. If a tank has discharged or contributed to the discharge of a pollutant, that tank will be taken out of service until the tank is repaired or replaced. All repairs to storage tanks will be made in a manner preventing any discharge from the storage tank system due to structural failure or corrosion for the remaining life of the storage tank system. All repairs to damage or defective storage tank system components shall be made to restore the structural integrity

of the storage tank system. All pipe sections and fittings from which a pollutant has been discharged or which is otherwise damaged or defective will be repaired in accordance with the manufacturer's specifications or in accordance with Rule 62-762.210 F.A.C.

The secondary containment system will be repaired as necessary to maintain product tightness and containment volume of the system, including, but not limited to sealing cracks in concrete, repairing punctures, and maintaining containment walls.



**RAIDER ENVIRONMENTAL SERVICES, INC.**

**OPA LOCKA FLORIDA**

**ATTACHMENT 8**

**CLOSURE PLAN**

**December, 2012**

# Facility Closure Plan

## Used Oil Processing Facility Permit Application

Raider Environmental Services  
4103 NW 132<sup>nd</sup> Street  
Opa Locka, Florida

## **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. The facility is located at 4103 NW 132<sup>nd</sup> Street, Opa Locka, 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 South 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 waste products, as defined in 40 CFR 261 are not collected.

## **USED OIL MANAGEMENT**

### **Process Description**

Ricky's Oil Service, Inc uses a combination of physical and chemical mechanisms to separate water from the oil. Phase separation is achieved by heating the oil. As the water/oil mixture is heated, the oil layer rises and the aqueous layer sinks. The water is removed by draining the bottoms of the storage tanks. Processed oil contains high thermal content and is sold as an energy source. The primary customers are asphalt plants, who use the oil as a replacement for higher-cost diesel fuel or natural gas.

## **FACILITY CLOSURE PROCEDURES**

In accordance with Rule 62-710.800(9)(a) FAC, 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) used oil will not contaminate surface or groundwater; (3) all tanks, piping, secondary containment and ancillary equipment including the storage pad for oily rags/absorbents and drums will be emptied, cleaned and decontaminated, and all materials removed and managed; and (4) aboveground storage and process tanks and all integral piping will be closed pursuant to Rule 62-761, FAC.



The above requirements will be met by closing the aboveground storage tank system and assessing the site in accordance with Rule 62-761.800(5) FAC. These activities will include:

1. Notification of DERM and FDEP at least 30 days prior to closure of the storage tank system,
2. Removal of all liquid and sludge from the tanks and integral piping and off-site disposal of the contents at properly licensed and permitted disposal/recycling facilities,
3. Pressure wash ~~rising~~ of all containment areas and the storage pad, and
4. Collection of representative soil samples from around and beneath the tank area, and visual inspection for evidence of contamination. Should evidence of contamination be present, then soil and 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 identified and FDEP approval for the sampling locations prior to implementing the sampling plan. All liquid and solid samples will be analyzed for the same constituents as the sampling for used oil or sludges managed at the facility with the addition of TRPH for soil samples.



# Florida Department of Environmental Protection

Bob Martinez Center • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form #62-710.901(7)  
Form Title Used Oil Processing Facility  
Closing Cost Estimate Form  
Effective Date June 9, 2005 rev. 2/2/12

## Used Oil Processing Facility Closing Cost Estimate Form

Date: Oct 19, 2012

Date of DEP Approval: \_\_\_\_\_ (DEP use only)

I. GENERAL INFORMATION: Latitude: 25.8949 Longitude: -80.2643 EPA ID Number: FLR 000 143 891

Facility Name: Raider Environmental Services Permit Number: 266845-HO-001

Facility Address: 4103 NW 132nd Street, Opa Locka, FL 33054

Mailing Address: 4103 NW 132nd Street, Opa Locka, FL 33054

Contact Person's Name: Steve Obst Phone Number: (305) 994-9949

E-mail: steve@raiderenvironmental.com Fax Number: (305) 681-6175

### II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

☒ Letter of Credit\* ☐ Performance Bond\* ☐ Guarantee Bond\* \*Indicate mechanisms that require use of a Standby Trust Fund Agreement  
☐ Insurance Certificate ☐ Financial Test ☐ Trust Fund Agreement

### III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

Rule 62-710.800(6)(c), Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

#### ☐ (a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at <http://www.dep.state.fl.us/waste/categories/swfir/>

This adjustment is based on the Department approved closing cost estimate dated: \_\_\_\_\_

_____	X	_____	=	_____
Latest DEP approved		Current Year		Inflation Adjusted
Closing Cost Estimate		Inflation Factor		Annual Closing Cost Estimate

Signature: \_\_\_\_\_ Phone: (479) 353-1368

Name and Title: John Jones, Professional Engineer E-mail: johnmjonespe@sbcglobal.net

If you have questions concerning this form, please contact the Used Oil Permitting Coordinator at the address below, by phone at (850) 245-8781, or by e-mail at: [Bheem.Kothur@dep.state.fl.us](mailto:Bheem.Kothur@dep.state.fl.us)

#### **Please mail this completed cost estimate to:**

Used Oil Permitting Coordinator  
Florida Department of Environmental Protection  
600 Blair Stone Road MS 4560  
Tallahassee, FL 32399-2400

#### **Please e-mail or mail a copy of the cost estimate to:**

Solid.Waste.Financial.Coordinator@dep.state.fl.us  
or  
Solid Waste Financial Coordinator - FDEP  
2600 Blair Stone Road MS 4565  
Tallahassee, FL 32399-2400

☒ (b) Recalculated Cost Estimates (complete items IV and V)

#### IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing **most expensive**.

Third Party Estimate/Quote must be provided for each item.

Costs must be for a third party providing all materials and labor.

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL
<b>1. Decontamination and Disposal</b>				
Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil Tanks, containers, piping, equipment and secondary containment decontamination	Each	5	\$1,300.00	\$6,500.00
waste characterization	Each	1	\$600.00	\$600.00
disposal			\$0.00	\$0.00
b. Wash Water				
waste characterization	Each	1	\$600.00	\$600.00
disposal	Gal	5000	\$0.18	\$900.00
c. Sludges/Sediment				
waste characterization	Each	1	\$600.00	\$600.00
disposal	Drums	20	\$110.00	\$2,200.00
d. Used Oil Filter Management				
waste characterization	NA		\$0.00	\$0.00
disposal	NA		\$0.00	\$0.00
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipment and secondary containment				
waste characterization	Each	1	\$600.00	\$600.00
disposal	Gal	200,000	\$0.15	\$30,000.00
f. Mobilization Costs	Each	1	\$600.00	\$600.00
g. Other				
Subtotal (1) Decontamination/Disposal:				\$42,600.00



**2. Engineering (On-site Inspections and Quality Assurance are to be included in this item).**

a. Closure sampling and analysis plan implementation  
as described in the permit application

\$4,500.00

b. Closure Certification Report

\$2,000.00

**Subtotal (2) Professional Services:**

\$6,500.00

**Subtotal of (1) and (2) Above:**

\$49,100.00

**3. Contingency (10% of the Subtotal)**

\$4,910.00

**TOTAL CLOSING COST:**

\$54,010.00

**V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR**

This is to certify that the Closing Cost Estimates pertaining to the engineering features of the this used oil processing facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.) Rule 62-710 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Closing Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1 of each year and revised, adjusted and updated as required by Rule 62-710.800(6)(c), F.A.C.

  
Signature of Engineer

\_\_\_\_\_  
Signature of Owner/Operator

John M. Jones, Professional Engineer  
Engineer's Name and Title (please print or type)

Steve Obst, Owner  
Owner/Operator's Name and Title (please print or type)

50227  
Florida Registration Number (please print or type)

(305) 994-9949  
Owner/Operator's Telephone Number

4103 NW 132nd Street, Opa Locka, FL 33054  
Engineer's Mailing Address

steve@raiderenvironmental.com  
Owner/Operator's E-mail Address

(479) 353-1368  
Engineer's Telephone Number

johnmjonespe@sbcglobal.net  
Engineer's E-mail Address

**RAIDER ENVIRONMENTAL SERVICES, INC.**

**OPA LOCKA FLORIDA**

**ATTACHMENT 9**

**EMPLOYEE TRAINING**

**December, 2012**

### **Employee Training Plan**

Raider Environmental Services employees will be trained in accordance with the "Used Oil Transporter's Training and Certification Manual. The contents of the program and a list of the specific topics is attached.



# Introduction and Training Program Description

## I. Introduction

In an effort to associate the term "Used Oil" with thoughts of a well managed, recyclable resource, the publisher of this invaluable publication has searched through federal and state resources to bring you the *Used Oil Transporter's Training and Certification Manual*.

If you transport or collect used oil, used oil filters, anti-freeze or any form of petroleum waste from more than one generator and transport it, if you own or operate a used oil transfer facility, please carefully read the information within this manual.

This manual will answer your questions concerning:

What is considered used oil?

When is used oil considered hazardous and should not be managed as used oil?

What is an EPA ID# and how do I get it?

How should I train my drivers?

What should I do if my truck springs a leak? Who should I notify?

Can I store oil on my truck till I get a full load?

What kind of records do I need to keep? Where do I get the proper forms for recording?

This manual is an excellent resource for the introduction of a new employee and the application of laws he needs to follow before he begins unsupervised transportation of waste oil and related products. Mark it up, add to it as you see fit to meet your needs. It is intended to help answer your questions. If you need further clarification please call or write the Used Oil Program Coordinator at the Department of Environmental Protection at (850) 245-8755.

## II. Training Program Description

### A. General Overview

Section 403.767 of the Florida Statutes mandates the Florida Department of Environmental Protection to develop rules governing certification of used oil transporters. This certification process was codified in Rule 710.600 of Chapter 62 of the Florida Administrative Code. Included below is the specific Rule language for your use.

### B. Training Manual Objective

As described above, the training manual's main objective is to assure that employees engaged in the transportation and management of used oil are thoroughly familiar with state and federal rules governing used oil, as well as proper used oil management practices including appropriate response actions to any breach, release or spill.

To assist your business in developing a suitable training program, the *Used Oil Transporters Certification and Training Manual* has been structured to provide a suitable base curriculum for used oil training. Key training areas include used oil, transportation, emergency and spill response procedures, storage tank, PCB, and PCW regulations.

### C. Training Manual Description

To assist your business in properly educating your employees, the *Used Oil Transporters Certification and Training Manual* has been structured to serve as an outline for your used oil-training program. Key training areas identified include used oil, transportation, storage tank, PCB, and PCW regulations, as well as emergency and spill response procedures. These areas have been labeled with "Course" numbers in the Table of Contents. You may customize your individual corporate training program to meet your needs, or you may use the certification and training manual as the cornerstone of your Training Program.

It is recommended that a minimum of thirteen (13) hours of training be conducted relative to the rules governing used oil management and proper used oil management procedures. Listed below are minimum training hours recommended for the Courses identified within the Certification Manual.

#### Base Curriculum:

Course 1- Compliance with Used Oil & Used Oil Filter Regulations	4.5 hours
Course 2- Emergency and Spill Response Procedures	3.0 hours
Course 3- Compliance with Storage Tank Regulations	0.5 hours
Course 4- Compliance with PCB Regulations	0.5 hours
Course 6- Compliance with Transportation Regulations	3.5 hours

#### Supplemental Curriculum:

Course 5- Compliance with Petroleum Contact Water Regulations	1.0 hour
---	----------

Each Section or Course in this manual contains a General Overview and Rule Highlights Section. Educating yourself and your employees with this information will assure familiarity with those laws and rules governing used oil transportation. A Specific Rules and Laws Section has been included to assist you in accessing detailed information covered within the General Overview and Highlights Section.

As a used oil transporter your business is solely responsible for providing assurance that the training, duration and methodology used by your company is adequate

### D. Implementation and Verification of Training

Rule 62-710.600(2)(b)3 requires new employees to be introduced to the applicable laws and rules before unsupervised driving of an used oil transportation vehicle.

Rule 62-710.600(2)(b)4 mandates that new employees shall complete the training program as soon as possible but no later than 90 days after beginning employment. Continued education as part of the training program, is highly recommended. Rule 62-710.600(3) states that training programs shall be reviewed and updated annually to address changes in regulations.

Rule 62-710.600(2)(c) requires the maintenance of training records in the company's operating record and the individual personnel files indication the type of training received along with the dated signature of those receiving and providing training.

Located on pages 7-10 of this certification and training manual are the *Used Oil Training Program Submittal Documents*. When completed and submitted to the FDEP, these documents will assist the Department in its evaluation and certification of your corporate training program.

***Please note the form will require your manual's serial number.***

***This is a unique number that has been assigned to your company only. When the Department evaluates and accepts your certification, the serial number you have provided on the forms will help identify your company's training program as acceptable. As this manual is a copyrighted publication, for your protection, do not share the contents of this manual with anyone outside of your company.***

Included with the *Forms* section beginning on page 63, are Record of Compliance Forms which may be used to maintain a record of training for your company's records and for placement into individual personnel files.

## Preface

This newly revised *Used Oil Transporters Certification and Training Manual* is made available to the industry and interested parties. Copying or reproduction in any form is prohibited, except for the private use of the owner (original purchaser) of the manual.

The publisher wishes to thank the industry volunteers, the Florida Department of Environmental Protection, The Florida Department of Transportation, and all industry affiliates who helped to prepare, coordinate and review the manual.

We recognize the importance of recycling used oil in Florida's sensitive environment. Industry members and affiliates are expected to adhere to and uphold local, state and national laws affecting the regulated community.

For a list of, or information on, the registered used oil transporters in Florida, please contact the Used Oil Coordinator at FDEP.

### Using this manual

Located on pages 7-10 of this certification and training manual are the *Used Oil Training Program Submittal Documents*. When completed and submitted to the FDEP, these documents will assist the Department in its evaluation and certification of your corporate training program.

**Please note the form will require your manual's serial number. This is a unique number that has been assigned to your company only. When the Department evaluates and accepts your certification, the serial number you have provided on the forms will help identify your company's training program as acceptable.** As this manual is a copyrighted publication, for your protection, please do not share the contents of this manual with anyone outside of your company.

Included with the *Forms* section beginning on page 63, are *Record of Compliance Forms*, which may be used to maintain a record of training for your company's records and for placement into individual personnel files.

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### Disclaimer

While every effort has been made to insure the accuracy of the contents of the manual, the publisher nor its agents take responsibility for its contents and applicability to or interpretation of the laws. Competent legal counsel should be sought to insure compliance with the laws affecting used oil transportation as they apply to individuals and businesses in Florida.

### Additional Copies

Additional copies of this Used Oil Transporters Certification and Training Manual may be ordered from:  
BFA Custom Publications, 318 Newman Rd., Sebring, Fl. 33876-6702. Telephone 863-655-0691 — FAX 863-655-3713.



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**RAIDER ENVIRONMENTAL SERVICES, INC.  
OPA LOCKA FLORIDA**

**ATTACHMENT 4**

**SLUDGE, RESIDUE, AND BYPRODUCT  
MANAGEMENT**

**December, 2012**

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## **SLUDGE, RESIDUE, AND BYPRODUCT MANAGEMENT DESCRIPTION**

Sludge, residue and by-products from filters, tank bottoms and or storage tank, etc., are removed as needed, on a frequency which depends on volumes (layer) less specific on frequency of oil and oily waste received and processed at the facility.

The sludge and sump solids come from filter baskets and pump sumps. These materials are commingled. This washing procedure minimizes the quantity of waste that must be shipped off-site for disposal and placed in containers. Representative samples will be obtained after start-up and characterized. Sludge residues, filter basket solids, and other residues are shipped in bulk to a State permitted landfill or thermal treatment (waste to energy) facility. Any wastes that contain free liquids will be tested for flashpoint, prior to shipment. If found not to be characteristic for flashpoint, these materials may be sent to a State permitted facility for solidification and/or ultimate disposal at a Treatment, Storage, and Disposal Facility (TSDF).

Solid material or residue that accumulates over time in the bottom of separation vessels, pump trucks, or tankers is removed and analyzed for Florida pre-burn constituents, as defined in 62.713.501(4), F.A.C. Solids that are not hazardous as defined in 40 CFR Part 261 limits are stabilized with an inert organic material (such as saw dust, granular/clay absorbent, etc.) and are sent for disposal as a non-hazardous waste at a secured landfill or sent for thermal treatment. Solids that exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are containerized and disposed at an off-site licensed TSDF. Any material sent to a TSDF is accompanied by a hazardous waste manifest.

Whenever a tank is cleaned, a sample of the sludge will be collected for analysis. The analytical testing will include, at minimum, TCLP 8 RCRA Metals, TCLP Volatiles, TRPH, PCB's, Total Halogens, and Percent Solids. Any solids determined to exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are disposed at an off-site licensed TSDF. Each material sent to the TSDF is accompanied by a hazardous waste manifest.

## Secondary Containment Calculations Used Oil Storage and Processing Area

1. Overall Dimensions   Length = 107.33 feet  
                                    Width = 47.5 feet  
                                    Area = 5098 square feet
2. Deductions for occupied space (refer to drawing A-0 and Tank Summary)
  - a. Vertical storage tanks (T-1,T-2,T-3, T-4)  
Diameter of tanks = 10.5 feet  
Area of each tank =  $(3.14 \times 10.5 \times 10.5) / 4 = 86.5$  Square Ft.  
Total area for tanks =  $4 \times 86.5 = 346$  Square Ft.
  - b. Saddles for horizontal tanks (T-5,T-6, T-7, T-16)  
Each saddle = 1.5 feet wide x 9 feet 2 inches long  
Area of each saddle =  $1.5 \times 9.16 = 13.75$  Square Ft.  
Total number of saddles = 8  
Area of saddles =  $8 \times 13.75 = 110$  Square Ft.
  - c. Vertical tanks (T-8, T-9, T-10, T-11,T-12)  
Diameter of tanks = 5.33 feet  
Area of each tank =  $(3.14 \times 5.33 \times 5.33) / 4 = 22.3$  Square Feet  
Total area for tanks =  $5 \times 22.3 = 111.5$  Square Feet
  - d. Equipment bases (Pumps, strainers, filters)  
6 bases at 3 ft. x 4 ft. =  $6 \times 12$  Square Feet = 72 Square Feet

Total area to be deducted =  $346 + 110 + 111.5 + 72 = 639$  SF  
Use 650 Square Feet to allow for miscellaneous supports
3. Containment Area available =  $5098 - 650 = 4448$  Square Ft,
4. Containment Volume available =  $4448 \text{ SF} \times 1.33 \text{ Ft high}$   
   = 5916 Cubic Feet  
   = 44,252 Gallons  
   = 126 % of the volume of largest tank