

## Thursby, Kim

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**From:** Kothur, Bheem  
**Sent:** Monday, September 30, 2013 9:30 AM  
**To:** Thursby, Kim  
**Subject:** FW: Raider Environmental Services, Inc.-Opa Locka,FLR 000 143 891;Notice of Deficiency

Hi Kim,  
For your information.  
Bheem

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**From:** John Jones [<mailto:johnmjonespe@sbcglobal.net>]  
**Sent:** Monday, September 30, 2013 9:20 AM  
**To:** Kothur, Bheem  
**Subject:** Re: Raider Environmental Services, Inc.-Opa Locka,FLR 000 143 891;Notice of Deficiency

I have received the document.

**From:** "Kothur, Bheem" <[Bheem.Kothur@dep.state.fl.us](mailto:Bheem.Kothur@dep.state.fl.us)>  
**To:** 'John Jones' <[johnmjonespe@sbcglobal.net](mailto:johnmjonespe@sbcglobal.net)>; "steve@raiderenvironmental.com" <[steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com)>  
**Cc:** "Thursby, Kim" <[Kim.Thursby@dep.state.fl.us](mailto:Kim.Thursby@dep.state.fl.us)>; Epost HWRS <[EpostHWRS@dep.state.fl.us](mailto:EpostHWRS@dep.state.fl.us)>  
**Sent:** Monday, September 30, 2013 8:03 AM  
**Subject:** FW: Raider Environmental Services, Inc.-Opa Locka,FLR 000 143 891;Notice of Deficiency

Hello John and or Steve,  
Please confirm that you have received the attached documents ASAP.  
Thanks.  
Bheem

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**From:** Epost HWRS  
**Sent:** Friday, September 20, 2013 11:17 AM  
**To:** [steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com)  
**Cc:** Bahr, Tim; Goddard, Charles; Winston, Kathy; [johnmjonespe@sbcglobal.net](mailto:johnmjonespe@sbcglobal.net); Miller, Randy J.; Bejnar, Tor; Eldredge, Susan F.; Martin, Lee; Kothur, Bheem; Tripp, Anthony  
**Subject:** Raider Environmental Services, Inc.-Opa Locka,FLR 000 143 891;Notice of Deficiency

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

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

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

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

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

Tim Bahr  
Environmental Administrator  
Hazardous Waste Regulation  
Department of Environmental Protection  
E-Mail Address: [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us)

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



September 20, 2013

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER  
2600 BLAIRSTONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

**SENT VIA E-MAIL**

[steve@raiderenvironmental.com](mailto:steve@raiderenvironmental.com)

Mr. Steve Obst, President  
Raider Environmental Services, Inc.  
4103 NW 132<sup>nd</sup> Street  
Opa Locka, Florida 33054

RE: Raider Environmental Services, Inc.-Opa Locka, Florida  
EPA I.D. No. FLR 000 143 891  
Permit Numbers: 284932-HO-004; 284932-SO-005  
Used Oil and Material Processing Facility Permit Renewal Applications  
Notice of Deficiency

Dear Mr. Obst:

The Florida Department of Environmental Protection (the Department) has reviewed your permit applications dated August 20, 2013 and received on August 21, 2013 for the Used Oil and Material Processing Facility in Opa Locka, Florida.

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

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

Mr. Steve Obst, President  
September 20, 2013  
Page Two

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

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

Sincerely,

  
Bheem Kothur, P.E. III  
Hazardous Waste Program and Permitting

BK/bk

Enclosure: Attachment

cc: Kathy Winston, FDEP/Southeast District, [kathy.winston@dep.state.fl.us](mailto:kathy.winston@dep.state.fl.us)  
John Jones, [johnmjonespe@sbcglobal.net](mailto:johnmjonespe@sbcglobal.net)  
Randy Miller, FDEP/Tallahassee, [randy.j.miller@dep.state.fl.us](mailto:randy.j.miller@dep.state.fl.us)  
Tor Bejnar, FDEP/Tallahassee, [tor.bejnar@dep.state.fl.us](mailto:tor.bejnar@dep.state.fl.us)  
Susan Eldredge, FDEP/Tallahassee, [susan.eldredge@dep.state.fl.us](mailto:susan.eldredge@dep.state.fl.us)  
Lee Martin, FDEP/Tallahassee, [lee.martin@dep.state.fl.us](mailto:lee.martin@dep.state.fl.us)

**ATTACHMENT**  
**September 20, 2013**  
**Raider Environmental Services, Inc.**  
**Opa Locka , Florida**  
**EPA I.D. No. FLR 000 143 891**  
**Permit No. 284932-HO-004; 284932-SO-005**  
**Notice of Deficiency**

**Specific Comments:**

1. Permit Renewal Application Cover Letter dated August 20, 2013: The subject should be "Raider Environmental Services, Inc. Renewal Permit Application" instead "Raider Environmental Services, Major Permit Modification". Please review and correct the subject cover letter as appropriate in future correspondence.
2. Used Oil Processing Facility Permit Application, Part I, A. General Information, Item 4, Page 1 of 8: The facility Date current operation began on "January 1, 2008" instead "October 13, 2008". Please review and revise as appropriate.
3. Used Oil Processing Facility Permit Application, Part I, B. Site Information, Item 2, Page 2 of 8: The facility size should be "1.55-acres" instead "1.22-acres". Please review the permit application and revise as appropriate.
4. Tab 2, Attachment 2, Detailed Used Oil Treatment Processing Description, Third Paragraph, Last Line, Page 1: The facility name should be "Opa Locka" instead "Mulberry". Please review and revise as appropriate.
5. Tab 2, Attachment 2, Detailed Used Oil Treatment Processing Description, Figure 1-Flow Diagram: Please show tank numbers on this process flow diagram.
6. Tab 4, Attachment 4, Third Paragraph, First Sentence: F.A.C. Chapter 62-713.501(4). This reference does not exist. What did you intend to cite? Please review and revise as appropriate.
7. Tab 4, Attachment 4, Sludge, Residue, And Byproduct Management Description, Second Paragraph, Second Sentence, Page 1: Please show on a map where this activity will be conducted. Please ensure that the sludges are also tested similarly?

8. Tab 5, Attachment 5, Tracking Plan, First Paragraph, Second Sentence: It appears that the facility is also collecting and storing the Antifreeze and PCW at the facility. Please identify Antifreeze and PCW in Tank Table 2, AST Details and Contents. Tanks 1 through 5 appears to be storing Used Oil; however, in Tank Table 2 is not shown such material. Please review and revise the contents as appropriate.
9. Tab 5, Attachment 5, Tracking Plan, Third Paragraph, Fourth Sentence, Page 1: Please attach the example of the "Daily Route Log" document, "Daily Tank Inventory" document, "Permanent Daily Report" document and "Weekly used Oil Collection Report" document.
10. Tab 6, Attachment 6, Contingency Plan, 1. Introduction, Second Paragraph, Page 1: Please described where these materials (Filters, PCW, Oily Wastes, and Absorbents) stored and how are they tested?
11. Tab 6, Attachment 6, Preparedness and Prevention Contingency Plan, and Page 12: Please show the location of all emergency equipment on a map.
12. Tab 6, Attachment 6, Preparedness and Prevention Contingency Plan, Table 1, Page 3: Please include the FDEP West Palm Beach district Bureau of Emergency response's (BER) phone number to read (561) 393-5877 and the office is located in Boca Raton. The address is: 7251 West Palmetto Park Road, Suite 303, Boca Raton, Florida 33433. Please review and revise as appropriate.
13. Tab 6, Attachment 6, Preparedness and Prevention Contingency Plan, Page 3: The FDEP Southeast Office physical address is: 400 North Congress Ave, Third Floor, West Palm Beach, Florida 33401. Please review and revise as appropriate.
14. Tab 6, Attachment 6, Table 1, Recipients of The Following October 2012 Revised Preparedness And Prevention Contingency Plan, Page 3: Facility has listed contact names, phone numbers and e-mail address for all. In addition to this, please provide mailing address also. Facility's primary and secondary emergency coordinators home mailing address must be included. Also need to include your outside cleanup contractor information here. Please review and revise as appropriate.
15. Tab 6, Attachment 6, Contingency Plan, Page 3: Table 1 should also include recipients Address.
16. Tab 6, Appendix B – Oil /Water Separators, Page 34: Page 34 is missing. Please review and include the missing page.

17. Tab 8, Attachment 8, Closure Plan, Introduction, First Paragraph, Second Sentence, and Page 2: The facility is located at "4103 NW 132<sup>nd</sup> Street, Opa Locka, Florida 33054" instead "4103 NW 136<sup>th</sup> Street, Opa Locak, Florida, 33055". Please review and revise as appropriate.
18. Tab 8, Attachment 8, Closure Plan, Facility Closure Procedure, First Paragraph and Second Paragraph, Page 4: The reference of above ground tank rule should be "Rule 62-762.801, F.A.C." not "Rule 62-761, F.A.C.". Also the tank "Rule 62-762.801", F.A.C. not "Rule 62-761.800(5)", F.A.C. Please review and revise as appropriate. Also provide the closure schedule.
19. Tab 8, Attachment 8, Closure Plan, Closure of Tank Farm Containments: Please describe the decontamination process and how a completion determination is made.
20. Tab 8, Attachment 8, Closure Plan, Facility Closure Procedure, Page 3: The facility shall propose vertical and horizontal soil sampling (including parameters) around all waste handling areas to determine if any contamination exists. Also propose groundwater sampling which may be contingent upon results of soil sampling. The closure cost estimate should address these items.
21. Tab 8, Attachment 8, Closure Plan, Closure Cost Estimate, Page 4: Please delete old closure cost estimates and update with the latest approved closure cost estimate for the year 2013.
22. Tab 9, Attachment 9, Employee Training: The employee training program does not include USDOT hazardous materials training. Used Oil is commonly contaminated with gasoline, and the mixture may be flammable. Raider Environmental Services, Inc used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor D test kits will not assess the flammability of the materials Raider Environmental Services, Inc may be called upon to transport. Please modify the employee training program to include USDOT hazardous materials training. Also Paginate this page.
23. Tab 9, Attachment 9, Employee Training Plan, Page 1: This paragraph need to be expanded. Also state that writer training records including name of the employee, date and type of training will be kept at the site.

**General Comments:**

24. Facility needs to submit an updated site map in an electronic format (pdf preferred) so that this map can inserted into the permit.

25. Facility needs to submit an updated used oil tank table in an electronic format (pdf preferred) so that this table can be inserted in to the permit.
26. Any oily wastes or sludge generated at the facility that cannot be managed for energy recovery, a hazardous waste determination will be conducted and the materials will be managed in accordance with 40 CFR Part 279.10 (c) and (e).
27. Attachments 1, 4, 5, 7, and 9: Please paginate all these attachments as appropriate.
28. Used Oil Renewal Permit Application Hard Copy dated August 20, 2013 and CD Received on August 27, 2013: The permit application in CD dated December 2012 is different than the hard copy dated August 2013. Please review these two documents and be consistent.

**Solid Waste Permit Application General Comments:**

29. Reference was made in several descriptions of operations to a site diagram but none was included with the solid waste application. Please provide a scaled site plan meeting the requirements of Form 62-701.900(4)B.2., F.A.C., which depicts the area for storage of treated and non-treated material and area/s where consolidation and solidification will take place.
30. In the Process Description, solid wastes are received in 55-gallon drums and roll-off containers and the maximum amount of wastes stored at the facility, including treated material, will be 40 tons. Please specify the corresponding number and sizes of drums/roll-off containers for compliance purposes and closure cost estimate purposes. Currently the closure cost estimate only lists 20 drums of sludges/sediments for characterization and disposal.
31. It is not clear from the Process Description for Solid Waste Management where the consolidation and solidification operations will be performed or where the roll-off container containing treated material will be stored prior to disposal in a Class I landfill.