

Jones Ecosystem Management

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

October 13, 2013

RE: Raider Environmental Services Used Oil Permit Renewal
EPA ID number FLR 000143891

Dear Mr. Kothur:

Attached please find responses to the Department's NOV dated September 20, 2013. In cases where changes were made to single pages, the replacement pages are included for inclusion into the documents previously submitted. In sections where there are multiple changes (the Preparedness and Prevention Plans and the Closure Plans), the entire section has been reproduced and should replace the previous submittal.

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

Sincerely,



John M. Jones, P.E.

cc: Steve Obst-Raider Environmental;

Raider Environmental Responses to FDEP Notice of Deficiency dated September 20, 2013

Raider Environmental Services (RES) has prepared responses to the Department's NOV for the renewal application for its Used Oil Processing permit. The response item numbers correspond to the same numbers in the Department's correspondence.

1. Correspondence has been corrected to properly refer to the Used Oil Processing Permit renewal.
2. The Used Oil Permit Application, Part I, A has been revised.
3. The Used Oil Permit Application, Part I, B has been revised.
4. Detailed Used Oil Process Description has been revised.
5. Tank numbers have been added to the Detailed Used Oil Process Description.
6. The correct citation is 62-770 Table A . The paragraph has been corrected.
7. Sludges are collected and containerized at the various equipment locations (strainers, filters, tanks, etc.). The containers, typically 55-gallon drums, are stored inside the containment area as shown on Site Diagram A0. Sludges are characterized by taking a composite sample at least once per year and analyzing for constituents of concern. Active profiles for disposal of these materials are maintained at permitted facilities.
8. Based on the market served, Raider Environmental no longer collects or processes PCW or anti-freeze. No tanks are dedicated to these waste streams.
9. Examples of the "Daily Route Log", "Daily Tank Inventory", "Permanent Daily Report", and "Weekly Used Oil Collection Report" are attached.
10. Filters, Oily wastes, and absorbents are stored in containers in the Solid Waste Storage area as depicted in drawing A0.
11. The locations of the emergency equipment have been shown on drawing A0.
12. The Preparedness and Prevention Plan has been revised to include the BER's information.
13. The Preparedness and Prevention Plan has been revised to include the physical address of the Southeast District office.
14. The Preparedness and Prevention Plan has been revised to include the information requested.
15. The Preparedness and Prevention Plan has been revised to include the information requested.
16. The Oil/Water Separators are not an integral part of the Used Oil treatment process. Accordingly, Appendix B has been omitted from this submission.
17. The zip code for the facility has been revised to the correct code 33054
18. The references to the Aboveground Storage Tank (AST) regulation have been corrected.
19. The decontamination of the tank farm area is accomplished by high-pressure water washing of the equipment and interior surfaces. Visual inspection with no visible staining will be the closure standard.
20. Sampling locations, as noted in the Closure Plan, will be proposed after the closure assessment has been performed. Parameters will be those associated with potential petroleum contamination.
21. The currently approved closure cost estimate has been included.
22. DOT training has been added to the Training Plan.
23. Employee training records will be maintained at the facility.

24. A site map in pdf format will be sent via e-mail to the Department.
25. An updated used oil tank table in electronic format will be sent via e-mail to the Department.
26. Raider will perform hazardous waste determinations on any wastes or sludges generated at the facility that cannot be managed for energy recovery.
27. Attachments 1, 4, 5, 7, and 9 have been paginated.
28. A CD containing the permit application and attachments will be submitted after any modifications required by the Department following review of this submittal have been finalized and a Notice of Intent has been issued.
29. Site Diagram A0 is included with this submittal and depicts the Solid Waste Storage area.
30. In order to determine the volume of solid waste, the following procedure is suggested:
For purposes of calculating the volume of solid waste at the facility, a full roll-off container will contain 20 tons. Each drum will represent 450 pounds. As an example, if there is a roll-off container 50% full and 100 drums present, then the amount of solid waste on-site would be:
$$0.50 \times 20 + (100 \times 450) / 2000 = 10 + 22.5 = 32.5 \text{ tons}$$
31. All solid waste operations will be performed in the area shown on drawing A0.

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 10/13/2013

2. Revision number 1

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: January 1, 2008

5. Facility name: Raider Environmental Services

6. EPA identification number: FLR 000143891

8. Facility mailing address:

<u>4103 NW 132nd Street</u>	<u>Opa Locka</u>	<u>Florida</u>	<u>33054</u>
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:

<u>4103 NW 132nd Street</u>	<u>Opa Locka</u>	<u>FL</u>	<u>33054</u>
Street or P.O. Box	City	State	Zip Code

10. Operator's name: Raider Environmental Services Telephone: (305) 681-4825

Mailing Address:

<u>4103 NW 132nd Street</u>	<u>Opa Locka</u>	<u>FL</u>	<u>33054</u>
Street or P.O. Box	City	State	Zip Code

11. Facility owner's name: Raider Environmental Services Telephone: (305) 681-4825

Mailing Address:

<u>4103 NW 132nd Street</u>	<u>Opa Locka</u>	<u>FL</u>	<u>33054</u>
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 Florida Zip Code 33054

14. Name of professional engineer John M. Jones Registration No. 50227

Mailing Address: _____

4103 NW 132nd Street _____ City Opa Locka State FL Zip Code 33054

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Associated with: Jones Ecosystem Management

B. SITE INFORMATION

1. Facility location:

County: Dade

Nearest community: Opa Locka

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

Section: 29 Township: 52 S Range: 41 E

UTM # _____ / _____ / _____

2. Facility size (area in acres): 1.55

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 2

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: RAIDEN 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 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 FROM FOR A USED OIL PROCESSING PERMIT


PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: RAIDER ENVIRONMENTAL EPA ID# FLA000143891

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

Name (please type)

Florida Registration Number:

Mailing Address:

Street or P. O. Box

City

State

Zip

Date:

Telephone

[PLEASE AFFIX SEAL]