RAIDER ENVIRONMENTAL SERVICES, INC.

OPA LOCKA FLORIDA

ATTACHMENT 8

CLOSURE PLAN

October, 2013

INTRODUCTION

Raider Environmental Services, Inc. is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater. The facility is located at 4103 NW 136th Street, Opa Locka, Florida 33054. The following Closure Plan has been prepared for Raider Environmental Services, Inc. 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, Inc. facility, in accordance with the record keeping requirements set forth in Rule 62-710.510(4), FAC

PROCESS DESCRIPTION

Raider Environmental Services, Inc. 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.

Fleet Vehicles

Raider Environmental Services, Inc. maintains a fleet of vacuum trucks, trailers, flat-bed trucks, roll-off containers, tractor trailers, and other ancillary equipment to collect and transport used oil and other oily waste to the Opa Locka facility.

Product Collection

Each truck is equipped with a Tek Mate Leak Detector (or equivalent device) and the vehicle operator is trained on the use of it. The product from each client is tested with this device, which will give off a beeping noise if the halogen content is >800 ppm. If the beeper goes off the vehicle operator will then use a "Dexsil" halogen solvent test kit. No product is collected that test positive for halogen solvents. In such a case, the client is instructed to have their product profiled through analytical test methods by a certified laboratory. It the product is then shown to be non-hazardous pursuant to 40 CFR 261, it will be collected.

Product Storage and Disposal

Product collected by fleet vehicles is transferred into designated product-specific ASTs at the facility for temporary storage. The product is subsequently transported off-site using the large capacity trailer rigs. Dependent upon the pre-determination arrangements, the product may be marketed as industrial fuel destined for recycling, reprocessing, used fuel

in a licensed energy recovery industrial furnace or disposed of otherwise at an appropriate facility.

USED OIL MANAGEMENT

Process Description

Raider Environmental Services, Inc. uses a combination of physical and chemical mechanisms to separate water from the oil. Phase separation is achieved by heating the oil. Heating is accomplished by using an internal coil in a process tank. 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. For more difficult mixtures, the phase separation is enhanced by adding proprietary chemicals. The demulsifying agents serve to accelerate the process by reducing surface tension of the small oil droplets and allowing coagulation. As in the basic process, the water is drained from the bottom of the storage/treatment tanks, allowing the purer oil to be transferred. Processed oil contains high thermal content and is sold as an energy source.

Liquid Waste Segregation

Each type of product is stored separately in a designated product-specific AST. Under no circumstance are incompatible liquids mixed. Each AST has a product designation.

Inventory of Stored Products

Weekly inventory reconciliation of the products currently stored on-site against the transportation and disposal manifest is performed. Any discrepancies are investigated to determine if product leakage for an AST occurred

Other Product Management

Used oil filters and absorbents/oily rags are collected in flat bed trucks. These products are then transferred into a designated "product-specific" sealed roll-off container at the facility. The used oil filters are transported off-site in the sealed roll-off container to a foundry where the filters are recycled. The oily rags/absorbents are transported off-site in the sealed roll-off container to an approved incinerator for energy recovery.

FACILITY CLOSURE PROCEDURES

In accordance with Rule 62-710.800(9)(a) FAC, in the event that the Raider Environmental Services, Inc. facility is closed, steps will be taken to ensure that: (1) there will be no need for further facility maintenance; (2) and that 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 62-762.801, FAC.

The above requirements will be met by closing the aboveground storage tank system and assessing the site in accordance with Rule 62-762.801, FAC. These activities will include:

1. Notification of RER 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, (Three weeks after initiation of closure activities).

3. A high pressure water rinse of all containment areas and the storage pad (7 business days following completion of Step 2 above). A visual inspection will be performed and serve as the standard for completion of the decontamination. No visible stain should remain on the containment.

4. A Closure Assessment will be conducted in accordance with 62-762.801(4). Waste material generated through the investigation process will be tested and managed by Department guidelines for investigative wastes. The petroleum product contaminants of concern are defined in Table A of 62-770, F.A.C. Raider will collect representative soil samples from around and beneath the tank area, and perform visual inspection for evidence of contamination. Additional field screening of the soil will be done using a Flame Ionization Detector. Samples will be obtained from 0 to 2 feet below surface. Groundwater samples will be obtained from areas indicating contamination, and will be collected by installing temporary monitoring wells. Installation of permanent wells will be contingent upon results of the temporary groundwater well samples.

   The Contamination Assessment is not intended to provide a complete horizontal and vertical characterization of any contamination detected. A complete site characterization would be addressed based upon the results of the Contamination Assessment.

   Should evidence of contamination be present, then additional soil and groundwater contamination assessment and possibly remedial activities will be conducted in accordance with Rule 62-780, FAC.

   Assuming no significant contamination is discovered, the contamination assessment will be completed 7 business day after completion of Step 3).

The total time for closure of the facility, assuming no significant contamination is discovered, will be 35 days following initiation of Step 2 above.

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. If necessary, a permit modification request for approval of a revised closure plan shall be submitted to DEP.

CLOSURE COST ESTIMATE

The Closure Cost Estimate is included with this Attachment.

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: Feb 8, 2013 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)

X Letter of Credit* ____ Performance Bond* ____ Guarantee Bond*

____ Insurance Certificate ____ Financial Test ____ Trust Fund Agreement

*Indicate mechanisms that require use of a Standby 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/swfr/

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

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

Signature: _____ Phone: _____

Name and Title: _____ E-mail: _____

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

Please mail this completed cost estimate to:

Used Oil Permitting Coordinator
Florida Department of Environmental Protection
2600 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
1. Decontamination and Disposal 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	10	$1,500.00	$15,000.00
waste characterization	Each	1	$800.00	$800.00
disposal				
b. Wash Water waste characterization	Each	1	$800.00	$800.00
disposal	Gallons	25000	$0.25	$6,250.00
c. Sludges/Sediment waste characterization	Each	1	$800.00	$800.00
disposal	Drums	80	$110.00	$8,800.00
d. Used Oil Filter Management waste characterization	NA			
disposal	NA			
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipement and secondary containment waste characterization	Each	1	$800.00	$800.00
disposal	Gallons	90000	$0.22	$19,800.00
f. Mobilization Costs	Each	1	$1,000.00	$1,000.00
g. Other Solid Waste Drums	Each	40	$110.00	$4,400.00
			Subtotal (1) Decontamination/Disposal:	**$58,450.00**

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	$6,000.00
b. Closure Certification Report	$2,000.00
Subtotal (2) Professional Services:	**$8,000.00**
Subtotal of (1) and (2) Above:	**$66,450.00**
3. Contingency (10% of the Subtotal)	$6,645.00
TOTAL CLOSING COST:	**$73,095.00**

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	