

Winston, Kathy

From: Winston, Kathy
Sent: Wednesday, June 11, 2014 7:30 AM
To: 'steve@raiderenvironmental.com'
Cc: 'John Jones'
Subject: Project Closed email for Inspection on 3/5/2014 at Raider Environmental Services
Attachments: final inspection report from 352014.pdf

The purpose of this email is to acknowledge return to compliance from the Department's inspection on March 5, 2014 at the above mentioned facility. Attached please find the final report for that inspection. Please feel free to contact me if you have any questions concerning this matter or any other compliance issue. Thank you for your cooperation in this matter.

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**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Raider Environmental Services

On-Site Inspection Start Date: 03/05/2014

On-Site Inspection End Date: 03/05/2014

ME ID#: 83539

EPA ID#: FLR000143891

Facility Street Address: 4103 NW 132nd St, Opa Locka, Florida 33054-4510

Contact Mailing Address: 4103 NW 132nd St, Opa Locka, Florida 33054-4510

County Name: Miami-Dade

Contact Phone: (305) 994-9949

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Antonia Varela, Operations Administrator; Norva Blandin, Environmental Specialist

LATITUDE / LONGITUDE: Lat 25° 53' 41.924" / Long 80° 15' 51.6958"

SIC CODE: 4959 - Trans. & utilities - sanitary services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Raider Environmental Services (RES) has been in operation at this location since November of 2008, and currently operates a Used Oil Processing Facility under Department permit #284932-HO-004, expiration date October 13, 2018. RES is a hazardous waste transporter, as well as, a transporter, processor, and marketer of used oil and used oil filters. The facility also processes oily water from tank bottoms and ships' bilges. RES is situated in a zoned industrial area and encompasses 1.55 acres. The facility has recently added a two story building, which is being used as office space. The building also has two full service bays in the rear for repair of the facility's vehicles. The facility has 40 full time employees and is on city water and sewer.

The facility has five vacuum trucks, two of which are Vactors, used for dry product such as fly ash. The facility has four tankers, one of which is a 6000-gallon vacuum truck, and the rest of the tankers have 7000-gallon capacities and are used for the transport of both used oil and oily water. The facility has four tractor trailers, one of which is a truck designed for picking up roll-offs and the other three are for used oil collection. For hazardous waste transport, the facility uses a box truck and there is also a box trailer, which is generally used for emergency response situations.

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The used oil tank farm has eleven tanks in use and of these, six are being used for storage of used oil. They are tank numbers one through six. Tank numbers seven, nine, ten, eleven and sixteen are process tanks. There is also another containment area in front of the processing building, which has four 20,000 gallon vertical tanks that hold already processed water.

Process Description:

While touring the laboratory area, it was noted that the waste container present there didn't have an appropriate label, this issue was corrected while the inspectors were still on site.

The facility representative gave the inspectors an overview of how both used oil and oily water are processed through the plant. Heat, emulsifiers and caustics are use in the oily water processing, while the used oil is processed using flocculants and acids.

Record Review

The training records (certificate of most recent HAZWOPER/used oil training) for Joey Betancourt, the yard foreman, and the training records (certificates of most recent HAZWOPER/used oil training and DOT training) for one of RES' drivers were not available for review, as the person in charge of those records was on vacation. Also, it was noted that the facility's general facility inspection logs had not been filled out for one week in February of this year. All other records appeared to be in order and were produced in a timely manner. These records included: the Contingency Plan, the waste analysis plan and the closure plan, which are included in the facility's permit, as well as, manifests, and acceptance and delivery logs for used oil and hazardous waste.

New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	62-710.600(2)(c)
Question Number:	29.380
Question:	Does the facility maintain training records?
Explanation:	The facility couldn't produce any training records for the employees as the person in charge of these records was on vacation.
Corrective Action:	Please forward the Department copies of hazardous waste/used oil training records for Joey Betancourt and hazardous waste/used oil and DOT training records for one of the facility's drivers.

Areas of Concern

Type:	Area Of Concern
Rule:	279.52(a)(1)
Question Number:	28.210
Question:	Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment?
Explanation:	The facility had missed a week of performing and recording general facility inspections in February of 2014.

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Corrective Action: The Department would like to remind RES to perform and record daily general facility inspections whenever the facility is operating.

Conclusion:

An exit interview was conducted at the conclusion of the inspection which addressed the potential violation and area of concern listed above. The facility was not in compliance at the time of the inspection. The facility was given fourteen days to return to compliance

Inspection Date: 03/05/2014

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kathy R. Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

3/10/2014

DATE**Supervisor:** Karen Kantor

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.