



FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

June 30, 2014

Bob Mulholland
Raider Environmental Services, Inc.
5080 SR 60 East
Mulberry, FL 33860
bobmulholland@raiderenvironmental.com

Re: Compliance Assistance Offer
Raider Environmental Services, Inc.
EPA Identification Number: FLR000176271
Polk County

Dear Mr. Mulholland,

A *Hazardous Waste Program* inspection was conducted at your facility on June 4, 2014, under the authority of Section 403.061, Florida Statutes (F.S.). During this inspection, possible violations of Chapter 403, F.S and Chapters 62-730 and 62-710, Florida Administrative Code (F.A.C.) were observed. The purpose of this letter is to offer you compliance assistance as a means of resolving these matters.

Please see the attached inspection report for a full account of Department observations and be advised this Compliance Assistance Offer is part of an agency investigation preliminary to agency action in accordance with Section 120.57(5), F.S. We request you review the items of concern noted in the attached inspection report and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should either:

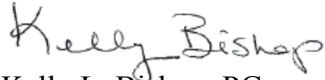
1. Describe what you have done to resolve the issue (see "Recommendations for Corrective Action" section of the report),
2. Provide information that either mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for one of our inspectors to visit your facility to offer suggested actions to return to compliance without enforcement.

It is the Department's desire that you are able to document compliance or corrective actions concerning the possible violations identified in the attached inspection report so that this matter can be closed without enforcement. Your failure to respond promptly in writing (or by e-mail) may result in the initiation of formal enforcement proceedings.

Raider Environmental Services, Inc.
EPA ID No.: FLR000176271
Compliance Assistance Offer
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Please address your response and any questions to Erin DiBacco of the Southwest District Office at (813) 470-5900, or via e-mail at Erin.DiBacco@dep.state.fl.us. We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Bishop".

Kelly L. Bishop, PG
Assistant Director
Southwest District
Florida Department of Environmental Protection

KB/ED/sdc

Enclosures: Inspection Report



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Raider Environmental Services Inc

On-Site Inspection Start Date: 06/04/2014

On-Site Inspection End Date: 06/04/2014

ME ID#: 100667

EPA ID#: FLR000176271

Facility Street Address: 5080 Hwy 60 E, Mulberry, Florida 33860

Contact Mailing Address: 5080 Highway 60 East, Mulberry, Florida 33860

County Name: Polk

Contact Phone: (863) 525-4411

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Transfer Facility

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Hazardous Waste Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D. Camp, Inspector

Other Participants: Bob Mulholland

LATITUDE / LONGITUDE: Lat 27° 53' 36.7303" / Long 81° 55' 32.3462"

SIC CODE: 2992 - Manufacturing - lubricating oils and greases

TYPE OF OWNERSHIP: Private

Introduction:

Raider Environmental Services, Inc. (Raider) was inspected on June 4, 2014, to determine the facility's compliance with state and federal hazardous waste regulations. The Department's Hazardous Waste Program last inspected this facility in August 2011. Since that inspection, Raider has been issued a combined Used Oil and Solid Waste Processing Permit and is currently registered as a Hazardous Waste Transporter and Transfer Facility. The combined permit was issued on August 12, 2013. This site operates with well water and a septic system.

Process Description:

Raider is a registered used oil/used oil filter transporter and transfer facility as well as a registered hazardous waste transporter and transfer facility and permitted used oil and solid waste processor. The facility includes eight used oil storage tanks ranging from 20,000 to 26,500 gallons as well as a warehouse and office space. Raider processes the used oil mainly by heating with a natural gas boiler to allow phase separation to occur. The water phase is removed and is commingled with other waste waters. The waste waters are transported to Raider's Opa Locka facility for further processing/disposal. The used oil fraction is transported to Noble Oil located in North Carolina as off specification used oil for further processing. Raider is not currently operating as a Used Oil Marketer.

Used oil/used oil filter transporting records, both the acceptance and the delivery records, were

Inspection Date: 06/04/2014

reviewed. According to Mr. Mulholland, Raider does not accept any used oil that fails the halogen screening. Used oil is typically screened with a "sniffer" refrigerant leak detector. If the sniffer reacts, the oil is tested with a Dexsil kit. Mr. Mulholland stated that it was the drivers responsibility to ensure the sniffers are working properly. Logs of sniffer checks are not being kept. The Department recommends keeping a log of sniffer checks to ensure the devices are operating properly. At the time of the inspection, Raider was not maintaining documentation of any rejected used oil loads. Raider was also not documenting halogen screening on all incoming used oil. Used oil filters are transported/released to Kellen, which is located on the same property, for processing.

Used oil and waste waters are transported by rail car to Noble or the Opa Locka facility. According to Mr. Mulholland, used oil is loaded into the rail car and released to CSX for transport the same day. Raider, however is not maintaining any documentation to verify the material is not being stored within the rail cars for greater than 24 hours. The rail cars and tracks are not equipped with any secondary containment or track pans.

The solid waste processing area is located within the building which is equipped with secondary containment. The processing is conducted within a sealed roll-off. On site records indicate that the facility is not storing more than 40 tons of processed or unprocessed solids. All of the solid waste material was located either in the roll-off or in closed 55-gallon drums. Safety Data Sheets (SDSs) and analytical data on the solid waste was available and reviewed during the inspection for some of the materials on site.

The hazardous waste 10-day transfer portion of the facility is also located within the building. Logs of the incoming and outgoing shipments, uniform hazardous waste manifests, and documented inspections of the containers were reviewed. No hazardous waste was in transport at the time of the inspection.

Other documentation reviewed during the inspection include: the contingency/SPCC plan, hazardous waste and used oil training documentation, PCW records, solid waste inventory spreadsheets, and daily inspections. Discrepancies are noted below.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11
Explanation:	Prior to the inspection, Raider had not conducted a proper waste determination on the filter basket solids. This material was being comingled with the solid waste processed at the facility and disposed of in the landfill.
Corrective Action:	Mr. Mulholland stated that he will begin collecting this waste and will analyze it to ensure it is not characteristically toxic prior to managing as non-hazardous waste.

Type:	Violation
Rule:	279.52(a)(1)
Explanation:	During the inspection, spent cigarette butts were observed in two 5 gallon bucket storing used oil. The buckets are used to collect used oil dripping from two of the fill ports.
Corrective Action:	Raider must maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned release.

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Type: Violation
Rule: 403.727(1)(c)
Explanation: At the time of the inspection, a large portion of the used oil tank system's piping and all three fill ports were not located within secondary containment per General and Standard Conditions Part II 6.c. of the permit.
Corrective Action: Raider must provide all piping and ancillary equipment of the tank system with appropriate secondary containment.

Type: Violation
Rule: 62-710.401(6)
Explanation: At the time of the inspection, several containers, including the eight used oil storage tanks, two 55-gallon drums and two 5-gallon bucket, storing used oil were not labeled with the words "Used Oil." Mr. Mulholland stated that decals for labeling the tanks were on order prior to the inspection.

At the time of the inspection, Raider was not providing the railcars with secondary containment protection during the loading of used oil. Please note that secondary containment will need to be provided to the railcars if they store used oil for greater than 24 hours prior to transport.
Corrective Action: Raider must ensure that all tanks and containers used to collect and store used oil are labeled with the words "Used Oil." Raider must also ensure that proper spill collection equipment is used while loading the rail cars. Secondary containment is required for rail cars storing used oil for periods greater than 24 hours.

Type: Violation
Rule: 62-710.510(2)
Explanation: Prior to the inspection, Raider was not maintaining documentation of rejected loads of used oil.
Corrective Action: Raider must begin keeping documentation of rejected loads of used oil.

Areas of Concern

Type: Area Of Concern
Rule: 62-740.100(10)
Explanation: On site records indicate that the facility has accepted PCW, however there is no designated storage tank for PCW. Personnel indicated that these loads would be comingled with other wastewaters prior to transport to Opa Locka for processing. (Corrected)
Corrective Action: Mr. Mulholland explained the records indicating PCW acceptance were likely inaccurate. After reviewing the definition of PCW, the material was more likely oily water or diesel and water mixtures. Mr. Mulholland stated that future PCW arrivals will be segregated.

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Conclusion:

At the time of the inspection, Raider Environmental Services, inc. was not operating in compliance with state and federal used oil processor regulations.

Inspection Date: 06/04/2014

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.

Shannon D. Camp

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE

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.

Hughes, Rhonda

From: Hughes, Rhonda on behalf of DiBacco, Erin
Sent: Monday, June 30, 2014 1:01 PM
To: Bob Mulholland (bobmulholland@raiderenvironmental.com)
Cc: DiBacco, Erin; Camp, Shannon D.
Subject: Raider Environmental Services, Inc. FLR000176271 Compliance Assistance Letter
Attachments: 1-CAO Raider.pdf; 2-Raider final.pdf

Tracking:	Recipient	Delivery
	Bob Mulholland (bobmulholland@raiderenvironmental.com)	
	DiBacco, Erin	Delivered: 6/30/2014 1:02 PM
	Camp, Shannon D.	Delivered: 6/30/2014 1:02 PM
	SWD_Clerical (Shared Mailbox)	
	SWD_Clerical@dep.state.fl.us	Delivered: 6/30/2014 1:02 PM

Dear Mr. Mulholland,

Attached, please find the above subject CAO Letter and Inspection Report. In an effort to reduce costs and waste, our agency is moving to electronic rather than paper correspondence. This is the only copy that you will receive, unless you request otherwise.

Acrobat Reader 6.0 or greater is required to read this document. It is available for downloading at <http://www.adobe.com/products/acrobat/readstep.html>

If you have any questions concerning the contents of the attached documents, please contact the FDEP Environmental Manager Mr. Erin DiBacco at (813) 470-5900 or via email Erin.DiBacco@dep.state.fl.us

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Sincerely,

Rhonda Hughes
Secretary Specialist
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637
Phone: (813) 813-470-5718
Fax: (813) 470-5993
Rhonda.Hughes@dep.state.fl.us

Hughes, Rhonda

From: Haines, Marcia on behalf of SWD_Clerical (Shared Mailbox)
Sent: Monday, June 30, 2014 9:39 AM
To: Hughes, Rhonda
Subject: FW: for review and signature - CAO Raider

Please process accordingly

From: Camp, Shannon D.
Sent: Monday, June 30, 2014 8:49 AM
To: SWD_Clerical (Shared Mailbox)
Subject: FW: for review and signature - CAO Raider

Please process.

Thanks.
Shannon

From: DiBacco, Erin
Sent: Monday, June 30, 2014 8:42 AM
To: Camp, Shannon D.
Subject: FW: for review and signature - CAO Raider

Shannon,

Please forward to admin. to process.

Thanks,

Erin

From: Bishop, Kelly L.
Sent: Monday, June 30, 2014 8:32 AM
To: DiBacco, Erin
Subject: RE: for review and signature - CAO Raider

Erin. IT is still working on getting the Bamboo pad/pen working so I through in my signature on the word document.

From: DiBacco, Erin
Sent: Monday, June 30, 2014 7:43 AM
To: Bishop, Kelly L.
Subject: FW: for review and signature - CAO Raider

Hi Kelly,

I will stop by to discuss.

Thanks,

Erin

From: Camp, Shannon D.
Sent: Wednesday, June 18, 2014 7:57 AM
To: DiBacco, Erin
Subject: for review and signature - CAO Raider

Erin:

<L:\Compliance Assurance Program\Outgoing Correspondence\Team DiBacco\Raider>

Oculus:

HW
Discovery Compliance
Polk Co.
FLR000176271
Noncompliance Related
Permitted/Consent TSD
CAO w/ Inspection Report

Thanks,

Shannon