



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

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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

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|--------------------|---|
| 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. |

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|--------------------|---|
| 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.

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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**Supervisor:**Erin DiBacco

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.