



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

November 4, 2015

Steve Obst
President
Raider Environmental Services, Inc.
5080 SR 60, East
Mulberry, FL 33860
steve@raiderenvironmental.com

Re: Compliance Assistance Offer
Raider Environmental Services, Inc.
EPA ID No.: FLR000176271
Polk County

Dear Mr. Obst,

A Hazardous Waste Program inspection was conducted at your facility on October 1, 2015, 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 property to offer suggested actions to return to compliance without enforcement.

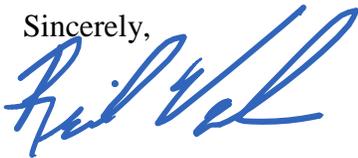
It is the Department's desire that you are able to document compliance or corrective actions concerning the possible violations identified in the attached inspection report so that this matter

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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.

Please address your response and any questions to Shannon Camp of the Southwest District Office at (813) 470-5904 or via e-mail at Shannon.D.Camp@dep.state.fl.us. We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly L. Bishop".

signed on behalf of

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

KLB/rv/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: 10/01/2015 **On-Site Inspection End Date:** 10/01/2015
ME ID#: 100667 **EPA ID#:** FLR000176271
Facility Street Address: 5080 Hwy 60 E, Mulberry, Florida 33860
Contact Mailing Address: 4103 NW 132nd St, Opa Locka, Florida 33054-4510
County Name: Polk **Contact Phone:** (305) 994-9949

NOTIFIED AS:

CESQG (<100 kg/month)
Transporter
Transfer Facility
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility
Routine Inspection for Used Oil Transfer Facility
Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D. Camp, Inspector
Other Participants: Kevin McIntyre

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 October 1, 2015, to determine the facility's compliance with state and federal hazardous waste regulations. The Department's Hazardous Waste Program last inspected this facility in June 2014. Raider has 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 and a modification was issued on September 30, 2014. The modification increased the non-hazardous, non-used oil storage capacity from 40 tons to 200 tons. The facility's permitted solid waste processing area was inspected by the Department's Solid Waste Program during this visit. A separate report will be issued for that inspection.

Process Description:

Operations have not changed since the previous inspection. 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.

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Many of the records requested to be reviewed during the inspection were not available. Repeated requests have been made, however they have still not been provided to the Department. In order for the Department to finish the inspection, the following records need to be provided to the Department: current contingency plan; record of all used oil releases greater than one gallon; used oil rejection log; copy of the current closure plan (the plan provided was outdated); copy of all hazardous waste manifests, including any hazardous waste disposals and where Raider was the transporter of hazardous waste; records demonstrating that rail cars are released to CSX within 24 of initiating filling with used oil; employee training records; and proof of current vehicle insurance and financial assurance.

During the inspection, a rail car was being filled with used oil. A "kiddy pool" was located beneath the rail car. Mr. McIntyre stated that two rail cars were to be filled that day and that they would be released to CSX that same day. Two additional rail cars were observed and Mr. McIntyre stated that they were empty.

The records reviewed during the inspection include: used oil acceptance records from January 2, 2015, to September 30, 2015; daily logs (1/1/15 through 9/30/2015); and monthly logs (January through September).

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.44(a), 279.46(a)(5)(i)
Explanation:	<p>During the inspection, one used oil acceptance record (UO-66210 dated 7/8/15) did not have the generator's signature. This record also did not include information on a halogen screening. Two other acceptance records (dated 1/3/15 and 1/5/15) also did not include information on a halogen screening.</p> <p>Delivery records from Raider's Opa Locka facility to the Mulberry facility were reviewed during the inspection. All of the records indicate that the used oil delivered to the Mulberry facility is "#5 On Spec" oil". No analyses are being conducted to ensure that the oil is on specification per 40 CFR 279.11 and as required under 40 CFR 279.70(a)(2) and 279.72.</p>
Corrective Action:	<p>Raider must ensure that all acceptance records are signed by a representative of the generator and have the results of a halogen screening documented on them.</p> <p>The facility has insisted that the oil is being sent to Noble Oil for further refinement. Please provide documentation from Noble Oil that the oil is not being accepted as on spec and is being re-refined. All future shipments of oil in which Raider is claiming it to be on specification must have analyses conducted in accordance with 40 CFR 279 Subpart H.</p>

Type:	Violation
Rule:	62-710.401(6)
Explanation:	<p>At the time to the inspection, the facility did not have secondary containment provided for the fill port located at the southern end of the property. (Corrected)</p> <p>The Department is also concerned that the tank system's secondary containment may need to be resealed. During the inspection, the western wall</p>

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appeared to show evidence of seepage of water.

Corrective Action: Secondary containment was provided for the fill port during the inspection.

The Department requests that the tank system's secondary containment be thoroughly inspected and any necessary repairs are conducted.

Conclusion:

At the time of the inspection, Raider Environmental was not operating in compliance with state and federal regulations governing used oil processors. Raider must provide all the requested documentation noted above to the Department within 30 days.

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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: Richard Vaughn

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.