



March 9, 2016

Rick Vaughn
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Response to October 1, 2015 Inspection

Dear Mr. Vaughn:

Please accept this letter as our response to the deficiencies noted upon Ms. Shannon Camp's inspection on October 1, 2015. In an effort to comply and fulfill the corrective actions/measures needed to address the alleged violations, please find below our corrective measures as listed in your email dated on February 25, 2016 to Mr. Steve Obst.

Type: Violation
Rule: 279.44(a), 279.46(a)(5)(i)

Explanation: 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. 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.

Corrective Action: 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. 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.

Corrective Measure: Upon further investigation on the above noted violation, we have reiterated and retrained our driver's to fully ensure that signatures are obtained from the generators on every shipment, as well as, ensuring that the halogen screening box is noted and indicated on each manifest that depicts used oil was picked up for recycling.

Since the October 1st inspection, all outbound shipments to Mulberry are classified as "#5 Off Spec Oil" and do not require any analysis to meet that definition. All shipments to Noble Oil are sent for further treatment. Noble Oil is located in Sanford, NC and receives Off Spec #5 Oil from Raider.



Type: Violation
Rule: 62-710.401(6)

Explanation: 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)

The Department is also concerned that the tank system's secondary containment may need to be resealed. During the inspection, the western wall 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.

Corrective Measure: Raider will apply an epoxy coating that is resistant to deterioration in an effort to prevent water seepage. This repair will be completed by March 31, 2016.

Thank you for duly noted observations during your inspection and hope this satisfies your needs in order for us to maintain compliance.

Sincerely,

A handwritten signature in black ink, appearing to read "Orlando Solis".

Orlando Solis
Director of Compliance & Environmental Operations
Raider Environmental Services, Inc.