



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

FACILITY INFORMATION:

Facility Name: Raider Environmental Services

On-Site Inspection Start Date: 12/08/2016 **On-Site Inspection End Date:** 12/08/2016

ME ID#: 83539 **EPA ID#:** FLR000143891

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

Contact Mailing Address: 4103 NW 132nd St, Opa Locka, FL 33054

County Name: MIAMI-DADE

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transfer Facility facility

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for Used Oil Processor facility

Routine Inspection for Universal Waste Transporter facility

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

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Ben Fisch, Environmental Specialist; Orlando Solis, Director of Compliance and Env. Operations

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 approximately 25 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

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for emergency response situations.

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:

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.

In the covered, bermed, bulking area for used oil filters and oily solid waste, one used oil filter drum was found to be leaking. The inspector reminded RES, despite the fact, that there is a sump in this area that feeds directly to the processing plant, an issue like this should be address by transferring the used oil filters into compatible container in good condition or simply overpacking it.

While touring the laboratory area, it was noted that the waste container present there didn't have an appropriate label. This is not required as RES is a Conditionally Exempted Small Quantity Generator but labeling is a always a "Best Management Practice", especially in the case of a laboratory.

No other issues were noted during the facility tour. The facility requires safety shoes, safety glasses and hard hats when out in the yard or shop. The facility has fire extinguishers located throughout the facility, which were serviced in November 2016. While in the shop area, the inspector noted a collection of fire extinguishers. The facility representative explained that these were ones that were missed last month or are going out for reconditioning. RES is an emergency response company; therefore, beside adequate equipment for cleanup and decon on their own site, they have an entire trailer full with response equipment for offsite work.

Record Review

From a review of the training records, it appeared that one of RES's drivers (Arturo Menendez) is overdue on his required every three year DOT training. All other records appeared to be in order and were produced in a timely manner. These records included: general facility inspection log, 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:	279.43(b)
Explanation:	Arturo Menendez, a driver for Raider, doesn't appear to have received every three year DOT training as required by HW and used oil rules.
Corrective Action:	Please provide the Department with a certificate demonstrating that Mr. Menendez has received the above-mentioned training.
	RES return to compliance on 12/23/2016 with the submittal of a certificate verifying every three year DOT training for Arturo Menedez.

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Conclusion:

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

RES return to compliance on 12/23/2016 with the submittal of a certificate verifying DOT training for Arturo Menedez.

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1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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2.0 - CESQG Checklist**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Standards for Conditionally Exempt Small Quantity Generators	Yes	No	N/A
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✓		

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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.

Kathy R. Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

01/19/2017

DATE

Ben Fisch

Inspector NAME

Environmental Specialist

Inspector TITLE

FDEP

ORGANIZATION

Orlando Solis

Representative NAME

Director of Compliance and Env. Operations

Representative TITLE

Raider Environmental Services

ORGANIZATION

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.

Report Approvers:**Approver:** Karen E. Kantor**Inspection Approval Date:** 01/19/2017