



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

October 16, 2017

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

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

Dear Mr. Obst,

Department personnel conducted a Hazardous Waste compliance inspection of the above-referenced facility on August 24, 2017. Based on the information provided during the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Elizabeth Knauss at (813) 470-5902, or via e-mail at: Elizabeth.Knauss@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Kennedy".

Shannon Kennedy
Environmental Manager
Compliance Assurance Program
Southwest District

Enclosures: Inspection Report

cc: Orlando Solis, Radier Environmental, Orlando@raiderenvironmental.com
Michael Ferguson, Polk County - michaelferguson@polk-county.net



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

FACILITY INFORMATION:

Facility Name: Raider Environmental Services Inc
On-Site Inspection Start Date: 08/24/2017 **On-Site Inspection End Date:** 08/24/2017
ME ID#: 100667 **EPA ID#:** FLR000176271
Facility Street Address: 5080 Hwy 60 E, Mulberry, FL 33860
Contact Mailing Address: 4103 NW 132nd St, Opa Locka, FL 33054-4510
County Name: Polk

NOTIFIED AS:

CESQG (<100 kg/month)

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant

Other Participants: Leslie Pedigo, ES III; Abigail Bridges, ES I; Kevin McIntyre, Manager

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 operates a used oil and solid waste processing facility under permit 316140-HO-001/316140-SO-003 that was issued September 30, 2014. The permit expires August 12, 2018. The company also operates a 10-day hazardous waste transfer facility at this location. Mr. Kevin McIntyre, the facility operations manager provided information during this inspection.

Process Description:

Operations are described in the facility's permit application. Currently two oil trucks, a box truck and two tanker trucks operate out of this facility. The tankers are used for picking up wastes generated by ships at the Port of Tampa. On occasion, the facility may receive oil transported by other companies, such as Speedy Oil.

At the time of this inspection, Raider was in the process of re-painting the tank farm equipment. The facility was clean and well managed, with no visible signs of releases. Since the previous inspection, the other businesses on the property, Kellen Environmental and McKensie Environmental have closed. The former Kellen oil filter processing building has been cleaned out, and a steam autoclave has been installed for a potential expansion into biomedical waste processing. No biomedical waste was on site, although the building was storing totes of DOT corrosive (UN1791) sodium hypochlorite solution. Two vertical tanks in secondary containment are used to store the boiler fuel for the autoclave.

Halogen checks are conducted on used oil when it is received. Used oil is then offloaded at one of three stations, depending on the material being unloaded - used oil and oily waste water are generally unloaded at different stations, as the processing requirements are different. Closed 55 gallon drums are staged at the unloading area to catch drips and store hoses. Oil is filtered and passes through a manifold system to the

Inspection Date: 08/24/2017

storage and processing tanks. De-emulsifiers and other chemicals can be added to the oil in the piping system as processing aids. A horizontal heated tank is used for gravimetric separation. Sampling ports in the tank allow separation to be monitored. The facility tests the oil for percent water prior to shipment off site, however it is not currently claiming that the oil meets the specification, so no specification analyses were reviewed as part of this inspection. The boiler for the processing system used to be fired by either natural gas or used oil, however the gas service has been disconnected. Separated water is shipped to Aqua Clean Environmental for further processing and treatment prior to disposal to a POTW owned by the City of Lakeland.

Currently, oil is usually being shipped to Noble Oil in Sanford N.C. by rail in cars owned by Noble Oil. The facility has upgraded its rail siding significantly since the previous inspection. No track pans were available, therefore the rail siding does not meet used oil transfer facility secondary containment requirements under 40 CFR 279.45(a). However after cars are loaded, they are released to CSX within the 24 hour limit.

At the time of this inspection, no hazardous waste containers were on site. A small number of 55 gallon drums of oily waste were in storage pending processing. A roll-off container inside the building was being used to consolidate containers of oily non-hazardous waste for disposal. No free liquids were observed in the roll off. The facility was within its permitted solid waste storage capacity. The area was clean and well managed. Some used refractory brick was stored on the pavement outside the building, along with a roll-off storing a filter press.

Facility records were in order. The 10-day hazardous waste transfer facility records included all required information. Hazardous waste manifest copies were on site and available for inspection. One manifest copy did not include the second page, showing transfer to a third transporter, however it was provided after the inspection. Used oil receiving and disposal records were also on file. Personnel training records, facility inspection records, financial assurance records and the contingency plan were up to date.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	263.20(d)(1)
Question Number:	6.11
Question:	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)
Explanation:	One manifest was missing a second page showing that the waste was transferred to another transporter. (Corrected)
Corrective Action:	A copy of manifest #014862188 JJK was provided after the inspection. Records documenting transfer to the next transporter or designated facility must be retained for a minimum of three years.

Conclusion:

Based on the results of this inspection, Raider's Mulberry facility is operating in compliance with state and federal regulations for used oil processors and hazardous waste transfer facilities. A missing manifest record was provided after the inspection

Inspection Date: 08/24/2017

6.0 - Transporters 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.	Transporter Requirements (62-730.170 & 40 CFR 263)	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - CESQG Bill-of-Lading			✓
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)		✓	
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)(1)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)(2)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓

Inspection Date: 08/24/2017

Item No.	SQG Waste	Yes	No	N/A
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)? 62-730.150(2)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

Inspection Date: 08/24/2017

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.

Elizabeth Knauss

Environmental Consultant

Principal Inspector Name**Principal Inspector Title**

FDEP - SWD

10/13/2017

Principal Inspector Signature**Organization****Date**

Leslie Pedigo

ES III

Inspector Name**Inspector Title**

FDEP - SWD

Organization

Abigail Bridges

ES I

Inspector Name**Inspector Title**

FDEP - SWD

Organization

Kevin McIntyre

Manager

Representative Name**Representative Title**

Raider - Mulberry

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:** Elizabeth Knauss**Inspection Approval Date:** 10/13/2017