Raider

ENVIRONMENTAL SERVICES

Mulberry, Florida

USED OIL PROCESSOR PERMIT APPLICATION

FLR 000 176 271

June, 2018

8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division–HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8772

Date Received (for FDEP Official Use Only)

EPA ID FLR000176271 | **MTS** | **RCRAInfo**

1. Reason for Submittal — Mark 'X' in correct box:

- ☐ To provide **initial notification** (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).
- ☒ To provide **subsequent notification** (to update status and facility identification information).
- ☐ Is this the **final notification** (see instructions) for the facility?

2. Facility or Business Name: Raider Environmental Services — **FEID No.**

3. Facility Operator (List additional Operators in the comments section).

- **Name of Operator:** Raider Environmental Services — ☐ New Operator — **Date became Operator:** ___/___/___ (mm dd yy)
- **Street or P.O. Box:** 4103 NW 132nd Street — **Phone Number:** (305) 994-9949
- **City or Town:** Opa Locka — **State:** FL — **Zip Code:** 33054
- **Operator Type:** ☒ Private ☐ Federal ☐ Municipal ☐ State ☐ Other ____

4. Facility Physical Location Information

- **Physical Street Address:** 3555 East State Route 60
- **City or Town:** Mulberry — **State:** FL — **Zip Code:** 22830
- **County:** Polk — **If available, please attach a map or sketch of the facility boundaries.**
- **Latitude:** 27 53 31.26 (d d m m s s.ssss) **Longitude:** 81 55 39.36 (d d m m s s.ssss) **Method:** GPS **Datum:**

5. Facility North American Industry Classification System (NAICS) Code(s)

A.	B.
324191	562112
C.	D.

6. Facility or Business Mailing Address

- **Street Address or P.O. Box:** 4103 NW 132nd Street
- **City or Town:** Opa Locka — **State:** FL — **Zip Code:** 33054

7. Facility or Business Contact Person

- **First Name:** Steve — **Last Name:** Obst — **Title:** Owner
- **Phone Number:** (305) 994-9949 — **Extension:** — **E-Mail:** steve@raiderenvironmental.com
- **Street or P.O. Box:** 4103 NW 132nd Street
- **City or Town:** Opa Locka — **State:** FL — **Zip Code:** 33054

8. Real Property (Land) Owner of the Facility's Physical Location (List additional real property owners in the comments section.)

- **Name of Real Property (Land) Owner:** Raider Environmental Services — ☐ New Owner — **Date became Owner:** ___/___/___ (mm dd yy)
- **Street or P.O. Box:** 4103 NW 132nd Street — **Phone Number:** (305) 994-9949
- **City or Town:** Opa Locka — **State:** FL — **Zip Code:** 33054
- **Owner Type:** ☒ Private ☐ Federal ☐ Municipal ☐ State ☐ Other ____

	EPA ID No.	FLR000176271

9. Type of Regulated Waste Activity (Mark 'X' in all that apply):

A. Hazardous Waste Activities:

(1) Generator of Hazardous Waste

(Choose only one of the following three categories.)

☐ a. Large Quantity Generator (LQG): Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of *non-acute* hazardous waste; **or** Greater than 1 kg (2.2 lbs) of *acute* hazardous waste

☐ b. Small Quantity Generator (SQG): Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of *non-acute* hazardous waste and/or 1 kg (2.2 lbs) or less of *acute* hazardous waste

☒ c. Conditionally Exempt SQG (CESQG): Generates in any calendar month 100 kg/mo or less (220 lbs.) of *non-acute* hazardous waste and 1 kg (2.2 lbs) or less of *acute* hazardous waste

In addition, indicate other generator activities that apply.

☐ d. United States Importer of hazardous waste

☐ e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 7, mark 'X' in all that apply.

(2) Treater, Storer, or Disposer of Hazardous Waste (at your facility) Note: A hazardous waste permit may be required for this activity.

☐ a. Operating Commercial TSD

☐ b. Operating Non-commercial TSD

☐ c. Non-operating: Postclosure or Corrective Action Permit or Consent Order (HSWA, etc.)

(3) ☐ Recycler of Hazardous Waste (at your facility)

Specify: ☐ Commercial; ☐ Non-Commercial.

A permit is required for storage prior to recycling.

(4) ☐ Exempt Boiler and/or Industrial Furnace

☐ a. Small Quantity On-site Burner Exemption

☐ b. Smelting, Melting, and Refining Furnace Exemption

(5) ☐ Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities - Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

(6) ☐ Underground Injection Control - Mark an 'X' even if the UIC well at your facility does not receive hazardous waste.

(7) ☐ Transporter of Hazardous Waste [Note: A Certificate of Liability Insurance is required along with this registration.] Registration must be renewed annually. ☐ a. For own waste only ☐ b. For commercial purposes

c. **Hazardous Waste Transporter Insurance Information**

Insurance Company _____

Address _____

_____

Contact _____ Telephone _____

Policy Number _____ Expiration date _____

d. **Transportation Mode** ☐ Air ☐ Rail ☐ Highway ☐ Water ☐ Other - specify _____

e. ☒ **Hazardous Waste Transfer Facility**: Storage Volume 200 drums + 20 cubic yards

☐ **Initial notification**

The following items are required to be submitted with the initial notification for a transfer facility [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

☐ Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]

☐ Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]

☐ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]

☐ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]

☐ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]

☐ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

☐ **Notification of changes in above items**

☒ **Annual update notification**

	EPA ID No. FLR000176271

B. Universal Waste (UW) Activities (Mark 'X' in all that apply) ("accumulated" means at any one time):

- ☐ Large Quantity Handler (LQH) = 5,000 kg (11,000 lb) or more of any combination of UW accumulated
- ☐ Small Quantity Handler (SQH) = always less than 5,000 kg accumulated
- ☐ Mercury-containing devices LQH = 100 kg (220 lb) or more accumulated by for-hire handler
- ☐ Mercury-containing devices SQH = less than 100 kg accumulated by for-hire handler
- ☐ Mercury-containing lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler
- ☐ Mercury-containing lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler
  [Note: 4 lamps = 1 kg, 62-737.200(10)]
- ☐ Pharmaceuticals LQH = 5,000 kg or more of universal pharmaceutical waste (UPW) accumulated
- ☐ Pharmaceuticals LQH = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste accumulated
- ☐ Pharmaceuticals SQH = always less than 5,000 kg of UPW and always 1 kg or less of acutely hazardous UPW accumulated

(1) For those Managing	Generate/ Accumulate	Transport (see note in instructions)	Handle at Transfer Facility	(2) Enter your esitmate of the maximum amount (in pounds) of each type of UW on site or transported at any one time.
a. Batteries	☐	☐	☐	
b. Pesticides	☐	☐	☐	
c. Pharmaceuticals	☐	☐	☐	
d. Mercury Containing Devices	☐	☐	☐	
e. Mercury Containing Lamps	☐	☐	☐	

(3) Mercury Recovery and/or Reclamation Facility ☐ Note: A hazardous waste permit is required for this activity. [Rule 62-737.800, F.A.C.]
[Chapter 62-737, F.A.C.]

(4) Reverse Distributor of UW ☐ Pharmaceuticals ☐ Lamps ☐ Devices ☐

(5) Destination Facility for UW ☐ Note: for this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.

C. Used Oil Activities:

(1) Used Oil Transporter - indicate type(s) of activity(ies):
- ☒ **a.** Transporter
- ☒ **b.** Transfer Facility

(2) ☐ **Collection Center**

(3) ☒ **Used Oil Processor** (A permit is required for this activity.)

(4) ☐ **Off-Specification Used Oil Burner**

(5) ☐ **Used Oil Fuel Marketer**

(6) Used Oil Filter
- ☒ **a.** Transporter
- ☒ **b.** Transfer Facility
- ☐ **c.** Processor
- ☐ **d.** End User

(7) Used Oil Transporters, Transfer Facilities, Collection Centers, Off-Specification Burners and Marketers must pay an annual $100 registration fee. Used Oil Processors are exempt from this fee. If applicable, enclose a check or money order, in the amount of $100, payable to Florida Department of Environmental Protection.
☐ A check is enclosed.

(8) Specific Certification to be signed by all Used Oil Transporters
I certify as a Used Oil Transporter that the training program and financial responsibility required under Section 62-710.600, F.A.C., are in place, current and being adhered to. If any modifications have been made to the orginally approved training program, they are explained in attachments to this registration form. Evidence of financial responsibility is demonstrated by the attached Used Oil Transporter Certificate of Liability Insurance, DEP form 62-710.901(4), F.A.C.

Signature of Authorized Person

Steve Obst
Print Name of Authorized Person

(9) The records required under the provisions of Rule 62-710.510, F.A.C., are kept at (check one):
- ☒ our mailing (business) address
- ☐ The site (facility) address

	EPA ID No. FLR000176271

D. Other State Regulated Waste Activities: ☐ **Petroleum Contact Water (PCW) Handler** [Chapter 62-740, F.A.C.]
Note: A water facility permit may be required for this activity.

10. Waste Codes for Federally Regulated Hazardous Wastes: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112).
Hazardous waste transporters list codes routinely or usually transported. Use an additional page if more spaces are needed.

1 D001	2 D003	3 D008	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28

11. Other Status Changes (Mark 'X' in all that apply):

A. Non-Handler of Regulated Waste at This Facility

☐ (1) Business no longer generates, transports, treats, stores, or disposes of hazardous waste
☐ (2) Waste generated by business has been delisted.
☐ (3) Other (explain) _____

B. Facility Closed

☐ (1) Closed at this location and **moved or moving** to another - submit a new Form 8700-12FL for the new location if you will be handling regulated waste there.

☐ (2) Out of Business - Business closed on _____ (Date). Please provide a contact person, mailing address, and phone number where you can be reached after closing.

Contact _____ Phone _____
Address _____
City, State, Zip _____

☐ **C. Property Tax Default** ☐ **D. Petition for Bankruptcy Protection**

12. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. If I have notified as a transfer facility, I am aware that transfer facilities must comply with the requirements of Rule 62-730.171, FAC, and Rule 62-730.182, FAC.

Signature of owner, operator, or an authorized representative	Print Name and Title	Date Signed (mm-dd-yyyy)
John M. Jones	John M. Jones, Engineer	06/10/2018

If the person who filled in this form is not the Facility Contact or Operator, please complete the information below:

John Jones	(479) 353-1368	johnmjonespe@gmail.com
(Name of person completing this form)	(Phone Number)	(E-mail Address)

13. Comments:

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

TO BE COMPLETED BY ALL APPLICANTS (***Please type or print***)

A. General Information

1. New_____ Renewal X Modification _____ **Date current permit expires** _____

2. Revision number _____

3. NOTE: Used Oil Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:
   - _____ Generators (Subpart C of Part 279)
   - X Transporters (Subpart E)
   - _____ Burners of off-spec used oil (Subpart G)
   - X Marketers (Subpart H)
   - _____ are disposing of used oil (Subpart I)

4. Date current operation began: JAN 1, 2011

5. Facility name: RAIDER ENVIRONMENTAL SERVICES, INC.

6. EPA identification number: FLR 000 176 271

8. Facility mailing address:
   4103 NW 132ND ST | OPA LOCKA | FL | 33054
   Street or P.O. Box | City | State | Zip Code

9. Contact person: STEVE OBST Telephone: (305) 681-6203

   Title: OWNER Email steve@raiderenvironmental.com

   Mailing Address:
   4103 NW 132ND ST | OPA LOCKA | FL | 33054
   Street or P.O. Box | City | State | Zip Code

10. Operator's name: RAIDER ENVIRONMENTAL Telephone: (305) 681-6203
    Mailing Address:
    4103 NW 132ND ST | OPA LOCKA | FL | 33054
    Street or P.O. Box | City | State | Zip Code

11. Facility owner's name: RAIDER ENVIRONMENTAL Telephone: (305) 681-6203

    Mailing Address:
    4103 NW 132ND ST | OPA LOCKA | FL | 33054
    Street or P.O. Box | City | State | Zip Code

12. Legal structure:
    - X Corporation (indicate state of incorporation) _____
    - _____ Individual (list name and address of each owner in spaces provided below)
    - _____ Partnership (list name and address of each owner in spaces provided below)
    - _____ Other, e.g., government (please specify) _____

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County _____ State _____

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

13. Site ownership status: [☒] owned [☐] to be purchased [☐] to be leased ____ years
[☐] presently leased; the expiration date of the lease is: _____

If leased, indicate: Land owner's name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

14. Name of professional engineer JUAN JONES Registration No. 50227
Mailing Address:
4103 NW 132ND ST OPA LOCKA FL 33054
Street or P.O. Box City State Zip Code
Associated with: _____

B. SITE INFORMATION

1. Facility location:
County: POLK
Nearest community: MULBERRY
Latitude: 27° 53' 35" Longitude: 81° 55' 32.1"
Section: 9 Township: 30 SOUTH Range: 24 EAST
UTM # ____ / ____ / ____ / ____

2. Facility size (area in acres): 6.99

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

The facility's detailed process description is labeled as Attachment 2.

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG, Etc.) CESQG

2. List applicable EPA hazardous waste codes:

D001, D006, D007, D018 (TANK BOTTOMS MAY BE CHARACTERISTIC)

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment 1

4. A detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. [See item four (4), page four (4) of the instructions.]

The facility's detailed process description is labeled as **Attachment** 2

5. The following parts of the facility's operating plan should be included as attachments to the permit application. [See item five (5), page four (4) of the instructions.]

   a. An analysis plan which must include:
   (i) a sampling plan, including methods and frequency of sampling and analyses;
   (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
   (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment provided the lots are discreet units) to include: metals and halogen content

   The analysis plan is labeled as Attachment 3

   b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

   Sludge, residue and byproduct management description is labeled as Attachment 4

   c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

   The tracking plan is included as Attachment 5

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. [See item six (6), page five (5) of the instructions.]

   The preparedness and prevention plan is labeled as Attachment 6

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. [See item seven (7), page five (5) of the instructions.]

The contingency plan is labeled as Attachment 6

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment 7

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. [See item nine (9), page six (6) of the instructions.]

The closure plan is labeled as Attachment 8

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. [See item ten (10), page seven (7) of the instructions.]

A description of employee training is labeled as Attachment 9

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(6) Operator Certification

Facility Name: RADER ENVIRONMENTAL EPA ID# FLR 000 176 271

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

STEVE OBST

Name and Title (Please type or print)

Date: 6/10/18 Telephone: (305) 681-6203

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Facility Owner Certification

Facility Name: RAIDER ENVIRONMENTAL EPA ID# FLR 000 176 271

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection.

Signature of the Operator or Authorized Representative*

STEVE DOST

Name and Title (Please type or print)

Date: 6/10/18 Telephone: (305) 681-6203

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: RAIDER ENVIRONMENTAL EPA ID# FLR 000 176 271

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described.

Signature of the Operator or Authorized Representative*

STEVE OBST OWNER
Name and Title (Please type or print)

Date: 6/10/18 Telephone: (305) 681-6203

* If authorized representative, attach letter of authorization.

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62 - 4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification X Recertification

1. DEP Facility ID Number: FLR 000176271 2. Tank Numbers: T-1 THRU T-8

3. Facility Name: RAIDER ENVIRONMENTAL SERVICES, INC

4. Facility Address: 3055 E. SR 60, MULBERRY, FL 33860

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

John M Jones
Signature

JOHN M. JONES
Name (please type)

Florida Registration Number: 50227

Mailing Address: 4103 NW 132ND ST
Street or P. O. Box

OPA LOCKA FL 33054
City State Zip

Date: 6/20/18 Telephone (479) 353-1368

[PLEASE AFFIX SEAL]

1 BRIEF DESCRIPTION

2 DETAILED PROCESS

3 ANALYSIS PLAN

4 SLUDGE MANAGEMENT

5 TRACKING PLAN

6 CONTINGENCY PLAN

7 UNIT MANAGEMENT PLAN

8 CLOSURE PLAN

9 TRAINING PLAN

10

Attachment 1

Brief Description

Used Oil Treatment Processing Description

Raider collects used oil from a variety of sources, including automotive repair shops, service stations, and utility companies. The oil is typically mixed with water, in concentrations ranging from 6% to 15%. In order to make the used oil viable as a replacement fuel, it is necessary to reduce the water content. Raider utilizes a variety of treatment options, the most frequently used of which are thermal treatment and chemical treatment.

In the case of thermal treatment, the oil is delivered to the Raider facility by bulk trucks and placed into storage tanks. Since the density of the used oil is less than that of water, limited separation occurs in the storage tank. Water is periodically drained from the bottom of the tanks and treated in the Raider permitted water treatment facility. The used oil is then transferred to a thermal treatment process tank. This vessel contains coils which are heated using a thermal treatment fluid from a gas-fired burner. The used oil and water mixture is heated to a temperature of 110-180 degrees Fahrenheit. At the elevated temperature, the difference in density between the used oil and the water is increased, making removal of the water phase more efficient. Water is removed from the bottom of the tank, leaving clean used oil to be transferred to a Clean Used Oil Tank. The clean used oil is tested per Raider's permit requirements and sold to customers.

Chemical treatment of used oil accomplishes the same goal of reducing the water content by a different method. After the used oil is placed in a storage tank, proprietary chemicals are introduced into the tank and the tank circulated. The proprietary chemicals are hydrophilic and extract water from the mixture. After the tank has circulated for a period of time, the circulating pumps are stopped and the mixture allowd to stand. The water collects at the bottom of the tank and is removed. The used oil is tested per Raider's permit requirements and sold to customers.

Attachment 2

Detailed Process Description

Detailed Used Oil Treatment Processing Description

Raider collects used oil from a variety of sources, including automotive repair shops, service stations, and utility companies. The oil is typically mixed with water, in concentrations ranging from 6% to 15%. In order to make the used oil viable as a replacement fuel, it is necessary to reduce the water content. A process flow diagram showing the steps required to collect and treat used oil is shown in Figure 1.

Raider utilizes a variety of treatment options, the most frequently used of which are thermal treatment and chemical treatment.

In the case of thermal treatment, the oil is delivered to the Raider facility by bulk trucks and placed into storage tanks. Since the density of the used oil is less than that of water, limited separation occurs in the storage tank. Water is periodically drained from the bottom of the tanks and treated in the Raider permitted water treatment facility. The used oil is then transferred to a thermal treatment process tank. This vessel contains coils which are heated using a thermal treatment fluid from a gas-fired burner. The used oil and water mixture is heated to a temperature of 110-180 degrees Fahrenheit. At the elevated temperature, the difference in density between the used oil and the water is increased, making removal of the water phase more efficient. Water is removed from the bottom of the tank, leaving clean used oil to be transferred to a Clean Used Oil Tank. The clean used oil is tested per Raider's permit requirements and sold to customers. A typical piping diagram of the flow of the oil is shown in Figure 2. This diagram is applicable for all storage tanks at the Mulberry facility All piping is 4 inch diameter carbon steel.

Chemical treatment of used oil accomplishes the same goal of reducing the water content by a different method. After the used oil is placed in a storage tank, proprietary chemicals are introduced into the tank and the tank circulated. The proprietary chemicals are hydrophilic and extract water from the mixture. After the tank has circulated for a period of time, the circulating pumps are stopped and the mixture allowed to stand. The water collects at the bottom of the tank and is removed. The used oil is tested per Raider's permit requirements and sold to customers.

Attachment 3

Waste Analysis Plan

RAIDER ENVIRONMENTAL WASTE ANALYSIS PLAN
USED OIL TESTING

This section of the manual is to comply with 40CFR 279.55. This analysis plan will describe the procedures that will be used to comply with the analysis requirements of 40 CFR279.53 (rebuttal presumption for used oil) and to 279.72 (specifications for used oil) when applicable.

Route Drivers:

1-When a driver reaches any destination or any customer location on a route, the driver must first attempt to park his vehicle in an area that will not disturb the business flow of traffic in and out of the customer's station or facility.

2-Before the driver attempts to check the tank or pump the customer's tank, the driver must seek out the contact person that is listed on his route sheet or the person in charge and inform the customer that they are to check the amount of used oil in their used oil storage tank and pump it if necessary.

If the customer informs the driver that it not a good time, the driver must then inform the customer of our next scheduled route for his facility and that there may be a possible off route pick-up charge if they need to be picked up prior to the next scheduled service. The driver should then notify dispatch of any problems.

3-After the driver has checked with the contact person at each facility, and has been approved to service the facility; the driver will then follow these pick-up procedures:

A-The driver will stick the customers tank and determine by the size of the tank and the amount of oil projected to be at the stop, which is listed on the drivers route sheet, to determine whether the customer needs to be pumped or not.

B-If the driver determines that the customer's tank needs pumping, the driver will then use a halogen sniffer to sniff the air space of the storage tank or use the top to bottom sampling method that consist of a small pipe with a check valve on the end that allows the operator to sample the tank from top to bottom. This is a sample method that has been shown to be equivalent to that in (APPENDIX 1 of 40CFR 261 and 260.20 and 260.21). The driver will then run the halogen sniff test on the oil to determine whether the oil is contaminated with any halogenated solvent.

This halogen sniff test consist of a halogen leak detector device that will be used to determine the presence of halogens. The driver must calibrate the sniffer using a calibration standard on each day.

(Raider's Compliance and Transportation Management staff does training on calibration).

If the sniff test fails, the driver will run a second test using the Dexsil Chlor-D-Tech Q4000 test kit to determine whether the used oil is over a 1000 ppm halogen. If this kit test fails, the driver

is required to inform the customer that a halogenated waste may have been mixed with the used oil. If there are multiple containers and further kit tests are needed to determine the source of contamination or if only part of the used oil might not be contaminated with halogens.

40 CFR 279.55(ii)

This test will be done and these procedures shall be followed on every pick-up of used oil and shall be done on site at the generator's location.

40 CFR 279.55 (iii)

This test method is approved by EPA and listed as EPA SW-846 Method Number 9077.

If the oil fails the Dexsil Kit Test, showing the presence of halogens over 1000ppm, the driver will then inform the customer that his oil is presumed to be contaminated with a hazardous waste and must be regulated as a hazardous waste. Or, rebut the presumption and provide an analysis to prove otherwise. If the customer wants to rebut the assumption that hazardous waste has been mixed with the used oil in question, the driver should then take a top to bottom sample of the used oil and label the sample. Then the sample must be brought back to the plant with a completed manifest where the customer was charged for the GC Analysis. The sample should be submitted to RES's lab to be sent out to a third party lab for the GC analysis.

(Note: the GC Analysis results should be attached to the Customer's manifest when billed)

If the customer does not desire us to have the GC analysis run on his used oil, the driver must then instruct the customer to get in contact with our office for assistance in disposing of the used oil that is contaminated with a hazardous waste. After notifying the customer of the condition of his used oil under hazardous waste regulations, the driver will also be required to immediately notify our office and let management know what customer on his route has failed the Dexsil Test Kit analysis, also, if there were any other problems or information that may be helpful to management as we assist the customer in disposing of his potential hazardous waste.

C- Any customers that fail our halogen analysis that does not rebut the presumption by the GC analysis or other acceptable rebuttal options must be reported to State regulatory agency.

40 CFR 279.53 (Rebuttal Presumption)

If the customer chooses to rebut the presumption under 279.53, it will be the policy of Raider Environmental Services, Inc. to use an analytical method from SW-846, Edition III to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in APPENDIX VIII of 40 CFR 261. The Gas Chromatography method will be the method Raider Environmental Services will use when rebutting such presumption.

If the customer chooses to exempt any halogenated waste mixed with the used oil by way of the conditionally exempt small quantity generator rules at 40 CFR 261.5, the customer must provide

Raider Environmental Services, Inc. with a written and signed certification that the generator has generated less than 100kg of hazardous waste during the previous and current calendar month.

Prior to pick up, the President of Raider or his designee must approve acceptance of any material under this exemption.

D- IF the used oil that is tested passes the analysis showing that the amount of halogen is under 1000ppm, the driver will then stick his truck tank and look on his chart that shoes how many gallons per inch goes in his truck, and then proceed to pump the customer's tank calculating the gallons going into the tank truck with the chart that each driver has on board his vehicle.

The customer must certify that there has not been any hazardous waste mixed into the waste water/antifreeze being disposed of. The wastewater will usually be picked-up at the time of normal used oil service.

Wastewater and antifreeze should be tested with the halogen sniffer using the same procedures as used oil. If this testing fails, drivers should report to Raider Environmental Services, Inc. management for further instruction.

If the driver is operating one of the multi compartment trucks, the water/antifreeze can be pumped on the spot. However, the driver should always let the customer know that water is present. The driver should also assist the customer in locating the source of the water to avoid future contamination.

E-After the driver has pumped the used oil from the customers storage tank, the driver will determine the amount of gallons that he pumped by measuring the tanker truck before and after pumping, using the tank chart to calculate correct gallons. The driver will then fill out a used oil pick-up manifest, taking the data off his route sheet, filling the manifest out completely. The driver must be sure to check the box showing that the used oil being picked-up was under 1000 ppm halogen.

The purpose of this documentation is to have proper records for any state or federal regulatory inspections that may occur in the future. After the customer has signed the pick-up manifest, the driver will leave the top original copy with the generating facility and proceed on to his next route stop.

(Be sure that the tanker dome lid is closed and secured between stops)

F-After the driver has run his route and he has a full truckload of use oil ready to be unloaded, the driver will proceed to the unloading facility designated by management.

G- The plant will then take the composite sample of each tank compartment of the used oil collected and the drivers detailed truck report to the plant lab and the driver will report to the office. The following test shall be performed on each incoming truckload shipments of used oil to Raider Environmental Services, Inc. plant facility.

Test Method

Halogen (SW-846 9077 or 9075)

Water Distillation

Flash Point ASTM closed cup)

PCB's GC (batched sample)

If the sample fails the halogen test then to rebut the presumption under 279.53 it will be the policy of Raider Environmental Services, Inc. to use an analytical method from SW-846, Edition III to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in APPENDIX VIII of 40 CFR part 261. This used oil should be segregated until testing and approval of results is completed.

The gas Chromatography method will be the method Raider Environmental Services, Inc. will use when rebutting such presumption. Only the President of Raider or his designee can approve other rebuttal options.

These are the basic procedures for our analysis plan. There may be changes from time to time, however all changes to Raider Environmental Services, Inc. plan must be approves by the President or his designee prior to changes being made.

If the President or his designee are not available to approve a shipment prior to rebuttal, then management should segregate material for testing, using his or her best judgment. But all incoming used oil must be tested at our plant facility before a shipment of used oil is accepted and unloaded.

Attachment 4

Sludge Management

SLUDGE, RESIDUE, AND BYPRODUCT MANAGEMENT DESCRIPTION

Sludge, residue and by-products from filters, tank bottoms and or storage tank, etc., are removed as needed, on a frequency which depends on volumes (layer) less specific on frequency of oil and oily waste received and processed at the facility.

The sludge and sump solids come from filter baskets and pump sumps. These materials are commingled . This washing procedure minimizes the quantity of waste that must be shipped off-site for disposal and placed in containers. Representative samples will be obtained after start-up and characterized Sludge residues, filter basket solids, and other residues are shipped in bulk to a State permitted landfill or thermal treatment (waste to energy) facility. Any wastes that contain free liquids will be tested for flashpoint, prior to shipment. If found not to be characteristic for flashpoint, these materials may be sent to a State permitted facility for solidification and/or ultimate disposal at a Treatment, Storage, and Disposal Facility (TSDF).

Solid material or residue that accumulates over time in the bottom of separation vessels, pump trucks, or tankers is removed and analyzed for Florida pre-burn constituents, as defined in 62.713.501(4), F.A.C. Solids that are not hazardous as defined in 40 CFR Part 261 limits are stabilized with an inert organic material (such as saw dust, granular/clay absorbent, etc.) and are sent for disposal as a non-hazardous waste at a secured landfill or sent for thermal treatment. Solids that exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are containerized and disposed at an off-site licensed TSDF. Any material sent to a TSDF is accompanied by a hazardous waste manifest.

Whenever a tank is cleaned, a sample of the sludge will be collected for analysis. The analytical testing will include, at minimum, TCLP 8 RCRA Metals, TCLP Volatiles, TRPH, PCB's, Total Halogens, and Percent Solids. Any solids determined to exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are disposed at an off-site licensed TSDF. Each material sent to the TSDF is accompanied by a hazardous waste manifest.

Attachment 5

Tracking Plan

ATTACHMENT 5
TRACKING PLAN

Raider Environmental Services maintains records of all materials transported from and received at the Raider facility for a minimum of three years. Incoming materials (used oil, oily water, oily wastes, antifreeze, PCW, and industrial wastewater) are tracked by completion of Daily Route Logs (completed by driver) and Permanent Daily Report Sheet.

Each driver must submit a "Daily Route Log" to accompany the bill of ladings and/or manifests. Bill of Ladings and/or manifests are in accordance with the requirements specified in 40 CFR 279.56(a). The corresponding information is then entered into the facility's "Permanent Daily Report". Bill of ladings and manifests will be kept on site and are filed by driver, by month at the facility. On occasion, an independent used oil hauler may deliver materials to the facility. A manifest is generated for each independent hauler and the information is entered into the electronic "Oil Purchase" spreadsheet (hardcopy generated weekly).

The "Permanent Daily Report" information is maintained at the Opa Locka facility. The total volumes collected by Raider are added directly to the "Weekly Used Oil Collection Report." Copies of the reports generated on a weekly basis will be retained at the facility for at least three years. Copies of the "Daily Route Log", "Permanent Daily Report", and the "Weekly Used Oil Collection Report" are included as part of this section.

Tank inventory records are filed daily. These records are also retained for a three-year period. Analytical results performed by an independent laboratory to verify the on-specification claim will be maintained until closure of the facility, in accordance with 40 CFR 279.57. Analyses concerning rebuttal materials (materials that did not meet the waste acceptance procedure requirements) will also be maintained in accordance with 40 CFR 279.57. Reports and records concerning the implementation of the contingency plan will be maintained for the life of the facility.

PREPAREDNESS AND PREVENTION CONTINGENCY PLAN WITH INCLUDED SPILL PREVENTION CONTROL & COUNTERMEASURES PLAN (SPCC)

RAIDER ENVIRONMENTAL, INC. FACILITY (FLR 000 176 271)

3555 STATE ROUTE 60 EAST
MULBERRY, FL 33830

Location: $27^0$53'38" North,$81^0$55'32" West

Telephone Number: (863) 425-4411

24 Hour Emergency Response Number: (877) 316-0633

Mailing Address

4103 N.W. 132ND STREET
OPA-LOCKA, FL 33054

Prepared: June 2018

PROFESSIONAL ENGINEER CERTIFICATION

I herby certify that I have examined the Raider Services. Spill, Prevention, Control & Countermeasure (SPCC) Plan, addressing the Raider Services, Inc. facility located at 5080 State Route 60 East, Mulberry, Florida 33830 and being familiar with the provisions of 40 CFR 112, attest that this plan has been prepared in accordance with good engineering practices.

John M. Jones
Printed Name of Registered Professional Engineer

_____
Signature of Registered Professional Engineer

_____	50227	Florida
Date	Registration Number	State

Professional Engineer Seal

Raider
ENVIRONMENTAL SERVICES

PLAN REVIEW LOG

By	Date	Activity	PE certification required?	Comments
John M. Jones	June, 2012	Initial Plan	Yes	
John M. Jones	June, 2018	Review	Yes	

TABLE OF CONTENTS

TABLE OF FIGURES

TABLE OF TABLES

1. INTRODUCTION

Raider Environmental Services, Inc. (Raider) operates a non-hazardous waste facility on 6.39 acres of land in Polk County, Florida. The facility is located at 3555 State Road 60 East, FL 33830 (Parcel 24-30-08-000000-011050, 27°53'38" North Latitude, 81°55'32" West Longitude). The location of the Facility along with the nearest hospital and fire station is shown in Figure 1.

The Raider Mulberry non-hazardous waste operation has the following licenses, certificates and registrations as of December 2012:

- City of Mulberry Occupational License Storage Tank Facility (Polk County; Storage Tank Facility 490020; FLR 000 176 271).
- Used Oil Transporter, Transfer Facility, Filter Transporter and Filter Transfer Facility (FDEP/EPA #: FLR 000176 271).
- Storage Tank Registration Placard #: 402973 (FDEP/EPA #: FLR 000 176 271; STCM Account #: 68633; Facility ID #: 9813440).
- Hazardous Waste Transporter Certificate of Approval (FDEP/EPA #: FLR 000176 271).

Applications for a Used Oil Processing Permit and a ten (10)-day hazardous waste storage permit are in the process of being prepared for submittal to the Florida Department of Environmental Protection (FDEP).

Mr. Steve Obst, President of Raider, is the person in charge/qualified individual (Primary Emergency Coordinator) of the Facility. He can be reached twenty-four (24) hours a day, seven (7) days a week at (954) 605-6853. The alternate person in charge/alternate qualified individual (Backup Emergency Coordinator) is Mr. Bobby LeClaire. He can be reached at 954 543-2862 twenty-four (24) hours a day, seven (7) days at week. The Facility can be operated twenty-four (24) hours a day, seven (7) days a week as needed.

No spill events have taken place or occurred at the Facility since it has been in operation. The prevention and mitigation of potential of spills and leaks at the Facility have been minimized using a combination of secondary containment areas (SCA)s and inspection and maintenance best practices.

The following document presents a Preparedness and Prevention Contingency Plan (PPCP) in compliance with 40 CFR 265-52 that incorporates a Spill Prevention Control and Countermeasures Plan (SPCC) as required by Florida Statute Title XXIX Public Health Chapter 403.74 *Environmental Control* pursuant to 40 CFR Part 112. The overall purpose of this plan is to describe engineered structures and developed procedures implemented by Raider to prevent oil discharges from occurring and how to respond in a safe, effective and timely manner if a spill does occur. In addition to

fulfilling requirements of 40 CFR Part 112, this plan is used as a reference for oil storage information and testing records, as a tool to communicate practices to employees regarding the prevention and response to discharges, as a guide to facility inspections and a resource during emergency response operations.

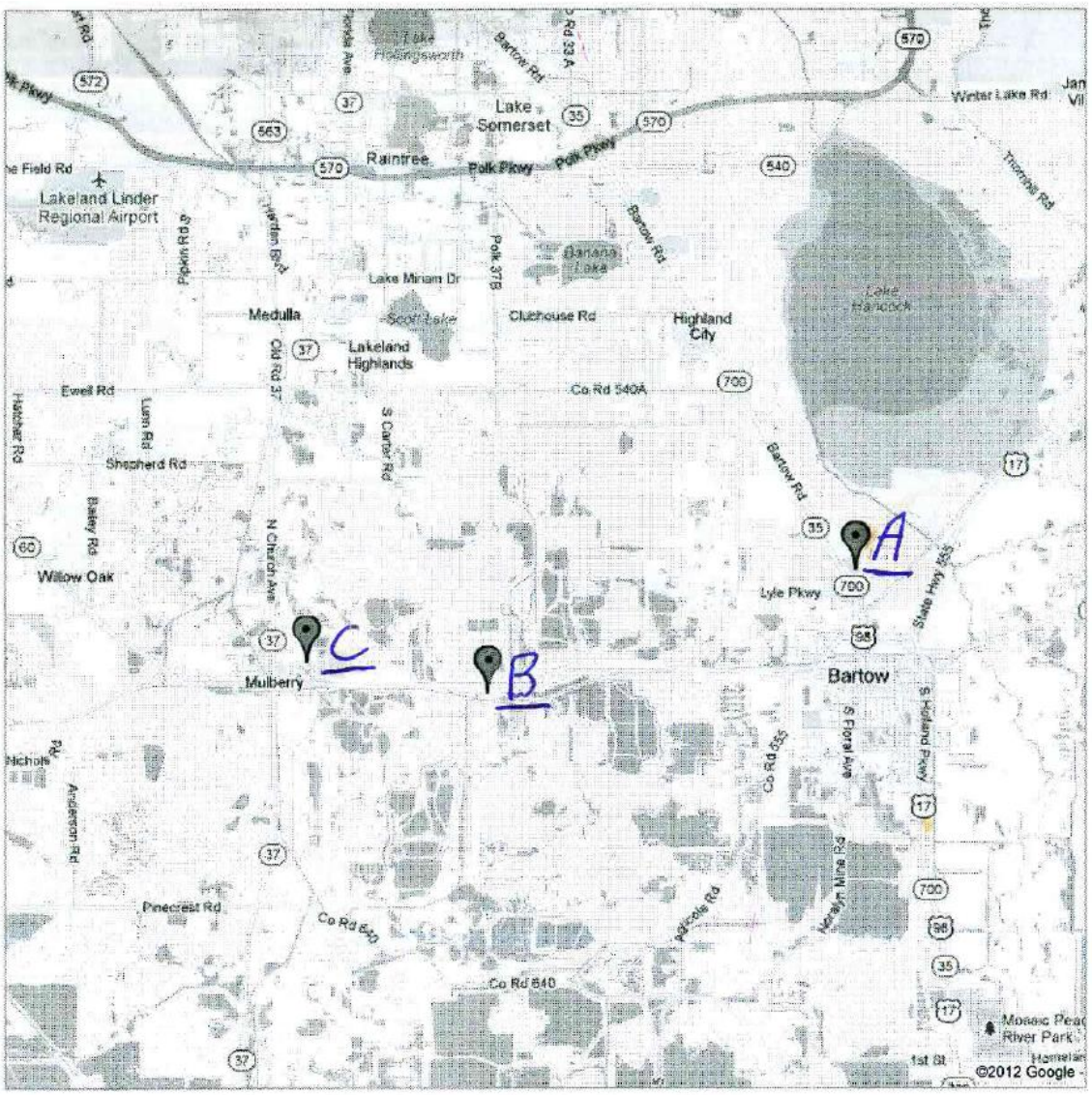
Raider management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix A of this Plan.

This Plan provides guidance on key actions that Raider must perform to comply with the SPCC rule:

- Inspections, tests and evaluations listed in Appendix B that include daily, monthly and annual site inspections (Appendix C, Appendix D and Appendix E respectively).
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan and document them on the log included in Appendix B.
- Immediately report any discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day. The required notification information is presented in Appendix C.
- Submit this plan to the EPA Region 4 Regional Administrator (RA) and the Florida Department of Environmental Protection (FDEP), along with other information as detailed in Appendix C of this plan, if either of the following oil discharges occur from the Facility to navigable waters of the U.S. or adjoining shorelines.
    - More than 1,000 gallons of in a single spill event, or;
    - More than 42 gallons in each of two spill events within any 12-month period.
- Review this plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page on page ii.
- Amend this plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised plan must be recertified by a Professional Engineer (PE) on the certification page on page ii.
- Review and update the plan on an annual basis to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact

information, such as phone numbers. Administrative changes must be documented in the plan review log on page iii of this plan, but do not have to be certified by a PE.

This document was distributed to the County and State agencies and individuals listed in Table 1 as an email and as a hardcopy sent by U.S. Certified Return Receipt Mail. Copies of enclosure letters emailed and sent by U.S. Mail to the recipients listed in Table 1 are provided in Appendix A with the exception of the listed Raider recipients who were provided copies of this document in person. The Certified Mail Return Receipts received by Raider were appended to a copy of each respective enclosure letter copy to provide proof that each of the following agencies were sent this initial Preparedness and Prevention Contingency Plan.



Locations of Closest Hospital and Fire Station to Raider

A — Bartow Regional Medical Center
2200 Osprey Boulevard, Bartow, FL 33831
911, (863) 533-8111

B — Raider Environmental Services, Inc.
3555 State Road 60 E, Mulberry, FL 33830
(863) 425-4411

C — Mulberry Fire Station 720
900 5th Street, Mulberry, FL 33860
(863) 425-9299

FIGURE 1. LOCATION MAP OF FACILITY AND NEAREST HOSPITAL AND FIRE STATION

Raider
ENVIRONMENTAL SERVICES

TABLE 1. RECIPIENTS OF THE FOLLOWING DECEMBER PREPAREDNESS AND PREVENTION CONTINGENCY PLAN

(Plan was delivered to the recipients by email and by U.S. Mail)

Document Recipients	Contact	Phone Number	Address	Email Address
Bartow Memorial Hospital	Mr. Carlos Felix (Facilities Director)	(863) 533-8111	2200 Osprey Blvd., Bartow, FL 33831	carlos.felix@hma.com
Polk County Fire Department	Mr. Wesley Hayes (Fire Marshall)	(863) 534-6019; cell: (863) 651-7974	2470 Clower Street, Bartow, FL 33830	wesleyhayes@polkfl.com
Polk County Police Department	Ms. Fay Smith (Communications Manager)	(863) 401-2255	1911 Jim Keene Boulevard, Winterhaven, FL 33880	fsmith@polksheriff.org
Polk County Department of Forestry	Mr. Victor Memmoli	(863) 648-3160	5745 South Florida Avenue, Lakeland, FL 33813	victor.memmoli@freshfromflorida.com
Florida Department of Environmental Protection	Ms. Kathy Winston, Environmental Consultant	(561) 681-6756	Southeast District, Hazardous Waste Compliance/Enforcement, 400 N. Congress Avenue, Suite 200, West Palm Beach, FL 33401-2319	kathy.winston@dep.state.fl.us
Raider Environmental Services, Inc.	Mr. Steve Obst (President)[1]	(305) 994-9949		steve@raiderenvironmental.com
Raider Environmental Services	Mr. Bobby LeClaire (Field Operations Manager)[1]	(305) 994-9949		bobby@raiderenvironmental.com

1 – Revised Preparedness and Prevention Contingency Plan provided directly to recipient.

2. SECURITY & ON-CALL STATUS

Raider developed and implemented a security program to minimize the possibility of unauthorized entry to the facility, maximize the personal protection of employees operating the facility and prevent the accidental spill of any oil. The security program components are listed below.

- The entire facility is contained within a limited access fenced area, which is monitored 24 hours per day.
- Concrete masonry unit fencing surrounds the entire site to meet safety and security requirements.
- Facility lighting is adequate to permit surveillance of the facility, discourage vandalism and detect spills during hours of darkness.
- Access into the Facility is only available through the main gate.
- Regular security patrols by facility guards during non-working hours.

The following key personnel have been identified and are available to respond to any situation on an as needed basis 24/7.

- Mr. Steve Obst (President of Raider) at (954) 605-6853
- Mr. Kevin McIntyre (Maintenance Manager) at (954) 300-9178
- Ms. Carolyn Moore (Office Manager) at (813) 777-4001

3. PERSONNEL TRAINING AND DRILLS

Facility operations personnel – all HAZWOPER trained - are taught how to properly operate and maintain equipment to prevent the discharge of used oil, oily-water and wastewater along with applicable pollution control rules and regulations. Operations personnel are additionally provided with periodic spill prevention briefings in order to maintain their familiarity with this plan.

The training of all appropriate personnel in the prompt and effective response to a spill is an important component of the Raider training program. Training is intended to assure that all personnel clearly understand the contents of this plan and their respective roles.

4. SECONDARY CONTAINMENT AREAS

The Facility consists of one (1) secondary containment area around eight (8) permitted tanks that will be used for the treatment and processing and storage of used oil, the storage of treated and processed oil and the storage of oily-water separated out of the used oil during treatment and processing operations. The containment area was designed and constructed to minimize the potential for any leak/spill to impact groundwater resources and soils/sediments. The minimum containment area volume was calculated by multiplying the largest tank volume to be contained in the area by a factor or 1.10 (110% of the tank of volume). Figure 2 is provided to show the location of the tank containment area at the Facility.

4.1 SAFE VEHICLE OPERATION

All vehicles entering the Facility are and are required to be operated by trained and licensed operators. Warning signs will be posted where appropriate.

4.2 STORAGE TANKS

All of the treatment/processing and storage tanks at the Facility are above ground storage tanks (AST)s, which are located in the one (1) secondary containment area depicted in Figure 2. The material composition and design of the (AST)s and appurtenances are compatible with the used oil and oily-water to be contained within the tanks. A list of all the Facility ASTs and their contents is provided in Table 2.

Tank integrity inspections are completed for all Facility ASTs on a daily basis. The results of the inspections are recorded and maintained in the Facility office. If a leak is detected, it will be reported, recorded and mitigated followed by necessary actions to prevent the leak from occurring again.

4.3 PREDICTION OF SPILL BEHAVIOR

Any potential spill/leaks of wastes from ASTs and associated appurtenances will be contained by the secondary containment tank enclosure and sumps.

4.4 SPILL DIVERSION AND RETENTION PONDS

No diversion or retention ponds exist at the Facility.

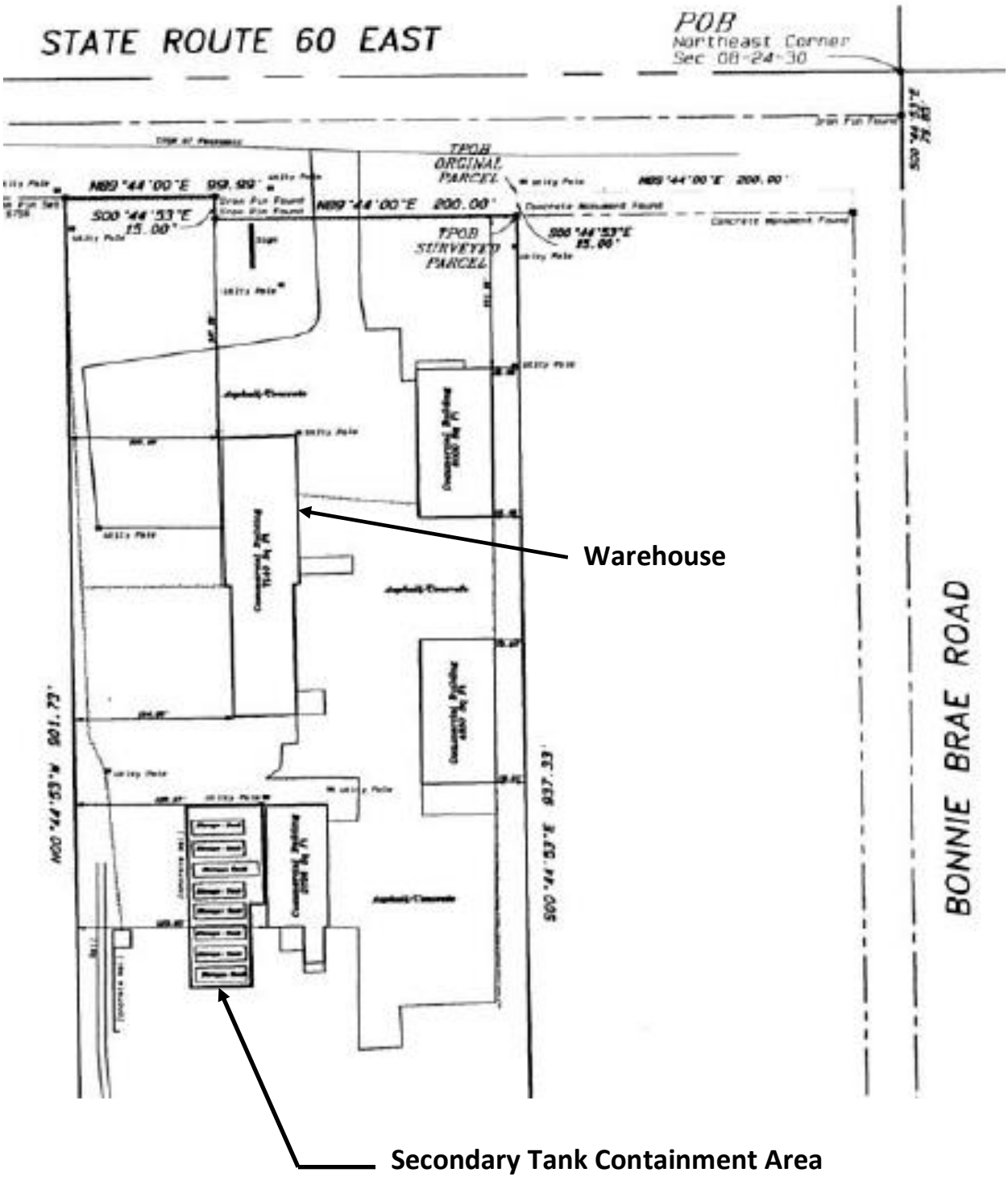


FIGURE 2. SECONDARY CONTAINMENT AREA

TABLE 2. AST DETAILS AND CONTENTS

Tank #	Date Installed	Size (Gallons)	Construction Material	Contents
1	2012	20,000	Carbon Steel	Virgin Oil
2	2012	20,000	Carbon Steel	Virgin Oil
3	2012	26,500	Carbon Steel	Thermal Treatment Tank
4	2012	20,000	Carbon Steel	Unprocessed Used Oil
5	2012	20,000	Carbon Steel	Oily-Water
6	2012	20,000	Carbon Steel	On Spec # 5 Fuel Oil
7	2012	20,000	Carbon Steel	On Spec # 5 Fuel Oil
8	2012	20,000	Carbon Steel	On Spec # 5 Fuel Oil

4.5 SPILL AND STORMWATER DISPOSAL

All rainwater that accumulates in the secondary tank containment area will be pumped through an oil-water separator prior to being discharged outside of the containment area. A description of oil/water separators is provided in Appendix J.

4.6 INSPECTIONS

All ASTs along with supports and foundations, piping, joints, valves and bodies are visually inspected by plant employees as a required part of their daily work. All observed defects, leaks and spills are immediately reported to their supervisor. The supervisor will record the reported information and take any corrective action needed to resolve the problem. Supervisors will complete and maintain written records of the following types of visual inspections/measurements completed on a daily basis in addition to the on-going visual inspections by plant employees.

- Tank integrity
- Tank supports and foundations
- Tank volumes based on internal surface float elevations and site gauges

The written inspection/measurement records are maintained in the Facility Office. Appropriate action, repairs and maintenance will be completed immediately on all Facility components observed to be leaking or to have deteriorated.

All storage tanks, foundations will be visually inspected by operating personnel as a part of everyday operations. Records of visual inspections will be maintained both at the Facility and communicated to line management for review and incorporated in the operating file.

5. EMERGENCY SPILL RESPONSE PLAN

If a spill occurs within the Facility, Steve Obst (President/Primary Emergency Coordinator, cell: 954 605-6853) and/or Kevin McIntyre (Maintenance Manager/Back-up Emergency Coordinator, cell: 954 300-9178) will initiate the following Emergency Spill Response Plan sequence of steps and then notify the regulatory agencies listed on page 19 once the situation has been stabilized. The emphasis of the plan is to remain calm and try to get the situation/spill under control as soon as possible.

1. Dial 911 for emergency medical assistance, if you or anyone else has been hurt;
2. Evaluate the degree of contamination to the Facility and estimate the number of gallons spilled. If more than 25 gallons of used oil or other liquids with hazardous constituents is spilled, notify the FDEP using the numbers listed on page 19;
3. Recover as much liquid as possible using the following spill containment procedures and emergency response materials and equipment listed on page 12.

5.1 SPILL CONTAINMENT PROCEDURES

The spill containment and cleanup procedures presented below are a function of the spill location within the Facility and the permeability of the spill surface.

ASPHALT AND CONCRETE

1. Use the booms, pads, unconsolidated sorbent particles (e.g., “kitty litter) and sand located in the Facility emergency supply location within the Facility’s main office (refer to Table 3 on page 18) to prevent the migration of the spill onto permeable surfaces that are not covered with asphalt or concrete.
2. Use the Facility vacuum truck to remove spill liquids, if the spill is too large for booms.
3. Use loose sorbent materials and sand to surround and contain the spill.
4. Layout secured plastic sheeting on an area away from the spill for the temporary storage of used spill-soaked sorbent materials and sand to prevent potential infiltration of liquids into surface imperfections (e.g., cracks) that may exist.
5. Steam or pressure wash the impacted surface to remove spill residue.
6. Once spill has been cleaned up, dispose sorbent materials and sand into the Facility’s solid waste roll-off and transfer recovered spill liquids into an appropriate storage tank.

Raider
ENVIRONMENTAL SERVICES

TABLE 3. EMERGENCY EQUIPMENT & SUPPLIES LOCATED IN THE WAREHOUSE

ITEM	SIZE	QUANTITY	CAPABILITY
Empty drums	55-gallon	2 drums	Containment of contaminated media
Loose sorbent material	40 lb bags	3 bags	Sorption of contaminants
Sorbent pads	17”X19”X3/8”	600 (3 bundles)	Sorption of contaminants
Nitrile Gloves	Large	6 pairs	Chemical protection
Neoprene Gloves	Large	6 pairs	Chemical protection
Vinyl/PVC pull-on overboots	Large	6 pairs	Chemical protection
Non-sparking shovels	Standard	3	Preparation of Berms etc.
Brooms	Standard	3	Sweeping of sorbent materials
Drain seals or mats	Various	2	Prevention of spill migration
Sand bags	50-lb bags	12	Prevention of spill migration
Sorbent Booms	10’X8’	10	Sorption of contaminants
Sorbent Booms	10’X5’	20	Sorption of contaminants
Rug	36”X300’	1	Sorption of contaminants
Rug	18”X30’	1	Sorption of Contaminants
Plastic Sheeting Rolls	20’X100’	3	Impermeable barrier
Full Face Negative Air Mask	Medium to Large	5	PPE
Organic Vapor Cartridges	Standard	10 pairs	PPE
Half Face Masks	Standard	5 pairs	PPE
Protective Safety Glasses	Standard	10	PPE
Tyvek Suits	Large and XXL	25	PPE

Plastic Bags	33”X60”	200	Disposal of used sorbents, PPE and solid waste
VAC truck	Standard	One (1)	Liquid and semi-solid vacuuming

Notes:

1. PPE – Personal Protective Equipment

PERMEABLE SURFACES NOT COVERED WITH ASPHALT OR CONCRETE

1. Obtain earth moving equipment (loader, backhoe, dump truck, etc.) and sand.
2. Determine the direction of the spill flow and excavate a catch basin or deploy a sand berm to contain the flow
3. Pump the contained liquid into the site VAC truck
4. Lay out plastic sheeting on a surface area – preferably impervious - nearby the spill area.
5. Place impacted soils and spent sorbents on the plastic sheeting.
6. Excavate at least one (1) foot of soil below the spill surface or until the soil appears visually clean.
7. Collect samples of the excavation walls and bottom and place them into sample jars for head space analyses.
8. Use an organic vapor analyzer (OVA) to conduct head space analyses.
9. Review the headspace analytical results to determine how much soil to excavate.
10. Collect soil samples for submittal to a NELAC-certified laboratory for analyses of the spill components to confirm that all impacted soils have been removed.
11. Pickup and transport the impacted soil to the Raider Opa-Locka facility for disposal.

5.2 SECURITY AT SPILLS

Security will be maintained by Facility employees during spill response operations. If the spill is significant, Raider will request security assistance from the local Mulberry police department.

5.3 EMERGENCY COORIDINATOR RESPONSIBILITIES

1. **Activate** Raider Environmental Services Facility alarm/communication system to notify all Facility personnel by:

   a. Notify Facility personnel by word of mouth

2. **Notify** appropriate State or Local Agencies with designated response roles if their help is needed. In the case of fire or explosion:

   a. Pull fire alarm pull switch for Plant alarm system. This will notify Plant personnel as well as notify the Alarm Company.

b. Call 911 to notify the Fire Department.

3. **Identify** the character, exact-source, amount and extent of any released material. This may be done by observation, review of Facility records and/or chemical analysis.

4. **Access** possible hazards to human health or the environment that may result from the release, fire or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion. If assessment indicates that evacuation of local areas may be advisable, immediately notify appropriate authorities. Be available to help local authorities decide whether local areas should be evacuated.

5. **Notify** immediately the government official designated as the On-Scene Commander of the National Response Center using their twenty-four (24) hour toll free number (800) 424-8802. The report must include:

   a. Name and telephone number of person reporting;

   b. Name and address of the Facility

   c. Time and type of incident (release, fire, etc.)

   d. Name and quantity of material(s) involved;

   e. The extent of injuries, if any; and

   f. The possible hazards to human health, the environment or outside the Facility.

   g. Wait for the other party to hang up, **do not hang up first**.

6. **Take** all responsible actions necessary to ensure that releases, fires and explosions do not occur, recur or spread to other oil or waste at the Facility.

7. **After** the emergency is over, provide for the recycling, storing or disposal facility of the recovered materials or materials that result from the release, fire or explosion. In affected area(s) of the Facility make sure that no waste or used oil that may be incompatible with the released material is recycled, treated, stored or disposed of until the clean-up procedures are completed. All emergency equipment listed in this

contingency plan need to be cleaned and fit for its intended use before operations are resumed.

8. **Notify** the Regional Administrator and appropriate State and Local Authorities that the Facility is in compliance with 40 CFR Part 279.52 before resuming operations in the affected area(s) of the Facility.

9. **Note** in the operating record the time, date and detail of any incident that requires implementing this Contingency Plan.

10. **Submit** a written report within fifteen (15) days after the incident to the Regional Administrator. The report must include:

    a. Name, address and telephone number of the Owner or Operator;

    b. Name, address and telephone number of the Facility;

    c. Date, time and types of incident (release, fire, etc.)

    d. Name and quantity of materials involved;

    e. The extent of injuries, if any;

    f. An assessment of actual or potential hazards to human health or the environment outside of the Facility, where applicable; and

    g. Estimated quantity and disposition of recovered material that resulted from the incident.

    h. The name and telephone number of the person or persons to be contacted for more information

6. EMERGENCY RESPONSE CONTACTS AND ARRANGEMENTS

Fire Department: Mulberry Fire Department (911, (863) 401-2255/(863) 425-9299)

Telephone conversations were conducted with fire department personnel confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes.

Police Department: Polk County Police Department (911, (863) 401-2255)

Telephone conversations were conducted with police department personnel confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes.

Hospital: Bartow Regional Medical Center (911, (863) 401-2255/(863) 533-8111)

Telephone conversations were conducted with hospital representatives confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes.

TABLE 4. EMERGENCY CONTACT PHONE NUMBERS

Mulberry Fire Department Station 720, 900 5th Street, Mulberry, FL 33860)	Emergency:	**911**, (863) 401-2255
	Local Office:	(863) 425-9299
Polk County Police Department	Emergency:	**911**, (863) 401-2255
	Main Office:	(863) 401-2255
Polk County Department of Forestry 5745 South Florida Avenue, Lakeland, FL 33813	Emergency:	**911**, (863) 401-2255
	Local Office:	(863) 648-3160
Bartow Regional Medical Center	Emergency:	**911**, (863) 401-2255
	Main Number:	(863) 533-8111
National Response Center	(800) 424-8802	
US EPA – Region IV	(800) 241-1754/(404) 562-8357	
Florida Department of Environmental Protection	State Warning Point (Emergency):	**(800) 320-0519**
	Polk County Warning Point (Emergency):	**(863) 401-2222**
	Regional Office:	(813) 632-7600
Chemtrec	(800) 424-9300	

Raider
ENVIRONMENTAL SERVICES

TABLE 5. MULBERRY FACILITY CONTACT INFORMATION

NAME	TITLE	OFFICE	CELL
Obst, Steve	President		(954) 605-6853
Obst, Tavia	Controller		(954) 914-8414
Moore, Carolyn (Carrie)	Office Manager	(863) 425-4411	(813) 777-4001
McIntyre, Kevin	Maintenance Manager	(863) 425-4411	(954) 300-9178
Corrales, Pedro	Welder	(863) 425-4411	(786) 232-7506
Crowley, Rick	Driver – Class A		(941) 549-0618
De Peralta, Jorge Grave	Oil Driver	(954) 732-5986	(239) 271-7037
Hirt, Warren (Pete)	Box Truck Driver – Class A	(772) 485-2091	(386) 983-3302
Machado, Tony	Used Oil Driver – Class A	(941) 961-9862	(727) 224-6295
Maya, Omar	Used Oil Driver – Class A	(863) 781-9844	(727) 254-7362
Shuman, Bryan	Driver – Class A		(863) 529-6073
Tomayo, Mario	Driver – Class A	(941) 623-5849	(954) 275-1778

7. GENERAL RESPONSIBILITIES

7.1 Personnel Assignments

Mr. Obst and Mr. McIntyre have been designated, respectively, as the Leader and Backup Leader for the following emergency responsibilities at the facility.

- Emergency Coordination
- Communications
- Evacuation
- Emergency Assessment
- Spill Containment
- Fire Fighting
- First Aid

7.2 Emergency Procedures & Actions

Mr. Obst, the emergency response coordinator (ERC), will be notified immediately, if an emergency situation develops at the Facility. Mr. McIntyre, the backup emergency response coordinator (BERC), will be contacted immediately, if the primary leader cannot be contacted.

The ERC/BERC will mobilize to the primary Emergency Operations Center (EOC) when an emergency occurs and respond to the situation using the following steps.

1. Determine the type of emergency (e.g., fire, explosion potential, spill).

2. Identify the source and the quantity of materials involved based on:
    a. Observations
    b. Labeling
    c. Inventory records
    d. Reported analytical information
    e. Knowledge of the facility

3. Decide if any steps can be taken immediately to keep the situation from worsening (e.g., relocation of reactive materials that have not been impacted to reduce explosion and flammable potentials).

4. Assess whether assistance is required from outside organizations (e.g., Mulberry Fire Department and Polk County Police Department).

5. Request assistance from authorities, if company personnel do not have the training and/or resources to respond to the emergency.

6. Direct employees to respond directly to the emergency situation (e.g., spill), if outside help is not determined to be needed.

7.3 Response Procedures & Actions to Specific Emergency Types

Spill

1. Find out if anyone has been injured from the spill and if they have, take appropriate actions.
2. Determine the following information about the spill
    a. Source
    b. Identity
    c. Quantity
3. Use emergency equipment and absorbent material to minimize potential off-site migration and impacts to sewers, soils and groundwater.

Fire

The Emergency Response Coordinator (ERC) will determine whether or not the fire is controllable and if the facility is to be evacuated.

Controllable Determination

1. Use fire extinguishers to put out the blaze.

Uncontrollable Determination

1. Notify the Mulberry Fire Department and Polk County Police Department by dialing 911.
2. While awaiting the arrival of the authorities:
    a. Ensure the accessibility to the fire location fire fighters.
    b. Remove materials and equipment from the area that might fuel the fire and cause it to spread.
    c. ERC monitors for leaks and pressure build-up in the Facility systems.

Severe Weather/Natural Disasters

The ERC will take the following steps, if severe weather is predicted to impact the Facility.

- Determine the nature and duration of the predicated weather event/natural disaster and if and when an evacuation might be required.

- Preparations
    - Move all:
        - Items not securely anchored (e.g., empty and full containers, all hoses and fittings, wall mounted fire extinguishers units, forklifts, pallets and all other loose objects) into the water plant building.
        - Empty trailers (e.g., bulk trailers, box trailers, drum trailers, FRAC tanks) as far away from the Warehouse as possible.
        - Water-sensitive items to storage areas that are as high above ground level as possible.
    - Dismantle and store all equipment in the Warehouse that is located above ground and is expected to be structurally compromised from strong winds (e.g., antennas, satellite dishes)
    - Secure all:
        - All vertical storage tanks with at least three (3) feet of product or water to keep them from lifting off their foundations if storm-water in secondary containment areas rise to a level above ground greater than the bottom of the tanks during a storm.
        - Doorways and windows with plywood sheets that are lag bolted into the walls.
- Cancellation of work
    - Indefinite until the weather (e.g., hurricane) is no longer considered to be a threat to employee safety.
    - Temporary until the weather event (e.g., thunderstorms and sporadic heavy rains) is no longer considered to be threat to employee safety.
    - Communication of Work Cancellations
        - Phone calls to employees at home if work is cancelled before the beginning of the work day at 7 AM.
        - Face to face notification of all employees at the Facility and phone calls to all employees on project work outside of the Facility.
- Shelter Locations
    - Warehouse of the Facility.
- Return to Work/"All Clear" Notification to all employees that the severity of the weather has abated to a level safe for employees to return to work.

Evacuation

The ERC is responsible for implementing the following evacuation procedures.

- Communication/notification of all personnel.
- Notify all employees to stop all work including telephone conversations and exit the Facility (walk, do not run) along with any non-Raider personnel/visitors, unless instructed otherwise by the ERC.
- Account for the presence of all employees who reported for work that morning. Note: each employee is responsible for immediately reporting to their respective

manager once they have left the facility so all employees can be accounted for by the ERC.

Continuation of Facility Operations Following an Evacuation

The ERC must complete the following steps before allowing a resumption of operations at the Facility.

1. Confirmation from authorities that the facility is safe for the resumption of operations.
2. Cleaning, replacement and preparation of all equipment and materials used for an emergency response.

8. REVIEW AND UPDATE OF PPCP WITH INCLUDED SPCC

This PPCP with included SPCC will be reviewed and immediately amended, if necessary, whenever the:

- Applicable regulations are revised.
- Plan fails in an emergency.
- Facility design, construction, operation, and maintenance is changed in a way that:
    1. Materially increases the potential for fires, explosions, releases of used oil or industrial wastewater.
    2. Affects the SPCC or emergency response procedures.
- The list of emergency response coordinators changes.
- The list of emergency equipment changes.

APPENDIX A –SUBSTANTIAL HARM DETERMINATION

Facility Name: Raider Environmental Services, Inc.

Facility Address: 3555 State Route 60 East
Mulberry, Florida 33830

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? NO

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area? NO

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? NO

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? NO

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? NO

APPENDIX B – INSPECTION AND TESTING PROGRAM

Facility Component	Action	Frequency/Circumstances
Aboveground container	• Test container integrity • Combine visual inspection with another testing technique (e.g., non-destructive shell testing). • Inspect outside of container for signs of deterioration and discharges.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Container supports and foundation	Inspect container's supports and foundations.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Liquid level sensing devices (overfill)	Test for proper operation.	Monthly
Effluent treatment facilities	Detect possible system upsets that could cause a discharge.	Daily, monthly
All aboveground valves, piping, and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly

APPENDIX C – DAILY INSPECTIONS

A designated Raider employee performs a thorough visual inspection of the facility during each day of operation. The inspection involves observations of tanks/piping/valves for any damage or leakage, staining or accumulation of oil in secondary containment area, and soils that have become stained or discolored or accumulate more than normal amounts of water in diked and bermed areas.

APPENDIX D – MONTHLY INSPECTIONS

APPENDIX D.1 Inspection Elements

Inspections cover the following key elements.

- Observations of the exterior of:
  - Aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
  - Portable containers for signs of deterioration or leaks.
  - Tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vents for obstructions and proper operation.
- Verification of the proper functioning of overfill prevention systems.
- Checking the inventory of emergency response spill/discharge equipment and restocking as needed.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Raider President. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery. The monthly inspection to be used by Raider is provided in Appendix C.2 below.

Written monthly inspection records are signed by the RAIDER President and maintained with this plan for a period of three (3) years.

APPENDIX D.2 Monthly Inspection Checklist

The following inspection record must be completed *each month* except the month in which an annual inspection is performed. Further description and comments must be added on a separate sheet of paper and attached to the record, if necessary. Any checklist item that receives "yes" as an answer must be described and addressed immediately.

MONTHLY INSPECTION CHECK LIST

	Y*	N	Description & Comments
Storage tanks			
Tank surfaces show signs of leakage			
Tanks are damaged, rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Level gauges or alarms are inoperative			
Vents are obstructed			
Secondary containment is damaged or stained			
Water/product in interstice of double-walled tank			
Piping			
Valve seals, gaskets, or other appurtenances are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Unloading and transfer equipment			
Loading/unloading rack is damaged or deteriorated			
Connections are not capped or blank-flanged			
Secondary containment is damaged or stained			
Berm drainage valve is open or is not locked			
Oil/water separator			
Oil/water separator > 2 inches of accumulated oil			
Oil/water separator effluent has a sheen			
Security			
Fencing, gates, or lighting is non-functional			
Pumps and valves are locked if not in use			
Response Equipment			
Response equipment inventory is complete			

Date: _____ **Signature**:_____

APPENDIX E – FACILITY INSPECTION TO BE CONDUCTED IN JUNE OF EACH YEAR

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. The annual inspection complements the monthly inspection described above and is performed in June of each year using the checklist provided in Appendix E.1 below.

The annual inspection is preferably performed after a large storm event in order to verify the imperviousness and/or proper functioning of drainage control systems such as the dike, rollover berm, control valves, and the oil/water separator.

Written annual inspection records are signed by the RAIDER President and maintained with this plan for a period of three (3) years.

APPENDIX E.1 Inspection Checklist to be Completed in June of Each Year

	Y*	N	Description & Comments
Storage tanks			
Tank surfaces show signs of leakage			
Tank is damaged, rusted, or deteriorated			
Bolts, rivets, or seams are damaged			
Level gauges or alarms are inoperative			
Piping			
Valve seals or gaskets are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Out-of-service pipes are not capped			
Warning signs are missing or damaged			
Unloading and transfer equipment			
Fuel dispenser filters clogged (reduced fuel flow)			
Fuel dispenser strainers clogged			
Connections are not capped or blank-flanged			
Rollover berm is damaged or stained			
Berm drainage valve is open or is not locked			
Drip pans have accumulated oil or are leaking			
Oil/water separator			
Oil/water separator > 2 inches of accumulated oil			
Oil/water separator effluent has a sheen			
Security			
Fencing, gates, or lighting is non-functional			
Pumps and valves are not locked (and not in use)			
Response equipment			
Response equipment inventory is incomplete			

- *Any item that receives “yes” as an answer must be described and addressed immediately.
- The RAIDER President must sign the annual inspection record, which must be maintained with this plan for a period of three years.
- Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet.

Date: _____ Signature of Raider President: _____

APPENDIX F – RECORD OF ANNUAL DISCHARGE BRIEFINGS AND TRAINING

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

APPENDIX G – NOTIFICATIONS OF ANY SIZE DISCHARGE

Provide the following information to the National Response Discharge Center (1-800-424-8802).

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

APPENDIX H – NOTIFICATIONS FOR OIL DISCHARGES GREATER THAN 1,000 GALLONS

This appendix presents the agencies required to be notified immediately and within sixty days of a spill greater than 1,000 gallons.

APPENDIX H.1 Immediate Notifications

The following agencies must be notified immediately in the order presented.

- Bartow Regional Medical Center: 911, if anybody is injured
- Local fire or police department: 911
- National Response Discharge Center: 1-800-494-8802
- Southern Waste Systems (SWS): 954-957-7271, if cleanup help is needed

The above contact information is posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance building, and at the unloading area).

Provide the following information to the notified agencies.

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

A discharge notification form is provided in Appendix C.2 below to assist with the reporting of the required information.

APPENDIX H.2 Discharge Notification Form

Part A: Discharge Information	
Person who Notified the Agency:	
Company Name: Raider Environmental Services, Inc.	
Address: 3555 East State Route 60, Mulberry, Florida 33830	
Telephone: 863-425-4411	
Owner/Operator: Steve Obst	
Primary Contact: Carolyn Moore	
Type of Material Released/Discharged:	Discharge Date (Time):
Quantity Released/Discharged:	Discovery Date (Time):
Quantity Released/Discharged to a waterbody:	Discharge Duration:
Location/Source:	
Number and Types of Injuries (if any)	
Affected media (e.g., air, groundwater, surface water, stormwater sewer, POTW, oil-water separator)	
Danger or threat posed by the release or discharge:	
Part B: Information Received from Notified Agency	
Agency Notified:	Person Spoken To:
Information/Directions Received from Agency :	

* The POTW should be notified of a discharge only if oil has reached or threatens sewer drains that connect to the POTW collection system.

APPENDIX H.3 60-Day Notifications

The following information must be submitted to the EPA Regional Administrator and to FDEP within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence;
- Other pertinent information requested by the Regional Administrator.

A standard report form for submitting the information to the EPA Regional Administrator and to FDEP is provided below in Appendix C.4.

APPENDIX H.4 Agency Notification Standard Report

Agency Notification Standard Report

Facility:	*Raider Environmental Services, Inc.*
Owner/operator:	Steve Obst
Name of person filing report:	
Location:	3555 State Road 60 East, Mulberry, FL 33830
Maximum storage capacity:	
Daily throughput:	
Nature of qualifying incident(s):	

Description of facility (attach maps, flow diagrams, and topographical maps):
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:

Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:
Additional preventive measures taken or contemplated to minimize possibility of recurrence:

Other pertinent information:

APPENDIX I – COPIES OF ENCLOSURE LETTERS

APPENDIX J – OIL/WATER SEPARATORS

Oil/water separators are devices commonly used for wastewater discharges (Figure 1). The effluent from oil/water separators is typically discharged to either a sanitary sewer system or a storm sewer. Properly designed, installed and operated, oil/water separators provide a treatment system for handling oily wastewater that prevents the entry of unacceptable levels of contamination to a storm sewer or sanitary sewer.

According to Stoke's Law, a 100-micron diameter oil droplet will rise approximately six (6) inches in water every ten minutes. A 20-micron oil droplet will take over two hours to rise the same distance. Because an oil droplet must rise approximately 48 inches to reach the water surface in a typical gravity – type oil/water separator, smaller droplets may pass through uncollected. Coalescing (binding together) the smaller oil droplets makes them larger and more buoyant, causing them to rise faster. Coalescing oil/water separators may use inclined plates placed within the separation chamber, which provide only a short vertical distance (1/4") for the small droplets to travel before they encounter a fixed surface. Here they can coalesce with other droplets and continue to rise along the plates to the water's surface. Another coalescing method uses a filter made of oleophillic (oil "loving") fibers such as polypropylene. The fine oil droplets attach to the fibers as the wastewater flows through. As the droplets get larger, they become buoyant enough to detach from the fibers and rise to the surface, where they can be collected.

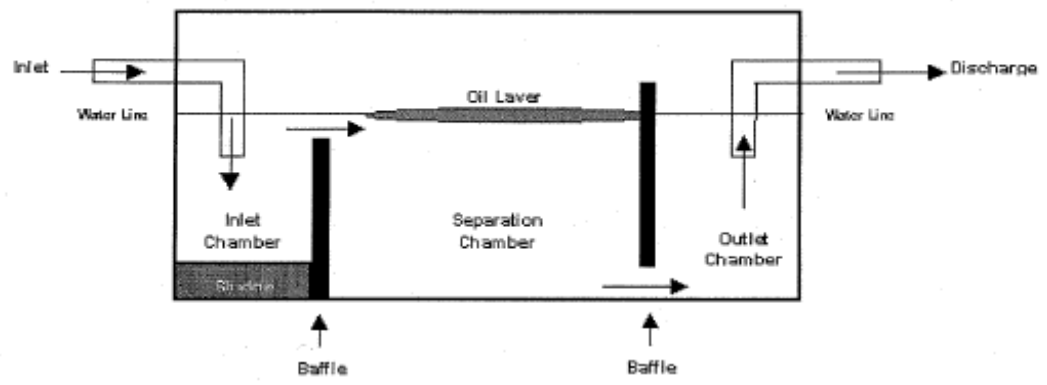


Figure 1. Conceptual Diagram of a Simple Gravity Oil/Water Separator. In a gravity operated O/WS, the oil wastewater is introduced through the system inlet. Water turbulence is calmed in the inlet chamber behind the first baffle, where solids settle out and form sludge on the bottom of the chamber. As the wastewater flows over the first baffle to the middle, or separation, chamber, oil droplets rise to surface and are trapped behind a second, higher baffle, which has an opening along its edge. The remaining water passes under the second baffle into the outlet chamber, where it is diverted to a discharge point. Consequently, solid sludge's can be collected from the bottom of the inlet chamber and oil droplets that accumulate at the water's surface in the separation chamber can be skimmed off or otherwise routed to a separate holding tank.

APPENDIX J.1 OPERATIONS AND MAINTENANCE

Eliminate unpermitted pollutants and prohibit discharge of wastewater from industrial operations containing hazardous wastes and heavy metals.
Implement dry cleanup procedures and only use floor drains to carry residual amounts of floating petroleum pollutants. Plug floor drains to oil/water separators that carry industrial wastewater from maintenance shops. Collect, treat and dispose of industrial waste separately.
Establish a primary office of responsibility (to include the functional organization for the management of pollutants discharged and Civil engineering for maintenance of oil/water separators) which understands and has direct control over respective functions.
Remove and test oil/water separator sludge regularly prior to disposal to ensure compliance with sludge disposal requirements. If sludge is hazardous, take immediate actions to identify and eliminate sources of hazardous pollutants. Dispose of sludge as a hazardous waste and retest wastewater from oil/water separator to assure compliance.

APPENDIX J.2 GENERAL CONSIDERATIONS

O/WSs are typically very simple devices. However, several factors that could potentially affect safety, efficiency and proper management must be given careful consideration prior to the installation or modification of any O/WS.

Flow Rate

In general, the effectiveness of an O/WS in separating out the oil phase is increased by slower wastewater flow rates into the separator and longer “residence times” (i.e., the period of time that the wastewater remains in the oil/water separator). When the wastewater enters the receiving chamber of the separator, the velocity and turbulence of the fluid is reduced allowing heavier-than-water solids to settle, while larger oil droplets rise to the water’s surface. Further separation continues in the middle chamber (see Figure 2) where smaller droplets of oil rise (more slowly) to the water’s surface and join the larger droplets. The remaining wastewater, once it has passed under the second baffle to the outlet chamber, is discharged (with proper authorization and/or permitting) to a local storm water or sanitary sewer system.

Design Capacity

An O/WS has upper limits to the amounts of oil and sludge that can effectively accumulate while it is in operation. If too much oil accumulates in the receiving and middle chambers, it may flow into the wastewater outlet and end up being discharged to the environment. Proper O/WS design will ensure the separator capacity is sized to meet the needs of the process.

Emulsifying Agents

Detergents and soaps designed to remove oily grime from equipment, weapon systems, vehicles or other components can adversely affect the operation of a gravity O/WS. These types of emulsifying agents are specifically formulated to increase the dispersal of oil into tiny drops in water, which is why they are such good cleaners. When these soapy wastewaters enter the O/WS, it takes significantly longer for the oil to separate, if it can, from the water. Excessive use of detergents can render an O/WS inefficient by completely emulsifying oils into the wastewater stream and allowing it to pass through the system. Low-emulsifying soaps are available that allow oil separation to occur more quickly after the soapy water enters the O/WS. (**NOTE:** Personnel must not use low-emulsifying soaps on weapon system components unless they are specifically approved by the weapon system's single manager.)

Maintenance Practices

The ability of oil/water separators to function properly depends upon the timely performance of required service and maintenance. Oil/water separators must be monitored and maintained by competent personnel who understand how the systems operate. O/WSs should be given the same close attention given to any other important piece of equipment. The operators, users and maintainers of the O/WS must clarify who will be responsible for monitoring, inspecting, maintaining and servicing the system. Frequent inspections should be made of the system and all associated piping, valves, etc. to prevent operational and mechanical failures or inefficiencies. Sludges and oils that are not periodically removed from O/WSs can render it inoperative. Additionally, leaks from oil/water separators can result in environmental pollution, which can trigger costly investigative studies and cleanups. Rigorous implementation of an O/WS inspection and maintenance plan can prevent discharges from the oil/water separator that may contaminate the environment.

Oil/Water Separators Used to Meet SPCC Secondary Containment Requirements

Oil/water separators can be used to meet the SPCC requirements for secondary containment in §§ 112.7(c), 112.7(h)(1), 112.8(c)(2), 112.8(c)(11), 112.12(c)(2) and/or 112.12(c)(11). Additionally, §§ 112.8(b), 112.9(b) and 112.12(b) set forth design specifications and/or drainage associated with secondary containment provisions at the facility. Properly designed, maintained and operated oil/water separators may be used as part of a facility drainage system to meet the secondary containment requirements of the rule.

Standard gravity and enhanced gravity separators or other types of oil/water separators (separator designs may vary), may be used to meet secondary containment requirements. In this application, the separators are expected to have oil and water present in the system when there is oil discharge or oil-contaminated precipitation runoff

within the drainage area. Generally, these separators should be monitored on a routine schedule and collected oil should be removed as appropriate in accordance with procedures in the SPCC Plan.

Many oil/water separators used for secondary containment are installed in areas where they may receive considerable flow from precipitation. If the flow rate exceeds the maximum design rate of the separator, the separator may discharge accumulated oil and/or untreated wastewater; therefore, it may be an inappropriate choice for secondary containment and may result in a discharge to navigable waters and adjoining shorelines. The specifications from the oil/water separator manufacturer outline these and other design factors as important items to consider when specifying the use of a given oil/water separator for a given application. Additionally, the manufacturer specifies the maintenance requirements for these separators that would ensure proper operation of these devices.

When oil/water separators are used to meet SPCC requirements they must be properly operated and maintained to ensure that the unit will perform correctly and as intended under the potential discharge scenarios it is aimed to address (e.g., §§ 112.7(c), 112.8(c)(2) and 112.12(c)(2)). The required oil/water separator capacity should always be available (i.e., oil should not continually accumulate in the separator over a period of time such that the required storage capacity would not be available if an oil release were to occur within the drainage area). The use of oil/water separators as a method of containment may be risky as they have limited drainage controls to prevent a discharge of oil and rely heavily on proper maintenance.

The capacity of an oil/water separator used to meet secondary containment requirements does not count toward a facility's overall storage capacity. Any volume of oil that would flow into the oil/water separator would come from another source within the drainage area that is already generally counted in the facility storage capacity determination. Containers used to store recovered oil after oil/water separation, however, represent additional oil storage and count toward a facility's total storage capacity. These include slop tanks or other containers used to store waste.

APPENDIX K – DIRECTIONS TO THE BARTOW REGIONAL MEDICAL CENTER

If a container holding waste is not in good condition (e.g. severe rusting, apparent structural defects) or if it begins to leak, Raider personnel will transfer the waste from this container to a container that is in good condition. At least weekly, Raider personnel inspect areas where containers are stored, looking for leaking containers, and for deterioration of containers. Raider maintains aisle space (at least 24 inches) to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

All of Raider's aboveground storage tanks are located within a containment area. The containment system is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the material is removed. The containment system has sufficient capacity greater than 110% of the volume of the largest container. The precipitation, which enters the tank storage area and the secondary containment area, is pumped into the onsite water storage tanks for treatment.

All aboveground used oil process and storage tanks are properly labeled with the words "Used Oil." All tanks at Raider are steel aboveground storage tanks equipped with overfill protection. All oil piping is aboveground so there is no contact with the soil.

Any new aboveground storage tanks constructed of steel will meet or exceed the requirements found in UL No. 142, API Standard No. 620, API Standards No. 650, API Standard No. 12B, API Standard No. 12D, or API Standard No. 12F.

Raider inspects the aboveground tanks and piping for leaks as part of a release detection-monitoring program. At least once a month, RAIDER personnel inspect the exterior of each tank and the secondary containment area for wetting, discoloration, blistering, corrosion, cracks, or other sign of structural damage or leakage.

In the event any component of Raider's storage tank system is discovered to have discharged or contributed to the discharge of a pollutant, Raider personnel will isolate that component from the system, if possible, and not utilize that component until it is correctly repaired or replaced. If the storage tank system or any component of the system cannot be operated in compliance with Chapter 62-762 F.A.C., the storage tank system will not be operated until the component has been repaired or replaced. If a tank has discharged or contributed to the discharge of a pollutant, that tank will be taken out of service until the tank is repaired or replaced. All repairs to storage tanks will be made in a manner preventing any discharge from the storage tank system due to structural failure or corrosion for the remaining life of the storage tank system. All repairs to damage or defective storage tank system components shall be made to restore the structural integrity

of the storage tank system. All pipe sections and fittings from which a pollutant has been discharged or which is otherwise damaged or defective will be repaired in accordance with the manufacturer's specifications or in accordance with Rule 62-762.210 F.A.C.

The secondary containment system will be repaired as necessary to maintain product tightness and containment volume of the system, including, but not limited to sealing cracks in concrete, repairing punctures, and maintaining containment walls.

Attachment 8

Closure Plan

INTRODUCTION

Raider Environmental Services, Inc. is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater. The facility is located at 3555 East State Route 60, Mulberry, Florida 33830. The following Closure Plan has been prepared for Raider Environmental Services, Inc. pursuant to the permitting requirements set forth in Rule 62-710.800(9)(a), Florida Administrative Code (FAC). A copy of this Closure Plan will also be maintained on file at the Raider Environmental Services, Inc. facility, in accordance with the record keeping requirements set forth in Rule 62-710.510(4), FAC

PROCESS DESCRIPTION

Raider Environmental Services, Inc. operates a waste oil collection; transportation, processing and recycling business with serves a variety of automotive commercial and industrial businesses throughout South Florida with operations and management as described in the following:

Types of Products Collected

Automotive, industrial waste oils, as well as oily wastewaters, off-specification diesel fuel, oil filters, oily rags/absorbents, and used automotive coolants are collected. Hazardous waste products, as defined in 40 CFR 261 are not collected.

Fleet Vehicles

Raider Environmental Services, Inc. maintains a fleet of vacuum trucks, trailers, flat-bed trucks, roll-off containers, tractor trailers, and other ancillary equipment to collect and transport used oil and other oily waste to the Mulberry facility.

Product Collection

Each truck is equipped with a Tek Mate Leak Detector (or equivalent device) and the vehicle operator is trained on the use of it. The product from each client is tested with this device, which will give off a beeping noise if the halogen content is >800 ppm. If the beeper goes off the vehicle operator will then use a "Dexsil" halogen solvent test kit. No product is collected that test positive for halogen solvents. In such a case, the client is instructed to have their product profiled through analytical test methods by a certified laboratory. It the product is then shown to be non-hazardous pursuant to 40 CFR 261, it will be collected.

Product Storage and Disposal

Product collected by fleet vehicles is transferred into designated product-specific ASTs at the facility for temporary storage. The product is subsequently transported off-site using the large capacity trailer rigs. Dependent upon the pre-determination arrangements, the product may be marketed as industrial fuel destined for recycling, reprocessing, used fuel

in a licensed energy recovery industrial furnace or disposed of otherwise at an appropriate facility.

USED OIL MANAGEMENT

Process Description

Raider Environmental Services, Inc. uses a combination of physical and chemical mechanisms to separate water from the oil. Phase separation is achieved by heating the oil. Heating is accomplished by using an internal coil in a process tank. As the water/oil mixture is heated, the oil layer rises and the aqueous layer sinks. The water is removed by draining the bottoms of the storage tanks. For more difficult mixtures, the phase separation is enhanced by adding proprietary chemicals. The demulsifying agents serve to accelerate the process by reducing surface tension of the small oil droplets and allowing coagulation. As in the basic process, the water is drained from the bottom of the storage/treatment tanks, allowing the purer oil to be transferred. Processed oil contains high thermal content and is sold as an energy source.

Liquid Waste Segregation

Each type of product is stored separately in a designated product-specific AST. Under no circumstance are incompatible liquids mixed. Each AST has a product designation.

Inventory of Stored Products

Weekly inventory reconciliation of the products currently stored on-site against the transportation and disposal manifest is performed. Any discrepancies are investigated to determine if product leakage for an AST occurred

Other Product Management

Used oil filters and absorbents/oily rags are collected in containers and transported in flat bed trucks. These products are then stored in a designated storage area prior to being shipped off site for disposal or recycling at a permitted facility.

FACILITY CLOSURE PROCEDURES

In accordance with Rule 62-710.800(9)(a) FAC, in the event that the Raider Environmental Services, Inc. facility is closed, steps will be taken to ensure that: (1) there will be no need for further facility maintenance; (2) and that used oil will not contaminate surface or groundwater; (3) all tanks, piping, secondary containment and ancillary equipment including the storage pad for oily rags/absorbents and drums will be emptied, cleaned and decontaminated, and all materials removed and managed; and (4) aboveground storage and process tanks and all integral piping will be closed pursuant to Rule 62-761, FAC.

The above requirements will be met by closing the aboveground storage tank system and assessing the site in accordance with Rule 62-761.800(5) FAC. These activities will include:

- Notification of Polk County and FDEP at least 30 days prior to closure of the storage tank system,
- Removal of all liquid and sludge from the tanks and integral piping and off-site disposal of the contents at properly licensed and permitted disposal/recycling facilities,
- A high pressure water rinse of all containment areas and the storage pad, and
- Collection of representative soil samples from around and beneath the tank area, and visual inspection for evidence of contamination. Should evidence of contamination be present, then soil and groundwater contamination assessment and possibly remedial activities will be conducted in accordance with Rule 62-780, FAC.

A closure certification report will be submitted to certify closure was completed in accordance with the closure plan. Soil sample locations will identified and FDEP approval for the sampling locations prior to implementing the sampling plan. All liquid and solid samples will be analyzed for the same constituents as the sampling for used oil or sludges managed at the facility with the addition of TRPH for soil samples. If necessary, a permit modification request for approval of a revised closure plan shall be submitted to DEP.

CLOSURE COST ESTIMATE

The Closure Cost Estimate is included with this Attachment.

Florida Department of Environmental Protection

Bob Martinez Center • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form #62-710.901(7)
Form Title Used Oil Processing Facility Closing Cost Estimate Form
Effective Date 4-23-13
Incorporated in Rule 62-710.800(6)(b)

Used Oil Processing Facility Closing Cost Estimate Form

Date: March 1, 2018 Date of DEP Approval: _____ (DEP use only)

I. GENERAL INFORMATION: Latitude: _____ Longitude: _____ EPA ID Number: FLR 000 176 271

Facility Name: Raider Environmental Services Permit Number: 316140-HO-001

Facility Address: 5080 East State Road 60, Mulberry FL 33860

Mailing Address: 4103 NW 132nd Street, Opa-Locka FL 33054

Contact Person's Name: Steve Obst Phone Number: (305) 994-9949

E-mail: steve@raiderenvironmental.com Fax Number: _____

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

_____ Letter of Credit* _____ Performance Bond* _____ Guarantee Bond*

_____ Insurance Certificate _____ Financial Test X Trust Fund Agreement

*Indicate mechanisms that require use of a Standby Trust Fund Agreement

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

Rule 62-710.800(6)(c), Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

■ **(a) Inflation Factor Adjustment**

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at http://www.dep.state.fl.us/waste/categories/swfr/

This adjustment is based on the Department approved closing cost estimate dated: 3/1/2017

$57,023.00	X	1.013	=	$57,764.00
Latest DEP approved Closing Cost Estimate		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Estimate

Signature: _____ Phone: (479) 353-1368

Name and Title: John Jones, Engineer E-mail: johnmjonespe@gmail.com

If you have questions concerning this form, please contact the Used Oil Permitting Coordinator at the address below, by phone at (850) 245-8781, or by e-mail at: Bheem.Kothur@dep.state.fl.us

Please mail this completed cost estimate to:

Used Oil Permitting Coordinator
Florida Department of Environmental Protection
2600 Blair Stone Road MS 4560
Tallahassee, FL 32399-2400

Please e-mail or mail a copy of the cost estimate to:

Solid.Waste.Financial.Coordinator@dep.state.fl.us
or
Solid Waste Financial Coordinator - FDEP
2600 Blair Stone Road MS 4565
Tallahassee, FL 32399-2400

☐ **(b) Recalculated Cost Estimates (complete items IV and V)**

IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing **most expensive**.

Third Party Estimate/Quote must be provided for each item.
Costs must be for a third party providing all materials and labor.

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL
1. Decontamination and Disposal Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil Tanks, containers, piping, equipment and secondary containment decontamination				
waste characterization				
disposal				
b. Wash Water waste characterization				
disposal				
c. Sludges/Sediment waste characterization				
disposal				
d. Used Oil Filter Management waste characterization				
disposal				
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipement and secondary containment waste characterization				
disposal				
f. Mobilization Costs				
g. Other_____				

Subtotal (1) Decontamination/Disposal: _____

2. Engineering (On-site Inspections and Quality Assurance are to be included in this item).

a. Closure sampling and analysis plan implementation as described in the permit application _____

b. Closure Certification Report _____

Subtotal (2) Professional Services: _____

Subtotal of (1) and (2) Above: _____

3. Contingency (10% of the Subtotal) _____

TOTAL CLOSING COST: _____

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Closing Cost Estimates pertaining to the engineering features of the this used oil processing facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.) Rule 62-710 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Closing Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1 of each year and revised, adjusted and updated as required by Rule 62-710.800(6)(c), F.A.C.

John M. Jones
Signature of Engineer

Steve Obst
Signature of Owner/Operator

John M. Jones, Engineer
Engineer's Name and Title (please print or type)

Steve Obst, Owner
Owner/Operator's Name and Title (please print or type)

50227
Florida Registration Number (please print or type)

(305) 994-9949
Owner/Operator's Telephone Number

4103 NW 132 St, Opa-Locka, FL 33054
Engineer's Mailing Address

steve@raiderenvironmental.com
Owner/Operator's E-mail Address

(479) 353-1368
Engineer's Telephone Number

johnmjonespe@gmail.com
Engineer's E-mail Address

RAIDER ENVIRONMENTAL SERVICES, INC.

OPA LOCKA FLORIDA

ATTACHMENT 9

EMPLOYEE TRAINING

December, 2012

Employee Training Plan

Raider Environmental Services employees will be trained in accordance with the "Used Oil Transporter's Training and Certification Manual. The contents of the program and a list of the specific topics is attached.

Introduction and Training Program Description

I. Introduction

In an effort to associate the term "Used Oil" with thoughts of a well managed, recyclable resource, the publisher of this invaluable publication has searched through federal and state resources to bring you the ***Used Oil Transporter's Training and Certification Manual.***

If you transport or collect used oil, used oil filters, anti-freeze or any form of petroleum waste from more than one generator and transport it, if you own or operate a used oil transfer facility, please carefully read the information within this manual.

This manual will answer your questions concerning:

What is considered used oil?

When is used oil considered hazardous and should not be managed as used oil?

What is an EPA ID# and how do I get it?

How should I train my drivers?

What should I do if my truck springs a leak? Who should I notify?

Can I store oil on my truck till I get a full load?

What kind of records do I need to keep? Where do I get the proper forms for recording?

This manual is an excellent resource for the introduction of a new employee and the application of laws he needs to follow before he begins unsupervised transportation of waste oil and related products. Mark it up, add to it as you see fit to meet your needs. It is intended to help answer your questions. If you need further clarification please call or write the Used Oil Program Coordinator at the Department of Environmental Protection at (850) 245-8755.

II. Training Program Description

A. General Overview

Section 403.767 of the Florida Statutes mandates the Florida Department of Environmental Protection to develop rules governing certification of used oil transporters. This certification process was codified in Rule 710.600 of Chapter 62 of the Florida Administrative Code. Included below is the specific Rule language for your use.

B. Training Manual Objective

As described above, the training manual's main objective is to assure that employees engaged in the transportation and management of used oil are thoroughly familiar with state and federal rules governing used oil, as well as proper used oil management practices including appropriate response actions to any breach, release or spill.

To assist your business in developing a suitable training program, the *Used Oil Transporters Certification and Training Manual* has been structured to provide a suitable base curriculum for used oil training. Key training areas include used oil, transportation, emergency and spill response procedures, storage tank, PCB, and PCW regulations.

C. Training Manual Description

To assist your business in properly educating your employees, the *Used Oil Transporters Certification and Training Manual* has been structured to serve as an outline for your used oil-training program. Key training areas identified include used oil, transportation, storage tank, PCB, and PCW regulations, as well as emergency and spill response procedures. These areas have been labeled with "Course" numbers in the Table of Contents. You may customize your individual corporate training program to meet your needs, or you may use the certification and training manual as the cornerstone of your Training Program.

It is recommended that a minimum of thirteen (13) hours of training be conducted relative to the rules governing used oil management and proper used oil management procedures. Listed below are minimum training hours recommended for the Courses identified within the Certification Manual.

Base Curriculum:

Course 1- Compliance with Used Oil & Used Oil Filter Regulations	4.5 hours
Course 2- Emergency and Spill Response Procedures	3.0 hours
Course 3- Compliance with Storage Tank Regulations	0.5 hours
Course 4- Compliance with PCB Regulations	0.5 hours
Course 6- Compliance with Transportation Regulations	3.5 hours

Supplemental Curriculum:

Course 5- Compliance with Petroleum Contact Water Regulations	1.0 hour

Each Section or Course in this manual contains a General Overview and Rule Highlights Section. Educating yourself and your employees with this information will assure familiarity with those laws and rules governing used oil transportation. A Specific Rules and Laws Section has been included to assist you in accessing detailed information covered within the General Overview and Highlights Section.

As a used oil transporter your business is solely responsible for providing assurance that the training, duration and methodology used by your company is adequate

D. Implementation and Verification of Training

Rule 62-710.600(2)(b)3 requires new employees to be introduced to the applicable laws and rules before unsupervised driving of an used oil transportation vehicle.

Rule 62-710.600(2)(b)4 mandates that new employees shall complete the training program as soon as possible but no later than 90 days after beginning employment. Continued education as part of the training program, is highly recommended. Rule 62-710.600(3) states that training programs shall be reviewed and updated annually to address changes in regulations.

Rule 62-710.600(2)(c) requires the maintenance of training records in the company's operating record and the individual personnel files indication the type of training received along with the dated signature of those receiving and providing training.

Located on pages 7-10 of this certification and training manual are the *Used Oil Training Program Submittal Documents.* When completed and submitted to the FDEP, these documents will assist the Department in its evaluation and certification of your corporate training program.

Please note the form will require your manual's serial number.
This is a unique number that has been assigned to your company only. ***When the Department evaluates and accepts your certification, the serial number you have provided on the forms will help identify your company's training program as acceptable.*** *As this manual is a copyrighted publication,* ***for your protection, do not share the contents of this manual with anyone outside of your company.***

Included with the *Forms* section beginning on page 63, are Record of Compliance Forms which may be used to maintain a record of training for your company's records and for placement into individual personnel files.

Preface

This newly revised *Used Oil Transporters Certification and Training Manual* is made available to the industry and interested parties. Copying or reproduction in any form is prohibited, except for the private use of the owner (original purchaser) of the manual.

The publisher wishes to thank the industry volunteers, the Florida Department of Environmental Protection, The Florida Department of Transportation, and all industry affiliates who helped to prepare, coordinate and review the manual.

We recognize the importance of recycling used oil in Florida's sensitive environment. Industry members and affiliates are expected to adhere to and uphold local, state and national laws affecting the regulated community.

For a list of, or information on, the registered used oil transporters in Florida, please contact the Used Oil Coordinator at FDEP.

Using this manual

Located on pages 7-10 of this certification and training manual are the *Used Oil Training Program Submittal Documents.* When completed and submitted to the FDEP, these documents will assist the Department in its evaluation and certification of your corporate training program.

Please note the form will require your manual's serial number. This is a unique number that has been assigned to your company only. When the Department evaluates and accepts your certification, the serial number you have provided on the forms will help identify your company's training program as acceptable. As this manual is a copyrighted publication, for your protection, please do not share the contents of this manual with anyone outside of your company.

Included with the *Forms* section beginning on page 63, are *Record of Compliance Forms*, which may be used to maintain a record of training for your company's records and for placement into individual personnel files.

Disclaimer

While every effort has been made to insure the accuracy of the contents of the manual, the publisher nor its agents take responsibility for its contents and applicability to or interpretation of the laws. Competent legal counsel should be sought to insure compliance with the laws affecting used oil transportation as they apply to individuals and businesses in Florida.

Additional Copies

Additional copies of this Used Oil Transporters Certification and Training Manual may be ordered from:
BFA Custom Publications, 318 Newman Rd., Sebring, Fl. 33876-6702. Telephone 863-655-0691 — FAX 863-655-3713.

Table of Contents

Table of Contents