

Thursby, Kim

From: Orlando Solis <orlando@raiderenvironmental.com>
Sent: Monday, August 6, 2018 11:12 AM
To: Epost HWRS; 'steve@raidernenvironmental.com'
Cc: Baker, Bryan; Walker, Kim (Waste); Buselli, Bradley; McBride, Ashanti; Cinquino, Dawn; Kothur, Bheem; Financial Assurance Working Group; Jarmolowski, James; Blandin, Norva; Berberena, Robert; 'johnmjonespe@gmail.com'
Subject: RE: 08-06-2018; First Request for Additional Information (RAI) Miami Dade County – Hazardous Waste Facility Name: Raider Environmental Services, Inc. – Opa Locka Facility EPA I.D. Number: FLR 000 143 891 Current Permit Numbers: 284932-004-HO & 284932-005-

Confirmed receipt. Of attached document.

Thank you,

Orlando Solis

Orlando Solis
Director of Compliance & Environmental Operations



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From: Outley, Debra [mailto:Debra.Outley@dep.state.fl.us] **On Behalf Of** Epost HWRS
Sent: Monday, August 06, 2018 10:38 AM
To: 'steve@raidernenvironmental.com'
Cc: Baker, Bryan; Walker, Kim (Waste); Buselli, Bradley; McBride, Ashanti; Cinquino, Dawn; Kothur, Bheem; Financial Assurance Working Group; Jarmolowski, James; Blandin, Norva; Berberena, Robert; Orlando Solis; 'johnmjonespe@gmail.com'
Subject: 08-06-2018; First Request for Additional Information (RAI) Miami Dade County – Hazardous Waste Facility Name: Raider Environmental Services, Inc. – Opa Locka Facility EPA I.D. Number: FLR 000 143 891 Current Permit Numbers: 284932-004-HO & 284932-005-SO

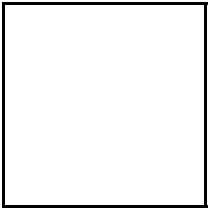
In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting





FLORIDA DEPARTMENT OF Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

August 6, 2018

Steve Obst, President
Raider Environmental Services, Inc.
4103 NW 132nd Street
Opa-Locka, Florida 33054
steve@raidernenvironmental.com

RE: **First Request for Additional Information (RAI)**
Miami Dade County – Hazardous Waste
Facility Name: Raider Environmental Services, Inc. – Opa Locka Facility
EPA I.D. Number: FLR 000 143 891
Current Permit Numbers: 284932-004-HO & 284932-005-SO
DEP Application Numbers: 284932-006-HO & 284932-007-SO

Dear Mr. Obst:

Thank you for your application for the Used Oil and Material Processing Permit for the above referenced Facility. The Department has assigned DEP Application Numbers 284932-006-HO & 284932-007-SO to the application. A Department staff review of the application dated July 10, 2018, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800(3), Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

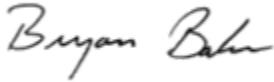
In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, September 7, 2018, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to bradley.buselli@floridadep.gov. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to bradley.buselli@floridadep.gov, alerting us that it has been posted.

Mr. Steve Obst
Page 2 of 6
August 6, 2018

If you have any questions, please contact Bradley Buselli by telephone at (850) 245-8989 or by e-mail at bradley.buselli@floridadep.gov.

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G., Administrator
Hazardous Waste Program and Permitting

Attached: List of Requested Information

cc:

Ashanti McBride, DEP OGC, ashanti.mcbride@floridadep.gov
Dawn Cinquino, DEP Headquarters, dawn.cinquino@floridadep.gov
Bheem Kothur, DEP Headquarters, bheem.kothur@floridadep.gov
Financial Assurance Working Group, DEP Headquarters,
financial.assurance.working.group@floridadep.gov
James Jarmolowski, DEP Headquarters, james.jarmolowski@floridadep.gov
Norva Blandin, DEP Southeast District, norva.blandin@floridadep.gov
Robert Berberena, DEP Southeast District, robert.berberena@floridadep.gov
Orlando Solis, Raider Environmental, orlando@raiderenvironmental.com
John Jones, P.E., johnmjonespe@gmail.com

Attachment: List of Requested Information

Facility Name: Raider Environmental Services, Inc. – Opa Locka Facility
EPA ID Number: FLR 000 143 891
Current Permit Number: 284932-004-HO & 284932-005-SO
DEP Application Number: 284932-006-HO & 284932-007-SO

Review Comments for Renewal of Used Oil Processing Facility Permit: The renewal application for a used oil processing facility has been reviewed with respect to the applicable requirements in 62-710.800, F.A.C.; comments are included below. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

1. Please note that the subject matter and date (RE / August 20, 2013) listed on the cover letter submitted with the application are reflective of a previous document submittal and not the current permit renewal application; revision of this item is not necessary.
2. **Application, DEP Form 62-710.901(6), Part I:**
 - a. Section A.1: Date current permit expires should be October 13, 2018.
 - b. Section A.2: The revision number should be zero (0).
 - c. Section C.1: Please refer to comment 3 below.
 - d. Section B.3: Attachment 2 of the permit application does not contain a detailed site map of the facility showing the location of all material and waste receiving areas, storage and processing areas (including tanks, containers, pipelines, and equipment), and waste traffic patterns for incoming and outgoing materials. The permit application contained several maps in other sections, including a site plan, however the font was either blurry, too small, or the map did not contain all the required information. Please submit a site map in an electronic format to be inserted into the permit that contains the above referenced items as applicable.
3. **Attachment 3, Facility Process Description, Rebuttal Presumption Verbiage:** The Department has recently adopted the Federal Generator Improvements Rule into Chapter 62-730, F.A.C. effective June 18, 2018. The Conditionally Exempt Small Quantity Generator (CESQG) was changed to Very Small Quantity Generator (VSQG). A number of citations in 40 CFR 261 have also been changed and reorganized, and a review of the new rule is recommended. No revisions are required, however please note these changes for future application and document submittals.
4. **Attachment 6, Contingency Plan:** Please revise all affected pages as noted below.
 - a. Pages 3 and 7 contain tables titled Table 1, and other in-text references to Table 1 are also listed within pages 1 and 7. Please review and update these discrepancies.
 - b. Section 4.1, Used Oil and Waste Processing Operations: A typographical error is noted in the bulleted list of secondary containment areas (SCAs). Based on other verbiage in this section of the application, bullet four (4) appears to reference SCA #1 and SCA #3 (not SCA #5).

c. Section 5, Emergency Sill Response Plan:

- (1) The contingency plan must list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators in accordance with 40 CFR 279.52(b)(iv). This attachment is missing the address for emergency coordinators identified under the plan. Please provide the home addresses for all emergency coordinators at this facility. In addition, local authorities should be notified of any revised emergency contacts.
- (2) Item number 2 listed in this section indicates that the notification list is on page 24, however Table 4 is located on page 18.

d. Section 5.1, Spill Containment Procedures (Asphalt and Concrete):

- (1) Item number 1 in this section states that the location of emergency supplies can be found in Table 2 on page 18; however, Table 3 for Emergency Equipment/Supplies, Capabilities, and Locations begins on page 11.
- (2) The location and a physical description of emergency equipment and a brief outline of its capabilities is provided, however, fire extinguishing systems are not documented within this attachment. Please either revise Figure 2 / Table 3, or provide a map showing the location of fire extinguishing systems in accordance with 40 CFR 279.52(b)(2)(v).

5. Attachment 8, Closure Plan:

- a. Process Description and Types of Products Collected: These sections indicate that the facility operates a *waste oil* collection, transportation, processing and recycling business..." and receives "industrial *waste oils*." The Department believes the term "waste oil" was mistakenly used, as this term refers to used oil that has been mixed with hazardous waste, and is not interchangeable with the term "used oil". Please clarify and revise all affected attachments accordingly.
- b. Facility Closure Procedures: Notification to the Department must be made in writing *at least 60 days prior* to the scheduled date of closing the facility. In addition, a certification of closure completion must be submitted within 30 days after closing the facility. Please revise this section in accordance with Rule 62-710.800(5)(d) & (e) respectively.

Review Comments for Renewal of Material Processing Facility Permit: The renewal application for a material processing facility has been reviewed with respect to the applicable requirements in 62-701.710, F.A.C.; comments are included below. Certain sections of the Used Oil Processing Facility application, submitted as a separate document, were found to contain items applicable to the Material Processing Facility application. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

1. The renewal application indicates that the maximum amount of solid waste to be stored at the facility will be 40 tons. It is also indicated that the waste received daily will vary between 0 and 30 tons and that the maximum time materials will be stored is 30 days. Please indicate how much material can be processed in one day (what is the daily through-put rate?). Also, please indicate what steps are taken to prevent exceeding 40 tons of material being stored at the facility at any one time. Rule reference: 62-701.710(2)(a), F.A.C

2. The renewal application did not include a site plan that shows the facility location, total acreage of the site, and other relevant features such as water bodies, or wetlands within 200 feet of the site, and potable wells within 500 feet of the site. The site plan should have a scale not greater than 200 feet to one inch, and be signed and sealed by a professional engineer pursuant to Chapter 471, Florida Statutes. Please submit a site plan that meets these requirements. Rule reference: 62-701.710(2)(b), F.A.C.
3. The renewal application did not include a boundary survey and legal description of the property. Please submit a boundary survey and legal description of the property. Rule reference: 62-701.710(2)(c), F.A.C.
4. The application did not include information regarding record keeping of the materials associated with the materials processing portion of the permit. Operational records are required to be maintained to include a daily log of the quantity of solid waste received, processed, stored, and removed from the site for recycling or disposal, and the county of origin of the waste, if known. These records shall include each type of solid waste, recovered materials, residuals, and unacceptable waste which is processed, recycled, and disposed. Such records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for three years. Additional information regarding how the record keeping requirements will be met should be submitted. Rule reference: 62-701.710(2)(e) and 62-701.710(8)(a), F.A.C.
5. The application did not include a contingency plan. Please revise the application to reflect that a contingency plan that complies with 62-701.320(16) and 62-701.710(2)(g) F.A.C. is included in the Used Oil Processing Permit Application that has also been submitted for this facility.
6. The application did not include any financial assurance documentation required by subsection 62-701.710(7), F.A.C. Please revise the application to reflect that financial assurance documentation that complies with 62-701.710(7), F.A.C. is included in the Used Oil Processing Permit Application that has also been submitted for this facility.
7. The application did not include a history and description of any enforcement actions by the applicant described in 62-701.320(3), F.A.C., relating to solid waste management facilities in Florida. Please submit this information.
8. The Solid Waste Closure Plan - Process Description section indicates that the facility operates a *waste oil* collection, transportation, processing and recycling business..." The Department believes the term "waste oil" was mistakenly used, as this term refers to used oil that has been mixed with hazardous waste, and is not interchangeable with

the term “used oil”. Please clarify and revise all affected attachments accordingly. In addition, please refer to Used Oil review comment 5.b above and revise as needed.

Citation Errors: Please note that multiple citation errors were observed in the permit application; while revisions of these items are not required, a thorough review and update of all referenced citations is recommended.