

Jones Ecosystem Management

Mr. Bheem Kothur, P.E.
Florida Department of Environmental Protection
2600 Blair Stone Road MS 4560
Tallahassee, FL 32399-2400

August 31, 2018

RE: Raider Environmental Services Request for Additional Information dated 8/6/18
EPA ID number FLR 000143891

Dear Mr. Kothur:

Attached please responses to the Department's RFAI dated 8/6/2018

Thank you for your assistance. If you need any additional information, please contact me at (479) 353-1368.

Sincerely,

John M. Jones, P.E.

cc: Steve Obst-Raider Environmental

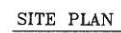
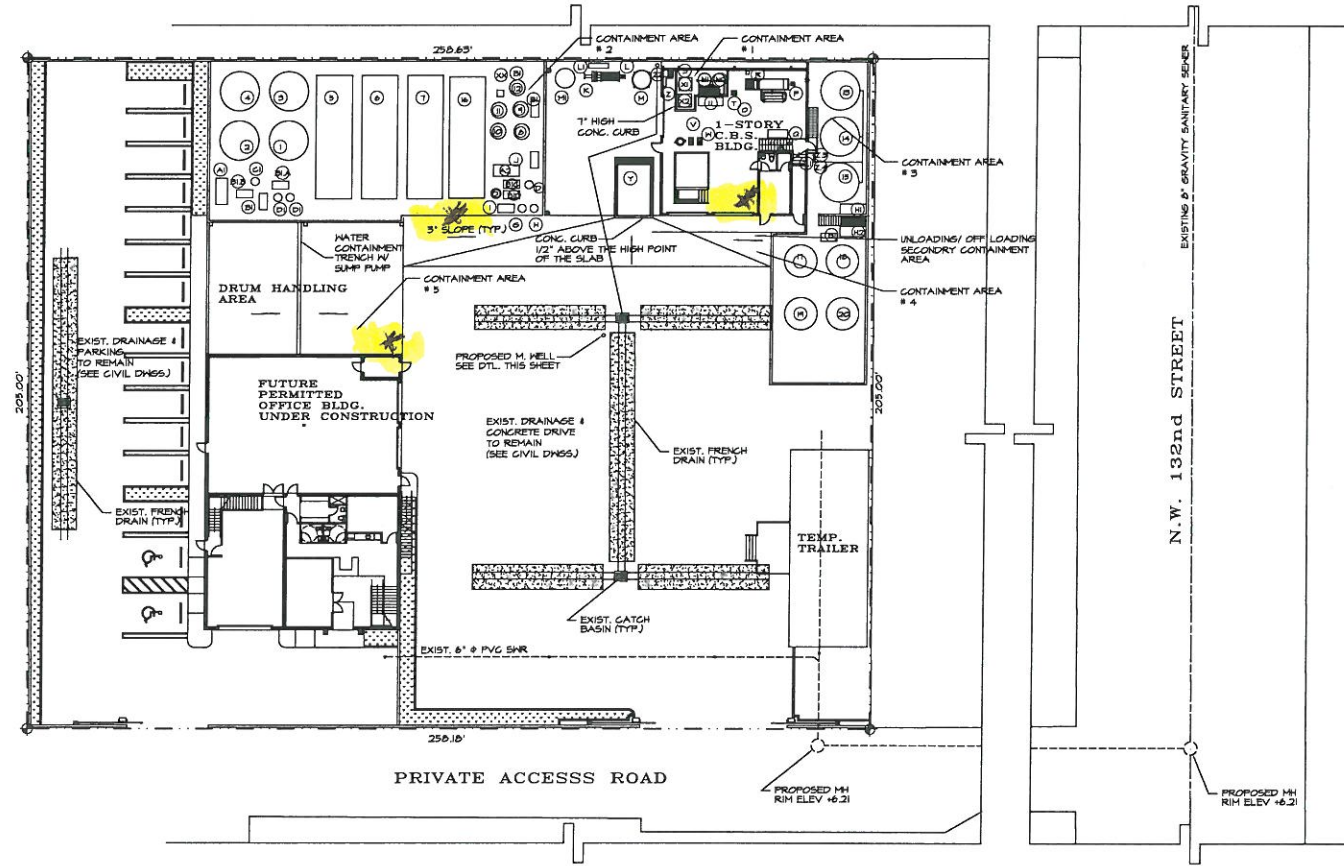
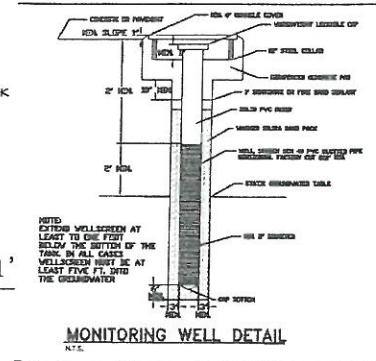
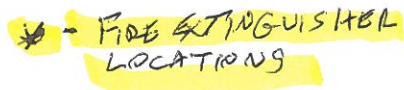
Used Oil Processor Permit Application

1. Date of Application: The Application has been revised with this submittal.
2. Application form 62-710.901(6)
 - a. The Date of current permit application expiration has been revised.
 - b. The Revision number has been changed to zero.
 - c. No changes have been made per comment 3 of the Review Comments.
 - d. A site map with the appropriate notations is attached to this response
3. The changes in generator status will be incorporated on future submittals.
4. Attachment 6. Contingency Plan. The revisions to the Contingency Plan have been made and are included with this submittal.
5. Revisions to the Closure Plan have been made and are included with this submittal.

Solid Waste Processing Permit

1. The Process Description has been revised to include the Department's comments. The revised Process Description is included in this response.
2. A Site Plan meeting the requirements of the RFAI is not currently available. Raider is preparing a Site Plan and will forward it as soon as it is prepared.
3. A Boundary Survey meeting the requirements of the RFAI is not currently available. Raider is preparing a Boundary Survey and will forward it as soon as it is prepared.
4. The facility will maintain a daily log on-site documenting the amount of material received, the type of solid waste, the amount of waste processed, and the inventory on-site. The records will be compiled on a monthly basis. Records will be maintained at the facility for three years.
5. A contingency plan for the facility was submitted with the Used Oil Processing Facility Permit Application.
6. Financial Assurance Information was submitted with the Used Oil Processing Facility permit Application.
7. No enforcement actions relating to Solid Waste activities at the facility have been taken.
8. The Solid Waste Closure Plan has been revised to incorporate the Department's comments. A revised Closure Plan is provided with this correspondence.

The diagram illustrates a riser system with three tanks labeled 13, 14, and 15. Tank 13 is labeled 'EG' (Effluent Gas). Tank 14 is labeled 'PROCESS WATER TANK'. Tank 15 is labeled 'EFFLUENT TANK'. A piping system connects these tanks. A 3" sampling port is located on the line between tanks 13 and 14. A 4" butterfly valve is located on the line between tanks 14 and 15. An existing 4" line (EXIST. 4" LINE) is shown entering tank 15. A new 6" sewer line (EXIST. 6" SEWER LINE) is shown exiting tank 15. A new 15-IBM-AAA2 Alpha Glass 2 Master Meter is installed on the line between tanks 14 and 15. The diagram is labeled 'RISER DIAGRAM' and 'N.T.S.' (Not To Scale).



NOTE:

1. REFER TO SITE DEVELOPMENT PLAN BY ALBERTO A. DOMINGUEZ FOR SET BACKS, STORM WATER MANAGEMENT, SITE DETAILS, PARKING REQUIREMENTS AND ALL OTHER CONSTRUCTION OUTSIDE THE BUILDING.
2. PROPERTY WALLS AND FENCE UNDER A SEPARATE PERMIT, AND THEY ARE NOT PART OF THIS DOCUMENTS.
3. THIS IS ONLY AN EQUIPMENT LAYOUT, PATHI ARCHITECTS, INC. TAKES NO RESPONSIBILITY FOR THE INSTALLATIONS AND/OR INSPECTION OF THE EQUIPMENTS, OWNER TAKES FULL RESPONSIBILITY FOR THE SAME.
3. ALL TANK'S VENTS ARE OVER 12'-0" HEIGHTS.



CONSULTANT:

PROJECT:

**PROPOSED WAREHOUSE FOR:
RAIDER ENVIRONMENTAL SERVICES, INC.
4103 N.W. 132st.
OPA-LOCCA, FLORIDA**

OWNER:
Mr. STEVE OBST

ADDRESS:
4401 PETERS ROAD
PLANTATION, FLORIDA 33371

PHONE:
305 944 9944

[illegible][illegible]

DATE:	12/02/09
SCALE:	AS SHOWN
DRAWN:	RUL
CHECKED:	A.P.
COMMISSION NO.:	25009

SHEET

A — O

SHEET NO. OF

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

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

A. General Information

1. New _____ Renewal _____ 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)

_____ Transporters (Subpart E)

_____ Burners of off-spec used oil (Subpart G)

_____ Marketers (Subpart H)

_____ are disposing of used oil (Subpart I)

4. Date current operation began: _____

5. Facility name: _____

6. EPA identification number: _____

8. Facility mailing address:

Street or P.O. Box City State Zip Code

9. Contact person: _____ Telephone: (____) _____

Title: _____ Email _____

Mailing Address:

Street or P.O. Box City State Zip Code

10. Operator's name: _____ Telephone: (____) _____

Mailing Address:

Street or P.O. Box City State Zip Code

11. Facility owner's name: _____ Telephone: (____) _____

Mailing Address:

Street or P.O. Box City State Zip Code

12. Legal structure:

_____ 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 _____ Registration No. _____

Mailing Address: _____

Street or P.O. Box City State Zip Code

Associated with: _____

B. SITE INFORMATION

1. Facility location:

County: _____

Nearest community: _____

Latitude: _____ Longitude: _____

Section: _____ Township: _____ Range: _____

UTM # _____/_____/_____/_____

2. Facility size (area in acres): _____

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 _____

C. OPERATING INFORMATION

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

2. List applicable EPA hazardous waste codes:

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 _____

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 _____

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 _____

- 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 _____

- 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 _____

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 _____

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 _____

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 _____

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 _____

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 _____

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: _____ EPA ID# _____

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*

Name and Title (Please type or print)

Date: _____ Telephone: (____) _____

* 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: _____ EPA ID# _____

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*

Name and Title (Please type or print)

Date: _____ Telephone: (____) _____

* 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: _____ EPA ID# _____

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*

Name and Title (Please type or print)

Date: _____ Telephone: (____) _____

* 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 _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

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.

Signature

Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

City State Zip

Date: _____ Telephone (____) _____

[PLEASE AFFIX SEAL]



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

RAIDER ENVIRONMENTAL, INC. FACILITY (FLR 000 143 891)

**4103 NORTHWEST 132ND STREET
OPA LOCKA, FL 33054**

Location: 25°53'41" North, 80°15'51" West

Telephone Number: (305) 994-9949

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

Mailing Address

**4103 NORTHWEST 132ND STREET
OPA LOCKA, FL 33054**

Revised: August, 2018

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1. INTRODUCTION

Raider Environmental Services, Inc. (Raider) operates a non-hazardous waste facility on 1.22 acres of land in Miami-Dade County. The facility is located at 4103 Northwest 132nd Street, Opa Locka, FL 33054 (Folio 08-2129-000-0140, 25°53'41" North Latitude, 80°15'51" West Longitude). The location of the Facility is shown in Figure 1.

The Facility is fully permitted, registered and licensed with County, State and Federal regulatory agencies for the processing, bulking, treatment and disposal of used oil and the following non-hazardous wastes.

- Petroleum contact water (PCW), oily water and industrial wastewater;
- Used oil filters, and;
- Solid waste.

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. Orlando Solis. He can be reached at (954) 470-8659 twenty-four (24) hours a day, seven (7) days a 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 was constructed in 2007. 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. This document has been 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. Certified Mail Return Receipts will be provided with each of the enclosure letter copies in an original version of this document sent to the Florida Department of Environmental Protection. The certified mail return receipts will be provided as proof that each of the following agencies were sent an updated version of this Preparedness and Prevention Contingency Plan.

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

**TABLE 1. RECIPIENTS OF THE FOLLOWING OCTOBER 2012
REVISED PREPAREDNESS AND PREVENTION CONTINGENCY PLAN**

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

Document Recipients	Contact	Phone Number	Email Address
Hialeah Hospital	Ms. Janice Ryan (Administrative Assistant to CFO and COO)	305 693-6100	Janice.ryan@tenethealth.com
Miami-Dade County Fire Department	Captain Tony Trimm	(786) 331-4252	ttrim@miamidade.gov
Miami-Dade County Police Department	Commander Garry F. Jeanniton	(305) 836-8601	gfjeanniton@mdpd.com
Opa-Locka Police Department	Chief Antonio Sanchez	305 953-2889	asanchez@opalockapd.com
Florida Department of Environmental Protection	Mr. Bryan Baker	(850) 245-8787	Bryan.baker@dep.state.fl.us
Miami-Dade County Department of Regulatory and Economic Resources (RER)	Mr. Juan Trimble (Pollution Control Inspector)	(305) 372-6509	trimbj@miamidade.gov
Raider Environmental Services, Inc.	Mr. Steve Obst (President) ¹	(305) 994-9949	steve@raiderenvironmental.com
Raider Environmental Services	Mr. Orlando Solis	(954) 470-8659	orlando@raiderenvironmental.com

2. SECURITY & ON-CALL STATUS

The Facility is completely surrounded with concrete walls and heavy duty fences and gates. The gates are locked when the Facility is not in operation. The Opa Locka Police Department patrols the Facility twenty-four (24) hours a day seven (7) days a week. Facility lighting is maintained and changed when necessary to maximize visibility for the discovery of accidental spills/leaks and prevent acts of vandalism.

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
Home address: 210 SW 44th Avenue, Plantation FL 33317
- Mr. Orlando Solis (Operations Manager) at (954) 470-8659
Home address: 14004 SW 32nd Street, Miramar FL 33027

3. PERSONNEL TRAINING AND DRILLS

Facility operations personnel 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

Since Raider Environmental Services also offers twenty-four (24) hour, seven (7)-day emergency spill response services, all personnel receive on the job training responding to real spill events. This practical application of oil spill mitigation techniques supplements the OSHA mandated HAZWOPER training.

4. SECONDARY CONTAINMENT AREAS

The Facility consists of five (5) secondary containment areas (SCA-1, SCA-2, SCA-3, SCA-4 and SCA-5) that were designed and constructed to minimize the potential for any leak/spill to impact groundwater resources, soils/sediments or the sanitary sewer system. The minimum containment area volumes were calculated by multiplying the largest tank volume to be contained in each area by a factor of 1.10 (110% of the tank of volume). Figure 2 is provided to show the location of the SCAs at the Facility.

4.1 USED OIL AND WASTE PROCESSING OPERATIONS

The following four (4) primary operations occur within SCAs listed below.

- SCA # 4: Unloading/off-loading and decontamination;
- SCA # 5: Solid waste and used oil filter bulking;
- SCA # 2: Used oil processing and Storage Area for Used Oils and Wastewaters, and;
- SCA #1/SCA # 3: Industrial wastewater pretreatment and storage areas.

SC4 # 4: UNLOADING/OFF-LOADING AND DECONTAMINATION OPERATIONS

Transport vehicles containing used oil, oily water and wastewater are off-loaded and pumped into above ground storage (AST)s located in SCA # 2. Trucks and various sized tanks and containers (e.g., 4,000-gallon vac truck tanks, 6,500-gallon vacuum trailer tanks, 55-gallon drums and 250-gallon totes) are washed and decontaminated. The decontamination water is pumped into storage tanks located in SCA # 2 for treatment and processing and residual solid waste is placed into a 40-yard roll-off located in SC # 5. Treated oil (Fuel Oil) is transferred from SCA # 2 into tanker trailers that are used to transport the Fuel Oil to Raider clients.

SCA # 5: SOLID WASTE AND USED OIL FILTER BULKING

Drummed (generally 55-gallons in volume) solid waste, oil filters, wastewaters (industrial and oily) and used oil are unloaded from vehicles and stored prior to being emptied. The solid waste is emptied and bulked into a 40-yard roll-off that is covered whenever it rains or prior to the end of daily operations. The used oil and wastewater are pumped into ASTs located in SCA # 2

SCA # 2: USED OIL PROCESSING AND STORAGE AREA FOR USED OILS AND WASTEWATERS

Used oil is filtered and treated (primarily to remove suspended solids and water) and recycled into Fuel Oil for sale to Raider clients. Oily water separated from the used oil during treatment operations is stored in a vertical AST prior to being conveyed to the industrial pretreatment wastewater component of the Facility in SCA # 1 and SCA # 3.

Bypass valves were not incorporated into any part of the used oil processing system in order to prevent any accidental spills of used oil or wastewaters outside of SCA # 2. Any accidental spill or leak within this SCA # 2 will be intercepted by an impermeable concrete sump and pumped back into the used oil processing for treatment.

SCA # 3: INDUSTRIAL WASTEWATER PRETREATMENT AND STORAGE AREA

Wastewater delivered to the Facility and oily-wastewater separated during the treatment and recycling of used oil is treated and disposed into the sanitary sewer system.

4.2 STORAGE TANKS

All of the storage tanks at the Facility are above ground. The material composition and design of above ground storage tanks (AST)s and appurtenances are compatible with contained wastes.

The ASTs used to process, treat and store used oil, oily water and industrial wastewater are located in secondary containment areas SCA # 1, SCA # 2, and SCA # 3 (refer to Figure 2). 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 and recorded

4.3 PREDICTION OF SPILL BEHAVIOR

Any potential spill/leaks of wastes from ASTs and associated appurtenances will be contained by secondary containment enclosures, sloped surfaces, sumps and

TABLE 2. AST DETAILS AND CONTENTS

Tank #	Date Installed	Size (Gallons)	Construction Material	Contents
1	2007	35,000	Carbon Steel	Oily Water (Influent)
2	2007	35,000	Carbon Steel	Oily Water (Influent)
3	2007	35,000	Carbon Steel	Oily Water (Influent)
4	2007	35,000	Carbon Steel	Oily Water (Influent)
5	2007	25,000	Carbon Steel	Used Oil / Oily Water
6	2007	25,000	Carbon Steel	Used Oil / Oily Water
7	2007	25,000	Carbon Steel	Used Oil Processing
8	2007	3,000	Carbon Steel	Heater Fuel/Oil
9	2007	3,000	Carbon Steel	Used Oil Processing
10	2007	6,000	Carbon Steel	Used Oil Processing
11	2007	6,000	Carbon Steel	Used Oil Processing
12	2007	3,000	Carbon Steel	Carbon Polishing Tank
13	2007	20,000	Fiberglass	Equalization
14	2007	20,000	Fiberglass	Process Water

15	2007	20,000	Fiberglass	Effluent Water
16	2011	27,000	Carbon Steel	Used Oil Processing
17	2011	15,000	Carbon Steel	Air Stripper Effluent
18	2011	15,000	Carbon Steel	Air Stripper Effluent
19	2011	15,000	Carbon Steel	Treatment Effluent for Testing
20	2011	15,000	Carbon Steel	Treatment Effluent for Testing



containment trenches. Refer to Figure 2 for locations of secondary containment features within the Facility.

4.4 SPILL DIVERSION AND RETENTION PONDS

No diversion or retention ponds exist at the Facility.

4.5 SPILL AND STORMWATER DISPOSAL

A fleet of vacuum tank trucks, mobile Frac tanks and tanker trailers are stored, maintained and operated out of the Facility. One (1) vacuum tank truck is restricted to the Facility for the cleanup of any accidental spills or leaks that could occur. All rainwater that accumulates in the SWAs is pumped through an oil-water separator prior to being discharged into Facility's on-site stormwater infiltration system. A description of oil/water separators is provided in Appendix B.

4.6 INSPECTIONS

All USTs 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 Bobby LeClaire (Operations Manager/Back-up Emergency Coordinator, cell: 954 543-2862) will initiate the following Emergency Spill Response Plan sequence of steps and then notify the regulatory agencies listed on page 24 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 RER and FDEP using the numbers listed on page 18;
3. Recover as much liquid as possible using the following spill containment procedures and emergency response materials and equipment listed on page 11.

5.1 SPILL CONTAINMENT PROCEDURES

The spill containment and cleanup procedures presented below are 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 Facility emergency supply location (refer to Table 2 which begins on page 11) to prevent the migration of the spill into the Facility's stormwater infiltration system and onto more permeable surfaces that are not covered with asphalt or concrete on the west and north sides of the Facility.
2. Use the dedicated on-site vacuum truck to remove spill liquids, if the spill is too large for booms:
3. Use sorbent materials and sand to contain and encircle 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 the wastewater or oil processing systems for treatment and disposal.

TABLE 3. EMERGENCY EQUIPMENT/SUPPLIES, CAPABILITIES & LOCATIONS

Item	Size	Quantity	Capabilities	Location
Pads	17"x19"x3/8"	2000	Sorption	EE&S
Boom	10'x8'	30	Sorption	EE&S
Boom	10'x5'	60	Sorption	EE&S
Rug	36"x300'	2	Sorption	EE&S
Rug	18"x30'	2	Sorption	EE&S
Pillows	9"x15"	10	Sorption	EE&S
Duct Tape Rolls	2"	30	Various	Main Office
Chemical Resistant Gloves	Large	12 dozen	PPE	Main Office, EE&S and ERB
Plastic Sheeting	20'x100'	10 rolls	Impermeable Barrier	EE&S
Bags of Kitty Litter	40 lb	40	Sorption	EE&S
Bags of Sand	40-lb	30	Containment and Sorption	EE&S
Full Face Negative Air Masks	Medium to Large	15	PPE	ERB
Organic Vapor Cartridges		20	PPE	Main Office
Half Face Masks	Medium to Large	10	PPE	EE&S and ERB

TABLE 3. CONTINUED

Item	Size	Quantity	Capabilities	Locations
Self Contained Breathing Apparatuses and air hoses	Medium to Large	2	PPE For use when supplied air is needed	EE&S
Protective Safety Glasses (Clear and Tinted)		30	Eye protection	Office and ERB
Tyvek Suits	Large and XXL	50	PPE	Main Office, EE&S and ERBs
Plastic Bags	33"x60"	700	Containment of solid waste and used PPE and sorbents	EE&S
Pressure Washers		1	1,500 – 2,000 psi	Portable in SCA # 1 and on VAC Trucks
VAC Trucks		6, one (1) dedicated to the Facility	Liquid and semi-solid vacuuming	Facility Parking Lot
VACTOR Truck		1	Soil vacuuming	Facility Parking Lot
Air Lord		1	Ash vacuuming	Facility Parking Lot
Drums	55-gallon	75	Containment of liquids and solids	SCA # 5

TABLE 3. CONTINUED

Item	Size	Quantity	Capabilities	Locations
Drums	55-gallon	75	Containment of liquids and solids	SCA # 5
Totes	250-gallon	10	Containment of Liquids	SCA # 5
Spools of Polypropylene Rope	¼-inch	1	Various	EE&S
Harness and 50-foot tag line	Variable	1	For Elevation work	EE&S
Dexsil Kits		48	Detection of Volatile Halogens	EE&S
Explosimeter /Gas Detectors		4	Detection of explosive levels of gases & O ₂ /CO ₂ /CH ₄ /Sulfide Concentrations for Confined Space Entries	Main Office

Notes:

1. EE&S – Emergency equipment and supplies stored on the second floor of the building in the southeast corner of the Facility where SCA # 1 is. The location is marked as EE & Supplies in Figure 2.
2. ERB – Emergency response bags kept with operating personnel at all times.
3. 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 dedicated on-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 Opa-Locka 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

Names and Addresses of Emergency Response Coordinators

- Mr. Steve Obst (President of Raider) at (954) 605-6853
Home address: 210 SW 44th Avenue, Plantation FL 33317
- Mr. Orlando Solis (Operations Manager) at (954) 470-8659
Home address: 14004 SW 32nd Street, Miramar FL 33027

EMERGENCY RESPONSE CONTACTS AND ARRANGEMENTS

Fire Department: Miami-Dade Fire Department (911, (786) 331-4252)

Personnel from the responding station toured Raider Environmental Services Facility and are acquainted with the Facility operations and layout. The fire station has a key to the fire box located at the entrance gate.

Police Department: Miami-Dade Police Department (911, (305) 836-8601)

Uniformed personnel have been acquainted with the Facility layout and are familiar with the operations. Police personnel would assume charge of any traffic control issues that should arise in the event of an emergency.

Hospital: Hialeah Hospital (911, 305 693-6100)

Emergency Response Arrangements:

Telephone conversations were conducted with hospital representatives confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes. Copies of the material safety data sheets for chemicals used in Raider Environmental Services processes were included in the hospital copy of the original contingency plan.

TABLE 4. EMERGENCY CONTACT PHONE NUMBERS

Miami-Dade County Fire Department	Emergency: 911
	Local Office: (786) 331-4800
Miami-Dade County Police Department	Emergency: 911
	Main Office: (305) 476-5423
Opa-Locka Police Department	Emergency: 911
	Local Office: (305) 953-2889
Medics Ambulance Service	Emergency: 911
	Local Office: (305) 687-4040
Hialeah Hospital	Emergency: 911
	Main Number: (305) 693-6100
National Response Center	(800) 424-8802
US EPA – Region IV	(404) 562-8357
Florida Department of Environmental Protection	State Warning Point (Emergency): (800) 320-0519
	Regional Warning Point (Emergency): (561) 393-5877
	Regional Office: (561) 681-6600
Miami-Dade County RER	County Warning Point (Emergency): (786) 336-6600
	Main Number: (305) 372-6600
Chemtrec	(800) 424-9300
U.S. Coast Guard	305-535-4472 / 4520

TABLE 5. OPA-LOCKA FACILITY CONTACT INFORMATION

NAME	TITLE	HOME	CELL
Aragon, Vicente	Field Technician	(954) 822-8910	
Archer, Tony	Used Oil Driver – Class A	(786) 229-9895	(305) 494-7683
Barrera, Denys	Mechanic	(786) 219-8733	
Berler, Dan	Compliance Manager		(305) 528-0959
Betancourt, Joey	Driver – Class A	(786) 718-5782	
Burden, Darryl	Driver – Class A	(786) 587-3769	(954) 465-1735
Carter-Klein, Judith	Accounts Receivable	(954) 401-2309	
Fundora, Luis	Tire Maintenance	(786) 443-8349	
Graham, Zenobia	A.P./H.R. Administrator		
Huff, Avery	Used Oil Driver – Class A	(954) 204-4422	(954) 300-6194
Leclair, Bobby	Operations & ER Mgr		(954) 543-2862
Martin, Jesus	Driver – Class B		
Mendoza, Carlos	Used Oil Driver – Class A		
Menendez, Art	Driver – Class A	(786) 444-2088	(954) 558-8295
Moya, Alex	Used Oil Driver – Class A	(954) 861-8824	(305) 345-4199
Nixon, Stephen	Driver – Class A	(754) 246-6597	(954) 559-7960
Obst, Steve	President		(954) 605-6853
Obst, Tavia	Controller		(954) 914-8414
Olmeda, Ernesto	Used Oil Driver – Class A	(305) 244-5648	(954) 393-6140
Perez, Judith	Administrator	(305) 767-9731	
Pullido, Ivan	Driver – Class A	(786) 537-6164	(954) 529-5257
Rojas, Luciano	Driver – Class A	(305) 305-3430	(954) 594-4036

TABLE 5. CONTINUED

NAME	TITLE	HOME	CELL
Ruiz, Ray	Used Oil Collection Services Manger	(305) 778-5090	(305) 494-6110
Santana, Lazaro	Water Treatment Manager	(786) 897-2634	
Stanley, Kelvin	Field Technician	(786) 319-2290	
Stevens, Rick	Oil Processing Manager		(954) 594-7055
Varela, Toni	Administrator/Scheduling	(305) 397-4554	

7. GENERAL RESPONSIBILITIES

7.1 Personnel Assignments

Mr. Obst and Mr. LeClaire 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. LeClaire, 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., Miami-Dade Fire and Rescue, Police).

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 Miami-Dade Fire Department and 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 monitoring 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 water plant building and office trailer as possible.
 - Water-sensitive items to storage areas that are as high above ground level as possible (i.e., second story storage room of water plant building and inside the office trailer).
- Dismantle and store all equipment (water treatment plant building or office trailer) 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
 - Water plant building in the southeast corner of the Facility.
 - Office trailer.
- 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 – COPIES OF ENCLOSURE LETTERS











APPENDIX B – 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 oleophilic (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.

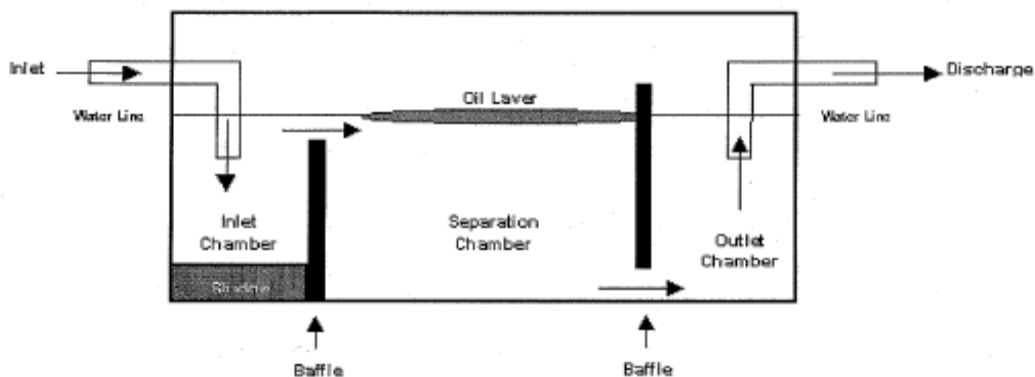


Figure 1. Conceptual Diagram of a Simple Gravity Oil/Water Separator. In a gravity operated O/WS, the oil wastewater is introduced through the system inlet. Water turbulence is calmed in the inlet chamber behind the first baffle, where solids settle out and form sludge on the bottom of the chamber. As 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.

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.

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.

Facility Closure Plan

Used Oil Processing Facility Permit Application

Raider Environmental Services
4103 NW 132nd Street
Opa Locka, Florida

INTRODUCTION

Raider Environmental Services is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater and other products as listed in Attachment A. The facility is located at 4103 NW 132nd Street, Opa Locka, Florida. The following Closure Plan has been prepared for Raider Environmental Services 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 facility, in accordance with the record keeping requirements set forth in Rule 62-710.510(4), FAC

PROCESS DESCRIPTION

Raider Environmental Services operates a used 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.

USED OIL MANAGEMENT

Process Description

Raider Environmental Services uses a combination of physical and chemical mechanisms to separate water from the oil. Phase separation is achieved by heating the oil. 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. Processed oil contains high thermal content and is sold as an energy source. The primary customers are asphalt plants, who use the oil as a replacement for higher-cost diesel fuel or natural gas.

FACILITY CLOSURE PROCEDURES

In accordance with Rule 62-710.800(9)(a) FAC, in the event that the Raider Environmental Services facility is closed, steps will be taken to ensure that: (1) there will be no need for further facility maintenance; (2) 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:

1. Notification of DERM and FDEP at least 60 days prior to closure of the storage tank system,
2. 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,
3. Pressure wash rinsing of all containment areas and the storage pad, and
4. 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 within 30 days after closure of the facility 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.



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: 3/5/2018 (DEP use only)

I. **GENERAL INFORMATION:** Latitude: 25.8939 Longitude: -80.2667 EPA ID-Number: FLR 000 143 891

Facility Name: Raider Environmental Services Permit Number: 284932-HO-004

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

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*

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

☐ Insurance Certificate

☐ Financial Test

☒ 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/swfir/>

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

\$77,198.00

x

1.013

=

\$78,202.00

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, equipment 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.



Signature of Engineer

John M. Jones

Engineer's Name and Title (please print or type)

50227

Florida Registration Number (please print or type)

4103 NW 132nd Street, Opa-Locka, FL 33054

Engineer's Mailing Address

(479) 353-1368

Engineer's Telephone Number

johnmjonespe@gmail.com

Engineer's E-mail Address



Signature of Owner/Operator

Steve Obst, Owner

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

(305) 994-9949

Owner/Operator's Telephone Number

steve@raiderenvironmental.com

Owner/Operator's E-mail Address