



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

FACILITY INFORMATION:

Facility Name: Raider Environmental Services

On-Site Inspection Start Date: 08/23/2018

On-Site Inspection End Date: 08/23/2018

ME ID#: 83539

EPA ID#: FLR000143891

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

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

County Name: Miami-Dade

Contact Phone: (305) 994-9949

NOTIFIED AS:

Transporter

Used Oil

VSQG

INSPECTION TYPE:

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

Routine Inspection for Used Oil Generator facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for Used Oil Processor facility

Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Robert Berberena, Environmental Specialist III

Other Participants: Justin Stark, Environmental Specialist I; Norva Blandin, Environmental Manager; Orlando Solis, Director of Compliance & Environmental Operations; Steve Obst, Manager

LATITUDE / LONGITUDE: Lat 25° 53' 41.924" / Long 80° 15' 51.6958"

SIC CODE: 4959 - Trans. & utilities - sanitary services, nec

TYPE OF OWNERSHIP: Private

Introduction:

On August 23, 2018 a used oil and hazardous waste compliance inspection was conducted at Raider Environmental Services (RES) [FLR000143891] an Used Oil Processor, Transporter and Transfer Facility located at 4103 NW 132nd St, Opa Locka, FL 33054-4510. RES was represented by Mr. Steve Obst (Manager) and Mr. Orland Solis (Environmental Operations).

Raider Environmental Services (RES) has been in operation at this location since November of 2008, and currently operates a Used Oil Processing Facility under Department permit #284932-HO-006, expiration date is June 30, 2019. RES is a hazardous waste transporter, as well as, a transporter, processor, and marketer of used oil and used oil filters. The facility also processes oily water from tank bottoms and ships' bilges. RES is situated in an industrial zone and encompasses 1.55 acres. The facility has approximately 45 employees and is connected to city water and sewer.

RES has five vacuum trucks one of which is a 6000-gallon vacuum other vacuum have a capacity of about 3,000 gallons. They have 20 tankers of 7,000 to 9,000 gallons capacities and are used for the transportation of both used oil and oily water. The facility has four tractor trailers, one of which is a truck designed for picking up roll-offs and the other three are for used oil collection.

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The facility requires safety shoes, safety glasses and hard hats when out in the yard or shop. All the DEP inspectors wore the required Personal Protection Equipment throughout the entire inspection.

Notification History

RES's last notification was on April 9th, 2018. [Their previous notification was received on March 30, 2017]

Inspection History

The last time that a routine inspection took place at RES was on December, 8th, 2016 a violation to 279.43 was observed and they returned to compliance on 12/23/2016. During the past five calendar years RES was also inspected on March 5th, 2014. The facility had a SFCO in 2015 issued based on the 3/5/2014 inspection findings. They started operations at this location on November of 2008.

Process Description:

The inspector presented his DEP credentials and business card to RES's Manager, Mr. Steve Obst who mentioned that Mr.. Orlando Solis was in charge of the Environmental Operations. This facility is authorized to process used oil, oily water waste water, petroleum contact water, oily solid waste and used oil filters. The facility is registered for both used oil as well as hazardous waste transporter. We held a pre-inspection meeting at Mr. Obst's administrative office where we reviewed all the permit and compliance documentation related to their operations.

After the review of documents we started a walk-through the facility. DEP inspectors toured the facility along with RES's representatives Mr. Obst gave the inspectors an overview of how both used oil and oily water are processed through the plant. Heat, emulsifiers and caustics are used in the oily water processing, while the used oil is processed using flocculants and acids. RES's contact indicated that no changes of the plant operations had happened and hence any activities related to the permits remains the same while implementing good management practices. Since their last inspections and permit application the facility has not implemented any changes to their used oil processes. The inspectors visited the following areas; QA/QC laboratory, tank farms, and used oil processing areas, used oil filters (UOF's) storage area, their small, solid waste bulk area and hazardous waste storage area, waste water treatment plant.

QA/QC Laboratory

We went to RES's QA/QC laboratory area, and their practices are satisfactory. All raw materials (in small bottles) were closed and labeled properly. No hazardous wastes or other containers were observed in this area. The transporters or technicians bring their samples to be analyzed by the technician prior to uploading their used oil to the processing areas. RES conducts additional testing for halogens and the percentages for water content. Quality control as well as Integrity test takes place in these laboratory on daily or as needed basis respectively. Other testing will be analyzed by their laboratory in the State of Georgia.

Central Accumulation Area

At the moment of the inspection no hazardous wastes containers were observed. As a very small quantity generator of hazardous wastes RES does not generate hazardous wastes in excess of 220 pounds per month or accumulate a total of 2200 pounds on-site at any time. The area had a sign of "Hazardous Waste Storage Area" ' It had a extinguisher and an eyewash station nearby.

Universal Wastes: The inspectors observed one 55 gallon drum of batteries. No other universal waste was observed at the moment of the inspection but RES representative stated that occasionally they also generate bulbs that are considered as universal wastes.

Preparedness and Prevention

RES has PPE, safety equipment such as fire extinguishers, and eye wash stations throughout the facility within a reasonable distance of any area where exposure is likely. Spill kits and absorbents are also available both near generation points and around all the loading/unloading sites. The fire extinguishers and the sprinkler system in the main building are serviced on an annual basis. The facility requires the use of diverse personal protective equipment (PPE) including hard hat, ANSI approved work shoes, reflective vest, safety glasses, and ear protection.

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Hazardous Wastes & Used Oil Manifests (Acceptance and Delivery Records)

The last time RES made a shipment of hazardous waste was on July 12, 2018 through Triumvirate Environmental Transporters (FLD981015773), Manifest # 014862385. Freehold Cartage (NJD054126164) was the secondary transporter and the designated facility was American Environmental Services (KYD985073196). The inspectors conducted an extensive review of the records for the last three years. Based on the file review, RES do not operates as a HW Transfer facility and only transport hazardous waste during the course of transportation (within 24 hrs). Waste profiles, LDR's, and proper documentation for both HW and Used Oil appeared to be in order.

Used Oil Rail Yard: RES takes the used oil to the rail yard located in Miami and the rail car is shipped to Noble Oil Services, Inc. in Sanford , N.C. They fill up 4 tankers with 6,000 gallons and fill up an approximately 23, 600 gallon rail car for shipment. At this location, RES did not have any storage of used oil or used oil filters. When the rail cars are ready, RES transport the used oil in tank trucks to this location. Therefore, an used oil transfer facility permit is not required for this operation.

Employee Training

RES representatives provided certifications for their responders of the different training courses such as DOT, Used Oil proper management under FDEP rules and Hazwoper. The certificates showed that the last training took place on February 7TH, 2018. Other training records demonstrated that RES has been providing training to their technical personnel for the past three years.

Contingency Plan

Full Contingency Plan/SPCC was submitted. The last revision was on 2/2018 including their proof of notification to the local authorities. The CP had provisions for fire and explosions and is adapted to their actual building.

Weekly Inspection Logs

A weekly log inspection logs were provided; it had information regarding the storage area and check marks accordingly. The weekly log was dated August 21, 2018, The rest of the inspection sheets were put in chronological order.

Annual Report by Used Oil Handlers

On March 2018 RES submitted their Annual Report by Used Oil & Used Oil Filter Handlers. No activities have changed since their last registration. They are authorized as Used Oil Transporter, Transfer facility, and Processor. RES provided a form regarding their used oil acceptance and delivery, that has been attached to this report. The designated facility is Nobile Oil Services, Inc. (FLCESQG577732)

Record Review

From a review of RES's documents such as manifests, training records, contingency plan / SPCC, letter to authorities, weekly inspection records, permits, notification form, biennial reports, and acceptance and delivery logs for used oil and hazardous waste we considered that it appeared that the facility's documentation was satisfactory. No issues or areas of concern were noted during the facility tour. The facility has fire extinguishers located throughout the facility, which were labeled, dated and serviced in a monthly basis. A copy of RES's Certification of liability insurance was provided. Their policy was updated and will expire on March 19, 2019.

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PHOTO ATTACHMENTS:

Used Oild Filters



Non Haz wastes



Universal Wastes



Eye wash Sataion



Spill Kit



Permit



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Empty drums



Laboratory



Certificate of Training



Conclusion:

An exit interview was conducted at the conclusion of the inspection. After making a walk-through the facility and reviewing the required documentation it appeared that Raider Environmental Services was in compliance at the moment of the inspection.

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1.0 - Pre-Inspection Checklist

Requirements:

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

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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2.0 - VSQG Checklist**Requirements:**

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

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Item No.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <ul style="list-style-type: none"> <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input checked="" type="checkbox"/> Has the waste been analyzed? <input checked="" type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied? 	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input checked="" type="checkbox"/> Type and amount of hazardous waste delivered. <input checked="" type="checkbox"/> Date of shipment 	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✓		

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5.0 - Used Oil Generator Checklist**Requirements:**

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

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Item No.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)	✓		
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)	✓		
5.16	contain the released oil? 279.22(d)(2)	✓		
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)	✓		
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)	✓		
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		

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Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)	✓		
5.29	contain the released oil? 62-710.850(5)(b)	✓		
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)	✓		
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4	✓		
Item No.	Used Oil Mixtures	Yes	No	N/A
	<input type="checkbox"/> Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	<input checked="" type="checkbox"/> Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)	✓		
	<input type="checkbox"/> Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)	✓		
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)	✓		
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)	✓		
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)	✓		
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)	✓		
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)	✓		
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)	✓		
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)	✓		
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)	✓		
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)	✓		
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)	✓		

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Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)	✓		
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)	✓		
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	✓		
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)	✓		
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)	✓		
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)	✓		
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)	✓		
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)	✓		
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)	✓		
Item No.	Marketing and Processing	Yes	No	N/A
	<input type="checkbox"/> Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]			
	<input checked="" type="checkbox"/> Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

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6.0 - Transporters Checklist**Requirements:**

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

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

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Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)	✓		
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)	✓		
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)	✓		
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)	✓		
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)	✓		
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)	✓		
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31	✓		
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

Inspection Date: 08/23/2018

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Robert Berberena

Environmental Specialist III

Principal Inspector Name**Principal Inspector Title**

DEP

10/24/2018

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

Justin Stark

Environmental Specialist I

Inspector Name**Inspector Title**

DEP

Organization

Norva Blandin

Environmental Manager

Representative Name**Representative Title**

DEP

Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Orlando Solis

Director of Compliance & Environmental Operations

Representative Name**Representative Title**

Raider Environmental Services

Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Steve Obst

Manager

Representative Name**Representative Title**

Raider Environmental Specialist

Organization

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Report Approvers:**Approver:** Norva Blandin**Inspection Approval Date:** 10/24/2018