



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

FACILITY INFORMATION:

Facility Name: Raider Environmental Services

On-Site Inspection Start Date: 01/28/2019

On-Site Inspection End Date: 01/28/2019

ME ID#: 100667

EPA ID#: FLR000176271

Facility Street Address: 5080 Hwy 60 E, Mulberry, FL 33860

Contact Mailing Address: 4103 NW 132nd St, Opa Locka, FL 33054-4510

County Name: Polk

Contact Phone: (305) 994-9949

NOTIFIED AS:

Transfer Facility

Transporter

Used Oil

VSQG

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

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

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for Hazardous Waste Transfer Facility facility

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Ileana A Hernandez, Environmental Specialist II

Other Participants: Beth Knauss, Environmental Consultant; Kevin McIntyre, Manager

LATITUDE / LONGITUDE: Lat 27° 53' 36.7303" / Long 81° 55' 32.3462"

SIC CODE: 2992 - Manufacturing - lubricating oils and greases

TYPE OF OWNERSHIP: Private

Introduction:

On January 28, 2019, Raider Environmental Services ("Raider") was inspected by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with hazardous waste and used oil management rules. Raider operates a used oil and solid waste processing facility under permits 316140-004-HO & 316140-005-SO which were issued on October 16, 2018. Both permits expire August 12, 2023. The company also operates a 10-day hazardous waste transfer at this location. This facility was last inspected by the Department's hazardous waste section on August 24, 2017. Mr. Kevin McIntyre accompanied the Department inspectors throughout the facility.

Used oil filters are not processed at this Mulberry facility; they are shipped to the Raider Environmental Services facility in Miami, FL (EPA ID #FLR000143891), for processing.

Process Description:

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

The facility was clean and well-maintained, with no visible signs of releases. Two vertical tanks in secondary

Inspection Date: 01/28/2019

containment are used to store boiler fuel for the steam autoclave that was installed in the former Kellen oil filter processing building for a potential expansion into biomedical waste processing. No biomedical waste was on-site.

Halogen checks are conducted on used oil when it is received. Used oil is then offloaded at one of three stations, depending on the material being unloaded - used oil and oily wastewater are generally unloaded at different stations, as the processing requirements are different. Closed 55-gallon drums are staged at the unloading area to catch drips and store hoses. Oil is filtered and passes through a manifold system to the storage and processing tanks. De-emulsifiers and other chemicals can be added to the oil in the piping system as processing aids. A horizontal heated tank is used for gravimetric separation. Sampling ports in the tank allow separation to be monitored.

The facility tests the oil for percent water prior to the shipment off-site; however, it is not currently claiming that the oil meets the specification, so no specification analyses were reviewed as part of this inspection. The boiler for the processing system used to be fired by either natural gas or used oil; however, the gas service has been disconnected and the facility is currently diesel as its primary fuel source instead of used oil. Separated water is shipped to Aqua Clean Environmental or to Raider Environmental Services at the Miami facility for further processing and treatment prior to disposal to the City of Lakeland's Publicly-Owned Treatment Works (POTW).

Currently, oil is usually being shipped to Noble Oil in Sanford, NC, by rail in cars owned by Noble Oil. Although no track pans were available for the facility's rail siding, once the rail cars are loaded they are released to CSX within the 24-hour limit keeping in compliance 40 CFR Part 279.

At the time of the inspection, there were less than 200 gallons of hazardous waste stored on-site in properly managed and labeled containers within the 10-day transfer limit. A small number of 55-gallon drums of oily waste were in storage pending processing. A roll-off container inside the building was being used to consolidate containers of oily, non-hazardous waste for disposal. No free liquids were observed in the roll-off. The facility was within its permitted solid waste storage capacity. The area was clean and well-maintained. Some used refractory brick was stored on the pavement outside the building, along with a roll-off storing a filter press.

Facility records were in order. The 10-day hazardous waste transfer facility records included all required information. Copies of hazardous waste manifests were on-site and available for inspection. Used oil receiving and disposal records were also on file. Personnel training records, facility inspection records, and financial assurance records were current.

Conclusion:

Based on the observations made at the time of the inspection, Raider Environmental Services was operating in compliance with state and federal hazardous waste and used oil management rules applicable to hazardous waste transporters, hazardous waste transfer facilities, used oil processors, used oil transfer facilities, and used oil transporters.

During the exit interview of the inspection and on an e-mail correspondence that was sent to the facility on February 1, 2019, the Department discussed with the facility representatives that they will need to include in the contingency plan (1) an evacuation map and (2) a section on the emergency procedures that will be taken in case there is an explosion at the facility the next time the contingency plan is revised.

*Please note that the Generator Improvements Rule was adopted by Florida on June 18, 2018.

Inspection Date: 01/28/2019

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.

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

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)			✓

Inspection Date: 01/28/2019

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: 01/28/2019

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.

Ileana A Hernandez

Environmental Specialist II

Principal Inspector Name**Principal Inspector Title**

FDEP-SWD

02/27/2019

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

Beth Knauss

Environmental Consultant

Inspector Name**Inspector Title**

FDEP-SWD

Organization

Kevin McIntyre

Manager

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.

Report Approvers:**Approver:** Shannon Kennedy**Inspection Approval Date:** 02/27/2019