



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

FACILITY INFORMATION:

Facility Name: Raider Environmental Services Inc
On-Site Inspection Start Date: 07/21/2020 **On-Site Inspection End Date:** 07/21/2020
ME ID#: 100667 **EPA ID#:** FLR000176271
Facility Street Address: 5080 Hwy 60 E, Mulberry, Florida 33860
Contact Mailing Address: 5080 SR 60 East, Mulberry, Florida 33860-4510
County Name: Polk **Contact Phone:** (863) 425-4411

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste, Transfer Facility **Used Oil:** Oil Filters, Processor **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Mercury Recovery and/or Reclamation**

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 Transporter Facility
Routine Inspection for Hazardous Waste Transfer Facility Facility
Routine Inspection for Universal Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kiana Sladicki, Inspector
Other Participants: Ileana Hernandez, Environmental Specialist II; Kevin McIntyre, Manager

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

NAIC: 324191 - Petroleum Lubricating Oil and Grease Manufacturing

TYPE OF OWNERSHIP: Private

Introduction:

On July 21, 2020, 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 on August 12, 2023. Raider also operates a 10-day hazardous waste transfer facility at this location. This facility was last inspected by the Department's hazardous waste section on January 28, 2019. Mr. Kevin McIntyre accompanied the Department inspectors throughout the facility.

Process Description:

Operations are described in the facility's used oil processor permit application. The process has not changed since the last inspection, however, Raider is working for authorization to be able to process biomedical waste by the end of 2020. Currently, two oil trucks, a box truck, and three tanker trucks operate out of this facility. The

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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. Oil trucks complete scheduled pickups from small automotive shops and facilities. Raider has been operating at this location for approximately 10 years and currently has six employees, three of which are drivers. Raider operates Monday - Friday, 7 AM - 3:30 or 5:00 PM depending on work load.

The facility consists of four buildings on the property, outlined as follows:

BUILDING ONE

This building, located at the northwest side of the property, is divided into two ground level areas and one upstairs loft. In the south ground level area, a roll-off container was being used to consolidate containers of oily, non-hazardous waste for disposal. There were no free liquids observed in the roll-off. There are also empty drums, containers of grease, and product containers stored here.

The second ground level area on the north end stored new drums, properly managed used oil filters, and the hazardous waste storage area. At the time of the inspection, there were seven properly managed 55-gallon used oil filter drums and no hazardous waste. 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. Above this area on the second floor was an empty loft space. In one corner of the loft, there was a plastic cylinder tote storing universal waste lamps. The container was neither labeled with the words "Universal Waste Lamps" nor closed. Raider placed the universal waste lamps in a properly managed container and submitted photo documentation via email to the Department on July 28, 2020. The Department verbally discussed proper universal waste lamp management and the one year accumulation time limit.

BUILDING TWO / TANK FARM

Located at the southwest side of the property, this building is used to receive used oil and perform second halogen checks on the 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. Demulsifiers 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. Oily rags generated in this area are put into the roll-offs.

Outside there are five used oil tanks, one processing tank, two oily water tanks, and three diesel tanks in addition to the boiler. 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 using diesel as its primary fuel source instead of used oil. Also located outside are a rainwater separator and truck wash area. 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").

BUILDING THREE / SOLID WASTE / FUTURE BIOMEDICAL WASTE

This building, located at the southeast side of the property, houses the solid waste processing and the future biomedical waste processing area. Two vertical tanks in secondary containment are used to store boiler fuel for the steam autoclave that was installed in the former Kellen oil filter processing building for the potential expansion into biomedical waste processing. Raider has created and labeled the biomedical waste area in preparation for receiving authorization and no biomedical waste was on-site. Raider processes all of their solid waste to meet the three-day deadline to process. At the time of the inspection, Raider had no solid waste in this area.

BUILDING FOUR

This building, located at the northeast side of the property, is used for spare part storage and is not used for any of the facility's used oil or hazardous waste processing.

RECORDS REVIEW

Currently, oil is usually being shipped to Noble Oil in Sanford, NC, by rail in cars owned by Noble Oil. Once the rail cars are loaded, they are released to CSX within the 24-hour limit keeping in compliance 40 CFR Part 279. The most recent Bill of Lading was dated July 14, 2020, for one car. Raider's oil trucks typically bring in used oil

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daily from small automotive shops and facilities.

At the time of the inspection, there was no hazardous waste on-site. The 10-day hazardous waste transfer facility records included all required information. Copies of hazardous waste manifests were on-site and available for inspection. The most recent hazardous waste shipping manifest was 021157517JJJ on June 26, 2020, for 30 gallons of waste paint. Raider picked up this hazardous waste from Norwegian Cruise Line (EPA ID #FLR000213298) and immediately sent to Clean Earth (EPA ID #KY0965073195).

The facility maintained current training records for their employees. All permits and records were up to date and on-site except for the Certificate of Liability Insurance, which expired on July 11, 2020. The facility received the current Certificate on July 24, 2020, indicating the Liability Insurance renewed on July 11, 2020. Please ensure a copy of the current Certificate of Liability Insurance is maintained on-site.

New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	273.15(c)(1) , 62-737.400(5)
Explanation:	All containers that are used to store universal waste lamps shall be stored in a closed container that prevents breakage and release of their components to the environment. All containers shall be closed except when adding or removing waste and be properly labeled with the words "Universal Waste Lamps" and an accumulation start date. Raider stored universal waste lamps in the upstairs loft area in an open tote that was not properly labeled.
Corrective Action:	CORRECTED: Raider placed the universal waste lamps in a properly managed container after the inspection.

Photo Attachments:

Universal waste lamps in an unlabeled open tote



CORRECTED: Raider properly managed universal waste lamps



PHOTO ATTACHMENTS:

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Roll-off for solidified oily waste.



Used oil filters.



Tank farm.



Solid waste processing area.



Conclusion:

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. However, Raider was not operating in compliance with state and federal universal waste rules. With information supplied after the inspection, the facility was determined to be back in compliance.

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

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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.

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)			✓

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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)			✓
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)	✓		

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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

Kiana Sladicki**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**07/28/2020**Date**Ileana Hernandez**Representative Name**Environmental Specialist II**Representative Title**FDEP**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.

Kevin McIntyre**Representative Name**Manager**Representative Title**Raider**Organization**

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Report Approvers:**Approver:**Shannon Kennedy**Inspection Approval Date:**07/30/2020