



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

FACILITY INFORMATION:

Facility Name: Raider Environmental Services
On-Site Inspection Start Date: 08/25/2020 **On-Site Inspection End Date:** 08/25/2020
ME ID#: 83539 **EPA ID#:** FLR000143891
Facility Street Address: 4103 NW 132nd St, Opa Locka, Florida 33054-4510
Contact Mailing Address: 4103 NW 132nd St, Opa Locka, Florida 33054-4510
County Name: Miami-Dade **Contact Phone:** (305) 994-9949

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste **Used Oil:** Oil Filters, Processor **Other:** Both
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

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility
Routine Inspection for Universal Waste Transporter Facility
Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for VSQG (<100 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Carlos Grajeda, Inspector
Other Participants: Orlando Solis, Director of Compliance and Environmental Operation

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

NAIC: 324191 - Petroleum Lubricating Oil and Grease Manufacturing

TYPE OF OWNERSHIP: Private

Introduction:

On August 25, 2020 (08/25/2020), Carlos Grajeda with the Florida Department of Environmental Protection (FDEP) conducted a routine Compliance Evaluation Inspection (CEI) at Raider Environmental Services (Raider), located at 4103 NW 132nd St, Opa Locka, FL 33054. Raider was inspected to determine the facility's compliance with the state and federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, adopted and incorporated by reference in Rule 62-730, Florida Administrative Code (F.A.C.), as well as the state, used oil Rule 62-710 F.A.C.

The inspector was escorted around the facility by Orlando Solis, Operations Manager. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

Raider occupies approximately 1.22 acres and is connected to public water and sewer. Raider has been operating at its current location since 2001 and employs 13 staff at this location. The facility office operates Monday to Friday from 7:00 a.m. to 5:00 p.m.

Notification History:

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Raider currently operates as a permitted facility (Permit #284932-006-HO, 284932-007-SO) for the operation of a Used Oil and Material Processing Facility. These permits are currently valid and expire on October 13, 2023.

Inspection History:

- 11/07/2018: The facility was inspected by the Department as a permitted used oil processor and HW transporter and was found to be in compliance at the time of the inspection.
- 08/23/2018: The facility was inspected by the Department as a permitted used oil processor and HW transporter and was found to be in compliance at the time of the inspection.
- 12/08/2016: The facility was inspected by the Department as a permitted used oil processor and HW transporter and was found to be out of compliance at the time of the inspection. The violation, pertaining to DOT training, was resolved on 12/23/2016. Compliance without enforcement was pursued in this case.

Personal Protective Equipment (PPE) was required to enter the facility. The Department inspector was equipped with steel-toed boots, safety vests, and face mask.

Process Description:

The facility staff noted that no changes to facility operations or tank contents have occurred since the date of the last inspection. The Department inspector began the inspection by going over the permit conditions and verifying the facility operations. The Facility is authorized to process used oil, used oil filters, oily water, solid waste, and to collect and transport petroleum contact water.

Used Oil Activities:

The Facility consists of 11 used oil / oily water processing and storage tanks with a total capacity of 257,000 gallons. The facility had four 35,000 gallons tanks, three 25,000 gallons tanks, two 3,000 gallons tanks, and two 6,000 gallons tanks. All tanks were properly labeled and located within a large concrete secondary containment unit. The secondary containment and loading/unloading areas were clean and accessible to inspect. No deficiencies were observed. Fire extinguishers and spill kits were located directly adjacent to the secondary containment.

The maintenance building consists of one bay. The facility stores used oil containers and used oil filter containers by the maintenance building.

The Department inspector observed the following containers during the inspection:

- 46 55-gallon metal drums of used oil with the words 'Used Oil'.
- 39 55-gallon metal drums of used oil filters with the words 'Used Oil Filters'
- Five 55-gallon metal drums of oily rags with the words 'Oily Rags'
- Two roller boxes of used oil filters and oily waste properly labeled.

All drums were observed to be properly labeled, closed. This building is also equipped with audible and visual alarm. Several fire extinguishers, two eyewash stations, and three spill kits were observed throughout the building.

Hazardous Waste:

This location is not permitted to be a hazardous waste transfer facility. Any HW transportation conducted by Raider goes directly to Triumvirate Environmental Services, Inc., or Freehold Cartage, Inc. during transportation (within 24 hours or less). The Department inspector verified this by viewing the hazardous waste manifests during the record review portion of the inspection.

Record Review:

All permits and documentation required by the Department inspector were available for review on-site. The inspector reviewed the following:

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- Acceptance and delivery records for used oil activities – Due to a large number of records, the months of March, April, and July for 2018 and 2019 were selected at random. No deficiencies were observed.
- HW manifests – Due to a large amount of records, the months of January, April, and July for 2018 and 2019 were selected at random. No deficiencies were observed.
- Daily inspection logs for the tanks and secondary containment. No deficiencies were observed.
- Raider facility operation logs (for used oil activities on-site less than 35 days). The facility maintains a full and complete standard operating procedure with requirements for daily tank inspections, acceptance and delivery records, halogen testing, laboratory procedures, and safety protocols.
- Full Contingency Plan/SPCC Plan (last revision August 2020). No changes have been made to the Contingency Plan since the last arrangements with local authorities were made in October 2012. All elements required by rule were included in the Contingency Plan including Closure Plan, Waste Analysis Plan (WAP), and Emergency Response Procedures.
- Employee training plan (last round of training was conducted on 01/07/2020). Training is conducted for each employee initially within 6 months of hire and is conducted annually thereafter. The Training Plan was observed to contain all the required elements.
- All permits, forms, and inspection reports displayed on-site appeared to be complete and in order. The inspector observed that the posted county permits/licenses appeared to be complete and in-order.
- Waste Analysis Plan. The Department inspector reviewed the facility's Waste Analysis Plan and appeared to be complete and in order at the time of the inspection. More specifically, the facility appeared to have a standard operating procedure for the testing of halogen content of used oil entering the facility.
- The last three years of the facility's annual financial reports, specifically for its Used Oil Processing Facility Closing Cost Estimate Forms, were available for review during the inspection and also submitted to the Department. The Closing Cost Estimate forms appeared to be complete and in order at the time of the inspection.
- Liability insurance plan in the amount of \$1,000,000. The plan policy #1000638045201 is insured by Starr Indemnity & Liability Company and expires on July 11, 2021. The Department inspector observed no lapse in insurance at any point in the last three years.
- The facility's Annual reports for used oil and used oil filters from the last three years were available for review during the inspection and were submitted on time to the Department. The most recent report (for 2019) was received by the Department on 02/24/2020.

Based on the record review, the facility operates as a Used Oil Processor, Transporter, and HW Transporter. All required records were available for review quickly and appeared accurate

PHOTO ATTACHMENTS:

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Photo No. 1: Vacuum Truck



Photo No. 2: Used Oil and Used Oil Filter Containers



Photo No. 3: Used Oil Filter Container



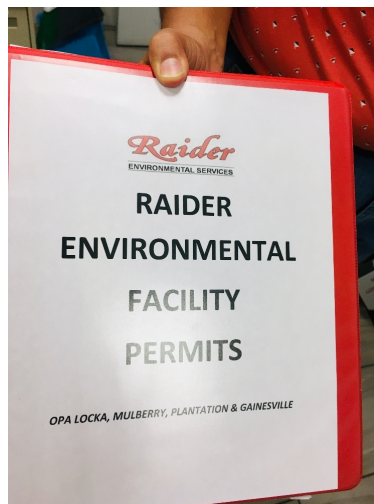
Photo No. 4: Tank Farm



Photo No. 5: Tank Farm



Photo No. 6: Raider's Permits



Conclusion:

Raider was inspected as a Processor, Transporter, and Transfer facility of used oil as well as a hazardous waste transporter and was found to be in compliance.

No further action is required at this time.

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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

Carlos Grajeda**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**FDEP**Organization**09/23/2020**Date**Orlando Solis**Representative Name**Director of Compliance and Environmental Operation**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:**Alannah B Irwin**Inspection Approval Date:**09/23/2020