



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

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**FACILITY INFORMATION:**

**Facility Name:** Raider Environmental Services Inc  
**On-Site Inspection Start Date:** 10/28/2021 **On-Site Inspection End Date:** 10/28/2021  
**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, Collection Center (Commercial) **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 **Mercury Recovery and/or Reclamation**

**INSPECTION TYPE:**

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

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Sarah M Green, Inspector  
Leslie Pedigo, Environmental Consultant; Victor Williams, Plant Operator; Kevin McIntyre,  
**Other Participants:** 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:**

An inspection was conducted at Heritage-Crystal Clean, LLC, d.b.a. Raider Environmental Services Inc ("Raider"), on October 28, 2021 to determine the facility's compliance with state and federal regulations for very small quantity generators ("VSQG") of hazardous waste, hazardous waste transporters, and transporters of used oil. While the facility initially notified as a Conditionally Exempt (now "Very") Small Generator of hazardous waste in May of 2011, Raider most recently notified on March 1, 2021. The Department last inspected this facility on July 21, 2020. Inspectors were assisted by Victor Williams, Plant Operator, and Kevin McIntyre, Manager, during the inspection.

Raider operates a used oil and solid waste processing facility under permits 316140-004-HO & 316140-005-SO, respectively, which were issued on October 16, 2018. Both permits expire on August 12, 2023. Storage tanks for the facility are registered under STCM ID#9813440.

**Process Description:**

Raider was purchased by Heritage-Crystal Clean in September 2021. The facility is still undergoing the process of merging and changing its name, and is currently still operating under the name Raider Environmental Services. The property and business will be undergoing additional changes, including fencing in the entire

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property and replacing signage/insignias.

The used oil operations are described extensively in the facility's used oil processor permit application. The process has not changed since the last inspection, however the facility has begun doing primarily used oil processing and cruise line autoclaving.

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

### BUILDING 5080-1

A general warehouse that is not currently used for waste processing or storage. The storage area just outside this building is being used to store various equipment most of which will be recycled as scrap metal.

### BUILDING 5080-4

This building serves as the processing and storage area for the facility's cruise line autoclaving service. "Contaminated" media is stored in rolling containers on the north side of the warehouse, before it is transferred into the autoclave to be sterilized by steaming for 60-minutes at 212-280 degrees Fahrenheit at 25-40 psi depending on the load. Processed waste is placed in the on-site compactor and is disposed of as a solid waste. Outside the south-eastern side of the building houses the boiler used for the autoclave machine, as well as two vertical tanks for fueling the boiler.

### BUILDING 5080-3

Located at the southwest side of the property, this building is used to receive used oil and oily wastewater. Used oil is halogen tested prior to being picked up from customers and a second halogen test is conducted prior to being unloaded at the facility. The facility has three unloading stations; 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. Outside the eastern entrance of the building, under and overhang, were two 55-gallon drums of oily debris that were closed, properly labeled and within a containment structure. All containers used for temporary storage of used oil within the processing area were observed to be labeled with the words "used oil". All storage tanks located on the tank farm appeared to be in good condition and labeled as appropriate: (5) used oil, (1) used diesel, (1) processing tank, (2) oily water, and (3) diesel fuel (for boiler). All tanks were located in a secondary containment structure.

### BUILDING 5080-2

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 no hazardous waste containers being stored on site. The facility currently has several containers filled with solid waste that are awaiting profiling to be approved for disposal at the local solid waste facility due to the recent facility ownership change.

### 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 with 40 CFR Part 279.

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 facility maintained current training records for their employees.

All permits and records were up to date including the Certificate of Liability Insurance.

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## PHOTO ATTACHMENTS:

Building 5080-1



Building 5080-4 Cruise Line waste storage containers



Building 5080-4 Autoclave Boiler



Building 5080-1 Equipment and Scrap Metal Area



Building 5080-4 Autoclave



Building 5080-4 Boiler Fuel Tanks





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Building 5080-3 Oily Debris Containers



Building 5080-3 Tank Farm



Building 5080-3 Tank Farm



Rail Yard



Building 5080-2 Storage



Building 5080-2 Storage



## Conclusion:

At the time of the inspection, Heritage-Crystal Clean, LLC, d.b.a. Raider Environmental Services Inc was operating in compliance with state and federal regulations for very small quantity generators of hazardous waste, hazardous waste transporters, and transporters of used oil.

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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.

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

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 <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 type="checkbox"/> Has the waste been analyzed? <input 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) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input 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(2)	✓		

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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

Sarah M Green**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**11/10/2021**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Victor Williams**Representative Name**Plant Operator**Representative Title**Crystal Clean**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**Crystal Clean**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 Lenhart**Inspection Approval Date:**11/10/2021