

Thursby, Kim

From: Bill Parkes [BParkes@cliffberryinc.com]
Sent: Tuesday, January 29, 2008 11:39 AM
To: Epost HWRS
Subject: RE: Cliff Berry, Inc. - Miami;FLD 058 560 699;77628-HO-004;Notice of Deficiency

Tim -

CBI confirms receipt of the attached document on January 9, 2008.

Thanks,

William E. Parkes, Jr.
Cliff Berry, Inc. (CBI)

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]
Sent: Wednesday, January 09, 2008 12:35 PM
To: Bill Parkes
Cc: Kantor, Karen E.; Winston, Kathy; Raoul.Clarke@dep.state.fl.us; Wick, Fred; Bahr, Tim; Prusty, Rabin; Kothur, Bheem
Subject: Cliff Berry, Inc. - Miami;FLD 058 560 699;77628-HO-004;Notice of Deficiency

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

January 9, 2008

SENT VIA EMAIL

bparkes@cliffberryinc.com

Mr. William E. Parkes, Jr.
Cliff Berry, Incorporated
Post Office Box 13079
Port Everglades Station
Fort Lauderdale, Florida 33316

RE: Cliff Berry, Inc. – Miami Facility
EPA I.D. No. FLD 058 560 699
Permit No. 77628-HO-004
Notice of Deficiency

Dear Mr. Parkes:

The Florida Department of Environmental Protection (Department) has received your renewal permit application dated December 7, 2007 to operate a Used Oil Processing Facility at 3033 N.W. North River Drive, Miami, Florida.


The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed summary. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies of your written response within 30 days of receipt of this notice. If you cannot submit this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Mr. William E. Parkes, Jr.
January 9, 2008
Page Two

Should you like to arrange a meeting or if you have any questions, please contact Rabin Prusty at (850) 245-8780 or via e-mail: rabin.prusty@dep.state.fl.us.

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp

Enclosure

cc: Karen Kantor, DEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
Kathy Winston, DEP/West Palm Beach, kathy.winston@dep.state.fl.us
Raoul Clarke, DEP/Tallahassee, raoul.clarke@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us

ATTACHMENT
January 9, 2008
Cliff Berry, Inc. – Miami Facility
EPA I.D. No. FLD 058 560 699
Notice of Deficiency

General Comments

Renewal Permit Application: Cliff Berry, Inc., Miami Facility must submit a standalone document with detailed and updated site specific information for the renewal permit application.

Site Map and Tank Table: Please provide a site map (8 ½"x11") in electronic format (PDF) identifying all tanks and also a tank table (8 ½ "x11") in electronic format (PDF). Please send the map and tank table via e-mail, so that the map and tank table can be attached to the permit. Also include hard copies of the map and tank table with your response.

Specific Comments

1. **Attachment 2, Application Form for a Used Oil Processing Facility Permit, page 8:** Under item #3, Processors must also meet all applicable subparts. Please check mark applicable sections.

C. Operating Information, page 10 and 11: Please provide detailed site specific information on the following:

Item # 3: Attach a revised and updated description of the facility operation, nature of the business, and activities that it intends to conduct, and the number of employees.

Item # 4: Attach a detailed description of the process flow. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment.

Item # 5: (a) An analysis plan, (b) A description of the management of sludges, residues and residues and byproducts, and (c) A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

Item # 6: Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing Spill Prevention Control and Countermeasure (SPCC) plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned release of used oil to air, soil surface water or groundwater which could threaten human health or the environment.

Item # 7: Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met by modifying or expounding on an existing SPCC plan.

Item # 8: Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions.

Item # 9: Attach a copy of the facility's Closure plan and schedule.

Item # 10: Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures.