

From: Carman, Roger
Sent: Thursday, November 10, 2011 10:27 AM
To: 'bparkes@cliffberryinc.com'
Cc: Kantor, Karen E.; Winston, Kathy; Kothur, Bheem; Tripp, Anthony; 'zdavis@cliffberryinc.com'
Subject: Inspection of CBI Miami Facility on 10-27-11 EPA ID#FLD 058 560 699
Attachments: SKMBT_36311110916140.pdf

Dear Mr. Parkes:

On October 27, 2001, the Department conducted a routine inspection of CBI's Miami Facility. The inspection covered all areas of the permitted facility and included the hazardous waste transfer facility (HWTF).

During my inspection of CBI, I observed that the HWTF had been moved from the location shown on the facility's Site Plan contained in the 2008 permit. It was observed to be located west and south of its former location and lies along the inside of the front wall of the warehouse building (see attached drawing). Mr. Zack Davis, Warehouse Manager, indicated that it has been in its current location for a few years now and that he believed FDEP staff had inspected it in its current location. The former HWTF area now contains miscellaneous shop materials. I was not able to find any documentation in the Department files notifying the Department prior to the HWTF being relocated. Please refer to 62-730.171(3)(b), F.A.C.

Two problems are immediately apparent to the Department regarding the HWTF. The first problem is that the HWTF does not appear to be separated or protected from other hazardous materials stored nearby in the warehouse that may be incompatible with hazardous wastes placed in the HWTF. Specifically, there is no dike, berm, wall or other device along the front of the storage area. The second problem is that at least the rear portion of the present HWTF appears to be located less than 50 feet from the facility's property line and CBI does temporarily store at least ignitable wastes in the HWTF. I roughly measured that it's about 32 feet from the front wall of the warehouse to the curb of NW North River Drive. Both of these requirements are contained in 40 CFR 265 Subpart I as referenced by 62.-730.171(4)(a), F.A.C.

Also, it appears the wording and intent of Part V- Non-Hazardous, Non-Used Oil Waste Conditions has changed from the 2003 permit. In the earlier permits, I believe this section of the permit was referring to the bulking/blending of all types of non-hazardous, non-used oil wastes into roll-off boxes. Now the language seems to limit this bulking\blending to non-hazardous solid wastes generated from CERCLA sites. CBI continues to bulk all types of non-hazardous wastes into roll-offs in the area at the north end of the covered dock and maybe the wording in Part V needs to be reviewed and revised to reflect this activity.

CBI has eliminated the antifreeze processing area formerly located in the south portion of the east warehouse which lies parallel to NW 30th Ave. This area is now occupied by a new bio-fuel processing plant. Additionally, CBI has about 70,000 gallons of used vegetable oil stored on-site in two tanker trailers, two frac-tanks and numerous 55-gallon drums.

The above changes and any other changes to the facility's permit need to be modified pursuant to Part I- General and Standard Conditions, Paragraphs 2 and 16 of the permit. For the HWTF, the notification required by 62-730.171(3)(b), F.A.C. must be submitted.

Please reply to the Department within 30 days of the receipt of the email stating the actions that have been taken and/or actions that will be taken to address the above issues. Also, please submit any documentation supporting any action CBI implements.

Sincerely,

Roger E. Carman
Environmental Specialist II, Hazardous Waste Section
Florida Department of Environmental Protection
Southeast District Office
400 N. Congress Avenue , Suite 200
West Palm Beach, FL 33304
PH: 561.681.6720 FAX: 561.681.6770
Email: Roger.Carman@dep.state.fl.us