



Cliff Berry, Incorporated
Environmental Services

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AUG 07 2012

FL DEP
WEST PALM BEACH

August 2, 2012

Florida Dept. of Environmental Protection
c/o Roger E. Carman
400 N. Congress Ave., Suite 200
West Palm Beach, FL 33401-2319

Re: Hazardous Waste Compliance Evaluation Inspection of Cliff Berry, Inc. - Miami Terminal, 3033 NW
North River Dr., Miami, FL
Miami-Dade County
EPA ID#: FLD 058 560 699

Mr. Carman,

In the order of requested items per inspection of October 27, 2011 and November 7, 2011:

Transporter Checklist

1. Regarding an observation of inadequate aisle space between containers stored in the hazardous waste transfer area: The hazardous waste transfer area has been returned to its original location and adequate aisle space per Rule 265.35 provided between containers.

Used Oil Processor

2. Regarding an observation of inadequate labeling per Rule 279.54(f) of UST tanks #2 and #5: Both used oil tanks #2 and #5 have had their "used oil" labels restored.

Checklist Independent Potential Violations and Areas of Concern

3. Regarding CBI not being shown as the transporter on manifest #008202734 JJK: The manifest has been amended to reflect CBI as the transporter.
4. Regarding a question as to whether CBI had made a determination that the gasoline contaminated rags used for cleanup in the bio-fuel area were hazardous: CBI determined that the rag did not meet the RCRA Subpart C characteristics for a hazardous waste. A rag was analyzed by an independent laboratory for RCRA TCLP (method 1311/8260B) and found to not contain any analyte above regulatory limit. The process was also determined not to generate a process waste, nor meet the characteristics of ignitability, corrosivity or reactivity. CBI does not condone the process employed and has so counseled the employee.
5. Regarding segregation of hazardous waste in the hazardous waste transfer area: The hazardous waste transfer area has been returned to its original location and segregation per Rule 262.11 provided between incompatible materials.

6. Regarding location of hazardous waste transfer area is within 50 feet of the facility property line: The hazardous waste transfer area has been returned to its original location which meets regulatory distances per rule.

7. Regarding repair of the secondary containment for the oily waste storage area: The curb has been repaired.

Please contact me if there are any questions, at (954) 763-3390 ext. 1007.



Steve Collins, CHMM
Manager of Health, Safety and Regulatory Affairs

Encl: Florida Spectrum Environmental Services, Inc. gasoline rags analysis #1110000802

Copy: rsc, file

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Report To:
Daniel T. Forehand
Cliff Berry Inc. - Ft. Laud.
P.O. Box 13079
Ft. Lauderdale, FL 33316

Page 1 of 4
Report Printed: 11/07/11
Submission # 1110000802
Order # 87331

Project: Cooking Oil Div. Gasoline Rags
Site Location: 3033 NW N. River Drive, Miami, FL 33142
Matrix: Solids

Sample I.D.: Solvent Cleaning Rags
Collected: 10/31/11 07:00
Received: 10/31/11 09:35
Collected by: Z. Davis

LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
TCLP Extraction Procedure	FLUID 1					1311 Ext.	11/02 09:00	11/03 11:18	MAZ
8260B TCLP: Volatile Organics Full List-GC/MS			Dilution Factor =10						
Acetone	U	U	ug/L	10.70	32.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Acrolein	U	U	ug/L	7.50	22.50	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Acrylonitrile	U	U	ug/L	4.10	12.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Dichlorodifluoromethane	U	U	ug/L	1.30	3.90	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Chloromethane	U	U	ug/L	3.50	10.50	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Vinyl Chloride	U	U	ug/L	3.40	10.20	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Bromomethane	U	U	ug/L	4.10	12.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Chloroethane	U	U	ug/L	1.70	5.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Trichlorofluoromethane	U	U	ug/L	4.70	14.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Methyl Ethyl Ketone	U	U	ug/L	7.50	22.50	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,1-Dichloroethene	U	U	ug/L	9.50	28.50	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Methylene Chloride	U	U	ug/L	5.00	15.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Trans-1,2-Dichloroethene	U	U	ug/L	5.00	15.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Methyl-Tert-Butyl Ether	U	U	ug/L	5.00	15.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,1-Dichloroethane	U	U	ug/L	5.30	15.90	1311/8260B	11/03 11:18	11/03 11:18	MAZ
2,2-Dichloropropane	U	U	ug/L	3.10	9.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ

Florida-Spectrum Environmental Services, Inc.
1460 W. McNab Road, Fort Lauderdale, FL 33309

Pembroke Laboratory
528 Gooch Rd.
Fort Meade, FL 33841

Big Lake Laboratory
610 North Parrot Ave.
Okeechobee, FL 34972
www.flenviro.com

Spectrum Laboratories
630 Indian St.
Savannah, GA 31401

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Cis-1,2-Dichloroethene	U	U	ug/L	1.10	3.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Chloroform	U	U	ug/L	8.00	24.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Bromochloromethane	U	U	ug/L	5.50	16.50	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,1,1-Trichloroethane	U	U	ug/L	2.50	7.50	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,1-Dichloropropene	U	U	ug/L	0.70	2.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Carbon Tetrachloride	U	U	ug/L	1.90	5.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Benzene	U	U	ug/L	0.90	2.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2-Dichloroethane	U	U	ug/L	2.40	7.20	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Trichloroethene	U	U	ug/L	0.90	2.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2-Dichloropropane	U	U	ug/L	2.00	6.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Bromodichloromethane	U	U	ug/L	2.40	7.20	1311/8260B	11/03 11:18	11/03 11:18	MAZ
2-Chloroethylvinyl Ether	U	U	ug/L	7.60	22.80	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Dibromomethane	U	U	ug/L	4.20	12.60	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Cis-1,3-Dichloropropene	U	U	ug/L	3.80	11.40	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Toluene	U	U	ug/L	1.40	4.20	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Trans-1,3-Dichloropropene	U	U	ug/L	5.00	15.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,1,2-Trichloroethane	U	U	ug/L	3.60	10.80	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,3-Dichloropropane	U	U	ug/L	3.80	11.40	1311/8260B	11/03 11:18	11/03 11:18	MAZ

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PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
Tetrachlorothene	U	U	ug/L	1.10	3.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Dibromochloromethane	U	U	ug/L	3.90	11.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2-Dibromoethane (EDB)	U	U	ug/L	4.00	12.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Bromobenzene	U	U	ug/L	4.60	13.80	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Chlorobenzene	U	U	ug/L	0.90	2.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Ethylbenzene	U	U	ug/L	1.30	3.90	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,1,1,2-Tetrachloroethane	U	U	ug/L	3.70	11.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
m & p-Xylene	U	U	ug/L	1.90	5.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
o-Xylene	U	U	ug/L	1.90	5.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Styrene	U	U	ug/L	1.70	5.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Isopropylbenzene	U	U	ug/L	5.00	15.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Bromoform	U	U	ug/L	3.80	11.40	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,1,1,2,2-Tetrachloroethane	U	U	ug/L	2.90	8.70	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2,3-Trichloropropane	U	U	ug/L	2.30	6.90	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,3,5-Trimethylbenzene	U	U	ug/L	1.10	3.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ
2-Chlorotoluene	U	U	ug/L	1.30	3.90	1311/8260B	11/03 11:18	11/03 11:18	MAZ
4-Chlorotoluene	U	U	ug/L	1.60	4.80	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Tert-Butylbenzene	U	U	ug/L	1.60	4.80	1311/8260B	11/03 11:18	11/03 11:18	MAZ

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1,2,4-Trimethylbenzene	U	U	ug/L	1.10	3.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Sec-Butylbenzene	U	U	ug/L	1.70	5.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
P-Isopropyltoluene	U	U	ug/L	1.10	3.30	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,3-Dichlorobenzene	U	U	ug/L	2.00	6.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,4-Dichlorobenzene	U	U	ug/L	1.40	4.20	1311/8260B	11/03 11:18	11/03 11:18	MAZ
n-Butylbenzene	U	U	ug/L	2.20	6.60	1311/8260B	11/03 11:18	11/03 11:18	MAZ
n-PropylBenzene	U	U	ug/L	1.70	5.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2-Dichlorobenzene	U	U	ug/L	4.80	14.40	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2-Dibromo-3-Chloropropane (DBCP)	U	U	ug/L	3.00	9.00	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2,4-Trichlorobenzene	U	U	ug/L	8.20	24.60	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Hexachlorobutadiene	U	U	ug/L	5.70	17.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ
Naphthalene	U	U	ug/L	0.150	0.450	1311/8260B	11/03 11:18	11/03 11:18	MAZ
1,2,3-Trichlorobenzene	U	U	ug/L	12.70	38.10	1311/8260B	11/03 11:18	11/03 11:18	MAZ

Unless indicated, soil results are reported based on actual (wet) weight basis.

Analytes not currently NELAC certified denoted by *.
 Work performed by outside (subcontract) labs denoted by Cert.ID in Analyst Field.
 Results relate only to this sample.
 QC=Qualifier Codes as defined by DEP 62-160
 U=Analyzed for but not detected.
 Q=Sample held beyond accepted holding time.
 I=Value is between MDL and PQL.
 J=Estimated value.


 Authorized CSM Signature (954) 978-6400
 Florida-Spectrum Environmental Services, Inc.
 Certification # ES6006

SUBMISSION # 110-802

Logged in LIMS by [Signature]
 CSM assigned [Signature]



CHAIN OF CUSTODY RECORD

- 1460 W. McNab Road Ft. Land, FL 33309
- 630 Indian Street Savannah, GA 31401
- 528 Gooch Road Fort Meade, FL 33841
- 610 Parrot Ave. N. Okeechobee, FL 34972

Tel: (954) 978-6400
 Tel: (912) 228-5050
 Tel: (863) 285-8145
 Tel: (863) 763-3336

Fax: (954) 978-2233
 Fax: (912) 234-4815
 Fax: (863) 285-7030
 Fax: (863) 763-1544

DUE DATE Requested

RUSH RESERVATION #

Rush Surcharges apply

Original Return w/report

Yellow-Lab File Copy

Pink - Sampler Copy

Report to: CBI
 (company name)
 Invoice to: CBI
 (company name)
 Purchase Order #

Project Name: Cooking Oil Div Gasoline Res
 and/or Number
 Project Contact: D Forehand
 Project Number: 2 Davis
 Project Name: 2 Davis
 (printed)
 Affiliation:

Site Address: 3033 NW, N. River Dr.
 Location: 3033 NW, N. River Dr.
 Site Address: 3033 NW, N. River Dr.
 Location: 3033 NW, N. River Dr.
 Fax: [Blank]
 Fax: [Blank]
 Email: Dforehand@cliffbruceinc.com

ORDER # Lab Control Number Shaded Areas For Laboratory Use Only	Sample ID	Date Sampled	Time Sampled	Matrix	Bottle & Pres. Combo Codes	Number of Containers Received & NELAC Letter Suffixes A-2	Analysis Required		Mgmt Resis		
							TEL	8021 Full List	T E M P	P H	C O N D
1	87331	10/31/11	0700	SWX	58	U	X				
2											
3											
4											
5											
6											
7											
8											
9											
10											
Special Comments:						Total					

"I waive NELAC protocol" (sign here) >
 Deliverables: QA/QC Report Needed? Yes No (additional charge)

Sample Custody & Field Comments

Temp as received: 4 Y N C
 Custody seals? 4 Y N C
 FIELD TIME: _____ hrs
 Sampling: _____ hrs
 Pick-Up: _____ hrs
 Misc. Charges: _____

Bottle Type: A-1ter amber
B-Bacteria bag/bottle
F-500 ml
I-liter bottle
S4-4 oz soil jar / S8-8 oz soil jar
T-250 ml
V-40 ml vial
W-wide mouth
X-other
 Additional Bottle Types: TED-Tedlar Air Bag
B-brown liter plastic

Preservatives: A-ascorbic acid
CHCL
Cu-CuSO4
H-HNO3
M-MCAB
Z-zinc acetate

Additional Preservatives: P-H3PO4
S-H2SO4
T-Na2S2O3
U-Underserved
N-NaOH
NH4-NH4CL

Hex-Hex Cr Buffer
 EDA-Ethylene Diamine

Signature	Affiliation	Date/Time
1 <u>[Signature]</u>	<u>CBI</u>	<u>10/31/11 0700</u>
2 <u>[Signature]</u>	<u>CBI</u>	<u>10/31/11 0700</u>
3 <u>[Signature]</u>	<u>CBI</u>	<u>10/31/11 0735</u>