



Cliff Berry, Incorporated
Environmental Services

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OCT 25 2012

FL DEP
WEST PALM BEACH

October 19, 2011

Florida Dept. of Environmental Protection
c/o Kathy Winston, CHMM
400 N. Congress Ave., Suite 200
West Palm Beach, FL 33401-2319

Re: FDEP inspection of the CBI Miami Facility October 27, 2011 ME ID#: 51668

Ms. Winston,

In response to the request for additional information voiced during our meeting of October 18, 2011, CBI is providing the following information.

Oily Waste Storage Area: The oily waste storage area has been designed as a storm water catchment with sump and tank. It is not designed to meet a volumetric calculation typical of a containment area (e.g. 110% of the largest container). The waste held in this area is primarily filter cake set inside a roll off box. The storage area basin is simply there to aid in retention of rain water so that when the water mingles with drips from the roll off box it does not run off the property. The space is sloped to the northeast corner (away from the wall that was damaged) toward a sump which is mechanically pumped to a 1,760 gallon tank.

The oily waste storage area was originally designed as a sloped area with only an earthwork on the southeast side (where the wall is today). It was later improved with a horizontal pipe about six inches off the ground acting as bumper for the forklift that carries oily waste to the roll off box. The pipe became damaged over time so it was further improved with cement blocks. When the cement blocks became damaged, as noted on the October 2011 inspection, they were removed and the wall rebuilt with reinforced concrete that can be observed today. Again, the purpose of the wall is to stop the forklift from colliding with the side of the roll off box. Although the wall surrounding the oily waste storage area appears similar to a containment wall, it simply acts as a means to delineate the edge of the storm water retention area and should not be held to the higher standard of a containment wall. Photos showing the latest iteration of the wall are attached.

Used Oil Tanks: Tanks #2 and #5 have had the "Used oil" markings restored.

Hazardous Waste Transfer Area (HWTa): The HWTa has been moved back to its original location. The attached photo was taken October 19, 2012. Pointers have been added to showcase additional measures taken by CBI to safeguard materials placed in the HWTa, including an extended berm to segregate materials, extended spacing between containers, a large swing door with lock, warning signage and rolls of replacement labels. The successful transition also places containers inside the HWTa and beyond the nearby traffic pattern to better protect materials.

Best regards,


Steve Collins, CHMM

- Encl:
1. Oily waste area photo showing curb elevation above ground and berm
 2. Tank #2 with "Used oil" signage
 3. Tank #5 with "Used oil" signage
 4. Hazardous Waste Transfer Area with improvements identified by arrows

Enclosure #1



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Enclosure #2

2



USED
OIL



Enclosure #3

5

USED
OIL

CBI Miami Facility – Hazardous Waste Transfer Area (Oct. 19, 2012)

Improvements



Additional aisle
space

Warning signs

Larger swing door

Lock

Labels

Curbing and
berm