Cliff Berry, Incorporated
Environmental Services

March 12, 2013

Mr. Bheem Kothur, P.E. III
Hazardous Waste Regulation
Florida Department of Environmental Protection (FDEP)
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Cliff Berry, Inc. – Canaveral Facility
EPA ID Number: FLR 000 119 792
Used Oil Processing Facility Permit Number: 249477–HO-002

Dear Mr. Kothur:

Cliff Berry, Inc. (CBI) has received your letter concerning the above referenced facility dated January 15, 2013. Specifically you listed fourteen (14) specific items and seven (7) general items that CBI needs to address.

(See Attachment A)

Listed below is each item in order from your letter and CBI's response.

SPECIFIC COMMENTS: Application Form for a Used Oil Processing Facility Permit and a Waste Processing Facility Permit.

Item No. 1 – Application Form for a Used Oil Processing Facility Permit ..... revision number.

(See Attachment No. 1)

Item No. 2 – B. Site Information, Facility location, Page 9: Please provide ..... degree symbol.

(See Attachment No. 2)

Item No. 3 – Review / revise the closure plan, closure cost estimates, renewal application, etc.

(See Attachment No. 3)

Item No. 4 – Florida DEP Application, Form # 62-710.901(6), C.3 through C.10, Page 10 and 11.

(See Attachment No. 4)

Item No. 5 - Proposing to install three (3) new AST's ..... review / revise drawings, tank tables.

(See Attachment No. 5)

Item No. 6 – Revise Closure Cost Estimate ..... and resubmit to the FDEP.

(See Attachment No. 6)

Item No. 7 – Revise the SPCC Plan for proper name ..... Cliff Berry, Inc. – Canaveral Facility.

(See Attachment No. 7)

Item No. 8 – Revise the SPCC Plan, Introduction ..... for emergency contact living in area.

(See Attachment No. 8)

Item No. 9 – Revise the SPCC Plan ..... list pollution control regulations, spills, personnel.

(See Attachment No. 9)

Item No. 10 – Revise the SPCC Plan ..... correct phone number for the FDEP Central District.

(See Attachment No. 10)

Item No. 11 – Revise sections of application ..... emergency responsible person living in area.

(See Attachment No. 11)

Item No. 12 – Revise secondary containment calculations ..... no change in evacuation routes.

(See Attachment No. 12)

Item No. 13 – Storage Tank and Piping Inspections .... provide forms for required inspections.

(See Attachment No. 13)

Item No. 14 – USDOT hazardous materials training ..... used oil screening for flammability.

(See Attachment No. 14)

GENERAL COMMENTS:

Item No. 1 – Submit a site map in an electronic format ..... to be inserted into the permit.

(See Attachment No. 15)

Item No. 2 – Submit a tank table in an electronic format ..... to be inserted into the permit.

(See Attachment No. 16)

Item No. 3 – Form 8700-12FL – Notification ..... show location of oil filter transfer activities.

(See Attachment No. 17)

Item No. 4 – Haz waste determination on oily wastes / sludge per 40 CFR part 279.10 (c) & (e).

(See Attachment No. 18)

Item No. 5 – Update the SPCC Plan, Contingency Plan, Emergency Response Information, etc.

(See Attachment No.19)

Item No. 6 – Revise the Closure Cost Estimates ..... include disposal of solid waste quantities.

(See Attachment No. 20)

Item No. 7 – Prepare the entire application ..... resubmit the renewal application.

(See Attachment No. 21)

If you have any questions or need any additional information please contact me at (954) 763 - 3390 or e-mail me at bparkes@cliffberryinc.com.

Sincerely,

William E. Parkes, Jr.
Manager Regulatory Affairs and Capital Projects
Cliff Berry Inc. (CBI)

ATTACHMENT - A

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

January 15, 2013

SENT VIA E-MAIL
bparkes@cliffberryinc.com

Mr. William E. Parkes, Jr.
Regional Affairs Manager
Cliff Berry, Incorporated
P.O. Box 13079
Fort Lauderdale, Florida 33316

RE: Cliff Berry, Inc.-Canaveral Facility
EPA I.D. No. FLR 000 119 792
Permit Number: 249477-HO-002
Used Oil Processing Facility Permit Application
Notice of Deficiency

Dear Mr. Parkes:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated December 12, 2012 and received on December 14, 2012 to operate a Used Oil Processing Facility in Canaveral, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. 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.

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit one hard copy and one electronic copy of your written response to the Tallahassee Solid and Hazardous Waste Regulation Section, and one hard copy to the Central District Office. If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: Bheem.kothur@dep.state.fl.us

Sincerely,

Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc: John White, FDEP/Orlando, john.white@dep.state.fl.us
Janine Kraemer, FDEP/Orlando, janine.kraemer@dep.state.fl.us
D.M. Ambrose, P.E., ambrosefox@charter.net
Randy Miller, OGC/Tallahassee, randy.j.miller@dep.state.fl.us
Tor Bejnar, FDEP/Tallahassee, tor.bejnar@dep.state.fl.us

ENCLOSURE

Cliff Berry, Inc. Canaveral Facility
Used Oil Facility Operating Permit No.: 249477-HO-002
Notice of Deficiencies
January 15, 2013

SPECIFIC COMMENTS: Application Form for a Used Oil Processing Facility Permit.

1. Application Form for a Used Oil Processing Facility Permit, Part I, A. General Information, Item 2, Page 8: Please insert the Revision Number as "1".

2. B. Site Information, 1. Facility location, Page 9: Please provide the degree symbol for Latitude and Longitude.

3. CBI, Inc. Cover Letter dated December 12, 2012: The facility indicates that there have been no changes in the CBI-Canaveral facility since the final permit was issued on February, 2008. However, the submitted renewal application shows there are three (3) new tanks added to the facility with a capacity of 25,000 gallons since February of 2008. Therefore, please review and revise the closure plan and closure cost estimates as well as all other aspects of the application appropriate for the facility.

4. Florida DEP Application, Form # 62-710.901(6), C.3 through C.10, Operating Information, Page 10: Please identify the Attachments on this form. Also, provide copies of all the Attachments with updates reflecting current operations.

5. Letter of Transmittal for Used Oil Processing Facility Permit Renewal, Second Paragraph and letter dated March 14, 2012: The letter indicates that the facility is proposing to install three (3) above ground storage tanks in addition to the existing 34,900 gallons above ground storage tanks. Please review the drawings and tanks and revise as appropriate.

6. Used Oil Processing Facility Closure Cost Estimate, Dated December 19, 2012 and DEP received on Dated January 10, 2013, Pages 1 through 3: The facility has a total of eight (8) tanks with a total capacity of 110,000 gallons of used oil to dispose when the facility decides to close the facility. The approved closure cost estimate amount for a total capacity of 34,900 gallons to dispose and close facility is $58,605.00 for year 2012. The submitted estimates are insufficient to close the facility by a third party. Please revise the estimate and resubmit.

7. CBI, Inc. Jacksonville Facility, SPCC Plan, Page iii: The facility name should be "CBI, Inc. Cape Canaveral" not "CBI, Inc. Port Everglades Facility". Please review and revise as appropriate.

8. CBI, Inc. Canaveral Facility, SPCC Plan, Introduction, Second Paragraph, Page 2: This paragraph describes that Cliff Berry, II as the emergency contact for the facility even though he is not in

Canaveral. The facility is required to provide someone who lives in the Canaveral area for emergency response. Please review and revise as appropriate.

9. CBI, Inc. Canaveral Facility, Personnel Training And Drills, Section 8, First Paragraph, Second Paragraph and third Paragraph, Page 1: List applicable pollution control rules and regulations; List and define the spill prevention briefing "frequency"; and List and define "appropriate personnel" respectively.

10. CBI, Inc. Facility, SPCC Plan, and Emergency Contact Phone Numbers: Please correct the phone number for the FDEP Central District Office as "407-897-4100" not as "407-894-7555".

11. CBI, Inc. Jacksonville Facility, Emergency Coordinator, Cliff Berry II as primary Emergency Responsible person: The facility primary emergency responsible person should be someone in the Canaveral area. Please make sure to revise changes in all appropriate sections of the application to include information specific to the Canaveral facility. Please review and revise as appropriate.

12. Drawing C1 of 1, and Tank Table: The facility previously submitted the permit application in 2008 and the current renewal permit application appears to be a major expansion at the site including number of tanks, tank sizes, and their capacities. Therefore, the facility must recalculate the secondary containment calculations, and revise the evacuation route etc.

13. Storage Tank and Piping Inspections: Please provide the documentation forms for the required daily, monthly and annual inspections.

14. Personnel Training and Drills, Page 1: The employee training program does not include USDOT hazardous materials training. Used oil is commonly contaminated with gasoline, and the mixture may be flammable. CBI, Inc. Canaveral used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor D Tect kits will not assess the flammability of the materials CBI, Inc. may be called upon to transport. Please see that the employee training program includes USDOT hazardous materials training.

GENERAL COMMENTS:

1. The Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can be inserted into the permit.

2. The Facility needs to submit a used oil tank table in an electronic format (pdf preferred) so that this can be inserted into the permit.

3. The facility Form 8700-12FL-Florida Notification of Regulated Waste Activity, C. Used Oil Activities: This form indicates that the facility is also a Used Oil Filter Transfer Facility. Please indicate on a site map where these activities take place. Also, revise the closure cost estimate to include such disposal activities.

4. A hazardous waste determination will be conducted on any oily wastes or sludge generated at the facility that cannot be managed for energy recovery. The materials will be managed in accordance with 40 CFR Part 279.10(c) and (e).

5. CBI, Inc. Permit Application dated December 12, 2012 indicates that there have been no changes in CBI, inc. Canaveral facility concerning the Used Oil Processing facility permit since the permit was issued on February 5, 2008. However, CBI, Inc. Canaveral facility is requesting to add additional tanks to the processing facility to include additional storage capacity of 75,000 gallons of used oil. Therefore, the SPCC Plan, Contingency Plan, Emergency Response Contact Information including Phone Numbers, The Training, and Evacuation Routes should be updated to reflect the proposed changes.

6. In addition to comment #4 under specific comments concerning the facility closure cost estimates: The facility proposes to expand the site to process solid waste activities, specifically used oil filters. Therefore, the facility must revise the closure costs to include disposal of solid waste quantities. The permit application cannot be considered complete and a permit issued until such time as financial assurance has been provided and approved. Please review the current estimate and revise as appropriate.

7. Please prepare the entire application, including all attachments, and resubmit the renewal application as a standalone document.

ATTACHMENT NO. 1

SEE ATTACHMENT NO. 4

ATTACHMENT NO. 2

SEE ATTACHMENT NO. 4

ATTACHMENT NO. 3

PREVIOUSLY SUBMITTED TO THE FDEP

ATTACHMENT NO. 4

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

TO BE COMPLETED BY ALL APPLICANTS (*Please type or print*)

A. General Information

1. New_____ Renewal _X___ Modification _____ **Date old permit expires** Feb 5, 2~~1~~

2. Revision number _/__

3. NOTE: Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:
   - _____ generators (Subpart C)
   - _X_ transporters (Subpart E)
   - _____ burners of off-spec used oil (Subpart G)
   - _X_ marketers (Subpart H)

   or
   - _____ are disposing of used oil (Subpart I)

4. Date current operation began: Feb 5, 2008

5. Facility name: Cliff Berry, Inc. - Canaveral Facility

6. EPA identification number: FLR 000 119 792

7. Facility location or street address: 5855 Industrial Drive Cocoa, Florida 32927

8. Facility mailing address:
   P.O. Box 13079 Fort Lauderdale, Florida 33316
   Street or P.O. Box City State Zip Code

9. Contact person: William E. Parkes, Jr. Telephone: (954)763-3390
   Title: Manager Regulatory Affairs
   Mailing Address:
   P.O. Box 13079 Fort Lauderdale, Florida 33316
   Street or P.O. Box City State Zip Code

10. Operator's name: Cliff Berry, II Telephone: (954)763-3390
    Mailing Address:
    P.O. Box 13079 Fort Lauderdale, Florida 33316
    Street or P.O. Box City State Zip Code

11 Facility owner's name: Cliff Berry, II Telephone: (954)763-3390
    Mailing Address:
    P.O. Box 13079 Fort Lauderdale, Florida 33316
    Street or P.O. Box City State Zip Code

12 Legal structure:
   - _X_ corporation (indicate state of incorporation) Florida
   - _____ individual (list name and address of each owner in spaces provided below)
   - _____ partnership (list name and address of each owner in spaces provided below)
   - _____ other, e.g. government (please specify) _____

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County N/A State _____

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

13 Site ownership status: ☐ owned ☐ to be purchased ☐ to be leased ____ years
☒ presently leased; the expiration date of the lease is: Dec 31, 2019

If leased, indicate:
Land owner's name: C-2 Holdings, Inc.
Mailing Address:
P.O. Box 350123 Fort Lauderdale, Florida 33335
Street or P.O. Box City State Zip Code

14 Name of professional engineer D.M. Ambrose, P.E. Registration No. 12831
Mailing Address:
P.O. Box 2368 Blowing Rock, North Carolina 28605
Street or P.O. Box City State Zip Code
Associated with: Consulting Engineer

B. SITE INFORMATION

1. Facility location:
County: Brevard
Nearest community: Cocoa
Latitude: 28° 27' 25" N Longitude: 80° 46' 18" W
Section: _____ Township: _____ Range: _____
UTM # _____/_____/_____/_____

2. Facility size (area in acres): 4.4

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) N/A

2. List applicable EPA hazardous waste codes:

   NONE

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

   A brief description of the facility operation is labeled as Attachment 1

4. Attach a detailed description of the process flow should be included. 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. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4).

   The facility's detailed process description is labeled as Attachment 2

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):
   - **a.** An analysis plan which must include:
     - (i) a sampling plan, including methods and frequency of sampling and analyses;
     - (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
     - (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

   The analysis plan is labeled as Attachment 3

   - **b.** A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

   Sludge, residue and byproduct management description is labeled as Attachment 4

   - **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.

   The tracking plan is included as Attachment 5

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. (See item 6, page 5).

   The preparedness and prevention plan is labeled as Attachment 6

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifiying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment 7

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. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment 8

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment 9

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. (See item 10, page 7).

A description of employee training is labeled as Attachment 10

Item 4 Attachment 1

CLIFF BERRY INC. (CBI) – CANAVERAL FACILITY BUSINESS AND OPERATIONS PLAN

1 - The CBI Canaveral Facility currently operates in the Canaveral area as a Used Oil Transporter Facility and Transporter for Hazardous and Non-hazardous Waste, Oil and Chemical Spill Emergency Response, Tank Cleaning Services, Remediation Services and is currently registered with the Florida Department of Environmental Protection (FDEP) as such.

2 – Upon completion of the storage tank farm expansion, we will fully utilize our FDEP Used Oil Processing Facility Permit.

The following wastes will be accepted at the Canaveral Facility with their corresponding management method.

Waste	Volume (g/mos.)	Management Method	Testing	Generator type	Time at Facility
Used Oil	10,000	Stored, bulked and transferred waste without treating. Destined for recycling.	Halogen (sniffer or Q1000 test kits to check for <1000 ppm halogens)	Oil change operators. Gas stations. Garages. Other used oil generators. Self generated.	Several days, but <30 days
Petroleum Contact Water (PCW)	1,000	Stored, bulked and transferred waste without treating, or recovery.	Generator knowledge from source that meets definition of PCW.	Gas stations. Oil terminal operators. Bulk tanks. Other PCW generators.	Several days, but <30 days
Oily Water	280,000	Stored, bulked and transferred waste without treating.	Generator knowledge/ process knowledge	Ships, vessels, tug bilges, shops.	Several days, but <30 days

3 – CBI operates five other locations in Florida:

The CBI Miami Facility serves as CBI's main processing facility for Wastewater and Used Oil. The facility operates under EPA regulations as a Wastewater Pretreatment Subpart D Multiple Wastestream Subcategory Centralized Waste Treatment Facility (CWT) for (Metals, Oils and Organics). The facility is permitted by the Miami-Dade County Permitting, Environment and Regulatory Affairs (PERM) and discharges to the Miami-Dade County Water and Sewer Department POTW. The Miami Facility also operates as a Used Oil Processing Facility recycling used oil into an on spec burner fuel for shipment to various asphalt and cement plants. The facility has a FDEP Used Oil Processing Facility Permit and has 26 registered storage tanks.

The CBI Port Everglades Facility is a Used Oil Transfer Facility with an FDEP used Oil Processing Facility permit and has eleven (11) registered storage tanks.

The CBI Fort Pierce Facility is registered with FDEP as a Used Oil Transfer Facility and has one (1) registered storage tank.

The CBI Tampa Facility is a Used Oil Transfer Facility with an FDEP Used Oil Processing Facility Permit and has five (10) registered storage tanks.

The CBI Jacksonville Facility is a Used Oil Transfer Facility with an FDEP Used Oil Processing Facility Permit and has nine (9) registered storage tanks.

4 – All oily water, used oil and used oil filters and PCW picked up by the CBI Canaveral Facility is ultimately transported to the CBI Miami Facility for recycling and petroleum recovery. Testing in Miami is conducted consistent with the Waste Analysis SOP for the CBI Miami Facility.

5 – Training for Used Oil Drivers includes FDEP Used Oil Handling and Transportation Requirements.

6 – All waste-streams, including soils, handled by CBI Facilities are profiled using lab analysis and generator knowledge to determine whether they are hazardous or non-hazardous and proper disposal methods.

7 – Response to any spills will be per the P.E. Certified "SPCC Plan and Contingency Plan and Emergency Procedures." All sludges and solids removed from the storage tanks will be characterized, using laboratory analysis including TCLP and EPA methods 8240 and 8260, and disposed per EPA guidelines in 40 CFR Hazardous Waste Regulations.

Item 4 – Attachment 2

4. *Attach a detailed description of the process flow should be included. The 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. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4)*

Cliff Berry Incorporated (CBI) provides used oil transportation and disposal for a range of clients from independent gas stations to multinational oil companies. The process and procedures are identical for all clients. Upon request from the client the material is profiled, including notification to the client that we don not pick up materials with halogens above 1.000 parts per million (ppm). CBI uses separate trucks to pick-up Used Oil and PCW and CBI does not co-mingle Used Oil and PCW in the same truck. Upon arrival at the client site the driver samples the used oil for halogens. If halogens are found the material is refused and the company is notified. If the material passes the halogens test it is pumped into the truck and manifested to the Canaveral storage facility or to the CBI Miami Facility or an approved third party. If sent to the storage facility it is stored within the permit limits then manifested to the CBI Miami Facility or other approved facility for processing. Use of storage is often necessary to ensure quick turnaround for clients with multiple loads or it allows for the accumulation of smaller loads into a cost effective load to the CBI Miami Facility or other approved facility. No processing occurs at the Canaveral storage facility except for gravity separation that occurs naturally as the material waits to be transported to the CBI Miami Facility or other approved facility. No additives, nor heating, are used to aid in gravity separation.

Attachment 2:
The following process description is consistent with the CBI Waste Analysis Plan which answers the questions as to "analysis, treatment, storage or other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment."

The Canaveral Facility does not have a lab and all testing is performed with field instruments. The pick-up of waste streams is coordinated in advance and those waste streams for which generator knowledge or process knowledge is used to profile the waste, a phone call is initiated with the generator to discuss the origin and process from which the waste is generated so that a proper profile can be developed.

Used Oil

A representative sample of the used oil will be collected and tested for halogens at each client location prior to pick-up using a sniffer (initially) or a Q1000 test kit (if warranted by a high reading on the sniffer). If the test results are <1000 ppm for halogens the load is allowed to be managed by CBI. Only used oil will be loaded into Used Oil designated tanks and kept separated from PCW tanks. As noted above all loads of used oil are eventually transported to the CBI Miami Facility and upon arrival a representative sample is brought to the lab for the following tests to be performed prior to offloading of

the waste or by product. The Miami Facility lab will perform several tests including water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the used oil load will then be offloaded in Miami. Approval will be given to the Miami Facility offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Petroleum Contact Water (PCW)

Only PCW will be loaded into PCW designated tanks and kept separated from Used Oil tanks. As noted above loads of PCW may be transported to the CBI Miami Facility or an approved third party disposal facility. If placed into storage at the Canaveral facility the technician will test for pH to ensure the material is non-hazardous for pH. If taken to the Miami Facility, upon arrival a representative sample is brought to the Miami Facility lab for the following tests to be performed prior to offloading of the waste or by product. The lab may perform several tests including, pH, water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the PCW load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Grit Trap/Sump Waste

The Canaveral Facility uses a grit trap as a crude filter to drop out sand and other solids prior to pumping Used Oil into a permitted storage tank. The volume of material build-up is minimal and may only be cleaned a couple of times a year. The sludge is typically placed into 55 gallon steel drums for disposal. Prior to disposal a representative sample of the grit trap/sump waste will be collected and brought to a third party lab for analysis for TCLP and EPA test methods 8240 and 8260. Based upon the results of testing arrangements will be made for appropriate disposal.

Item 4 – Attachment 3

5. *The following parts of facility's operating plan should be included as attachments to the permit application.*

a. An analysis plan which must include:

i. a sampling plan, including methods and frequency of sampling and analysis:

Sampled material	Sampling method	Frequency
Used Oil	Halogen (sniffer or Q1000 test kits to check for <1000 ppm halogens)	At each pick-up or upon arrival at the facility
PCW	Generator knowledge from source that meets definition of PCW. Test for pH.	For each pick-up
Oily Water	Generator knowledge/ process knowledge	For each pick-up

II. *a description of the fingerprint analysis on incoming shipments, as appropriate:*

Halogen and pH testing, as appropriate, are performed at the Canaveral facility using field instruments.

iii. *an analysis plan for each outgoing shipment (on batch/lot can equal shipment, provided the lots are discreet units) to include metals and halogens:*

The Canaveral Facility does not perform additional testing on outgoing shipments except for grit trap waste. Additional analysis may be performed for loads transported to the Miami Facility as described earlier or a sample may be sent out to a third party laboratory to establish a profile for an approved third party disposal facility. The Canaveral Facility will perform tests on sludges, residues and byproducts upon cleaning of grit traps as noted earlier (see question 4 responses). The Canaveral Facility does not have a lab and all testing is performed with field instruments.

Canaveral Waste Analysis Plan

Background:

CBI Canaveral Facility is a small satellite branch of Cliff Berry Incorporated, sited in the Canaveral, Florida area. The branch receives used oil, oily water and petroleum contact water for storage and transport to the CBI Miami Facility.

Purpose:

The purpose of this plan is to identify various waste streams that may be accepted into the CBI Canaveral Facility and then later into the CBI Miami Facility.

Discussion:

The Waste Analysis Plan will ensure compliance of the facility by detailing the minimum testing requirements for all wastes received into the facility and covers the following waste streams:

- Used Oil,
- Petroleum Contact Water (PCW),
- Oily Water, and
- Grit Trap/Sump Waste.

Methods and Equipment:

The Canaveral Facility does not have a lab and all testing is performed with field instruments. The pick-up of waste streams is coordinated in advance and those waste streams for which generator knowledge or process knowledge is used to profile the waste, a phone call is initiated with the generator to discuss the origin and process from which the waste is generated so that a proper profile can be developed.

Used Oil

A representative sample of the used oil will be collected and tested for halogens at each client location prior to pick-up using a sniffer (initially) or a Q1000 test kit (if warranted by a high reading on the sniffer). If the test results are <1000 ppm for halogens the load is allowed to be managed by CBI. Only used oil will be loaded into Used Oil designated tanks and kept separated from PCW tanks. As noted above all loads of used oil are eventually transported to the CBI Miami Facility and upon arrival a representative sample is brought to the lab for the following tests to be performed prior to offloading of the waste or by product. The Miami Facility lab will perform several tests including water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the used oil load will then be offloaded in Miami. Approval will be given to the Miami Facility offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Petroleum Contact Water (PCW)

Only PCW will be loaded into PCW designated tanks and kept separated from Used Oil tanks. As noted above loads of PCW may be transported to the CBI Miami Facility or an approved third party disposal facility. If placed into storage at the Canaveral facility the technician will test for pH to ensure the material is non-hazardous for pH. If taken to the Miami Facility, upon arrival a representative sample is brought to the Miami Facility lab for the following tests to be performed prior to offloading of the waste or by product. The lab may perform several tests including, pH, water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the PCW load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Grit Trap/Sump Waste

The Canaveral Facility uses a grit trap as a crude filter to drop out sand and other solids prior to pumping Used Oil into a permitted storage tank. The volume of material build-up is minimal and may only be cleaned once or twice a year. The sludge is typically placed into 55 gallon steel drums for disposal. Prior to disposal a representative sample of the grit trap/sump will be collected and brought to a third party lab for analysis for TCLP and EPA test methods 8240 and 8260. Based upon the results of testing arrangements will be made for appropriate disposal.

Item 4 – Attachment 4

5. b. *A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.*

Attachment 4

Sludges, residues and byproducts are managed using the same processes as detailed in Attachment 3 – Waste Analysis Plan. The Canaveral Facility will perform TCLP and EPA methods 8240 and 8260 analysis on grit trap waste/sludge when generated. The Canaveral Facility generates approximately 165 gallons of grit trap waste/sludge per year. The trap is typically cleaned three times per year.

Item 4 – Attachment 5

5. 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.*

Attachment 5

CBI facilities use manifests in tracking transportation of materials. The information from each manifest is transferred to our electronic database (Desert Micro ®) and the following information can be tracked: manifest number, name, address, EPA identification number of the transporter, origin, quantities and dates of all incoming shipments, plus the destination of all outgoing shipments of used oil.

The type and quantity of Used Oil and Petroleum Contact Water (PCW) is tracked in a log book annotating the number of the tank into which it was loaded and later removed. The tank farm is inspected weekly and certified by stamp and signature.

Used Oil and Petroleum Contact Water (PCW) are stored in separate tanks.

Item 4 – Attachment 6

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

Facility preparedness and prevention planning:

Please refer to the Canaveral Facility SPCCP and Contingency Plan which contains the information sought by this item.

Item 4 – Attachment 7

7. *Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met by using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions.*

Contingency Plan:

Please refer to the Canaveral Facility SPCCP and Contingency Plan which contains the information sought by this item.

Item 4 – Attachment 8

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. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.*

Tank Management and Secondary Containment Certification:

Please refer to the Canaveral Facility SPCCP and Contingency Plan which contains the information sought by this item.

ATTACHMENT NO. 9

Cliff Berry Inc.
Canaveral Facility Closure Plan
Revised: July, 2012

Introduction:

Cliff Berry, Inc. (CBI) is operating a used oil transfer facility in the Canaveral area that receives used oil, oily water and petroleum contact water (PCW) which are generated by retail gasoline stations, oil companies, automobile dealerships, airports and marine interests. All products are delivered to the CBI plant by over the road transport vehicles. The facility has the capacity of storing approximately 109,900 gallons of used oil, oily waste or PCW.

The facility operates under licenses issued by Brevard County, and the State of Florida Department of Environmental Protection (FDEP). Company owned transport vehicles are licensed by Broward County Environmental Protection Department (EPD), and Miami-Dade County Department of Permitting, Environment and Resource Management (PERM). All oily liquids and sludges will be transferred and stored within containment areas which have been designed to meet rules and regulations current at the time of installation. All oily liquids delivered to the facility will be handled under manifests issued by the generators.

General Provisions:

As required by the Florida Administrative Code (FAC) Rule 63-710.800 (9), CBI has adopted this document to be used as required, during the closure of the facility.

At closure, CBI will institute the following steps:

1. Remove all standing liquids, waste and waste residues from the facility. All stored liquids will be tested, if POTW standards are met, discharge will be made to the sewer system. All liquids which do not meet POTW standards will be sent off-site for proper disposal.
2. Current plans require that the closure event will result in the complete cessation of all operations at the CBI transfer facility. Management does not contemplate partial operation of the facility. There will be no need for further facility maintenance.
3. If monitoring wells have been installed prior to closing, all on site monitoring wells will be sampled in accordance with an approved Quality Assurance Plan and analyzed for US EPA approved mixed product analytical group parameters – Volatile Halocarbons (601), volatile aromatics in water (602), 1,2 dibromomethane (EDB), Methly ter-buty ether (MTBE), all eight RCRA Metals.
4. A split spoon coring device will be used for the extraction of composite soil samples (taken from the surface to groundwater). Soil samples will be taken from areas immediately adjacent to where trucks are stored and will include sample points on all sides of the facilities property, and at least at two depths (non-composite). Visual inspection of soils adjacent to the containment area will determine the location of soil sampling. An OVA/FID instrument will be used for the detection of organic contamination at levels greater than 50 parts per million. The samples

identified as being the most contaminated will be submitted to an approved laboratory for analysis and identification of individual constituents. Should contamination be found, CBI will submit a Contamination Assessment Plan (CAP). After approval and implementation of the CAP a Contamination Assessment Report (CAR) and Remedial Action Plan (RAP) will be developed.

5. All tanks, piping, secondary containment and ancillary equipment will be emptied, cleaned and decontaminated. Filter sand, sludge and treatment process residues will be tested for hazardous characteristics; disposal of these items will be consistent with the results of the analysis. Contaminated surfaces will be high pressure washed with appropriate detergents. The effectiveness of all decontamination steps will be assessed by using swab samples of the formerly contaminated surfaces. Decontamination will be confirmed through the analysis of final rinsate liquids.

All assessment and remedial work will be done in accordance with the Florida Administrative Code (FAC) Rules 62-762, 62-710.510 and 62-780.

Should material or containerized soils be encountered during the closure, steps will be taken to control mitigation of hazardous waste and hazardous waste constituents from the affected area into ground or surface water.

These steps will include:

1. Contaminated materials will be containerized and sealed prior to their proper disposal to prevent runoff due to rainfall.
2. Isolation of contaminated areas and materials from contact with personnel. Closed covered containers will be utilized for soils.
3. Separation of decontaminated material from non-contaminated materials.
4. Containment of all wash water and decontamination materials. Such will be handled as appropriate, either as a hazardous waste through a manifest or will be discharged to the PORW. Approval from the POTW will be obtained prior to release.

During execution of the above steps, the following factors will provide the basis of action:

1. Should disposal of closure generated materials require land treatment, the type an amount of hazardous waste and hazardous waste constituents along with the mobility and expected rate of migration of the material will be evaluated prior to implementing a remedial plan.
2. Factors such as location, topography, surround land use, climate (frequency) and pH of precipitation and biological characteristics of potential disposal sites will be performed.
3. Site specific studies involving unsaturated zone monitoring, type, concentration and depth of migration of hazardous waste constituents in the soil as compared to their background concentrations will be performed, if indicated.

Prior to initiating site closure, the following will be done:

1. Contaminated soil and liquids will be manifested off site to a permitted TSD facility.

2. Tanks, piping and machinery will either be removed or decontaminated.
3. Placement of final cover considering the following:
    a. Functions of the cover.
    b. Characteristics of the cover including material, final surface contours, thickness, porosity/permeability, slope, length of run of slope and type of area vegetation.
    c. Monitoring of groundwater.

Final Closure:

Sixty (60) days prior to the scheduled date of closing of the Canaveral Facility, CBI will submit an updated and detailed closure plan to the FDEP.

A revised final plan will be submitted and CBI shall provide a written notice seven (7) days prior to initiating closure. This plan will be issued during a closure event and will identify the steps necessary to perform final closure of the facility. The amended closure plan will include:

1. A description of how each waste management unit at the facility will be closed.
2. A description of how final closure of the facility will be conducted. The description will identify the maximum extent of operations conducted during the active life of the facility.
3. A projection of the maximum inventory of waste stored on site over the active life of the facility; and a detailed description of the methods to be used during final closure including but not limited to procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of contamination necessary to satisfy the closure performing standards.
4. A detailed description of the steps necessary to remove or decontaminate all waste residues of concern and contaminated material system components, equipment, structures, and soil during final closure including but not limited to procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of contamination necessary to satisfy the closure performing standards.
5. A detailed description of other activities necessary during the final closure period to insure that all closure activities satisfy the closure performance standards including but not limited to groundwater monitoring, leachate collection, and run-on and run-off control.
6. A schedule for closure of each waste management unit and for final closure of the facility. The schedule will include the total time required to close each waste management unit and the time required for final closure.

Within thirty (30) days of final closure of the Canaveral Facility, CBI will submit a certification of closure completion to the FDEP demonstrating that the facility was closed in substantial compliance with the detailed Closure Plan.

ATTACHMENT NO. 10

USED OIL
DRIVER TRAINING
2012

ATTACHMENT NO. 5

Table #1
Horizontal Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01	10/06	8,300	Steel	Used Oil/Water
02	10/06	8,300	Steel	Used Oil/Water
03	10/06	8,300	Steel	Used Oil/Water

Vertical Tanks

04	10/06	5,000	Steel	Used Oil
05	10/06	5,000	Steel	Used Oil
06	Est. 2013	25000	Steel	Used Oil
07	Est. 2013	25000	Steel	Used Oil
08	Est. 2013	25000	Steel	Used Oil

ATTACHMENT NO. 6

PREVIOUSLY SUBMITTED TO THE FDEP

ATTACHMENT NO. 7

ATTACHMENT NO. 8

ATTACHMENT NO. 9

ATTACHMENT NO. 10

ATTACHMENT NO. 11

PREVIOUSLY SUBMITTED TO THE FDEP

ATTACHMENT NO. 12

PREVIOUSLY SUBMITTED TO THE FDEP

ATTACHMENT NO. 13

Internal Facility Audit

FACILITY NAME: CBI Carnero DATE OF AUDIT: 2-28-13

MANAGER NAME: Paul Medina

AUDITOR NAME: Mark Greathouse

GENERAL FACILITY

- [x] Daily Facility Inspection Form
- [x] Perimeter Gates Closed
- [x] Proper fence line signage
- [x] No evidence of hazmat spill
- [x] Overall Cleanliness
- [x] OSRO Equipment Inspected

HAZMAT SAFETY

- [x] Safety Shower & Eye Wash tested
- [x] Secondary Containment Clean
- [x] Flammable Liquids Storage Cabinet
- [x] MSDS Log
- [x] Compatibility Storage (oxidizers, corrosives, flammables, etc.)

STORAGE TANKS

- [x] Secondary Containment
- [x] Labeled
  - [x] NFPA Diamonds
  - [x] Product Name or Use
- [x] Flammable Liquids Storage Cabinet
- [x] Compatibility Storage (oxidizers, corrosives, flammables, etc.)

CONTAINER MANAGEMENT

- [x] Closed, Clean, & Good Condition
- [x] Labeling:
  - Customer/Old Labels Removed
  - CBI Labels affixed
    - Customer Name
    - Shipping/Product Name
    - Date
    - CBI Manifest/Work Order Number
- [x] Leaking or Bulging Containers
- [x] Adequate Isle Space

RECORDKEEPING

- [x] Facility Inspection Log
- [x] Inbound Manifest Log
- [x] Outbound Manifest Log *(by destination)*
- [x] Used Oil Log (inbound)
- [x] Personnel Training Records
- [x] 10-Day Transfer Facility Log *(if applicable)*

HAZARDOUS WASTE

- [ ] Satellite Accumulation Area Labeled (~xylene waste) N/A
- [x] Recordkeeping
  - [x] HW Manifests *(5 years)*
  - [x] LDR *(5 years)*
  - [x] Waste Determination (profile/labs) *(5 years)*

ADDITIONAL COMMENTS:

Cliff Berry, Inc.

Canaveral Facility
Tank Farm Inspection Sheet

Date: 2-28-13
Inspected By: Mark Boothouse

Hoses and tanks secure	Y ✓
Sludge drum sealed and labeled	Y ✓
Sludge screen and roper screen clean	Y ✓
Fire ext. current	Y ✓
Overfill alarms tested	Y ✓
Spill Control/Decon Equipment checked	Y ✓
Safety & Security Signage checked	Y ✓
Facility Lighting checked	Y ✓
Interstitial spaces checked	Y ✓

Overhead Walk:
(steps clear, any sign of damage) O.K.
Tank condition:
(Leaks, cracks, signs of rust) NO
Valves and pipe:
(Leaks or cracks along weld) NO
Containment Area:
(Damage to wall, epoxy coating) NO
Electrical:
(Pump on/off switch, lighting) OK

Additional comment

DAILY INSPECTION LOG 2013

Canaveral Facility

February	Storage Tanks	General Facility	Monitor Calibration	Comments
1				
2				Saturday
3				Sunday
4				
5				
6				
7				
8				
9				Saturday
10				Sunday
11				
12				
13				
14				
15				
16				Saturday
17				Sunday
18				
19				
20				
21				
22				
23				Saturday
24				Sunday
25				
26				
27				
28				
29				
30				
31				

Internal Facility Audit

FACILITY NAME: CBI Conoveral **DATE OF AUDIT:** 1-31-13

MANAGER NAME: Paul Meding

AUDITOR NAME: Mark Groothouse

GENERAL FACILITY

- [x] Daily Facility Inspection Form
- [x] Perimeter Gates Closed
- [x] Proper fence line signage
- [x] No evidence of hazmat spill
- [x] Overall Cleanliness
- [x] OSRO Equipment Inspected

HAZMAT SAFETY

- [x] Safety Shower & Eye Wash tested
- [x] Secondary Containment Clean
- [x] Flammable Liquids Storage Cabinet
- [x] MSDS Log
- [x] Compatibility Storage (oxidizers, corrosives, flammables, etc.)

STORAGE TANKS

- [x] Secondary Containment
- [x] Labeled
  - [x] NFPA Diamonds
  - [x] Product Name or Use
- [x] Flammable Liquids Storage Cabinet
- [x] Compatibility Storage (oxidizers, corrosives, flammables, etc.)

CONTAINER MANAGEMENT

- [x] Closed, Clean, & Good Condition
- [x] Labeling:
  - Customer/Old Labels Removed
  - CBI Labels affixed
    - ☐ Customer Name
    - ☐ Shipping/Product Name
    - ☐ Date
    - ☐ CBI Manifest/Work Order Number
- [x] Leaking or Bulging Containers
- [x] Adequate Isle Space

RECORDKEEPING

- [x] Facility Inspection Log
- [x] Inbound Manifest Log
- [x] Outbound Manifest Log *(by destination)*
- [x] Used Oil Log (inbound)
- [x] Personnel Training Records
- [x] 10-Day Transfer Facility Log *(if applicable)*

HAZARDOUS WASTE

N/A ☐ Satellite Accumulation Area Labeled (~xylene waste)

- [x] Recordkeeping
  - [x] HW Manifests *(5 years)*
  - [x] LDR *(5 years)*
  - [x] Waste Determination (profile/labs) *(5 years)*

ADDITIONAL COMMENTS:

Cliff Berry, Inc.

Canaveral Facility
Tank Farm Inspection Sheet

Date: 1-31-13
Inspected By: Mark Grootkowe

Hoses and tanks secure	Y ✓
Sludge drum sealed and labeled	Y ✓
Sludge screen and roper screen clean	Y ✓
Fire ext. current	Y ✓
Overfill alarms tested	Y ✓
Spill Control/Decon Equipment checked	Y ✓
Safety & Security Signage checked	Y ✓
Facility Lighting checked	Y ✓
Interstitial spaces checked	Y ✓

Overhead Walk:
(steps clear, any sign of damage) O.K.
Tank condition:
(Leaks, cracks, signs of rust) O.K.
Valves and pipe:
(Leaks or cracks along weld) O.K.
Containment Area:
(Damage to wall, epoxy coating) O.K.
Electrical:
(Pump on/off switch, lighting) O.K.

Additional comment _____

DAILY INSPECTION LOG 2013

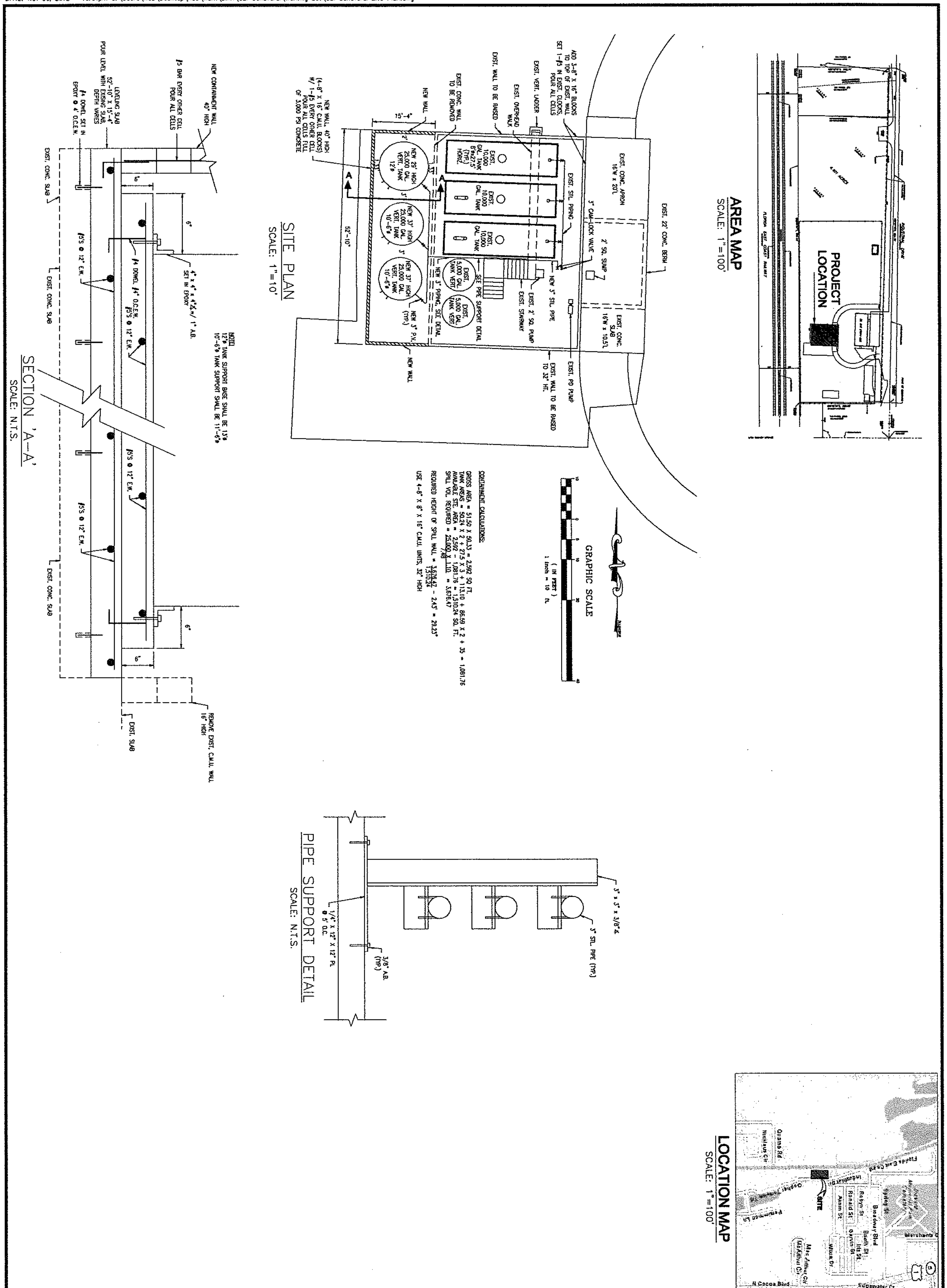
Canaveral Facility

january	Storage Tanks	General Facility	Monitor Calibration	Comments
1	MCH	MCH		
2	PL	PL		
3	PL	PL	Air monitor	
4	PL	PL		
5				Saturday
6				Sunday
7	PL	PL		
8	PL	PL		
9	PL	PL		
10	PL	PL		
11	PL	PL		
12				Saturday
13				Sunday
14	PL	PL		
15	PL	PL		
16	PL	PL		
17	PL	PL		
18	PL	PL		
19				Saturday
20				Sunday
21	PL	PL		
22	PL	PL		
23	PL	PL		
24	PL	PL		
25	PL	PL		
26				Saturday
27				Sunday
28	PL	PL		
29	MCH	MCH		
30	MCH	MCH		
31	MCH	MCH		

ATTACHMENT NO. 14

With regard to the request to conduct additional USDOT hazardous materials training, Cliff Berry, Incorporated already provides this training to Used Oil drivers as well as drivers for which it is required. Evidence of this training was not originally provided since it is not required by law. It is available upon request.

ATTACHMENT NO. 15



SEAL	D.M. AMBROSE, P.E. FLORIDA REGISTRATION NO. 12831	C1 OF 1	SCALE: AS NOTED DATE: 11/28/12 DRAWN BY: RCW CHECKED BY: DMA DESIGNED BY: DMA	D.M. AMBROSE, CIVIL ENGINEER CONSULTING ENGINEER	CBI CANAVERAL FACILITY 5855 INDUSTRIAL DRIVE COCOA, FLORIDA X

NO	DATE	BY	CKD	REVISIONS

ATTACHMENT NO. 16

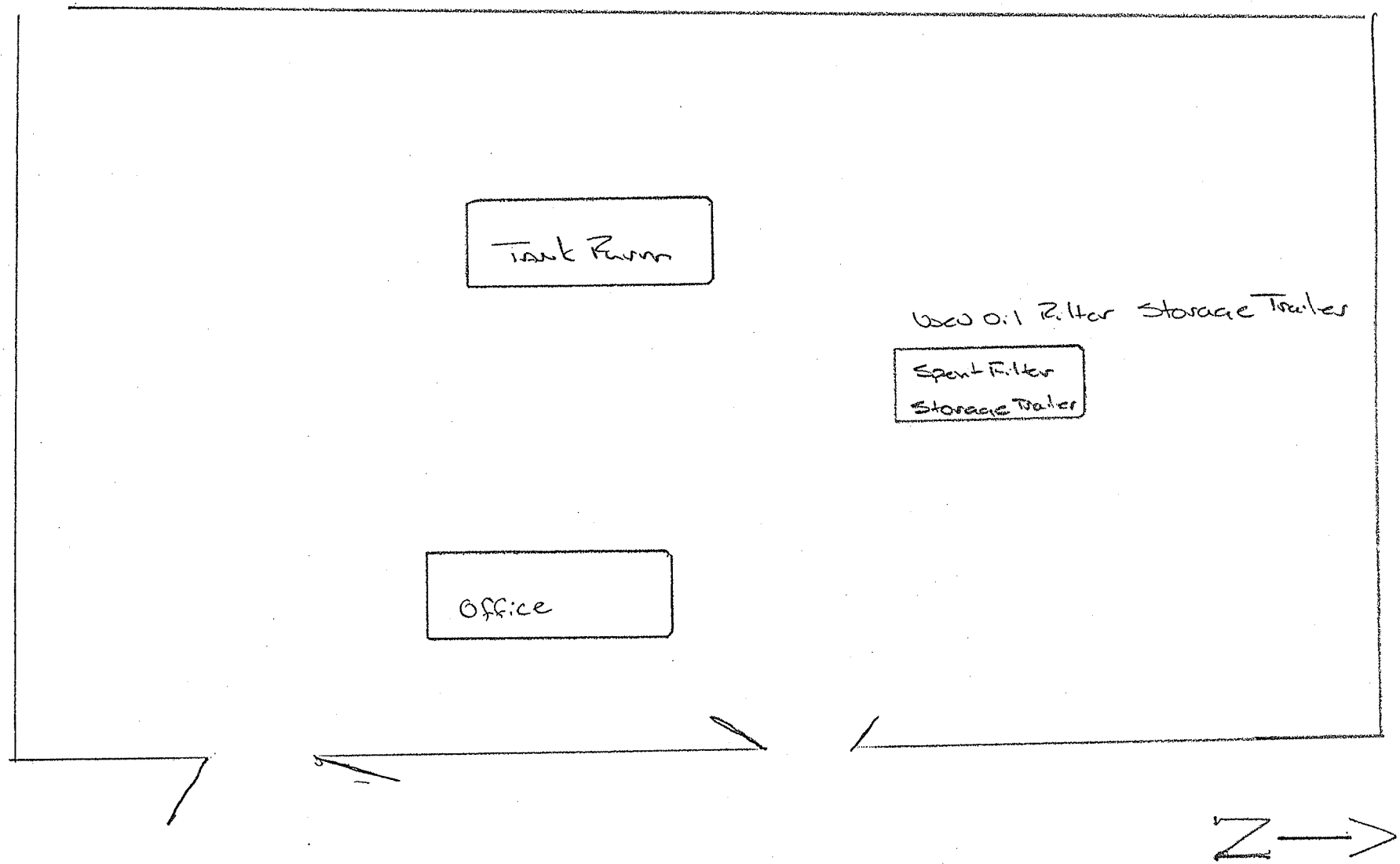
Table #1
Horizontal Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01	10/06	8,300	Steel	Used Oil/Water
02	10/06	8,300	Steel	Used Oil/Water
03	10/06	8,300	Steel	Used Oil/Water

Vertical Tanks

04	10/06	5,000	Steel	Used Oil
05	10/06	5,000	Steel	Used Oil
06	Est. 2013	25000	Steel	Used Oil
07	Est. 2013	25000	Steel	Used Oil
08	Est. 2013	25000	Steel	Used Oil

ATTACHMENT NO. 17


Tank Farm
Used Oil Filter Storage Trailer
Spent Filter
Storage Trailer
Office
N

ATTACHMENT NO. 18

STANDARD OPERATING PROCEDURE	Waste Analysis Plan	REVISION Date: Feb 2012 DRAFTED BY: LA REVIEWED BY: RSC APPROVED BY: LAD

Background:

CBI's Miami Wastewater Pre-Treatment Facility is approved by the State of Florida to accept and treat multiple waste streams. This plan is put in place to ensure the Facility remains in compliance with applicable permits, local ordnances and EPA mandates.

Purpose:

The purpose of this plan is to identify the various waste streams that may be accepted into the CBI Miami Facility and define the testing criteria for each.

Discussion

This Analysis Plan, coupled with the Waste Acceptance Plan, will ensure compliance of the facility by detailing the minimum testing requirements for all waste received into the facility. The Analysis Plan covers the following waste streams: Used oil, Petroleum Contact Water (PCW), Grit trap/Sump waste, EPA Sub Category (A) Metals, EPA Sub Category (B) Oils, EPA Sub Category (C) Organics and NON Hazardous Solids. The Analysis Plan covers: liquids, solids and semi solids waste streams to ensure compliance for the acceptance and treatability standards. The Miami Facility uses best treatment practices coupled with the waste analysis protocols to ensure compliance.

The following waste streams may be accepted into the Miami Facility for processing:

- Used Oil
- PCW
- Grit Trap/Sump Waste
- EPA Subcategory (A) Metals
- EPA Subcategory (B) oils
- EPA Sub Category (C) Organics
- Non Hazardous solids

General Comment

A hazardous waste determination will be conducted on any oily wastes or sludge generated at the facility that cannot be managed for energy recovery. The materials will be managed in accordance with 40 CFR Part 279.10(c) and (e).

Used Oil

A Representative sample of the used oil will be collected and brought to the lab for the following tests to be performed prior to offloading of the waste or by product. The lab will perform water by distillation, treatability, halogens, Flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile, the used oil load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the Facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales Manager or the generator directly to discuss the problem with acceptance of the waste stream. If (after discussion) it is deemed that the facility cannot treat and process the waste stream, the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. All used oil streams must meet the used oil specs designated by EPA for Used oil. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

PCW

A representative sample of the PCW will be collected and brought to the lab for the following tests to be performed prior to offloading. The lab will perform water by distillation and treatability tests. After all testing has been performed to ensure that it meets the approved profile, the PCW load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the Facility. All loads not meeting the profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales Manager or the generator directly to discuss the problem with the acceptance of the waste stream. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capability of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

Grit Trap/Sump Waste

A representative sample of the grit trap/sump waste will be collected and brought to the lab for the following tests to be performed prior to offloading the waste stream. The lab will perform treatability, metals, and percent solids tests. After all testing has been performed to ensure that it meets the approved profile, the load will be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the Sales Manager or the generator directly to discuss the problem with the acceptance of the waste stream. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capably of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected

EPA Sub Category (A) Metals

A representative sample of the EPA Sub Category (A) waste stream will be collected and brought to the lab for the following tests to be performed prior to offloading of the waste stream. The lab will perform treatability, metals, and percent solids tests. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capably of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

EPA Sub Category (B) Oils

A representative sample of the Sub Category (b) oils will be collected and brought to the lab for the following tests to be performed prior to offloading of the waste stream. The Lab Manager will perform water by distillation, treatability, halogens tests and a flash point, solids content and PCB scan when applicable. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. All used oil streams must meet the used oil specs designated by

EPA for Used Oil. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capably of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

EPA Sub category (C) Organics

A representative sample of the Sub Category (C) Organics will be collected and brought to the lab for the following tests to be performed prior to offloading of the load. The Lab Manager will perform metals, treatability, and solids content tests. If (after discussion) it is deemed that the facility cannot treat and process the waste stream the load will be rejected. If the waste stream has changed from the approval criteria in the profile, a letter must be submitted to the Lab Manager prior to offload and a new profile completed and signed. A copy of all bills of lading and manifests of waste rejected will be maintained for a minimum of 1 year. A note shall be placed in the receiving log documenting the reason why the load was rejected. Any and all loads found to be non-conforming will be rejected for treatment at the Cliff Berry Miami Facility. CBI Facility personnel will assist the generator in locating an off-site facility with the capably of accepting the non-conforming waste stream or assist in finding alternative solutions to handle streams that must be rejected.

Non hazardous Solids

All drums will be opened and inspected to meet all profile criteria. If the waste meets all the profile's criteria then it will be disposed of in a proper manner. If any waste does not meet profile criteria and it may cause a problem from compliance or health & safety criteria, then the Sales Manager and Disposal Manager will be contacted immediately for an alternate solution for the waste. The drummed waste will be rejected and sent off-site for alternative waste disposal. All drums will be inspected on arrival at the facility. They will be segregated and stored until time of disposal.

Summary

This waste Analysis Plan shall be followed as described. This plan sets the criteria for testing waste coming into the Miami Facility to ensure compliance. Only the President or Executive V.P. of Cliff Berry Inc. has authorization to alter or change the acceptance criteria prescribed above. Any employee who does not adhere to the specific acceptance criteria detailed in this plan will be subject to termination. The plan may be changed upon EPA, State or local rule changes for acceptance of waste. Annually, the Disposal Services Dept. Manager together with the Facility Manager will review this plan to ensure that this waste analysis program is being followed and it continues to reflect the standards needed to ensure the Facility remains compliant. Any changes to this plan will be provided to senior staff, all field managers and sales personnel.

ATTACHMENT NO. 19

PREVIOUSLY SUBMITTED TO THE FDEP

ATTACHMENT NO. 20

PREVIOUSLY SUBMITTED TO THE FDEP

ATTACHMENT NO. 21

SEE ATTACHMENT NO. 4