



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

May 3, 2013

Ileana Smothers, Facility Manager
Cliff Berry, Inc
1518 Talleyrand Avenue
Jacksonville, Florida 32206
ileana@cliffberryinc.com

Re: Cliff Berry, Inc
EPA/DEP ID: FLR 000 119 784
Duval County – Hazardous Waste

Dear Ms. Smothers:

Department personnel conducted a Hazardous Waste Compliance Inspection of the above-referenced facility on April 9, 2013. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Jabe Breland at (904) 256-1671 or via e-mail at jabe.breland@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vince Clark'.

Vince Clark
Compliance Supervisor
Northeast District

VGV

Enclosures: Final Inspection Report
ec: Jabe Breland, DEP



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Cliff Berry Inc - Jacksonville Facility
On-Site Inspection Start Date: 04/09/2013 **On-Site Inspection End Date:** 04/09/2013
ME ID#: 42441 **EPA ID#:** FLR000119784
Facility Street Address: 1518 Talleyrand Ave, Jacksonville, Florida 32206-5436
Contact Mailing Address: PO Box 13079, Fort Lauderdale, Florida 33316-0100
County Name: Duval **Contact Phone:** (954) 763-3390

NOTIFIED AS:

CESQG (<100 kg/month)
Transporter
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility
Routine Inspection for Used Oil Generator facility
Routine Inspection for Used Oil Transfer Facility
Routine Inspection for Hazardous Waste Transporter facility
Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector
Other Participants: Ileana Smothers, Manager

LATITUDE / LONGITUDE: Lat 30° 20' 30.0" / Long 81° 37' 49.0"

SIC CODE: 4213 - Trans. & utilities - trucking, except local

TYPE OF OWNERSHIP: Private

Introduction:

Cliff Berry, Inc. (CBI) was inspected on April 9, 2013, as unannounced hazardous waste compliance inspection. CBI provides emergency response cleanup for transportation accidents and the clean up and removal of hazardous and non-hazardous waste from industrial spills. They also perform routine used oil and hazardous waste transportation for its customers. CBI has been assigned the EPA identification number: FLR 000 119 784. Please use this number on all hazardous waste manifests and on all correspondence with the Department's Hazardous Waste Section. Ms. Ileana Smothers was present for the inspection.

On May 11, 2005, CBI, Jacksonville Branch, notified the Department that it was a hazardous waste and used oil transporter, a used oil transfer facility, a used oil processor, and a used oil marketer. A subsequent notification on December 18, 2012, showed the facility to be a hazardous waste, universal waste, and used oil transporter, used oil processor, and used oil filter transporter. CBI submitted a permit application to the Department on March 14, 2012. The Department issued a permit to CBI on December 20, 2012. However, CBI has not been processing used oil at the facility. This permit expires April 14, 2018.

The facility is currently operating as a registered used oil transporter and transfer facility. The facility is also a hazardous waste transporter and used oil filter transporter and transfer facility.

Inspection Date: 04/09/2013

Process Description:

CBI's current operation consists of an office building, a large storage warehouse, and a used oil storage area. Waste is not generated or stored in the office building and the storage warehouse. These two areas are used to store boats, pumps, hoses, boom, and other spill cleanup inventory.

Used Oil Storage:

The facility has three double-walled used oil storage tanks including one 15,000-gallon tank with two compartments of 10,000 and 5,000-gallon capacities, one 2,000-gallon tank, and one 4,000-gallon tank (Photos 1-2). The tanks were properly labeled and appeared to be in good condition. Next to the tanks is an area for storing used oil generated from the loading and off-loading of used oil into the tanks. The facility places buckets underneath the hose fittings during off-loading, and any used oil that drips into these buckets is captured and added to a 55-gallon used oil drum. This drum was properly labeled and in secondary containment. There was also one drum of oily rags from the off-loading operations. These drums were properly labeled (Photo 3).

The facility ships used oil to its Miami facility to be processed and sold as a fuel.

Non Hazardous Waste and Used Oil Filter Storage:

The facility has a semi trailer on-site to store non-hazardous waste, universal waste, and used oil filters it receives from its customers. The facility keeps a log of what drums are in the trailer and when they were delivered. At the time of the inspection, this trailer was almost full. The drums were properly labeled, closed, and in good condition.

Records:

According to the hazardous waste manifests supplied by the facility, CBI is accepting and transporting Small Quantity Generator (SQG) and Large Quantity Generator (LQG) amounts of hazardous waste. A hazardous waste manifest is required to accompany shipments of SQG and LQG hazardous waste. A review of the facility's hazardous waste manifests found them to be in order. At the time of the inspection, the facility did not have any hazardous waste on-site. According to Ms. Smothers, shipments of hazardous waste are taken directly to the permitted TSD or Cliff Berry's 10-day transfer facility at Port Canaveral.

A review of the facility's used oil acceptance records found them to be in order. The facility was performing halogen screening as required by Section 62-710.510(1)(g), FAC. The facility mainly picks up oily wastewater from its customers, which it takes directly to Liquid Environmental Solutions (LES) or Water Recovery Inc (WRI) for processing.

According to Ms. Smothers, CBI routinely performs training for its used oil transportation activities, and she provided documentation of this employee training. The facility's contingency plan was reviewed and was in order.

The facility displayed its current used oil transportation registration at the facility. The facility has submitted its certificate of liability insurance for its used oil and hazardous waste transportation activities. It has also completed its annual reporting for its used oil activities.

PHOTO ATTACHMENTS:

Inspection Date: 04/09/2013

Photo 1 - used oil tanks



Photo 2 - used oil tank



Photo 3 - used oil and oily absorbent drums



Inspection Date: 04/09/2013

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Jabe Breland III
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE


PRINCIPAL INSPECTOR SIGNATURE

DEP
ORGANIZATION

5/3/2013
DATE

Supervisor: Jabe Breland III

Inspection Approval Date: 05/03/2013

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.