

ATTACHMENT 9
CLOSURE PLAN

Cliff Berry, Inc.
Miami Facility Closure Plan

REVISED JUNE 2015

Introduction:

Cliff Berry, Inc. (CBI) operates a used oil transfer station which receives used oil, oily water and contaminated soil which are generated by retail gasoline stations, oil companies, automobile dealerships, airports and marine interests. All product is delivered to the CBI plant by over the road transport vehicles or railroad tank cars. The facility has a capacity of storing approximately 1.3 million gallons of used oil and oily waste water.

The facility operates under licenses issued by the Miami Dade County Department of Environmental Resource Management (DERM), and the State of Florida Department of Environmental Protection (FDEP). Company owned transport vehicles are licensed by Broward County Department of Planning and Environmental Protection (DPEP) and Miami Dade County Department of Environmental Resources Management (DERM). All oily liquids and contaminated soils are transferred and stored within containment areas which have been designed to meet rules and regulations current at the time of installation. All oily liquids and contaminated soils delivered to the facility are 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 transferred to a suitable transfer station.
2. Current plans require that the closure event will result in the complete cessation of all operations at the CBI Transfer Station. Management does not contemplate partial operation of the facility. There will be no need for further facility maintenance.
3. 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), Total Volatile Aromatics (VOA), Poly-nuclear Aromatic Hydrocarbons (610, 1,2 dibromomethane (EDB), Methyl tert-butyl ether (MTBE) and lead.

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. 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 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 the 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 as necessary. 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 (F.A.C.) Rules 62-762 and 62-710.510.

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. Used oil will not contaminate ground or surface water.

These steps will include:

1. Contaminated material 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 POTW. Approval from the POTW will be obtained prior to release.

During the 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 and

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 surrounding 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.

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

- i. Contaminated soil and liquids will be manifested off site to a permitted TSD facility.
- ii. Tanks, piping and machinery will be either removed and/or decontaminated.
- iii. Placement of final cover considering:
 - 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 Facility, CBI will submit an updated and detailed closure plan to the FDEP.

In the event hazardous wastes are temporarily stored, a revised final plan will be submitted. This plan will be issued during a closure event and will identify the steps necessary to perform partial and/or final closure of the facility. The amended closure plan will include:

1. A description of how each hazardous 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 operation which will be unclosed during the active life of the facility,.
3. A projection of the maximum inventory of hazardous waste stored on site over the active life of the facility; and a detailed description of the methods to be used during partial and

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 hazardous waste residues and contaminated material systems components, equipment, structures, and soil during partial and 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 partial or 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 hazardous waste management unit and for final closure of the facility. The schedule will include the total time required to close each hazardous waste management unit and the time required for intervening closure activities which will allow tracking of the progress of partial and final closure.

Within thirty (30) days of final closure of the 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.