

ATTACHMENT 1
BUSINESS AND OPERATIONS PLAN

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

1 - 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 21 registered storage tanks.

2 – The requested permit modification does not change the current operations of the Miami Facility. The modification includes installation of four additional process tanks of approximately 30,000 gallon capacity each, totaling approximately 120,000 gallons of total storage. A downstream filtration system will be added to the current processing technology to further clean the finished used oil product.

The following wastes are accepted at the Miami Facility with their corresponding management method.

Waste	Volume (g/mos.)	Management Method	Testing	Generator type	Time at Facility
Used Oil	613,200	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)	17,400	Stored, bulked and transferred waste without treating. Destined for recycling.	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	597,500	Stored, bulked and transferred waste without treating. Destined for recycling.	Generator knowledge/ process knowledge	Ships, vessels, tug bilges, shops.	Several days, but <30 days

3 – CBI operates five other locations in Florida:

The CBI Port Everglades Facility is a Used Oil Transfer Facility with an FDEP used Oil Processing Facility permit and has sixteen (16) 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 Canaveral Facility is a Used Oil Transfer Facility with an FDEP Used Oil Processing Facility Permit and has five (5) registered storage tanks.

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

The CBI Jacksonville Facility is a Used Oil Transfer Facility with an FDEP Used Oil Processing Facility Permit and has three (3) registered storage tanks.

4 – The Miami Facility accepts oily water, used oil, used oil filters and PCW picked up by other CBI facilities for recycling and petroleum recovery. Testing in Miami is conducted consistent with the Waste Analysis SOP.

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.” 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.