

Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

November 13, 2015

Mr. Walter Ciewierz, Facility Manager
Cliff Berry Inc. - Jacksonville Facility
1518 Tallyrand Avenue
Jacksonville, Florida 32206
wciecwierz@cliffberryinc.com

Re: Cliff Berry Inc. - Jacksonville Facility
EPA/DEP ID: FLR 000 119 784
Duval County – Hazardous Waste

Dear Mr. Ciewierz:

Department personnel conducted a compliance inspection of the above-referenced facility on September 1, 2015. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is enclosed for your records. Non-compliance identified in the inspection report has been corrected.

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 Heather Hahn at (904) 256-1675 or via e-mail at heather.hahn@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner".

Matthew Kershner
Environmental Manager
Compliance Assurance Program

MK/hh/tl

Enclosure



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Cliff Berry Inc - Jacksonville Facility
On-Site Inspection Start Date: 09/01/2015 **On-Site Inspection End Date:** 09/01/2015
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: Heather M. Hahn, Inspector
Other Participants: Jabe Breland, Inspector; Jon Sandora, Area Manager; Walter Ciewierz, Facility 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 September 1, 2015, as unannounced hazardous waste compliance inspection. The Department's Hazardous Waste Section last inspected the facility on April 9, 2013. 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. Jon Sandora, Area Manager, and Walter Ciewierz, Facility Manager, were available during the inspection.

CBI provides emergency response cleanup for transportation accidents and the clean-up and removal of hazardous and non-hazardous waste from industrial spills. It also performs routine used oil and hazardous waste transportation for its customers.

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.

Process Description:

CBI's current operation consists of an office building, a large storage warehouse, and a used oil

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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. Tanks one and two were properly labeled and appeared to be in good condition. Tank number three contained Petroleum Contact Water. The tank was labeled Used Oil [62-740.100(2)(c), FAC]. Per a September 1, 2015, e-mail, the facility re-labeled the tank. 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. It was properly labeled.

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. Shipments of hazardous waste are taken directly to the permitted facility or to 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.

CBI routinely performs training through its corporate headquarters for its used oil transportation activities. 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. All records reviewed were found to be in order.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-740.100(2)(c)
Explanation:	The facility labeled a 4,000-gallon tank of Petroleum Contact Water with the words "Used Oil," instead of the words "Petroleum Contact Water."

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Corrective Action: In a September 1, 2015, e-mail, the facility provided documentation that it had returned to compliance.

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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.

Heather M. Hahn <hr/> PRINCIPAL INSPECTOR NAME  <hr/> PRINCIPAL INSPECTOR SIGNATURE	Inspector <hr/> PRINCIPAL INSPECTOR TITLE FDEP <hr/> ORGANIZATION	11/12/2015 <hr/> DATE
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Supervisor: Pam Fellabaum **Inspection Approval Date:** 11/12/2015

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.