

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

FACILITY INFORMATION:

Facility Name: Cliff Berry Inc - Fort Pierce Facility

On-Site Inspection Start Date: 05/18/2016

On-Site Inspection End Date: 05/18/2016

ME ID#: 36809

EPA ID#: FLR000009266

Facility Street Address: 400 Angle Rd, Fort Pierce, Florida 34946

Contact Mailing Address: PO Box 13079, Fort Lauderdale, Florida 33316-0100

County Name: St. Lucie

Contact Phone: (954) 763-3390

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Kim Tampas, Environmental Specialist; John Katzor, AF Manager

LATITUDE / LONGITUDE: Lat 27° 27' 3.234" / Long 80° 21' 33.0225"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

Cliff Berry Inc. (CBI) is a registered Used Oil Transporter, Used Oil Transfer facility, Used Oil Filter Transporter, and Used Oil Filter Transfer Facility. CBI is also a Hazardous Waste Transporter and a Conditionally Exempt Small Quantity Generator. In addition, CBI is a Small Quantity Handler and Transporter of Universal Waste, and a Transfer facility for Universal Waste lamps and devices. The facility is situated on one and half acres in a light industrial area and is connected to city water and septic. The facility is completely surrounded by security fencing and consists of a building that serves as their main office and warehouse; and a tank farm inside secondary containment, which includes two connected and contained concrete pads for loading/unloading and has a fixed storage capacity of 83,000 gallons.

Parked next to the old gasoline and diesel pumps is the tractor trailer used as the non-hazardous transfer facility (debris, used oil filters, contaminated soils, etc.) There is also a small shed that serves as the transfer facility for the Universal Waste. The facility has been in operation at this site for approximately twenty years and has six employees. During this inspection, the PPE worn by the facility representative was Level D and consisted of ANSI approved shoes, safety glasses, and hard hats.

Inspection Date: 05/18/2016

Process Description:

All used oil, oily water, used oil filters and antifreeze brought to this facility is then transported by tanker trucks or tractor trailers to CBI's Miami facility. All non-hazardous waste CBI picks up is placed in a trailer still within their original containers for shipment to CBI Miami. All used oil filters, solids, etc. collected by CBI are remanifested under CBI's name before being shipped to Miami. There is a drum log kept in the rear of the trailer such that the content of the trailer is always known. CBI has box trucks that do milk runs from their facility for hazardous waste; however, the trucks don't return to the facility but instead go directly from the generator to the ten day transfer facility in Miami. The used oil truck drivers use halogen screening meters and then, if necessary, Dexisil kits when picking up the oil to ensure that it does not exceed 1000 ppm. There was no Universal Waste on site but it was explained to the inspector that it is handled on a case by case basis; the lamps and devices they do handle go to AERC in Melbourne. The fire extinguishers on site had not been serviced since April of 2015; however, they all still appeared to be charged, as their indicators remained in the green area. There were spill kits stationed around the facility and a trailer full of emergency response equipment located here; making it less likely that CBI would have to send equipment from the other facilities to respond to an incident in the vicinity.

During the facility tour, the inspector inquired as to the content of the four 12,000 gallon tanks because the tanks had the OSHA diamonds on them but only one was labeled "Used Oil", the other three were not labeled. The facility representative indicated that the tanks actually contained non-spent off-spec fuel from flushing a stationary pipeline that carries both diesel and jet fuel at different times. This is an operation that is exclusive to this CBI facility.

Record Review

The inspector recognized that when the facility changed their recordkeeping procedures they no longer were noting whether security features, emergency response equipment, and decontamination equipment were fully functionally and fully stocked. Although this was not a requirement at this particular facility, the inspector suggested that it was certainly something that should be addressed on a regular basis. All of the facility's other records were found to be in order: the Contingency Plan, training records, manifests, and the facility's acceptance and delivery logs met all requirements and were well organized.

Conclusion:

The facility was found to be in compliance with federal and state used oil and hazardous waste rules.

All issues discussed during the inspection and with the EHS officer after the inspection were clarified by an email sent the day of the inspection and a submittal received by the Department on June 20, 2016.

Inspection Date: 05/18/2016

Signed:

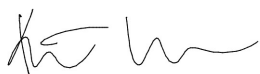
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection 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.

Kathy R. Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

7/18/2016

DATE**Supervisor:** Karen Kantor

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.