



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

October 25, 2017

Mr. Jon Sandora, Area Manager
Cliff Berry Inc.
1518 Talleyrand Avenue
Jacksonville, Florida 32206
JSandora@cliffberryinc.com

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

Dear Mr. Sandora:

Department personnel conducted a hazardous waste compliance inspection of the above-referenced facility on August 9, 2017. Based on the information provided during 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 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 Homer Butler at (904) 256-1531 or via e-mail at Homer.Butler@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script, appearing to read "K Hill".

Katrina Hill
Environmental Manager

Enclosure: Inspection Report

cc: compliance@cliffberryinc.com
SCollins@cliffberryinc.com



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

FACILITY INFORMATION:

Facility Name: Cliff Berry Inc - Jacksonville Facility
On-Site Inspection Start Date: 08/09/2017 **On-Site Inspection End Date:** 08/09/2017
ME ID#: 42441 **EPA ID#:** FLR000119784
Facility Street Address: 1518 Talleyrand Ave, Jacksonville, FL 32206-5436
Contact Mailing Address: PO Box 13079, Fort Lauderdale, FL 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 Transfer Facility facility
Routine Inspection for Non-Handler facility
Routine Inspection for Hazardous Waste Transporter facility
Routine Inspection for Universal Waste Transporter facility
Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Homer D Butler, Inspector
Other Participants: Jon Sandora, District Manager

LATITUDE / LONGITUDE: Lat 30° 20' 30" / Long 81° 37' 49"

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

TYPE OF OWNERSHIP: Private

Introduction:

Cliff Berry, Inc.'s Jacksonville facility (CBI) was inspected August 9, 2017, as a hazardous waste compliance inspection. Jon Sandora (CBI) and Tori Goodwin (DEP) were present throughout the entire inspection. CBI was last inspected by the Department's Hazardous Waste Program on September 20, 2012. CBI has been issued the EPA/DEP identification number FLR 000 119 784. Please use this number on all hazardous waste related correspondence with the Department.

CBI was issued Used Oil Processing Facility Renewal Operating Permit Number 249482-HO-003 on December 20, 2012. The facility's permit is up for renewal on April 14, 2018. CBI is a registered Used Oil Processor, a Used Oil Transporter/Transfer Facility, a Used Oil Filter Transporter/Transfer Facility, a Petroleum Contact Water (PCW) Transporter Facility and a Hazardous Waste Transporter, which will expire on June 30, 2018. The facility is also a registered Universal Waste Transporter and Handler, which will expire on March 1, 2018. The facility has been operating as Cliff Berry, Inc. at this location since 2005. The Jacksonville facility has 10 employees, is on city water and is connected to city sewer.

The CBI facility consists of a Main Office Building, a Waste Storage Area, an Aboveground Storage Tank (AGST) Area and a Large Storage Warehouse.

Process Description:

CBI provides emergency response cleanup for transportation accidents, the cleanup and removal of hazardous and non-hazardous waste from industrial spills and the removal of wastewater and PCW from storage tanks and bilge tanks.

Inspection Date: 08/09/2017

Summary of registered activities:

Used Oil Processor: CBI is a permitted used oil processor, however the facility does not currently process used oil, oily wastewater or PCW at the facility. Used oil is processed at the CBI Miami facility. Oily wastewater and PCW are processed at Liquid Environmental Solutions LLC. (LES) or Water Recovery, Inc. (WRI).

Used Oil Transporter/Transfer Facility: CBI transports used oil and may store the oil at its facility in one of the aboveground tanks described below. Used oil may be transported directly to the CBI facility in Miami. Used oil stored on-site is held for less than 35 days. It is stored in either Tank 1 or Tank 2 described below.

Used Oil Filter Transporter/Transfer Facility: CBI transports used oil filters and may store 55-gallon drums of filters at its facility inside the Waste Storage Area described below. Use oil filters may be transported directly to the CBI facility in Miami. Used oil filters stored on-site are held for less than 35 days.

PCW Transporter: CBI transports PCW and may store the PCW at its facility in one aboveground tank described below. PCW may be transported directly to LES or WRI. PCW stored on-site is held for less than 35 days. It is stored in Tank 3 described below.

Hazardous Waste Transporter: CBI transports hazardous waste occasionally. Transported hazardous waste is not brought to this facility. It is directly transported to the permitted hazardous waste treatment, storage or disposal facilities (TSDs) identified on the manifests.

Universal Waste Transporter: CBI transports universal waste such as batteries and spent fluorescent lamps. CBI may store universal waste at its facility inside the Waste Storage Area. Universal waste may be transported directly to AERC Recycling Solutions, Corp. Universal waste stored on-site is held for less than one year.

Facility Areas:

The Main Office Building:

The Main Office Building consists of several office spaces, a records room, a classroom and a small break room. No hazardous waste is generated inside or around the Main Office Building.

Waste Storage Area:

The Waste Storage Area consists of an on-site semitrailer for storage of non-hazardous waste, universal waste and used oil filters received from customers. The facility keeps a log of what drums are inside the trailer and when they were delivered. At the time of the inspection, there were six drums of non-hazardous "oily dirt" waste accumulating inside the trailer (Photo 1). The drums were properly labeled, closed and in good condition.

Large Storage Warehouse:

The Large Storage Warehouse is used to store emergency response equipment and materials used in clean-up efforts (Photos 2 and 3). No hazardous waste is generated inside or around the Large Storage Warehouse.

Aboveground Storage Tank (AGST) Area:

The AGST Area is located adjacent Large Storage Warehouse. There are three double-walled storage tanks located within secondary containment (Photo 4). The tanks are in-line and end-to-end in the order Tank 1, Tank 3 and Tank 2. These tanks are not included in the facility's Used Oil Processing Permit. Tanks 1 and 2 are currently being used for used oil storage of less than 35 days. Tank 3 is currently being used for PCW storage of less than 35 days.

Tank 1 has a 15,000-gallon total capacity divided into two sections (5,000-gallon C-1 and 10,000-gallon C-2) (Photo 5). Used oil is stored for less than 35 days in this tank. According to the facility records, only C-2 has been used for storage to date. Tank 2 has a 4,000-gallon total capacity (Photo 6). Used oil is stored for less than 35 days in this tank. Both Used Oil tanks were closed and properly labeled. The secondary containment

Inspection Date: 08/09/2017

is sealed and adequate for the tanks.

Tank 3 has a 2,000-gallon total capacity (Photo 7). Only PCW is stored inside this tank. The PCW tank was closed and properly labeled. The secondary containment is sealed and adequate for the tank.

In between Tank 1 and Tank 3 is a staging area for equipment and containers used for off-loading and on-loading operations (Photo 8). There was one 55-gallon drum of product absorbent and rags, one 55-gallon drum of spill clean-up material, two sets of hoses and four empty used oil buckets. When full, the spill clean-up drum is transported to LES.

Future Expansion:

The Used Oil Processing Permit for CBI includes future expansion of the current used oil storage area to include the installation of ten aboveground storage tanks. The secondary containment and the anchor pads for the tanks is complete (Photo 9). Adjacent to the Waste Storage Area are seven tanks that are waiting refurbishment, certification and final installation (Photos 10-14).

Records:

CBI is currently operating as a Non-Handler of hazardous waste. The facility had all current DEP registrations on display. The facility has submitted its certificate of liability insurance for its used oil and hazardous waste transportation activities.

Used oil and PCW are held for less than 35 days according to the facility AGST receiving and dispatching logs and transportation manifests. The AGST receiving and dispatching logs and transportation manifests are kept on-site for three years.

CBI screens every load of used oil with a halogen detector before transport and acceptance. Used oil is transported to the CBI Miami facility for further processing. Oily wastewater and PCW is transported to Liquid Environmental Solutions LLC. (LES) (FLD 981 928 484) or Water Recovery, Inc. (WRI) (FLR 000 069 062) for processing.

Hazardous waste is transported to E.Q. of Florida (FLD 981 932 494). Universal waste is transported AERC Recycling Solutions, Corp., (FLD 984 262 782).

CBI conducts training for its used oil and hazardous waste transportation activities and retains documentation of employee training on-site for three years. The facility's Contingency Plan and other operating records were reviewed and found to be in order.

PHOTO ATTACHMENTS:

Photo 1, Six drums of non-hazardous "oily dirt" waste



Photo 2, North side Large Storage Warehouse



Inspection Date: 08/09/2017

Photo 3, South side Large Storage Warehouse



Photo 4, Above Ground Storage Tank (AGST) Area



Photo 5, Tank 1 Used Oil



Photo 6, Tank 2 Used Oil



Photo 7, Tank 3 PCW



Photo 8, Storage Area



Inspection Date: 08/09/2017

Photo 9, New secondary containment with tank anchor pads



Photo 10, Tanks 1 and 2 of 7 waiting installation



Photo 11, Tank 3 of 7 waiting installation



Photo 12, Tank 4 of 7 waiting installation



Photo 13, Tank 5 of 7 waiting installation



Photo 14, Tanks 6 and 7 of 7 waiting installation



Inspection Date: 08/09/2017

1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 08/09/2017

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.

Homer D Butler	Inspector
Principal Inspector Name	Principal Inspector Title

<i>Homer D Butler</i>	DEP	10/23/2017
Principal Inspector Signature	Organization	Date

Jon Sandora	District Manager
Representative Name	Representative Title

Cliff Berry Inc.
Organization

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.

Report Approvers:

Approver: Pam Fellabaum	Inspection Approval Date: 10/23/2017
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