

## Thursby, Kim

---

**From:** Kelly Brandenburg <compliance@cliffberryinc.com>  
**Sent:** Wednesday, March 7, 2018 3:19 PM  
**To:** Epost HWRS  
**Cc:** Baker, Bryan; Walker, Kim (Waste); McBride, Ashanti; Kothur, Bheem; Cinquino, Dawn; Bejnar, Tor; Fellabaum, Pamela; 'deris@bdhcg.com'; Buselli, Bradley  
**Subject:** RE: Cliff Berry Inc. – Jacksonville; FLR 000 119 784; First Request for Additional Information (RAI)

Received the RAI.

Thank you,  
Kelly Brandenburg  
Cliff Berry, Inc.  
954-763-3390

---

**From:** Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS  
**Sent:** Tuesday, March 06, 2018 7:01 AM  
**To:** Kelly Brandenburg <compliance@cliffberryinc.com>  
**Cc:** Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@dep.state.fl.us>; McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@dep.state.fl.us>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Bejnar, Tor <Tor.Bejnar@dep.state.fl.us>; Fellabaum, Pamela <Pamela.Fellabaum@dep.state.fl.us>; 'deris@bdhcg.com' <deris@bdhcg.com>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>  
**Subject:** Cliff Berry Inc. – Jacksonville; FLR 000 119 784; First Request for Additional Information (RAI)

### **CAUTION - EXTERNAL EMAIL**

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.

Environmental Administrator  
Hazardous Waste Program & Permitting





# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Noah Valenstein  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

March 6, 2018

Kelly Brandenburg, Regulatory Affairs Manager  
Cliff Berry Inc. – Jacksonville Facility  
P.O. Box: 13079  
Ft. Lauderdale, Florida 33316  
[KBrandenburg@cliffberryinc.com](mailto:KBrandenburg@cliffberryinc.com)

**RE: First Request for Additional Information (RAI)**  
Duval County – Hazardous Waste  
Facility Name: Cliff Berry Inc. – Jacksonville Facility  
EPA ID Number: FLR 000 119 784  
Current Permit Number: 249482-003-HO  
DEP Application Number: 249482-004-HO

Dear Ms. Brandenburg:

Thank you for your application for renewal of the Used Oil Processing Permit for the above referenced Facility. The Department has assigned DEP Application No. 249482-004-HO to the application. A Department staff review of the application and supporting documentation submitted on February 12, 2018, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, April 6, 2018, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

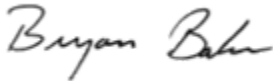
Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bradley.Buselli@floridadep.gov](mailto:Bradley.Buselli@floridadep.gov). If the file is very large, you may post it to a folder on this

Ms. Kelly Brandenburg  
Page 2 of 5  
March 6, 2018

office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bradley.Buselli@floridadep.gov](mailto:Bradley.Buselli@floridadep.gov), alerting us that it has been posted.

If you have any questions, please contact Bradley Buselli by telephone at 850-245-8989 or by e-mail at [Bradley.Buselli@floridadep.gov](mailto:Bradley.Buselli@floridadep.gov).

Sincerely,



Bryan Baker, P.G., Administrator  
Hazardous Waste Program and Permitting

Attached: List of Requested Information

cc:

Ashanti McBride, DEP OGC, [ashanti.mcbride@floridadep.gov](mailto:ashanti.mcbride@floridadep.gov)  
Bheem Kothur, DEP Headquarters, [bheem.kothur@floridadep.gov](mailto:bheem.kothur@floridadep.gov)  
Dawn Cinquino, DEP Headquarters, [dawn.cinquino@floridadep.gov](mailto:dawn.cinquino@floridadep.gov)  
Tor Benjar, DEP Headquarters, [tor.benjar@floridadep.gov](mailto:tor.benjar@floridadep.gov)  
Pam Fellabaum, DEP Northeast District, [pam.fellabaum@floridadep.gov](mailto:pam.fellabaum@floridadep.gov)  
Deris Bardales, BDH Consulting Group, LLC, [deris@bdhcg.com](mailto:deris@bdhcg.com)

### **Attachment: List of Requested Information**

Facility Name: Cliff Berry Inc. – Jacksonville Facility  
EPA ID Number: FLR 000 119 784  
Current Permit Number: 249482-003-HO  
DEP Application Number: 249482-004-HO

**Review Comments:** Comments for the used oil permit renewal application are included below. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

**1. Attachment 2, Description of Process:**

- a. On a recent site visit the inspector observed several 55-gallon drums of various materials and a mobile tank truck holding PCW stored on the sloped concrete pad at the truck unloading area. Please provide more details in this section for the truck unloading area, regarding how long materials are kept onsite at this location prior to being placed into storage or sent to an offsite facility.
- b. Table #1: The products listed for existing tanks in Table #1 do not match current tank usage on site. Tanks 01A, 01B, and 02 should be designated for used oil and Tank 03 should be designated for PCW. In addition, under Material of Construction, this table does not state that these tanks are “Steel, double walled” as does Table #1 in the SPCC. Please revise this table and resubmit an updated version to be inserted into the final permit document.

**2. Attachment 9, Closure Plan - Introduction:** This section states that “the facility has the capacity of storing 40,000 gallons of used oil, oily waste or PCW in existing tanks,” and that three additional tanks are proposed for installation in 2020. The stated capacity does not match the total capacity of currently installed tanks listed in Table #1. In addition, there are several other tanks that are proposed for installation according to the tank table and current operating permit. Please clarify or revise the stated capacity of 40,000 gallons, indicate in the text which tanks are proposed for installation in 2020, and provide an approximate timeframe when the other proposed tanks will be installed. Please also update the information in Attachment 1 - paragraph 2, to reflect these future operational changes and resubmit all affected pages.

**3. Attachment 11, SPCC Plan (multiple sections):**

- a. Section 1 - Storage Tank Periodic Integrity Testing: Paragraph 1 states that the next inspection and certification will be performed in 2018. Since we are already in March of 2018, please provide the anticipated date (month) for the inspection.
- b. Section 3 - Oily Waste Water and Used Oil Storage Tank Farm:
  - (1) On Shore Storage: This section references “Cliff Berry, Inc.’s *waste oil* storage tank farm and truck loading facility...” The term “waste oil” refers to used oil that has been mixed with a hazardous waste, which is not interchangeable with the term “used oil.” Please revise and resubmit this section with the appropriate term for your operation.

- (2) **Dikes, Berms, or Retaining Walls**: This section states that secondary containment is provided by an impervious concrete slab, and that all storage tanks are anchored to the concrete pad within the retaining wall. However, on a recent site visit the inspector noticed that the slab did not appear to be completely sealed and impervious, and that tanks were not anchored. Please review this section and provide more information on the impervious nature of the secondary containment area. Note that the permit application must reflect current conditions on site. If the secondary containment area currently holds only double-walled tanks and will be sealed prior to installing single-walled tanks, please state that in this section.
  - (3) **Table #1**: The tank table provided in this section does not match the Table #1 version provided in Attachment 2. Specifically, proposed tank 2 (to replace old tank 2) is not listed, and the sizes of proposed tanks 8 & 9 are different from the other table as well as the proposed site map. Please see comment 1.b. above. Revise and resubmit an updated version of the table in this section.
  - c. **Section 7 - Materials**: It is stated that the location of emergency response materials is “shown on the site map in Section 9,” however there is no map provided in that section. Please provide a site map showing the location of emergency equipment and update the reference to its location in the text as needed.
  - d. **Section 9 - Facility Emergency**: The verbiage in this section indicates that the facility is an “Oily Wastewater Transfer Facility.” Please revise and resubmit this section to match the information provided in Attachment 1 and as indicated on current DEP Form 8700-12FL.
4. **Attachment 13, Site Drawings**: This section provides an aerial photograph depicting the site layout and orientation of tanks in the storage area; however, the tanks are not labeled correctly in the image (tanks 2 and 3 appear to be switched). Also, the site map provided in Section 2 of the SPCC dated September 24, 2008 does not match the current tank configuration. Please provide a current site plan to be inserted into the final permit document.

**Typographical Errors**: The following typographical errors were observed in the permit application. Revisions for these items are not required to be submitted; however, please note them for future submissions.

1. **Attachment 2, Description of Process**: This section states that “we do not pick up materials with halogens above 1,000 parts per million (ppm).” Based on other elements of the permit application this should state 1,000 parts per million (ppm).
2. **Attachment 11, SPCC Plan (multiple sections)**:
  - a. **Section 11 - Fire Response (page 3, Fire and Explosion)**: In the second bullet, the word ‘send’ is used; should the word be ‘second’ instead?
  - b. **Section 12 - Explosion Response**:
    - (1) **Item 4.g.iii (page2)**: The word ‘cab’ is used; should the word be “can”

instead?

- (2) Item 5 (page 2): The sentence states “any boxed (cardboard, metal o wood);” should it be ‘or’ instead?
- c. Section 15 – Inclement Weather (page 2, Preparations for Hurricanes): The first line on this page references the South Florida area, however the CBI Jacksonville facility is located in North Florida.