

Cliff Berry, Inc. Environmental Services

March 21, 2022

Florida Dept of Environmental Protection Bob Martinez Center 2600 Blair Stone Road Tallahassee, FL 32399-2400 Michell Mason Smith, Environmental Administrator Hazardous Waste Program and Permitting

RE: Response to RAI 3/8/2022 Facility Name: Cliff Berry, Inc. – Port Evergaldes EPA ID Number: FLR 000 083 071 Current Permit Numbers: 00192423-007-HO & 00192423-008-SO DEP Application Number: 00192423-009-HO and 000192423-010-SO

The following document and attachments are in response to the Request for Additional Information (RAI) received from FDEP on March 8, 2022. Responses by CBI to FDEP are in red.

- 1. Item B.1. of the Solid Waste Application FormL A description of the operation of the facility including (62-701.710(2)(a):
 - **a.** The types of materials, ie wastes, recyclable materials or recovered materials to be managed or processed

Facility will accept non-hazardous, oil contaminated solid wastes that do not qualify as used oil, including, but not limited to, used oil filters, rags, absorbent pads, booms, filters, and kitty litter.

b. The expected daily average and maximum weights or volumes of materials to be managed or processed

All non-hazardous oil contaminated solid waste received at the site for bulking will be received either in drums or other small closed containers appropriate for their contents and properly labeled and marked. The maximum number of drums containing oil contaminated solid wastes shall not exceed twenty 55-gallon drums at any one time. The expected volume of processed solid waste at this facility is 20 to 50 cubic yards per day.

c. How will the materials be managed or processed

All non-hazardous oil contaminated solid waste received at the site for bulking will be received either in drums or containers in the storage and truck wash facility. Prior to acceptance of petroleum contaminated soil at the facility, CBI shall obtain from the generator a signed Profile Document which demonstrates that the waste is non-hazardous, which is either backed up with analysis or generator knowledge. The waste will be bulked and /or processed for acceptance at permitted solid waste disposal facilities. The oily solid wastes are processed and bulked together with solid waste generated from the truck wash oil water separator into roll-off container. Processed oily solids shall be stored in covered, lined roll-off containers or covered drums on impervious surfaces. The number of containers storing processed oily solids wastes, along with truck wash solids, awaiting disposal shall not exceed one (1) 40-cubic yard roll-off containers or two (2) 20-yard roll off containers.



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d. How will the materials flow through the facility including locations of the loading, unloading, sorting, processing and storage areas.

See response to 1(c) above for material flow response. Also, figure attached to response visually showing the projected location of the containment pad that is proposed for future site of the solid processing area. The facility's solid waste management area consists of 0.16 acres of building area for drum storage and a 75-feet by 95-feet roll-off /solidification area.

e. The types of equipment that will be used

Any blending, bulking and solidification of non-regulated solid waste will occur in rolloff box(es). This same roll-off box will be used to transport the processed waste to a licensed and permitted solid waste facility by CBI or other appropriately licensed and permitted waste transporter. All materials shall be processed and managed on impervious surfaces. There shall be no intermediate storage of treated or untreated waste outside the covered, oil-tight rolloff(s). A forklift and drum grappler will be utilized to handle the drums.

f. The maximum time materials will be stored at the facility The materials will be stored for a maximum of 30 days.

g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time

The expected volume of solid waste at this facility is 20 to 50 cubic yards per day. The maximum number of drums containing oil contaminated solid wastes shall not exceed twenty 55-gallon drums at any one time.

h. The expected disposition of materials after leaving the facility. This roll-off box(es) will be transported to a licensed and permitted solid waste facility by CBI or other appropriately licensed and permitted waste transporter. At this time, we use Waste Management and Wheelabrator.

2. Item B.9 of the Solid Waste Application Form History and description of any enforcement actions related to solid waste management facilities in Florida owned by the applicant.

CBI has two other solid waste facilities, one in Tampa FLR 000 013 888 and one in Miami FLD 058 560 699. Both facilities are in good standing and I am unaware of previous enforcement actions related to either one.

- 3. Used Oil Processing Facility Permit Application, A General Information, Item 1 and 2, Page 1 of 9: Please insert the current permit expiration date and revision number. Revised and Attached
- 4. Used Oil Processing Facility Permit Application, A General Information, Item 14, Page 2 of 9: Please provide the name of the Professional Engineer, registration number, telephone, email, mailing address. Revised and Attached
- 5. Used Oil Processing Facility Permit Application, C Operating Information, Item 1, Page 3 of 9: Correct Haz Waste Generator status from CESQG to VSQG Revised and Attached

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- 6. Attachment 1: A brief description of the facility operations: CBI Fort Pierce has two registered tanks, not one. Revised and Attached
- 7. **CBI Port Everglades Facility Tank Farm Revised Site Plan Map**, needs to be updated based on Table #1 Vertical Tanks. Storage Tanks 12-16 are installed in 2013 and they are not Proposed Vertical Storage Tanks anymore. Revised and Attached
- 8. **Provide CBI Port Everglades Facility Tank Farm Revised Site Plan Map** in Word document. Attached
- 9. Provide Tank Table with all the information in Word. Attached

Thank you for your work on this renewal and I look forward to finalizing the project.

Sincerely, Kelly Brandenburg

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