

Kothur, Bheem

From: Winston, Kathy
Sent: Wednesday, June 27, 2012 4:09 PM
To: Kothur, Bheem; Carman, Roger
Subject: FW: Change 3 to CBI Port Everglades SPCCP
Attachments: CBI PE SPCCP change 3.pdf

File: C:\PFD :
FLR 000 083 071
print applied, related
Revised Date: 6/27/12
Rec'd: 6/27/12

From: Steve Collins [<mailto:SCollins@cliffberryinc.com>]
Sent: Wednesday, June 27, 2012 4:01 PM
To: Winston, Kathy
Cc: Bill Parkes
Subject: Change 3 to CBI Port Everglades SPCCP

Please annotate the following as Change 3 to the CBI Port Everglades SPCC Plan of March 2012, to wit:

- In Section 2, remove the "C.B.I. Port Everglades Facility Tank Farm – Site Plan..." and replace it with the attached "C.B.I. Port Everglades Facility Tank Farm – Revised Site Plan..."
- In Section 2, remove page 2 "Table #1" and replace it with the attached page 2 "Table #1" showing future plans for new tanks numbered 12, 13, 14, 15, & 16.

Best regards,

Steve

Steve Collins, CHMM
Manager of Health & Safety and Regulatory Affairs
Cliff Berry, Inc. (954) 763-3390





Florida Department of Environmental Protection

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

DEP Form #62-710.901(7)
Form Title Used Oil Facility Financial Assurance Closing Cost Estimate Form
Effective Date June 9, 2005

Used Oil Processing Facility Closing Cost Estimate Form

Date: June 27, 2012

Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 26° 07' 00" Longitude: 80° 07' 57.6" EPA ID Number: FLR 000 083 071

Facility Name: Cliff Berry Inc., Port Everglades Facility Permit Number: 192423 HO-06 001

Facility Address: 3400 S.E 9th Avenue, Dania Beach, FL 33316

Mailing Address: P.O. Box 13079, Fort Lauderdale, Florida 33316

Contact Person's Name: William E. Parkes, Jr. Phone Number: 954-763-3390

Fax Number: 954-763-8375

Email: bparkes@cliffberryinc.com

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

- Letter of Credit* _____ Performance Bond* _____ Guaranty Bond* *Indicate mechanisms that require use of a Standby Trust Fund Agreement
- _____ Insurance Certificate _____ Financial Test _____ Trust Fund Agreement

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

(a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at <http://www.dep.state.fl.us/waste/categories/swfr/>

This adjustment is based on the Department approved closing cost estimate dated: _____

_____	X	_____	=	_____
Latest DEP approved Closing Cost Estimate		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Estimate

Signature: _____ Phone: _____

Name and Title: _____ E-Mail: _____

If you have questions concerning this form, please contact the Used Oil Permitting Coordinator at the address below, by phone at (850) 245-8781, or by E-Mail at: Bheem.Kothur@dep.state.fl.us

Please mail this completed cost estimate to:

Please email or mail a copy of the cost estimate to:

Used Oil Permitting Coordinator
MS4560
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Solid.Waste.Financial.Coordinator@dep.state.fl.us
Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

*original 1st Trone
cost estimate 02*

(b) Recalculated Cost Estimates (complete items IV and V)

IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing **most expensive**.

Third Party Estimate/Quote must be provided for each item.
Costs must be for a third party providing all materials and labor.

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL
1. Decontamination and Disposal				
Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil tanks, containers, piping, equipment and secondary containment decontamination	Tank	15	\$1,400.00	\$21,000.00
<i>" " " " " 0.5 MG</i>	Tank	1	\$3,500.00	\$ 3,500.00
waste characterization	Test	9	\$1,040.00	\$ 9,360.00
disposal	Drum	24	\$1,200.00	\$28,800.00
b. Wash water waste characterization	Test	3	\$1,040.00	\$ 3,120.00
disposal	Drum	6	\$1,200.00	\$ 7,200.00
c. Sludges/ sediment waste characterization	Test	11	\$1,040.00	\$11,440.00
disposal	Vac. Box	10	\$1,200.00	\$12,000.00
* d. Used oil filter management <i>Solid Waste</i>	Roll-Off	1	\$ 200.00	\$ 200.00
waste characterization	DRUMS	5	\$ 50.00	\$ 250.00
disposal	Roll-Off	1	\$ 500.00	\$ 500.00
<i>" " " "</i>	DRUMS	20	\$ 75.00	\$ 1,500.00
** e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipment and secondary containment waste characterization	Test	3	\$1,040.00	\$ 3,120.00
disposal	Drum	4	\$1,200.00	\$ 4,800.00
	4,000 GAL TANK	1	\$2,000.00	\$ 2,000.00
f. Mobilization Costs	L.S.	1	\$5,280.00	\$ 5,280.00
g. other _____	_____	_____	_____	_____

Subtotal (1) Decontamination/Disposal: \$114,070.00

* Roll-off & 20 Drums Filled w/Petroleum Related Solid Waste Stored In Solid Waste Building,
** 4,000 Gals Tank w/Oily Water Stored In Solid Waste Building.

2. Engineering (on-site inspections and Quality Assurance are to be included in this item).

a. Closure sampling and analysis plan implementation as described in the permit application \$ 6,000.00
b. Closure Certification Report \$ 3,000.00

Subtotal (2) Professional Services: \$ 9,000.00

Subtotal of (1) and (2) Above: \$123,070.00

3. Contingency (10% of the Subtotal) \$ 12,307.00

Closing Cost Subtotal: \$135,377.00

TOTAL CLOSING COST: \$135,377.00

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Financial Assurance Cost Estimates pertaining to the engineering features of the this solid waste management facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.), Rule 62-701.630 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Financial Assurance Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1 of each year and revised, adjusted and updated as required by Rule 62-701.630(4), F.A.C.

used oil/a

For 62-710.800(6)
D.M. Ambrose

Signature of Engineer

D.M. Ambrose, P.E.
Engineer's Name and Title (please print or type)

12831
Florida Registration Number (please print or type)

P.O. Box 2368, Blowing Rock, N.C. 28605
Engineer's Mailing Address

828-295-6144
Engineer's Telephone Number

dmambrose144@gmail.com
Engineer's email address

Cliff Berry, II
Signature of Owner/Operator

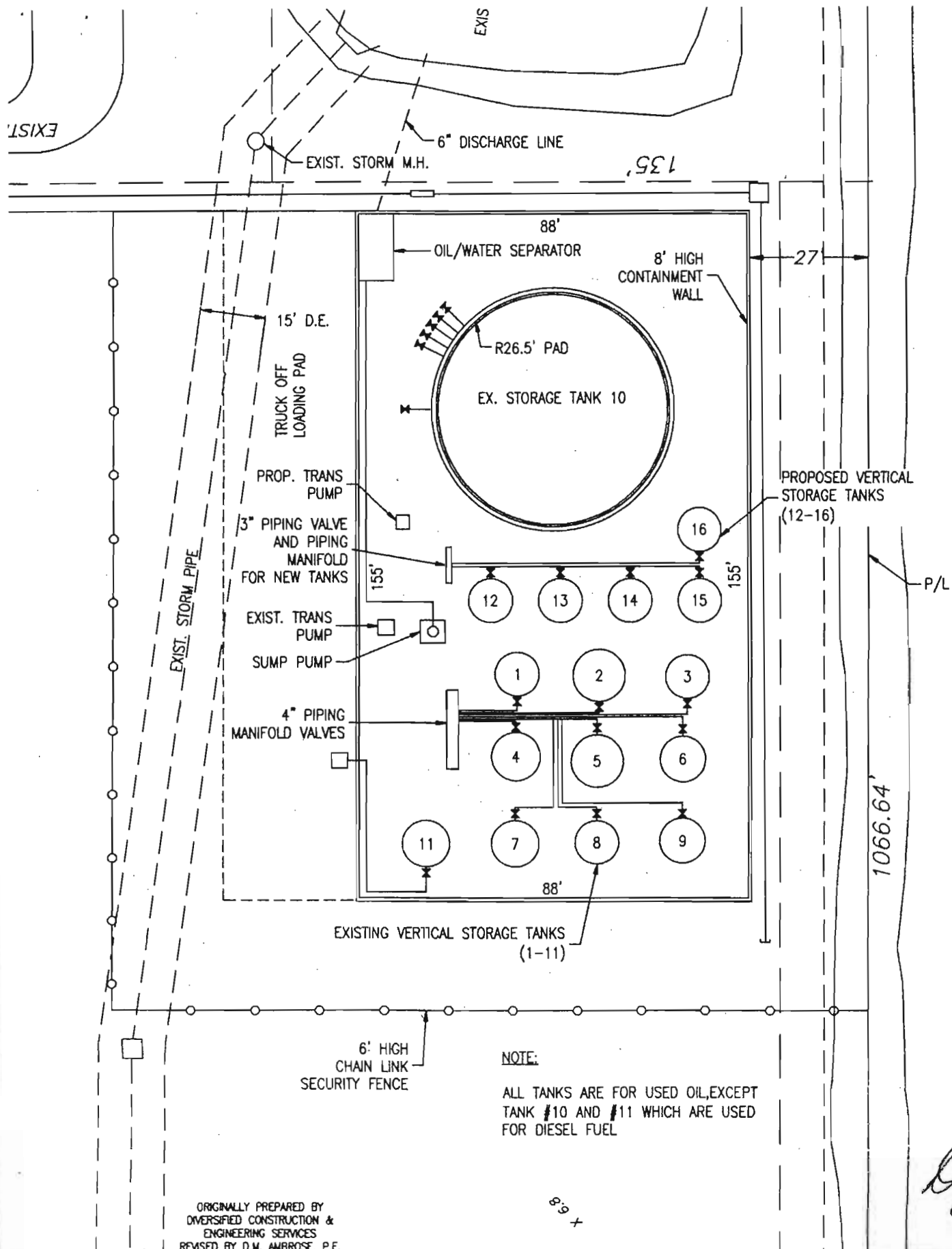
Cliff Berry, II, President
Owner's Name and Title (please print or type)

954-763-3390
Owner/Operator's Telephone Number

cb2@cliffberryinc.com
Owner/Operator's E-Mail Address

**Table #1
Vertical Tanks**

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01 (AST)	12/05	24,500	Steel	Used Oil/Water
02 (AST)	12/05	24,500	Steel	Used Oil/Water
03 (AST)	12/05	30,000	Steel	Used Oil/Water
04 (AST)	12/05	15,500	Steel	Used Oil/Water
05 (AST)	12/05	30,000	Steel	Used Oil/Water
06 (AST)	12/05	30,000	Steel	Used Oil/Water
07 (AST)	03/08	30,000	Steel	Used Oil/Water
08 (AST)	3/08	30,000	Steel	Used Oil/Water
09 (AST)	3/08	30,000	Steel	Used Oil/Water
10 (AST)	12/05	499,044	Steel	Diesel Fuel
11 (AST)	12/05	17,700	Steel	Diesel Fuel
12 (AST)	Proposed	12,000	Steel	Used Oil/Water
13 (AST)	Proposed	12,000	Steel	Used Oil/Water
14 (AST)	Proposed	12,000	Steel	Used Oil/Water
15 (AST)	Proposed	12,000	Steel	Used Oil/Water
16 (AST)	Proposed	12,000	Steel	Used Oil/Water



NOTE:
 ALL TANKS ARE FOR USED OIL, EXCEPT TANK #10 AND #11 WHICH ARE USED FOR DIESEL FUEL

DMA
 6/12/12

ORIGINALLY PREPARED BY
 DIVERSIFIED CONSTRUCTION &
 ENGINEERING SERVICES
 REVISED BY D.M. AMBROSE, P.E.

SCALE:	1" = 30'
DATE:	6/9/12
DRAWN BY:	RCW
CHECKED BY:	DMA
DESIGNED BY:	DMA

D.M. AMBROSE, CIVIL ENGINEER

CONSULTING ENGINEER
 P.O. BOX 2898 BLOWING ROCK, NC 28605
 PHONE: 828-295-4144 - 828-295-0284

**C.B.I. PORT EVERGLADES FACILITY
 TANK FARM - REVISED SITE PLAN
 3400 SE 9TH AVENUE DANIA BEACH,
 FLORIDA 33316**

Table #1
Vertical Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01 (AST)	12/05	24,500	Steel	Used Oil/Water
02 (AST)	12/05	24,500	Steel	Used Oil/Water
03 (AST)	12/05	30,000	Steel	Used Oil/Water
04 (AST)	12/05	15,500	Steel	Used Oil/Water
05 (AST)	12/05	30,000	Steel	Used Oil/Water
06 (AST)	12/05	30,000	Steel	Used Oil/Water
07 (AST)	03/08	30,000	Steel	Used Oil/Water
08 (AST)	3/08	30,000	Steel	Used Oil/Water
09 (AST)	3/08	30,000	Steel	Used Oil/Water
10 (AST)	12/05	499,044	Steel	Diesel Fuel
11 (AST)	12/05	17,700	Steel	Diesel Fuel
12 (AST)	Proposed	12,000	Steel	Used Oil/Water
13 (AST)	Proposed	12,000	Steel	Used Oil/Water
14 (AST)	Proposed	12,000	Steel	Used Oil/Water
15 (AST)	Proposed	12,000	Steel	Used Oil/Water
16 (AST)	Proposed	12,000	Steel	Used Oil/Water

Kothur, Bheem

From: Martin, Lee
Sent: Wednesday, June 27, 2012 3:55 PM
To: Kothur, Bheem
Subject: RE: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Thanks Bheem, I didn't have any additional comments but in going through the RAI information again I couldn't find a frequency for how often the rolloff container or drums for bulked solid wastes will be disposed (daily, weekly, monthly, every 30 days, etc) for the permit, but that is probably something I could just call Bill Parkes and get an answer if that is OK with you. Thanks, Lee

Lee Martin, P.E.
Solid Waste Section
850-245-8734 Fax 850-245-8811
Lee.Martin@dep.state.fl.us

From: Kothur, Bheem
Sent: Wednesday, June 20, 2012 4:28 PM
To: 'Bill Parkes'
Cc: Martin, Lee
Subject: FW: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Bill,
Please review the below comment from the district and revise as appropriate and resubmit the revised pages to the permit application.

Bheem

From: Winston, Kathy
Sent: Tuesday, June 12, 2012 4:24 PM
To: Kothur, Bheem
Subject: RE: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

As far as the location of the emergency equipment, they sort of answered the question and should probably just add this description onto the emergency equipment list – can be found in one of these places “housed in stand- alone 20 foot shipping containers, in spill trailers, on shelving in the new maintenance building, on vehicles or in the inventory room.” The information provided concerning operations at the new bulking facility seems to address my concerns; however, should any situations arise at the new facility which are not present in Miami, it would be expected that CBI would offer up this information so it can be determine whether a permit modification is necessary.

From: Kothur, Bheem
Sent: Tuesday, June 12, 2012 4:07 PM
To: Winston, Kathy; Martin, Lee
Cc: Tripp, Anthony
Subject: FW: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Hi Kathy,
Please review below responses from CBI, Inc. and let me know.
Thanks.
Bheem

From: Bill Parkes [<mailto:BParkes@cliffberryinc.com>]
Sent: Tuesday, June 12, 2012 3:41 PM
To: Kothur, Bheem
Subject: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Bheem –

Please note CBI's response below:

1. "Nowhere in the Contingency Plan do they discuss the locations of emergency equipment. The plan list what is available and its' capabilities but not where it is located on the site."

REPLY:

A. The location of emergency fire equipment is shown on the Site Plan following page 1 in Section 11.
B. The location of emergency response vehicles is shown in column one of the Vehicle Equipment List in Section 7.
C. The Materials List in Section 7 is emergency response equipment that is on the property, typically housed in stand- alone 20 foot shipping containers, in spill trailers, on shelving in the new maintenance building, on vehicles or in the inventory room. As this material is in constant flux due to operational usage and is constantly being replenished it seems imprudent to be more specific since the list of materials and locations is dynamic. CBI does not merely stow the materials for future use because materials age and may degrade during storage. We use it and replenish it so that the stock remains current. We recognize the burden we impose on the government from being less specific in location than other equipment but we anticipate FDEP support in understanding that due to operational commitments being more specific would provide no greater clarity for planning purposes than to simply identify it in the Materials List for the facility. If FDEP has suggested matrices we would be more than happy to create concomitant tables to rectify any perceived shortfall.

2. "I also felt like they referred back to CBI – Miami an awful lot. Basically saying we will run the new bulking facility like CBI – Miami is run now but there are always site specific issue that need to be addressed."

REPLY:

CBI has been bulking materials for decades in Miami so it is natural to draw on that body of knowledge for developing processes and procedures for bulking operations in Port Everglades. As the overlap has too much of the flavor of Miami, we will amend the practices and procedures to more thoroughly reflect Port Everglades. We will make the following revisions:

- a. CBI Port Everglades facility will bulk items which have been reviewed and meet the nonhazardous criteria set forth in CBI's waste analysis plan and therefore are approved for bulking at this facility.
- b. These items will be received in individual containers (sized from 5 gal to totes or cubic yard boxes) or in bulk loads via vacuum truck.
- c. They will be processed in the sloped truck wash bay or directly dumped into roll off boxes or dump trailers.
- d. A consolidation log will be maintained as the bulk containers are filled. The log will include the name of the generator, the inbound manifest number, and the number and size of the containers dumped.
- e. The log will be filed as an attachment to the outbound manifest along with a copy of the weight ticket.
- f. The work will only be done inside those areas of the building that are contained with berms.
- g. The bulking area is well ventilated with a floor to ceiling opening on one end and partial walls on the other end allowing for natural ventilation (fans are not required but are installed and available).

- h. There is a stop rail installed in the floor to keep a truck from sliding down the ramp into the eastern wall. The area is sloped permitting gross separation of liquids and solids through gravity separation.
- i. The second wash bay within the building is also contained with berms and allows us to stage the dump truck or roll off box for collection of bulked waste, either by tipping the drums or collecting solids picked-up from the sloped wash bay with a back hoe and then loaded into the bulk container.
- j. The bays have all appropriate safety equipment including fire extinguishers and first aid supplies.

Best regards,

Steve

Steve Collins, CHMM
Manager of Health & Safety and Regulatory Affairs
Cliff Berry, Inc. (954) 763-3390

<< OLE Object: Picture (Device Independent Bitmap) >>

From: Bill Parkes

Sent: Friday, June 08, 2012 1:45 PM

To: Steve Collins; Daniel Forehand

Subject: FW: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Steve / Daniel –

Please see the response below from Kathy Winston, FDEP Southeast District concerning the CBI – Port Everglades Facility submittal.

If you can get me the response by early next week, I can send it to the FDEP in Tallahassee before I leave on vacation next weekend.

Regards,

Bill

From: Kothur, Bheem [<mailto:Bheem.Kothur@dep.state.fl.us>]

Sent: Friday, June 08, 2012 8:13 AM

To: Bill Parkes

Subject: FW: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Hello Bill,

Please review e-mail comments from Kathy Winston, from our district office and revise and resubmit the appropriate changes as soon as possible.

Thanks.

Bheem

From: Winston, Kathy

Sent: Monday, June 04, 2012 3:14 PM

To: Kothur, Bheem

Subject: FW: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

I have looked through CBI – Port Everglades NOD submittals and still feel like it is lacking. Nowhere in the Contingency Plan do they discuss the locations of emergency equipment. The plan list what is available and its' capabilities but not

where it is located on the site. I also felt like they referred back to CBI – Miami an awful lot. Basically saying we will run the new bulking facility like CBI – Miami is run now but there are always site specific issue that need to be addressed.

From: Kothur, Bheem
Sent: Thursday, May 17, 2012 3:39 PM
To: 'Bill Parkes'
Cc: Tripp, Anthony; Martin, Lee; Winston, Kathy; Kothur, Bheem; Stein, Camille
Subject: FW: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Hello Bill,
As you know the dead line is fast approaching.
Please send your responses to the above cc list, through an electronic format (pdf) and a hard copy in the mail.
Thanks.

Bheem

From: Kothur, Bheem
Sent: Tuesday, April 24, 2012 4:06 PM
To: 'Bill Parkes'
Cc: Tripp, Anthony; Martin, Lee; Winston, Kathy
Subject: FW: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Hello Bill,
I have received, reviewed and approved the time extension request.
The due date to submit the responses are no later than May 23, 2012.

If you have any questions, let me know.

Bheem

From: Bill Parkes [<mailto:BParkes@cliffberryinc.com>]
Sent: Tuesday, April 24, 2012 1:27 PM
To: Kothur, Bheem
Subject: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

Bheem –

In reference to the attached Cliff Berry, Inc. - Permit Application Request for Additional Information from the FDEP in Tallahassee regarding the renewal of our Used Oil Processing Facility Permit and modification of this permit for the processing / bulking of solid waste at the CBI – Port Everglades Facility, CBI would like to respectfully request an additional 30 days to respond with the additional information requested by the FDEP.

This request is made due to a current heavy work load and time constraints at CBI. The requested additional information will be provided to the FDEP in Tallahassee by Wednesday, May 23, 2012.

Thank you in advance for consideration of this request.

Regards,

Bill

From: Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]

Sent: Friday, March 23, 2012 12:50 PM

To: Bill Parkes

Cc: Bahr, Tim; Coates, John; Kothur, Bheem; Tripp, Anthony; Kantor, Karen E.; Winston, Kathy; Martin, Lee; Wick, Fred; Holmes, Georgiana; Bejnar, Tor; ambrosefox@charter.net

Subject: Cliff Berry Inc.-Port Everglades, FLR000083071, Permit Application Request for Additional Information

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. (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.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).