

Thursby, Kim

From: Kelly Brandenburg <compliance@cliffberryinc.com>
Sent: Tuesday, March 5, 2019 12:26 PM
To: Thursby, Kim
Cc: Baker, Bryan; Walker, Kim (Waste); McBride, Ashanti; Jarmolowski, James; Dilmore, Cory; Buselli, Bradley; Ashwood, Janet; Knauss, Elizabeth; Kennedy, Shannon; Financial Assurance Working Group; Kothur, Bheem
Subject: RE: Cliff Berry, Inc. Tampa; FLR 000 013 888;First Request for Additional Information (RAI)
Attachments: Engineers Stamped Page - Used Oil Processing & Solids Processing 2109.pdf

We have received your RAI. I have attached the engineer stamped pages and I will mail originals with the RAI response. I believe we may have questions about the RAI, but I need some time to go through it first in detail. I will be in touch if we need a conference call.

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

From: Thursby, Kim <Kim.Thursby@dep.state.fl.us>
Sent: Friday, March 01, 2019 8:18 AM
To: Kelly Brandenburg <compliance@cliffberryinc.com>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>; Jarmolowski, James <James.Jarmolowski@dep.state.fl.us>; Dilmore, Cory <Cory.Dilmore@dep.state.fl.us>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>; Ashwood, Janet <Janet.Ashwood@dep.state.fl.us>; Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Financial Assurance Working Group <Financial.Assurance.Working.Group@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: Cliff Berry, Inc. Tampa; FLR 000 013 888;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. (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.

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, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

March 1, 2019

Kelly Brandenburg, Manager – Regulatory Affairs and Special Projects
P.O. Box 13079
Fort Lauderdale, Florida 33316
kbrandenburg@cliffberryinc.com

Re: **First Request for Additional Information (RAI)**
Hillsborough County – Hazardous Waste
Facility Name: Cliff Berry, Inc. Tampa - Facility
EPA ID Number: FLR 000 013 888
Current Permit Numbers: 76517-007-HO & 76517-008-SO
DEP Application Numbers: 76517-009-HO and 76517-010-SO

Dear Ms. Brandenburg:

Thank you for your Used Oil Processing Permit renewal applications for the above referenced Facility. The Department has assigned DEP Application No. 76517-009-HO and 76517-010-SO to the application. A Department staff review of the application and supporting documentation dated February 11, 2019, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800(3), 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, March 31, 2019 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, with a copy to bheem.kothur@floridadep.gov. If the file is very large, you may post it to a folder on this 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

Ms. Kelly Brandenburg

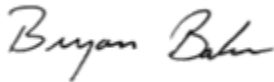
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March 1, 2019

posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to bheem.kothur@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur by telephone at 850-245-8781 or by e-mail at bheem.kothur@floridadep.gov.

Sincerely,



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

Attached: List of Requested Information

cc (w. Attachments):

Ashanti McBride, DEP OGC, ashanti.mcbride@floridadep.gov

James Jarmolowski, DEP Headquarters, james.jarmolowski@floridadep.gov

Cory Dilmore, DEP Headquarters, cory.dilmore@floridadep.gov

Bradley Buselli, DEP Headquarters, bradley.buselli@floridadep.gov

Janet Ashwood, DEP Headquarters, janet.ashwood@floridadep.gov

Elizabeth Knauss, DEP Southwest District, elizabeth.knauss@floridadep.gov

Shannon Kennedy, DEP Southwest District, shannon.kennedy@floridadep.gov

Financial Assurance Working Group, DEP Headquarters,

financial.assurance.working.group@floridadep.gov

Attachment: List of Requested Information

Facility Name: Cliff Berry, Inc. – Tampa
EPA ID Number: FLR 000 013 888
Current Permit Numbers: 76517-007-HO & 76517-008-SO
DEP Application Number: 76517-009-HO and 76517-010-SO

Review Comments: The renewal application has been reviewed with respect to the applicable requirements in 62-710.800, F.A.C; comments are included below. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

1. **Application, DEP Form 62-710.901(6):**
 - a. **Part II, Page 8 of 8, P.E. Certification, Signature, and Date:** Please review this page and complete as appropriate and resubmit.
2. **Items 2 Attachment 2 Through Items 2 Attachment 8 and Attachment 10:** Please review these Items and Attachments, paginate and date as appropriate and resubmit.
3. **Attachment 10, Training, Page 35:** Refrigerant leak detectors can also react to flammable vapors. If a Dexil test indicates halogens are not present, but the sniffer still gives a positive response, flammable liquids like gasoline are likely to be mixed with the used oil. How will the drivers ensure that the material is classified correctly for USDOT compliance? See 40 CFR 279.43(b).
4. **Attachment 11:** There are a large number of containers south of the solid waste processing building, including containers in the storm water retention area. Containers holding used oil must not be stored outside of secondary containment. Please review and revise as appropriate.
5. **Attachment 11, Spill Prevention Control & Countermeasure Plan and Contingency Plan and Emergency Response:** These documents were last revised on January 11, 2017 and Certification of SPCC Plan was on September 11, 2013: Please review, revise and update the Certification as of today and resubmit.
6. **Tank Tables and Site Plan Figures:** The tank tables and facility site plan figures are not consistent. Please review these two documents and revise as appropriate of the renewal application and resubmit.
7. **General Comment:** The facility has not applied for coverage under the NPDES multi sector generic storm water permit (MSGP). Used Oil recycling facilities are regulated under Sector N. For additional information. Please contact the DEP Southwest District Office, Compliance Section.

Solid Waste Renewal Application Review Comments: A renewal application for a Waste Processing Facility dated February 11, 2019, was submitted on February 14, 2019. The renewal application for a material processing facility has been reviewed with respect to the applicable requirements in 62-701.710, F.A.C. The following items are provided:

1. DEP Form # 62-701.900(4), Application for Operation of a Waste Processing Facility, was not signed and sealed by a Professional Engineer. A note on the signature page indicated that the sealed page would be submitted by February 20, 2019. The sealed page should be submitted as indicated. Rule reference: 62-701.710(2). F.A.C.
2. The Waste Processing Permit Application contained multiple maps, which included a site plan that contained the locations of fire extinguishers; a soil survey map; a map that showed expansion plans for the used oil processing facility; and an aerial photograph dated June 11, 2014. The site plan indicating the locations of the fire extinguishers contained font that was either blurry or too small. Based on review of the maps in the Waste Processing Permit Application, the Solid Waste Section has determined that the maps submitted thus far do not meet the requirements specified in rule 62-701.710(2)(b), F.A.C. As a result, pursuant to 62-701.710(2)(b), a site plan that shows the facility location, total acreage of the site, and other relevant features such as water bodies, or wetlands within 200 feet of the site, and potable wells within 500 feet of the site, should be submitted. The site plan should have a scale not greater than 200 feet to one inch and be signed and sealed by a professional engineer pursuant to Chapter 471, Florida Statutes. Rule reference: 62-701.710(2)(b), F.A.C.
3. The description of the operations indicated that the expected volume of waste is estimated to be 40 tons per month for solid waste processing/bulking of non-hazardous solids. Pursuant to 62-701.710(2)(a), F.A.C., please provide additional information regarding the following items:
 - a. Section A, Item 15 indicates that the expected volume of waste to be received is 5 yds³/day, which does not appear to be consistent with the expected volume of 40 tons per month. Please revise as needed.
 - b. It was indicated that non-hazardous solids are received in 55-gallon drums for placement in a bulk container. Where on the facility are the bulking operations conducted? Please identify all areas on-site where bulking operations are conducted.
 - c. What types of materials are bulked? Please identify all types of materials received for bulking.
 - d. What type of container is used for bulking operations? Are there multiple types of containers? Please identify all types of containers used for bulking.

- e. It was indicated that if any 55-gallon drums are found that do not meet applicable profile criteria, that “The drums will be rejected and sent off site for alternative waste disposal.” Please identify the alternative disposal method, and applicable facility.
 - f. Please identify the specific equipment used for bulking operations.
 - g. Please identify how long bulk containers are stored on-site prior to being transported off-site for disposal.
4. A closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C. was not included with the application. However, a closure plan was included as Attachment No. 9 in the Used Oil Application. It is therefore recommended that the applicant indicate that the closure plan submitted for the Used Oil Application will also apply for the Waste Processing Permit Application. In addition, it should be noted that the closure plan in Attachment No. 9 references the “Canaveral Facility”, which should be revised to reflect the Tampa facility. Rule reference: 62-701.710(2)(f) and 62-701.710(6), F.A.C.