

March 29, 2019

Florida Dept of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Bryan Baker, P.G., Administrator
Hazardous Waste Program and Permitting

RE: Response to RAI 3/1/19
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

The following document and attachments are in response to the Request for Additional Information (RAI) received from FDEP on March 1, 2019. Responses by CBI to FDEP are in red.

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.

Submitted via email (Tuesday, March 05, 2019 12:25 PM) and attached herein for convenience

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.

Attached as requested.

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).

If a driver gets a positive on the sniffer and a negative on the Dexil, then driver must report back to manager for guidance. The manager will contact the customer and determine if they mixed waste. If they did mix the waste or are unsure, we will reschedule the pickup so a haz waste unit can use a field test to categorize the waste and label and manifest as a hazardous waste. This requires EPA ID generation and printing of manifests and labels, which is a separate division within CBI called Disposal Services. All drivers are HM-181 trained, including used oil drivers and CBI is licensed as a hazardous waste transporter.

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.

No waste is stored outside of containment. Any container outside of secondary containment is empty. Unsure as to what needs to be revised and where/how these containers were seen. Annual inspections are performed at the facility and FDEP and Hillsborough County regulators physically inspect our facility for compliance and/or enforcement as necessary.

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.

Emailed valid Certification 3/18/19, but attached herein for convenience. We understand the rule to allow SPCC to be valid for 5 years from date of certification as long as no material changes occur, which they have not since January 2017.

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.

Reviewed and corrected

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.

Email response on 3/18/19 indicates we are under current permit; permit attached herein for convenience

Solid Waste Renewal Application Review Comments:

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.

Submitted via email (Tuesday, March 05, 2019 12:25 PM) and attached herein for convenience

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.

A new drawing is attached in pdf

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.

Expected waste is actually 200 tons per month, Section A, Item 15 has been updated.

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.

Bulking occurs in the enclosure and on the concrete pad next to enclosure on the northeast corner of the property:



c. What types of materials are bulked? Please identify all types of materials received for bulking.

The facility only accepts non-hazardous, oil contaminated solid wastes that do not qualify as used oil, such as used oil filters, rags, absorbent pads, booms, filters, kitty litter, and vacuum truck solids. The waste is bulked and /or processed for acceptance at permitted solid waste disposal facilities.

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.

Comes out of drums and vacuum trucks and goes into roll-off boxes and/or end-dumps

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.

Hazardous waste drums are never received into the facility. Non-hazardous waste drums that Tampa facility cannot manage go to CBI Disposal Services in the CBI Miami Facility

f. Please identify the specific equipment used for bulking operations.

Forklift with drum tilt, mini excavator and front-end loader

g. Please identify how long bulk containers are stored on-site prior to being transported off-site for disposal.

The containers are filled when bulking amounts are abundant enough to load and go. Therefore bulk containers are usually shipped when loaded, but they do not sit for any longer than 3-4 days. Containment area for these loaded end dumps or boxes are in the concrete area in the middle of the facility near the tank farm as denoted on the photo screen shot above 3(b).

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.

Closure Plan now reflects application to the Solid processing application and correction to references have been made.