From: Heyns, Jared
To: compliance@cliffberryinc.com
Cc: jhines@cliffberryinc.com; scollins@cliffberryinc.com
Subject: Cliff Berry Port Everglades (EPAID FLR000083071) Exit Interview
Date: Tuesday, March 17, 2020 1:24:00 PM

Kelly,

This email serves as an exit interview to the routine Compliance Evaluation Inspection (CEI) conducted by the Florida Department of Environmental Protection (DEP) on Wednesday, March 11, 2020 to determine your facility's compliance with Federal and state hazardous waste regulations. Thank you again for your time and assistance throughout the inspection. The following potential non-compliance items were observed during the inspection:

- 40 CFR 263.20(d)(1) – manifest requirements – The Department inspectors observed several manifests which did not list a second Transporter when the shipment went to Cliff Berry's Miami facility (EPAID FLD058560699). Though it was understood the shipment was not being held longer than 24 hours at the Port Everglades facility, the manifest (#018145724JJK, for example) was incomplete and therefore the Department inspectors were unable to determine the amount of time the shipment was on-site at each facility. Per discussion during the inspection, Cliff Berry may have received prior guidance from the Department regarding this issue. Please provide information or evidence relating to this guidance so that this issue can be addressed fully.
- Rule 62-710.510(1)(a) F.A.C. – used oil record keeping – The Department inspectors observed several used oil shipment records which incorrectly listed the Cliff Berry Miami facility (EPAID FLD058560699) as the used oil generator, as opposed to the Port Everglades facility. Please correct this issue in your system, and provide a used oil shipment record to the Department showing that the correction has been made.
- Rule 62-780.560(1) F.A.C. – petroleum or petroleum product de minimis discharges – The Department inspectors observed a de minimis discharge of petroleum product which appeared to not be properly treated or properly disposed of at the time of the inspection. Facility staff had already begun cleanup before the inspectors finished conducting the inspection. Please provide all documentation relating to this cleanup (total amount, disposal records, photos, etc.).

Please provide a response and evidence of your facility's corrective actions by close-of-business Wednesday, April 1, 2020. Feel free to reach out if there are any questions or concerns. Thank you for your help with these matters.

Regards,

Jared Heyns
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