



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Cliff Berry Inc - Tampa

On-Site Inspection Start Date: 02/19/2025

On-Site Inspection End Date: 02/19/2025

ME ID#: 13562

EPA ID#: FLR000013888

Facility Street Address: 5218 Saint Paul St, Tampa, Florida 33619-6118

Contact Mailing Address: PO Box 13079, Fort Lauderdale, Florida 33316-0100

County Name: Hillsborough

Contact Phone: (954) 763-3390

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste **TSD:** Operating Non-Commercial TSD **Used Oil:** On-Spec, Oil Filters, Processor, Collection Center (Commercial) **Other:** Transport **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Avery Ghirghi, Inspector

Other Participants: Leslie Pedigo, Environmental Consultant, Aiden Tellier, Facility Manager

LATITUDE / LONGITUDE: Lat 27° 55' 12.3033" / Long 82° 23' 43.3281"

NAIC: 562219 - Other Nonhazardous Waste Treatment and Disposal

TYPE OF OWNERSHIP: Private

Introduction:

Cliff Berry, Inc. Tampa (CBI) was inspected on February 19, 2025, by the Florida Department of Environmental Protection (Department) to determine the facility's compliance with state and federal hazardous waste regulations governing Used Oil Processors (UOP), Used Oil Transporters (UOT), Hazardous Waste Transporters (HWT), Universal Waste Transporters, and Very Small Quantity Generators (VSQGs). This was the Department's twelfth inspection of this facility. The facility was last inspected by Hillsborough County on November 12, 2008. The most recent inspection was conducted on December 19, 2022. The inspectors were accompanied throughout the facility by Aiden Tellier, Facility Manager.

NOTIFICATION HISTORY

- The facility initially notified as a non-handler of hazardous waste under the name Florida Waste Environmental Services, Inc. on February 19, 1996.
- The facility registered as a Used Oil Transporter and Transfer facility on April 16, 1996.
- The facility updated their status to a Small Quantity Generator (SQG) of hazardous waste on April 18, 1997.
- The facility's generator status was updated to a Conditionally Exempt Small Quantity Generator (CESQG) on April 15, 2009.
- The facility was purchased, and the name was updated to Cliff Berry, Inc., on December 1, 2022.
- The facility re-notified as a VSQG, and a transporter of universal waste, used oil, and hazardous waste on March 17, 2022

PERMITS AND REGISTRATIONS

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The facility has a number of permits/registrations issued, including:

- Used Oil/Filters Transporter, Transfer Facility, Processor, Collection Center registration; the current registration was issued on February 12, 2025, and expires June 30, 2026.
- Used Oil and Material Processing Facility (Operating Permit Number: 76517-009-HO & 76517-010-SO); the current permit was issued on May 9, 2024, and expires May 9, 2029.
- Transporter of Universal Waste Lamps and Devices and a Small Quantity Handler Facility for Universal Waste Lamps and Devices registration; the current registration was issued on February 14, 2025, and expires March 1, 2026.
- Hazardous Waste Transporter registration; the current registration was issued on February 7, 2024, and expires June 30, 2026.
- NPDES Stormwater permit (FLR05B570); the current permit was issued on August 1, 2021 and expires July 31, 2026.
- The ten aboveground storage tanks (ASTs) are registered with the Department's Storage Tank Program under facility ID #9802425 and the Storage Tank placard was available for review.

Process Description:

CBI is an emergency response cleanup contractor and a permitted used oil processor, used oil/used oil filter transporter, and transfer facility. The facility has five employees (two drivers, one technician, one administrative professional and one manager). The City of Tampa provided sewer and water services.

Any hazardous waste generated during an emergency response cleanup is transported directly to Republic Services Environmental Solutions/US Ecology the same day that it is generated. Hazardous waste is not typically generated at this facility, the facility maintains their VSQG notification due to both the used oil operations and in the case of a hazardous chemical spill at their location.

CBI picks up PCW and used oil from their clients. While these wastes are typically collected using CBI vacuum trucks, containers of used oil and PCW are also picked up. The vacuum trucks are off-loaded into the on-site aboveground storage tanks. CBI is no longer analyzing the used oil at the Tampa facility. The drivers screen the used oil at the generator's facility using a refrigerant leak detector sensitive to volatile organic and chlorinated organic vapors ("halogen meter/sniffer"). If the leak detector has a positive response during the screening process, the driver will conduct additional testing with a Clor-D-tect 1000 Kit. Used oil that contains over 1000 PPM of halogens will be rejected by the driver, and left at the generator's facility. Containerized used oil filters, typically in 55-gallon drums, are picked up from their clients and stored at the facility.

Used oil, used oil filters and PCW are transported to the CBI Miami processing facility (Hazardous Waste Facility ID # FLD058560699) for processing. CBI also contracts with outside transporters on an as needed basis. All used oil transportation activities in CBI vehicles are conducted using the facility ID number assigned to Cliff Berry Inc. – Port Everglades (Hazardous Waste Facility ID # FLR000083071).

CBI is permitted to bulk and process non-hazardous petroleum contaminated debris and soil in a mixing chamber. These oily solids are treated in a solid waste pit under a pole barn at the back of the facility prior to transportation. Waste Management transports the dumpsters to the Waste Management – Okeechobee Landfill for disposal. Records indicate that the facility does not accept or process more than 250-tons of oily soil waste per month.

Solid waste is placed in roll-off dumpsters for storage at the facility prior to disposal. Waste Management transports the dumpsters to the Waste Management – Okeechobee Landfill for disposal.

ADMINISTRATIVE OFFICES

CBI Tampa operates out of two addresses. All administrative work is conducted at the 4314 Raleigh St location 314 Raleigh Street, Tampa; no hazardous waste was observed at this property.

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SAINT PAUL ST LOCATION:

Used Oil, emergency response, and PCW operations occur, as described in the above paragraph, at the 5218 Saint Paul Street, Tampa location. The Saint Paul St location is typically unmanned.

TANK FARM

The tank farm consisted of ten aboveground storage tanks (ASTs) located within a concrete secondary containment structure. Tank 10 contains PCW, with tanks 1-9 used to contain used oil as needed. The tank sizes range from 15,000 to 30,000 gallons. Liquid waste is off-loaded through a valve-controlled pipeline to a "vac box" that contains filters to provide gross solids removal prior to entering the piping and tanks within the containment structure. The "vac box" is double lined. The concrete secondary containment unit was observed to be clean and dry, with no cracks or damage observed. All tanks were labeled with their appropriate contents and appeared to be in good condition.

TEMPORARY DRUM STORAGE

The tank farm had eleven 55-gallon metal drums near the tank farm. Mr. Tellier stated that this is not typically where drums are kept, typically these drums are stored on the trailers near the pole barn. Four of the eleven drums were empty.

The other drums near the tank farm were:

- One 55-gallon metal drum of dry used oil, labeled with the words "Used Oil."
- Six 55-gallon drums of used oil filters, labeled with the words "Used Oil Filters."

EQUIPMENT

Several emergency response vehicles and other emergency response equipment are stored in the yard space between the tank farm and the trailers/pole barn. No signs of spills were observed and no hazardous waste was being stored or generated in this area at the time of inspection. This area includes three frac tanks, empty at the time of inspection, for use for emergency response.

TRAILERS

Further north in the yard, past the tank farm and equipment storage, are three large trailers. Two of these trailers are being used to collect drums of used oil, PCW, universal waste, and oily solids. Once the trailers are full, they will be transported for further treatment or disposal. The third trailer contains only empty drums. CBI typically conducts its own transportation, but occasionally the trailers are picked up by Environmental Service Laboratories, a subsidiary of Pace Analytical Services LLC. Pickups happen on Thursdays, with Tuesdays added to the schedule on an as-needed basis.

POLE BARN

The pole barn behind the trailers houses a solid waste pit where oily solids are combined with dirt before being containerized and sent for disposal.

This area also had drums with waste stored outside of the trailers. Mr. Tellier informed staff that all drums were from the solid waste pit and are scheduled to be moved onto the nearby trailers for transportation later that day.

These drums included:

- Two 55-gallon metal drums of oily absorbents, labeled "Oily Absorbents."
- Three 55-gallon metal drums of oily dirt, labeled "Oily Dirt."
- Two 55-gallon metal drums of oily debris, labeled "Oily Debris."
- Four unlabeled 55-gallon metal drums containing a mixture of oily absorbents, dirt, and debris.

Additionally, six lead-acid batteries were located outside of the pole barn. The batteries were observed to be in good condition, with no signs of residue or discharge.

STATE WATCH INCIDENT 2025-1392

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On February 14, 2025, the Department received notification from CBI that an unplanned discharge of petroleum contact water (PCW) occurred from the vac box used to off-load truck to the tanks in the tank farm. PCW overfilled vac box due to valves being left open overnight. The spill was reported by the first morning driver and a discharge report form was filed with the Department. The discharge moved south of the vac box along the east side of the on-site warehouse and pooled in the driveway. The discharge appears to have remained on-site and does not appear to have affected surface waters. Remedial action was in progress at the time of inspection. According to facility personnel, all potentially impacted soil will be screened and removed in accordance with FAC 62-780.500. All liquids had been removed from surfaces with absorbent materials and a vacuum truck. The Depart requests that the final Source Removal Report for this incident be submitted to both the Southwest District Hazardous Waste Section and the Hillsborough County Environmental Protection Commission Storage Tank Compliance Section.

RECORDS

- Hazardous waste manifests: CBI has not transported hazardous waste in the past three years.
- Universal Waste Disposal Records: Disposal records were provided via email for electronic review on February 24, 2025. Universal waste is disposed through Northstar Contracting Group, Inc to the designated facility E-scrap, Inc. in Hialeah (Hazardous Waste Facility ID#: FLR000128199). The most recent completed shipment of Universal Waste was on January 25, 2025, for 219 pounds of waste electronics for recycling and 206 pounds of waste TVs/monitors.
- Used Oil Records: Dispatch tickets for used oil/filters/debris from generator to the designated facility were provided via email for electronic review on February 21, 2025. The most recent dispatch ticket was for 532 gallons of petroleum destined for recycling with Halogens <1000 PPM.
- Annual Training: Training records and materials for used oil handling and driver records. Records were provided on February 24, 2025; the most recent training occurred on February 21, 2025.
- A Spill Prevention, Control, and Countermeasure (SPCC) Plan was current and appeared adequate. This plan was last updated in January 2022.
- Inspections: The facility maintains daily tank farm inventory log (in feet and gallons). Weekly inspection logs of the facility which includes inspections of the safety equipment and the tank systems.

GENERATOR STATUS

Based on the facility's disposal records, this facility is operating as a VSQG.

PHOTO ATTACHMENTS:

tank farm and control valves



PCW filtration box



Drums by tank farm



Drums by solid waste pit



solid waste pit



Ongoing spill remediation



Conclusion:

At the time of inspection, Cliff Berry Inc- Tampa Facility was operating in compliance with state and federal regulations governing small quantity generators of hazardous waste.

1.0: Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			✓

2.0: VSQG Checklist**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment			✓
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)			✓

6.0: Transporters Checklist**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading			✓
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A

6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓

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6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Avery Ghirghi**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**03/05/2025**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Aiden Tellier**Representative Name**Facility Manager**Representative Title**Cliff Berry Inc**Organization**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:**Approver:**Michael Miller**Inspection Approval Date:**03/11/2025