

Tischler, Tarin

From: Tischler, Tarin
Sent: Thursday, March 3, 2022 2:45 PM
To: compliance@cliffberryinc.com; LArce@cliffberryinc.com; GGbery@cliffberryinc.com
Cc: Lancellotti, Romina; Stark, Justin
Subject: Cliff Berry Inc. Exit Interview (EPAID: FLD058560699)
Attachments: IMG_2873.JPG

Cliff Berry Inc. Team,

This email serves as an exit interview for the Florida Department of Environmental Protection (FDEP) compliance evaluation inspection conducted at your facility on 3/01/2022. This was a routine inspection to determine Cliff Berry's compliance with state and Federal hazardous waste and used oil regulations. Thank you for showing inspectors around your facility and taking time out of your busy schedules to assist in our inspection procedures.

As discussed during the inspection, the Department is requesting the following documentation:

1. 40 CFR 279.52(a)(6) Arrangements with local authorities

Please submit documentation of your arrangements with local authorities, including arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of used oil handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes.

2. 49 CFR 172.704 Training Requirements

Please submit training records for all employees who handle hazardous materials, including General Awareness/Familiarization training, Function-specific training, and Safety awareness training.

3. 40 CFR 279.56(a) Tracking

(a) Acceptance. Used oil processors/re-refiners must keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents

Please submit documentation of the following Uniform Hazardous Waste Manifests, as well as any other documentation of the following acceptance and deliveries:

Caterpillar Tractor	FLCESQG	Manifest Doc#: 023487101JJK
IRL Labs	FLR000166751	Manifest Doc#: 02348094JJK

The above hazardous waste were documented as accepted 10/22/2021.

During the inspection, facility representatives informed inspectors that the IRL Labs shipment was returned to the generator. The Caterpillar Tractor shipment shows acceptance 10/22/2021 and delivery 11/03/2021. Please submit all documentation of these shipments for Department review.

4. 40 CFR 273.33(d)(1) Lamps

(d) Lamps. A large quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:

(1) A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

During the inspection, inspectors observed waste lamps in a small room next to the restrooms without a container or label. Please submit photo documentation of these lamps placed in proper containers with proper labeling per 40 CFR 273.33(d)(1) and 273.34(e). Photos of the lamps observed are attached to this email.

Please submit the above documentation by 3/17/2022. As the Department continues to review records and photos taken during the inspection, additional documentation may be requested.

Please do not hesitate to reach out to me with any questions or concerns regarding the required documentation. I am here to assist you in your return to compliance.

Thank you,



Tarin Tischler

Environmental Specialist II

Florida Department of Environmental Protection

Southeast District – West Palm Beach

3301 Gun Club Road, MSC 7210-1

West Palm Beach, FL 33406

Tarin.Tischler@FloridaDEP.gov

Office: 561.681.6680