



**Charles E. Allen**

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**J.S."JIM"DANIEL**

PLANT MANAGER  
BROOKSVILLE CEMENT PLANT

Rinker Materials | 10311 CEMENT PLANT RD. | BROOKSVILLE FL 34601  
352.799.7881 | Fax 352.799.6088

## DIGITAL PHOTOGRAPHIC LOG

1. Facility Name: Florida Crushed Stone – Gregg Mine
2. County / Facility ID#: Hernando / FLA012073
3. Inspection Type: CEI
4. Inspection Date: 9/22/08
5. Type of Camera Used: Canon Power Shot 5.0 mega pixels A530 - IW digital camera
6. Digital Recording Media: Kingston 1 GB Multi Media Card
7. All Digital Photos Were Copied To: Digital Photographic Log
8. Original Copy Is Stored In/On: Alchemy
9. Were the photos altered?: NO ☒ YES \_\_\_\_\_ explain yes:
10. Photographer: James Womble
11. Signature of Photographer: \_\_\_\_\_

photos  
from  
IW-  
James  
Womble



Photo ID # IMG\_0136/10:21 AM – Lined area of perimeter ditch prior to the new A-frame.



Photo ID #IMG\_0138 /10:27 AM – Perimeter ditch, East of the new A-frame.



Photo ID #IMG\_0137 /10:24 AM – Newly constructed and lined A-frame.



Photo ID #IMG\_0139 /10:30 AM – MWB-1



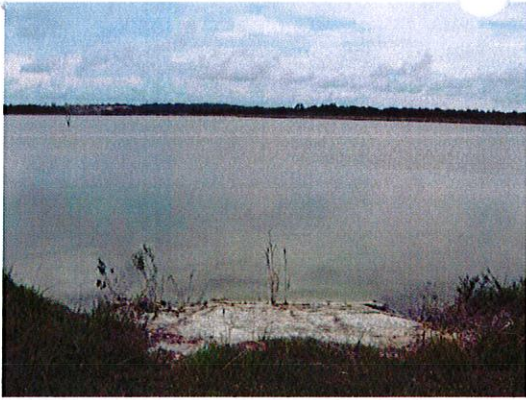


Photo ID #MIG\_0153 /12:18 PM – Sampling point in Pond 4 for TSS and pH.



Photo ID #IMG\_0154 /12:26 PM – Pond 7 discharge point.



Photo ID #IMG\_0155 /12:35 PM – Pond No. 7 berm/dam repairs.



Photo supplied by Joe Calamari – Absorbent sock added prior to perimeter pumps.



Photo supplied by Joe Calamari – Absorbent sock added prior to perimeter pumps.

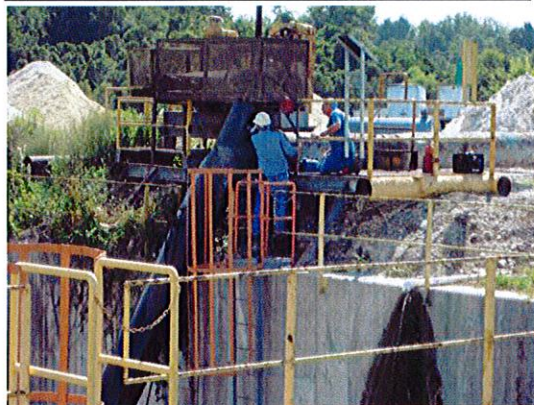


Photo supplied by Joe Calamari – Maintenance/cleanup work on the alternate/bypass pump.





Photo ID #IMG\_0141 /10:36 AM –  
Perimeter ditch.



Photo ID #IMG\_0144 /10:43 AM – MWC-6



Photo ID #IMG\_0142 / 10:39 AM- MWC-2



Photo ID # IMG\_0145/10:56 AM – Intake  
for alternate discharge pump.



Photo ID #IMG\_0143 /10:42 AM – MWC-7



Photo ID # IMG\_0146/10:58 AM-  
Temporary discharge pumps.



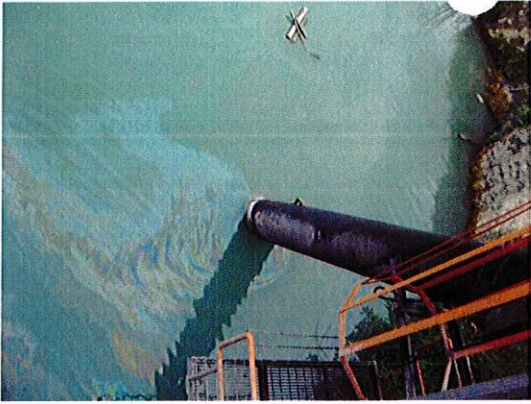


Photo ID #IMG\_0147 /11:02 AM – Intake structure for alternate pump, notice oil sheen.

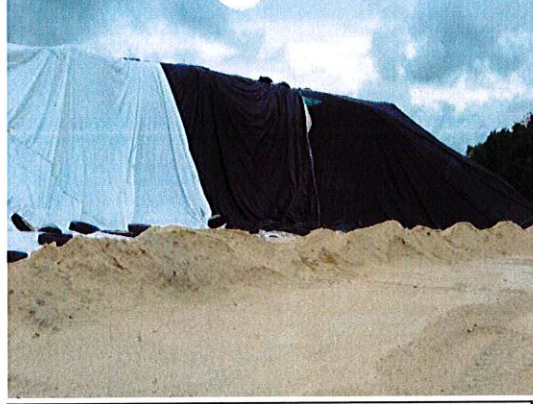


Photo ID # IMG\_0150/11:47 AM – North Teco-Gannon ash pile



Photo ID #IMG\_0148 /11:04 AM – Source of oil sheen from alternate pump.



Photo ID # IMG\_0151/12:13 PM – Intake structure to the power plant.



Photo ID #IMG\_0149 /11:39 AM – MWC-3



Photo ID # IMG\_0152/12:15 PM- MWC-5



J2/11/07



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION SOLID WASTE MANAGEMENT FACILITY INSPECTION CHECKLIST

Facility Name: FLORIDA CRUSHED STONE WTPF  
 WACS No.: SND/27/40778 COMET Project Number: 87650  
 Inspection Date: 10-18-06 Permit No.: 22787-002-WT Expiration Date: 12-6-05  
 Facility Address: 10311 CEMENT PLANT RD.  
 City: BROOKSVILLE County: HERNANDO Zip: 34601  
 Permittee or Operating Authority: FCS COMPANY  
 Telephone Number (Permittee or Operating Authority): (352) 799-7881  
 Inspection Participants (Include ALL Landfill and Department Employees With Corresponding Titles):  
 Principal Inspector: STEVE MORGAN, SELENA WILLIAMS  
 Other Participants: BILL BUTLER

## TYPE OF FACILITY (check all that apply):

### Landfill:

- ☐ Class I  
☐ Class II  
☐ Class III

### C&D Facility:

- ☐ Disposal  
☐ Disposal w/Recycling  
☐ Land Clearing

### Waste Processing Facility:

- ☐ Transfer Station  
☐ C&D Recycling  
☐ Class III MRF  
☐ MSW MRF  
☐ Pulverizer/Shredder  
☐ Compactor/Baling  
☐ Other \_\_\_\_\_

### Other Facilities:

- ☐ Composting Facility  
☐ WTE Facility  
☒ Waste Tire Facility  
☐ Yard Trash Processing Facility  
☐ Stationary Soil Treatment Facility  
☐ Incinerator/Trench Burner  
☐ Unauthorized Disposal  
☐ Other \_\_\_\_\_

## TYPE OF INSPECTION (check all that apply):

- ☒ Operation  
☐ Closure  
☐ Long-Term Care

- ☐ Complaint Investigation  
☐ Routine Inspection  
☐ Follow-up Inspection

☐ Other \_\_\_\_\_

## ATTACHMENTS TO THE INSPECTION CHECKLIST (check all that apply):

This Cover Page includes the following attachments.

Section No.	Section Title
<input checked="" type="checkbox"/> 1.0	File Review
<input type="checkbox"/> 2.0	Landfill Operation and Maintenance
<input type="checkbox"/> 3.0	Landfill Long-Term Care
<input type="checkbox"/> 4.0	Waste Processing Facilities
<input type="checkbox"/> 5.0	C&D Debris Disposal Facilities
<input type="checkbox"/> 6.0	Recycling Operations at C&D Debris Disposal Facilities
<input type="checkbox"/> 7.0	Land Clearing Debris Disposal Facilities
<input type="checkbox"/> 8.0	Compost Facilities
<input checked="" type="checkbox"/> 9.0	Waste Tire Facilities
<input type="checkbox"/> 10.0	Yard Trash Processing Facilities
<input type="checkbox"/> 11.0	Stationary Soil Treatment Facilities
<input type="checkbox"/> 12.0	WTE Facilities
<input checked="" type="checkbox"/> 13.0	Compliant Investigations
<input checked="" type="checkbox"/> 14.0	Narrative and Signatures



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION INSPECTION CHECKLIST

## SECTION 1.0 – FILE REVIEW

### REQUIREMENTS:

THE REQUIREMENTS LISTED IN THIS INSPECTION CHECKLIST ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NOT OK" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A POSSIBLE VIOLATION OF THE CORRESPONDING DEPARTMENT RULE(S) AT THE TIME OF THE INSPECTION. EACH POSSIBLE VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT. SOME REQUIREMENTS MAY BE IDENTIFIED AS "OK" BUT ARE DISCUSSED FURTHER IN THE "AREAS OF CONCERN" PORTION OF THE NARRATIVE SECTION.

FILE REVIEW (Pre- or Post-Inspection, as appropriate.)	OK	Not OK	Unk	N/A
1.1 For landfills, is the method and sequence of filling wastes according to plans? 62-701.500(2)(f)				✓
1.2 For landfills, are the following records being reported to the Department? (Check any that are Not OK.) <input type="checkbox"/> Waste reports (quarterly) 62-701.500(4) <input type="checkbox"/> Annual estimate of remaining life 62-701.500(13)(c)				✓
1.3 Is leachate sampled, tested and disposed as required? 62-701.500(8)(a) & 62-701.510(6)(c)				✓
1.4 Is gas monitoring being performed as required by the permit? 62-701.500(9) & 62-701.530(2)				✓
1.5 Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)				✓
1.6 Is water quality sampling and testing performed according to standard procedures and at the required frequencies? See 62-701.510(2) for landfills; 62-701.730(4)(b) & (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.7 Do the results of the water quality testing suggest there may be adverse impacts to water quality from the operation of the solid waste facility? 62-701.510(3) & (4)				✓
1.8 For closed landfills and C&D disposal facilities with final elevations higher than 20 feet above grade, has a final survey report verifying the final elevations and contours of the facility been submitted to the Department? 62-701.610(3) & 62-701.730(9)(c)				✓
1.9 Is financial assurance adequate? See 62-701.630 for landfills; 62-710(7)(a) & (10)(a) for WPFs; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(a) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities. NOTE: The Solid Waste Financial Coordinator in Tallahassee can assist with this information.	✓			
1.10 Are cost estimates current and adjusted every year? See 62-701.630(4) for landfills; 62-710(7)(b) & (10)(a) for WPFs; 62-701.730(11)(b) for C&D debris facilities; 62-713.600(6)(b) & (c) for stationary soil treatment facilities.	✓			
1.11 For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by April 1 <sup>st</sup> of each year? 62-701.730(12)				✓
1.12 For C&D recycling facilities with no disposal, is an Annual Report for the recycling operation submitted to the Department by April 1 <sup>st</sup> of each year? 62-701.710(9)(b)				✓
1.13 For compost facilities, has the compost product been sampled and analyzed every 20,000 tons or every 3 months (whichever is sooner)? 62-709.530(1)				✓
1.14 For compost facilities, has the annual report been submitted by June 1 <sup>st</sup> ? 62-709.530(3)				✓



## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION INSPECTION CHECKLIST

### SECTION 9.0 – WASTE TIRE FACILITIES

**REQUIREMENTS:**

THE REQUIREMENTS LISTED IN THIS INSPECTION CHECKLIST ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NOT OK" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A POSSIBLE VIOLATION OF THE CORRESPONDING DEPARTMENT RULE(S) AT THE TIME OF THE INSPECTION. EACH POSSIBLE VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT. SOME REQUIREMENTS MAY BE IDENTIFIED AS "OK" BUT ARE DISCUSSED FURTHER IN THE "AREAS OF CONCERN" PORTION OF THE NARRATIVE SECTION.

SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(16))		OK	Not OK	Unk	N/A
9.1	Unauthorized disposal/storage prohibited, except yard trash, within 500' of a potable water well? 62-701.300(2)(b)				✓
9.2	Unauthorized disposal/storage prohibited, except yard trash, within 1000' of a potable water well serving a community water system? 62-701.300(2)(h)				✓
9.3	Unauthorized storage/disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK): 62-701.300(12) <input type="checkbox"/> 100 feet for potable water wells (except on-site)? <input type="checkbox"/> 50 feet for water bodies? <input type="checkbox"/> 200 feet for community water supply wells?				✓
9.4	Unauthorized disposal/storage prohibited in an area subject to frequent and periodic flooding unless flood protection measures in place? 62-701.300(2)(d)	✓			
9.5	Unauthorized disposal/storage prohibited in any natural or artificial body of water including ground water? 62-701.300(2)(e)	✓			
9.6	Unauthorized disposal/storage prohibited, except yard trash, within 200' of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(f)	✓			
9.7	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
9.8	Are the following prohibited wastes or special wastes properly managed? (Check any that are Not OK) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Lead-acid batteries 62-701.300(8)(a) <input type="checkbox"/> Yard trash 62-701.300(8)(c) <input type="checkbox"/> White goods 62-701.300(8)(d) <input type="checkbox"/> Whole waste tires 62-701.300(8)(e) <input type="checkbox"/> Liquids 62-701.300(10) <input type="checkbox"/> Used oil, except as exempted 62-701.300(11) <input type="checkbox"/> Lead-acid batteries, mercury-containing switches and lamps in WTEs 62-701.300(9)	✓			

WASTE TIRE FACILITY – GENERAL REQUIREMENTS FOR STORAGE		OK	Not OK	Unk	N/A
9.9	If the facility accepts tires from the public, is a sign posted at the facility entrance stating operating hours, cost of disposal and site rules? 62-711.540(1)(a)				✓
9.10	Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(1)(b)	✓			
9.11	If the facility accepts tires from the public, is an attendant always present on site when the site is open for business? 62-711.540(1)(c)				✓
9.12	Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d)	✓			
9.13	Is an annual fire safety survey conducted? 62-711.540(1)(d)	✓			
9.14	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)	✓			
9.15	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	✓			
9.16	Does the EPM contain the following information? (Check all that are Not OK.) <input type="checkbox"/> Contact names and numbers 62-711.540(1)(e)1. <input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540(1)(e)2. <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e)3.	✓			



Section 9.0  
Waste Tire Facilities  
Inspection Checklist

WASTE TIRE FACILITY – GENERAL REQUIREMENTS FOR STORAGE (Continued)		OK	Not OK	Unk	N/A
9.17	Is the operator at the facility maintaining records of the quantity of WT received at the site, stored at the site, and shipped from the site? 62-711.540(1)(g) and 62-711.400(5)	✓			
9.18	If the operator of the site is not the owner of the property, has written authorization been obtained from the property owner to operate the facility? 62-711.540(1)(h)	✓			
9.19	Is adequate communications equipment available at the site? 62-711.540(1)(i)	✓			
9.20	Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.530(1)(j)	✓			

WASTE TIRE FACILITY – STORAGE INDOORS		OK	Not OK	Unk	N/A
9.21	Are WT piles more than 50 feet in width? 62-711.540(2)(a)				
9.22	Are WT piles along a wall more than 25 feet in width? 62-711.540(2)(a)				
9.23	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)				
9.24	Is there less than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711.540(2)(c)				
9.25	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(c)				
9.26	If waste tires are stored up to 15 feet in height, do walls have at least a 4-hour fire rating? 62-711.540(2)(e)				
9.27	If waste tires are stored >15 feet in height, do walls have a fire rating of not less than 6 hours and columns one hour FR? If > 20 feet, do columns and its connections with other structural members have two hour FR? 62-711.540(2)(f)				
9.28	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h)				

WASTE TIRE FACILITY – STORAGE OUTDOORS		OK	Not OK	Unk	N/A
9.29	Is the waste tire site operated >200 feet from a body of water? 62-711.540(3)(a)	✓			
9.30	Does the waste tire pile have a width < 50 feet? 62-711.540(3)(b)				✓
9.31	Does the waste tire pile have an area < 10,000 sq. ft? 62-711.540(3)(b)				✓
9.32	Does the waste tire pile have a height < 15 ft.? 62-711.540(3)(b)				✓
9.33	Is there a 50 ft. wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c)				✓
9.34	Is there unobstructed access to the fire lane? 62-711.540(3)(c)	✓			
9.35	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)	✓			
9.36	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f)	✓			
9.37	Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e)				✓
9.38	Are residuals contained on-site and disposed of in a permitted SW management facility? 62-711(540)(5)				✓
9.39	Does the waste tire site qualify for the exceptions to the technical and operational standards as allowed by rule? 62-711.540(6)				✓

WASTE TIRE FACILITY – COLLECTION CENTER		OK	Not OK	Unk	N/A
9.40	Are no more than 1500 tires at the CC at any one time? 62-711.550(1)(a)				✓
9.41	Are all waste tires, which are not used tires, removed from site yearly for recycling, processing, or disposal? 62-711.550(1)(b)				✓

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
INSPECTION CHECKLIST

## SECTION 14.0 – NARRATIVE AND SIGNATURES

## REQUIREMENTS:

THIS SECTION PROVIDES AN OPPORTUNITY FOR THE DEPARTMENT INSPECTOR TO ADD A NARRATIVE EXPLAINING ANY REQUIREMENTS IDENTIFIED AS "NOT OK" AT THE TIME OF THE INSPECTION. SOME REQUIREMENTS MAY BE IDENTIFIED AS "OK" BUT ARE DISCUSSED FURTHER IN THE "AREAS OF CONCERN" PORTION OF THE NARRATIVE SECTION.

14.1 Explanation for all "NOT OK" responses (continue on separate sheet if necessary).

OPERATION OF FACILITY 8 APPEARS TO BE IN COMPLIANCE WITH DEPARTMENT RULES.

NO RESPONSE IS NECESSARY

14.2 Explanation for all "Areas of Concern" (continue on separate sheet if necessary).

Signed:

*Selene Williams*  
DEP Representative

10.18.06  
Date

Received:

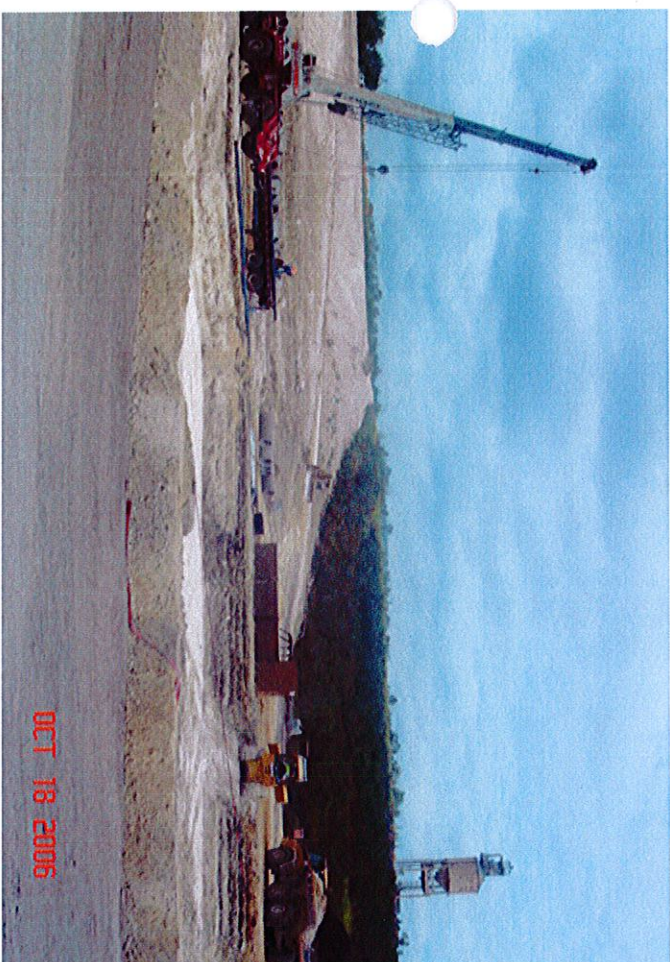
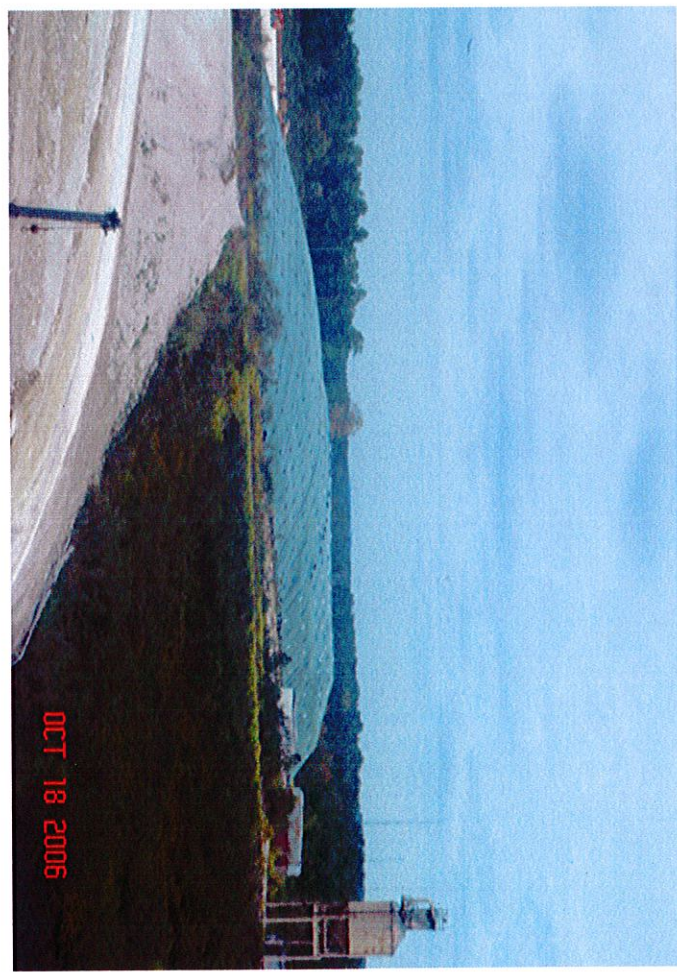
*Don Britton*  
Site Representative

10/18/06  
Date

**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 "NOT OK" or areas of concern.



FLORIDA CRUSHED STONE      STEVE MORGAN  
10.18.06      SELINA WILLIAMS



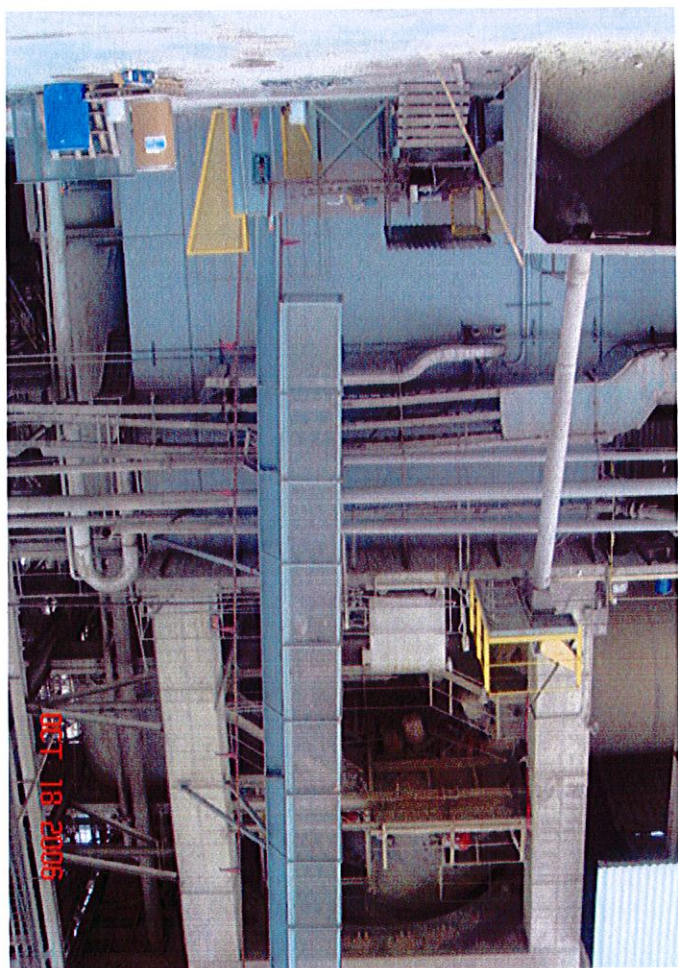




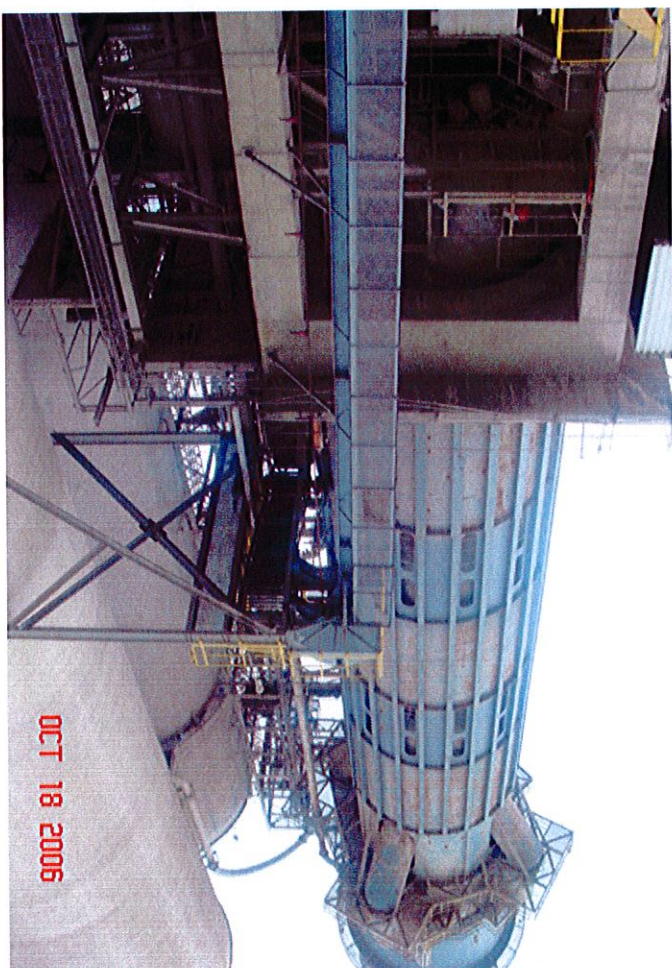
OCT 18 2006



OCT 18 2006



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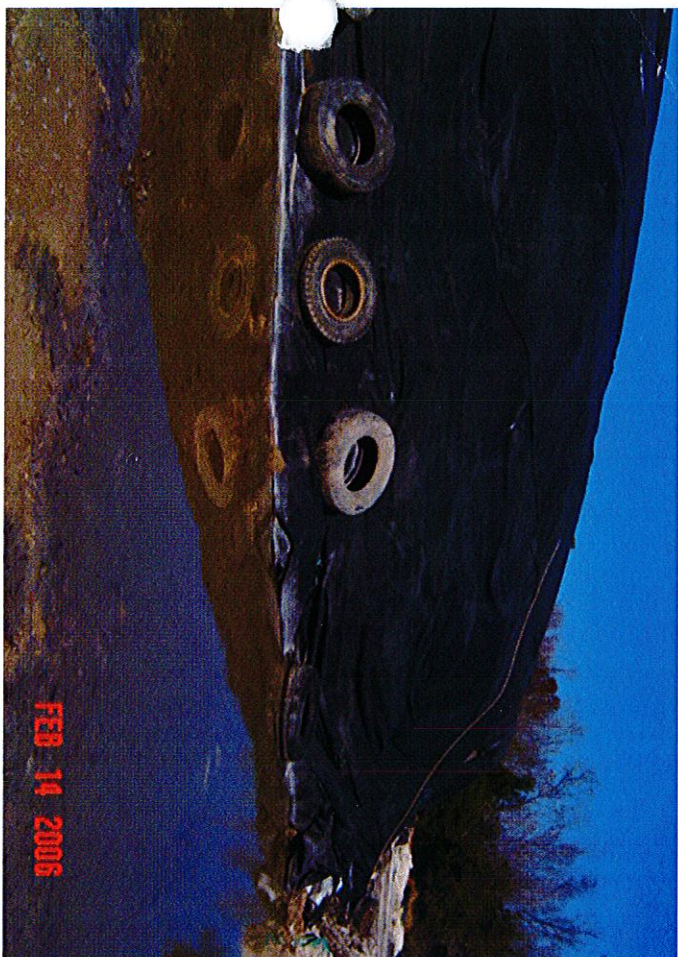


COAL USED FOR FUEL TO BURN TIRES

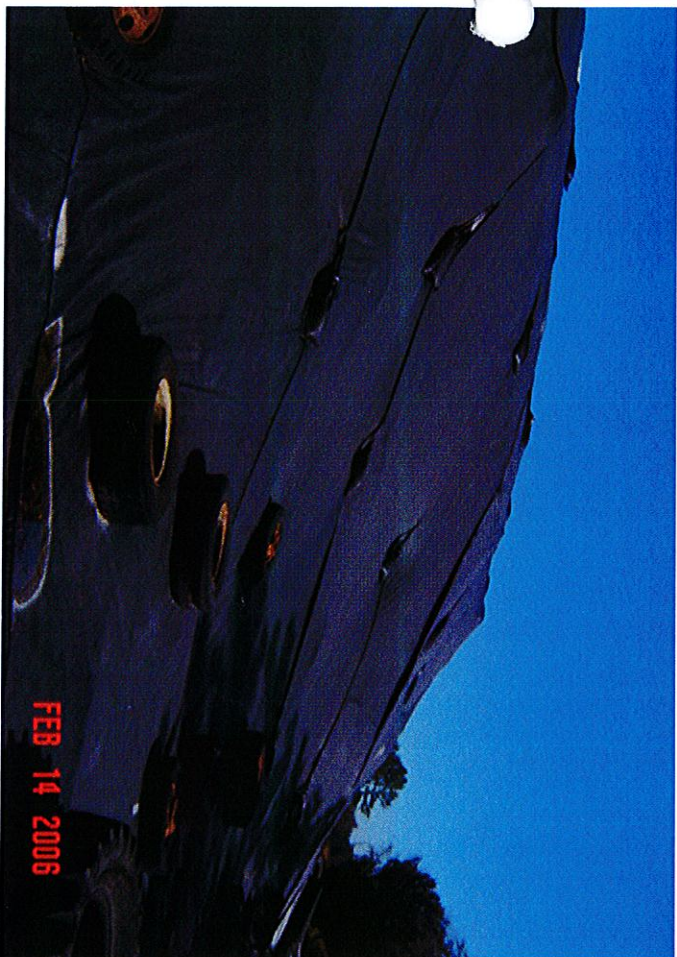




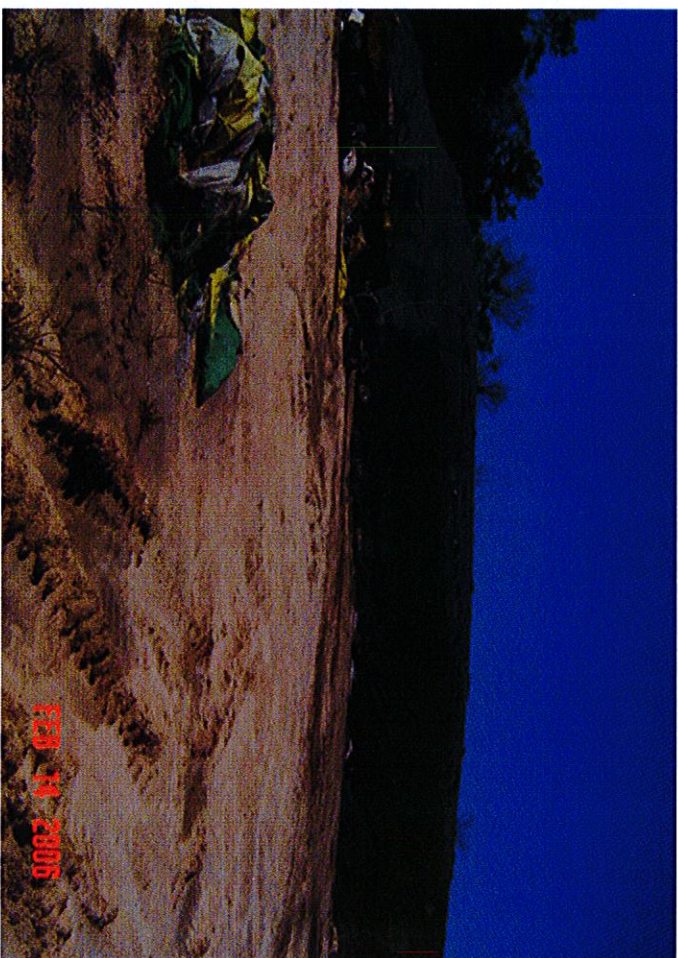
FCS Hernandez Co. BTG 2-14-06



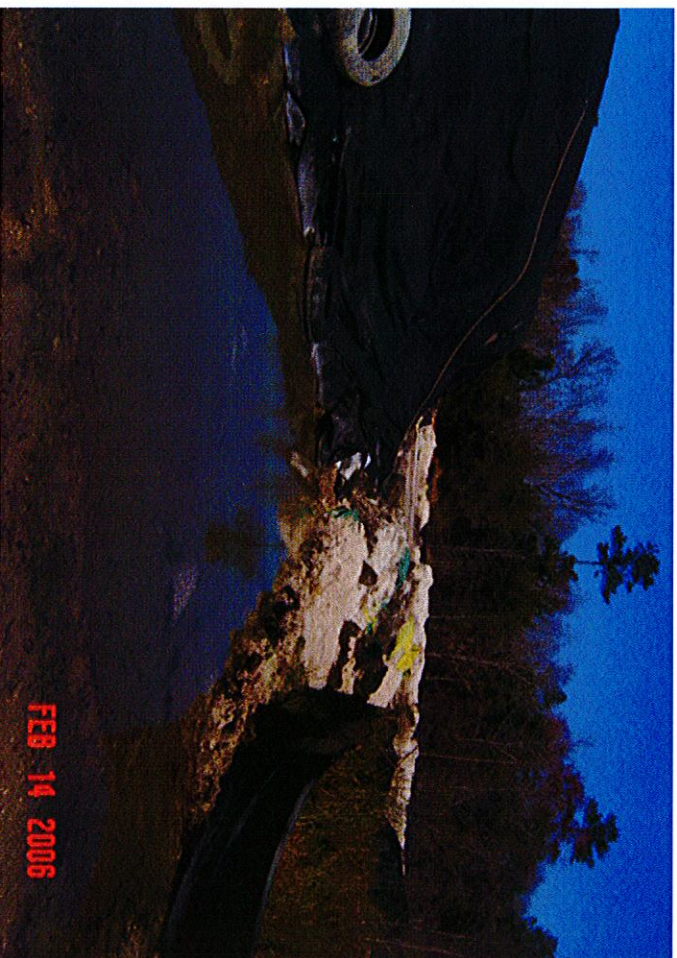
-pile 3 (Tercer Gran Ash) ponding water



Pile 3



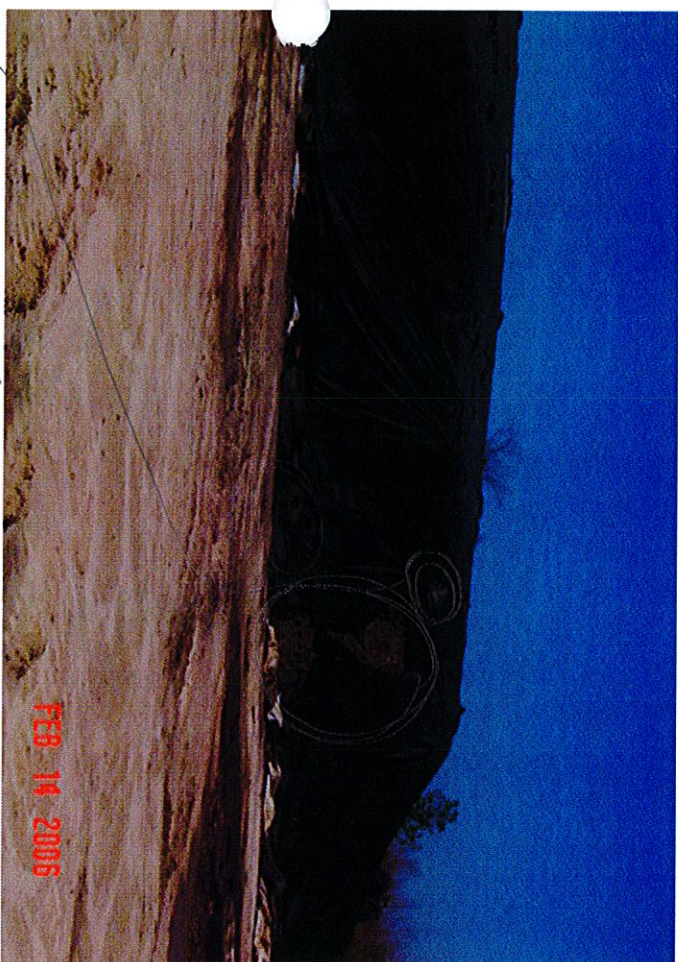
Pile 3



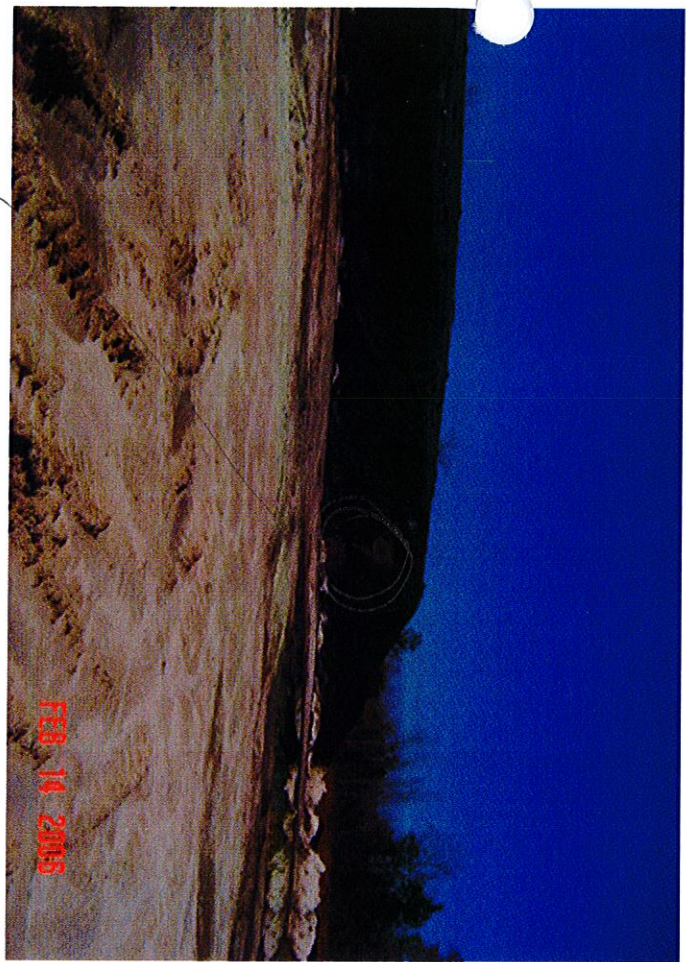
Pile 3



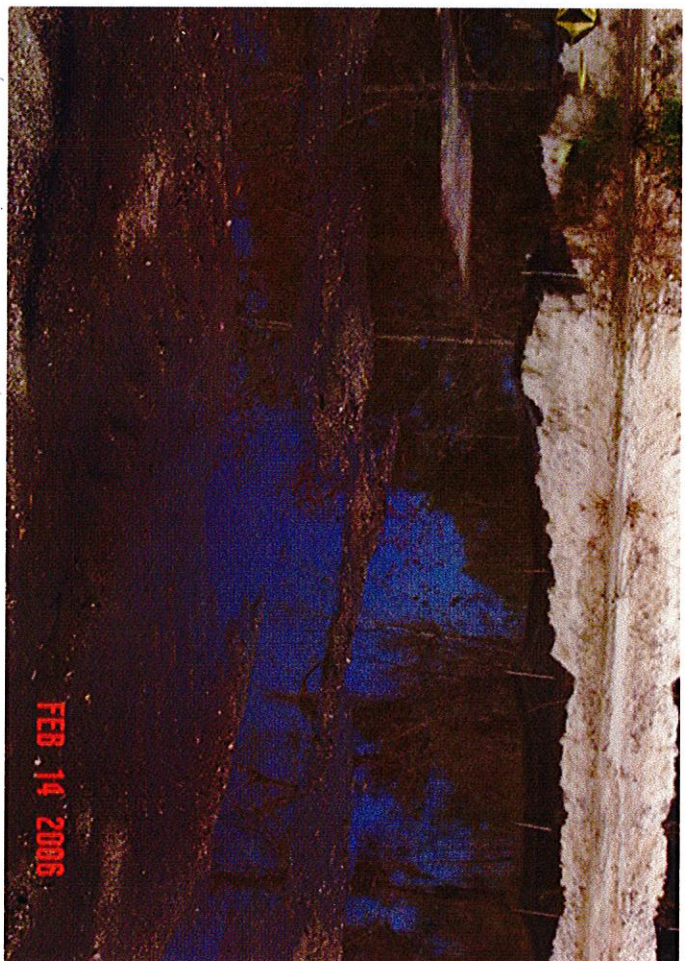
FCS Hernandez Co. BTG 2-14-06



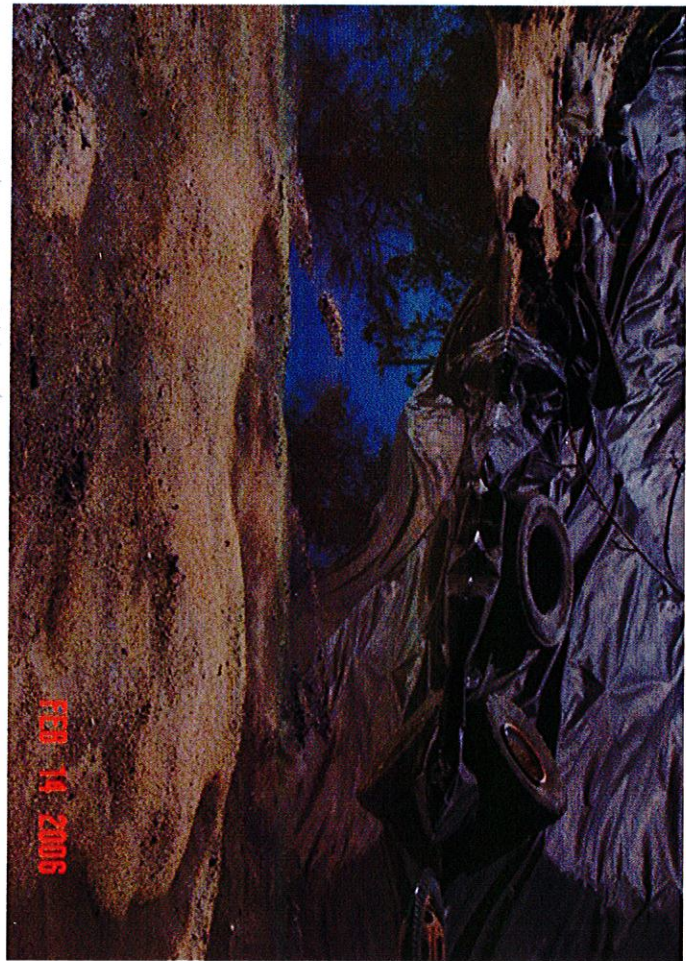
Cribs; part left open on Pile 3



Pile 3 - tarp left open/cracks (same as above)



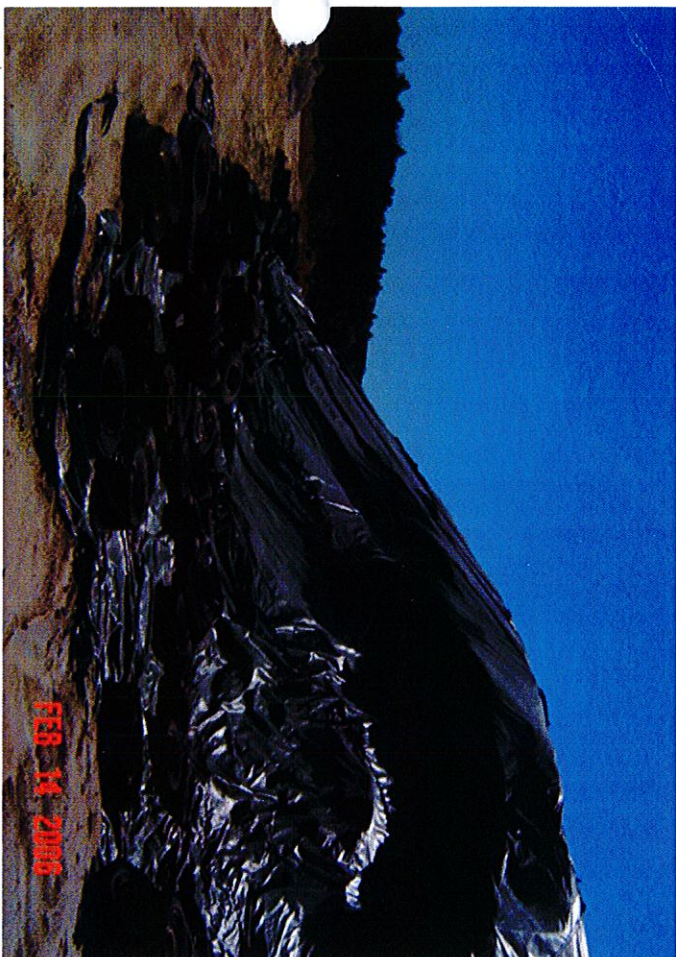
ponding water by pile 3



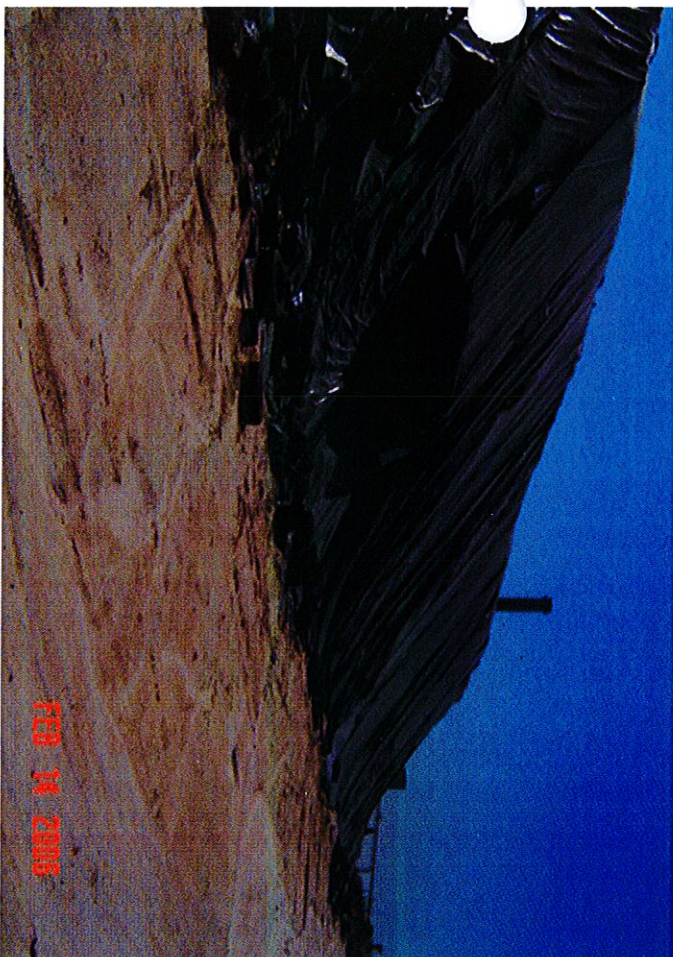
water sitting by Pile #3



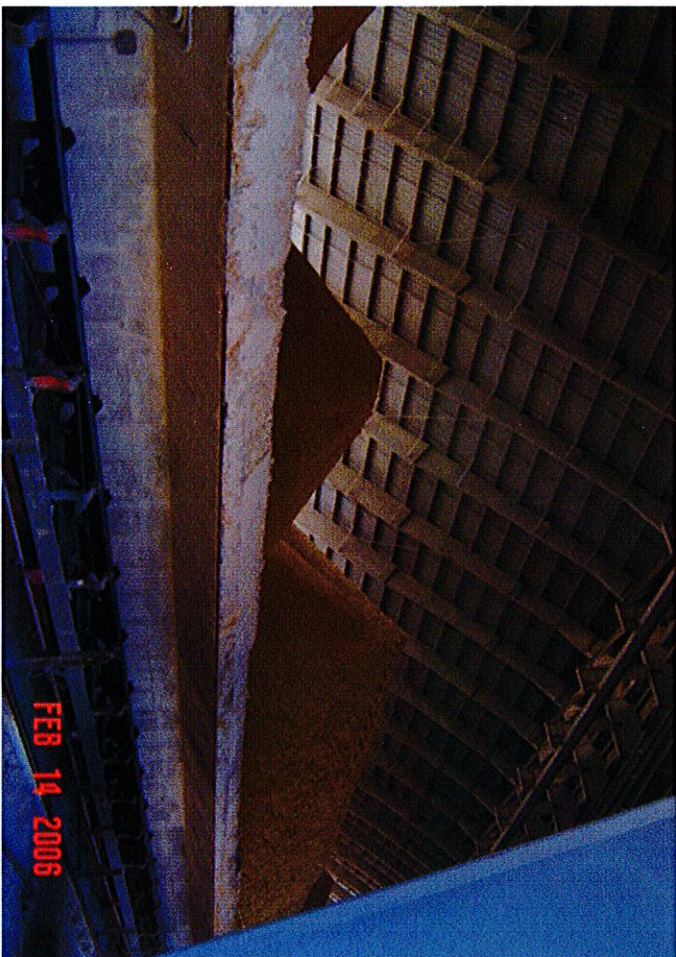
FCS BTG- 2-14-06 Hernando Co



Pile #1 of TECO Ash



Pile #1



where ash is mixed w/ rock



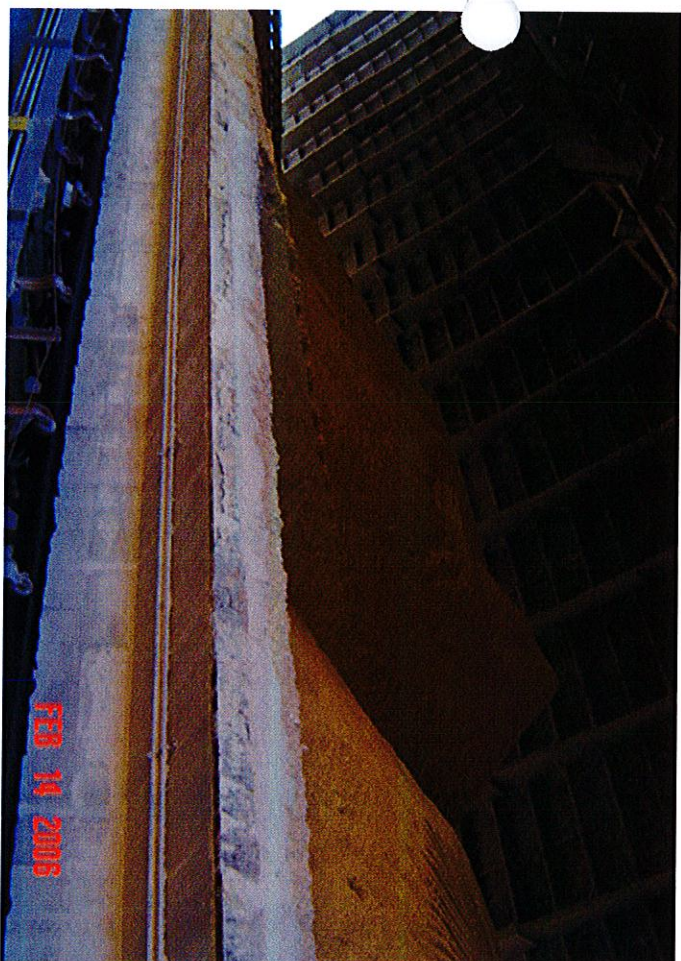
- bag house filters stored in enclosed rail car by pile #1



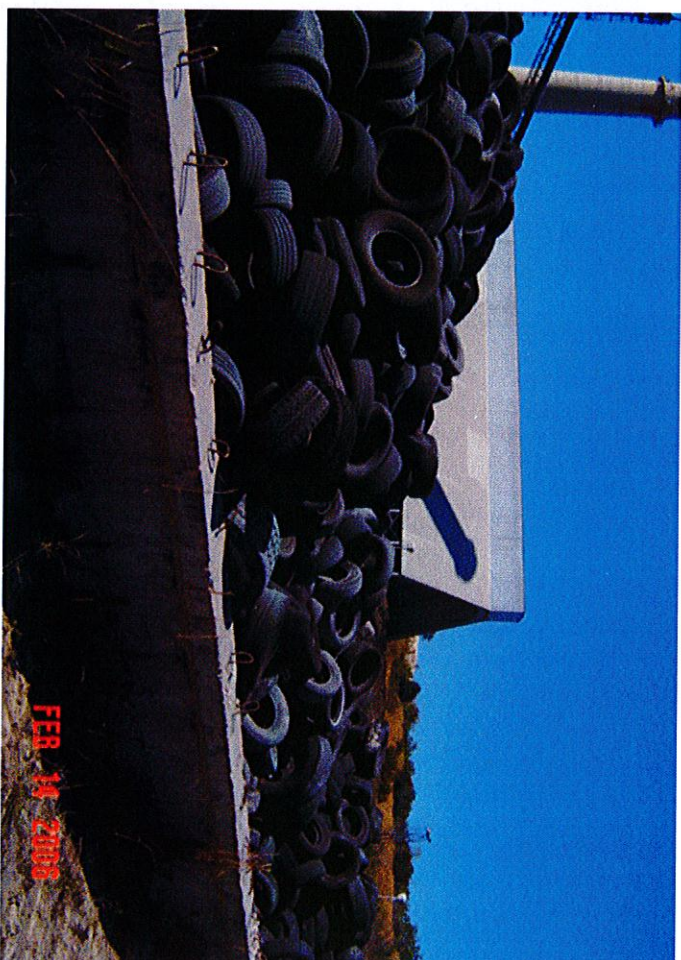
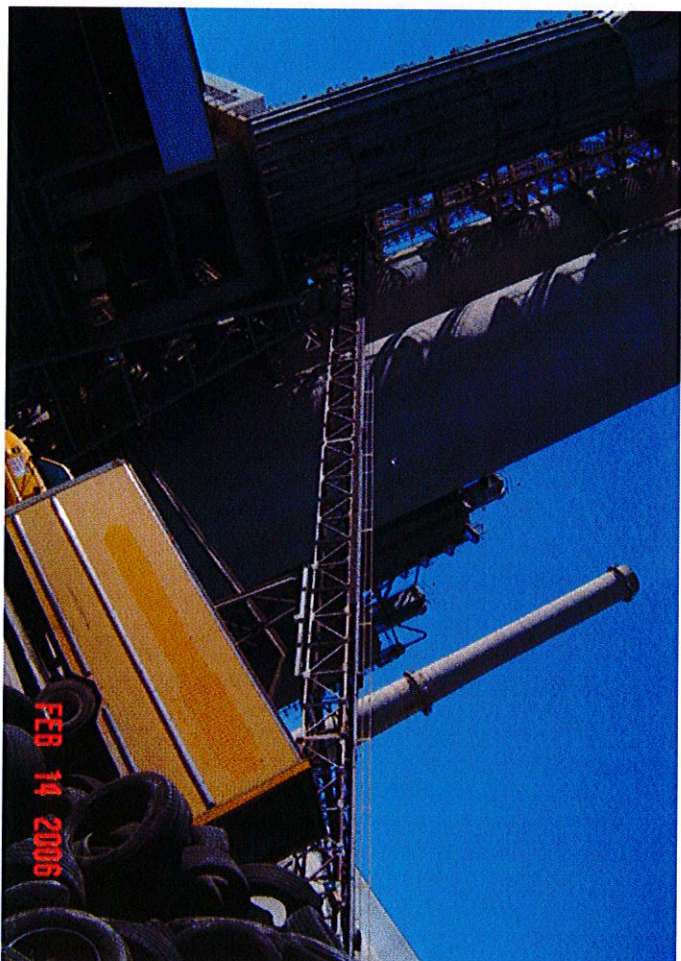
FCS BTG 2-14-05 Herando Co.



- waste tire pile



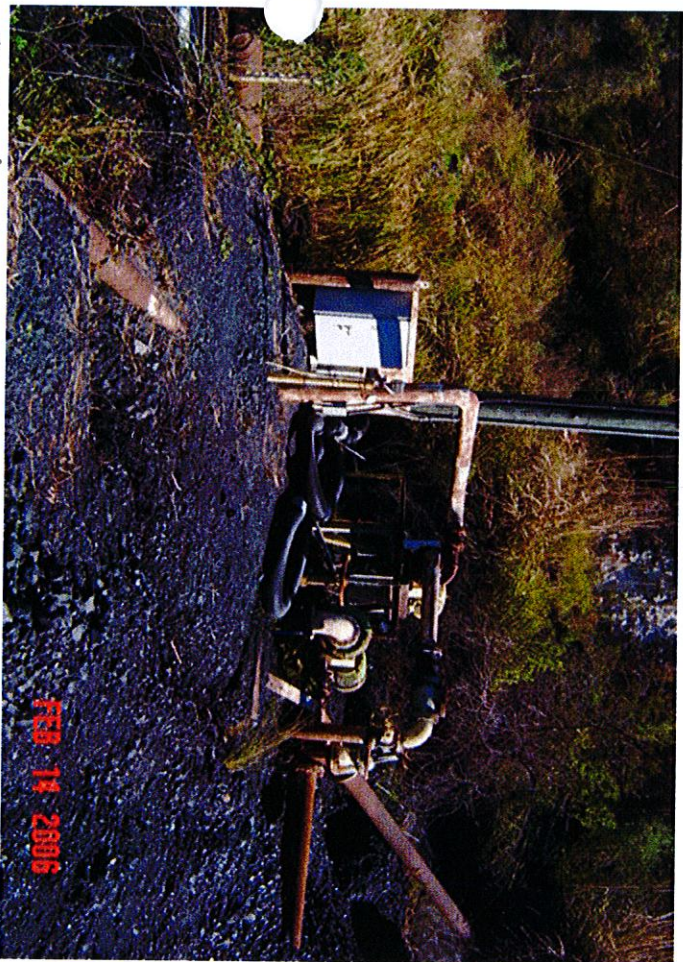
mixing area



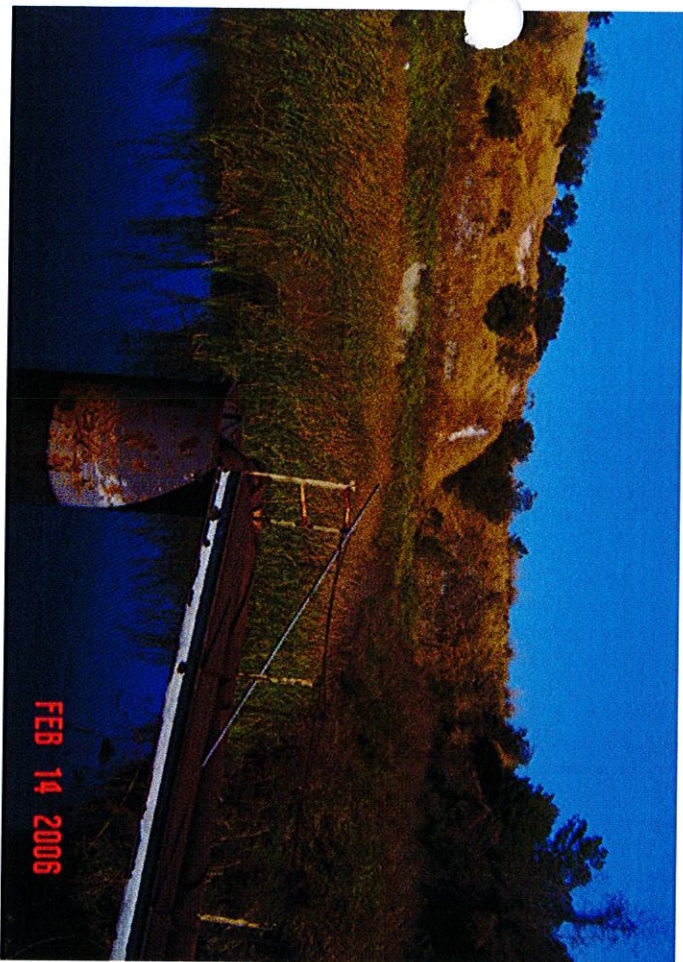
- waste tire storage



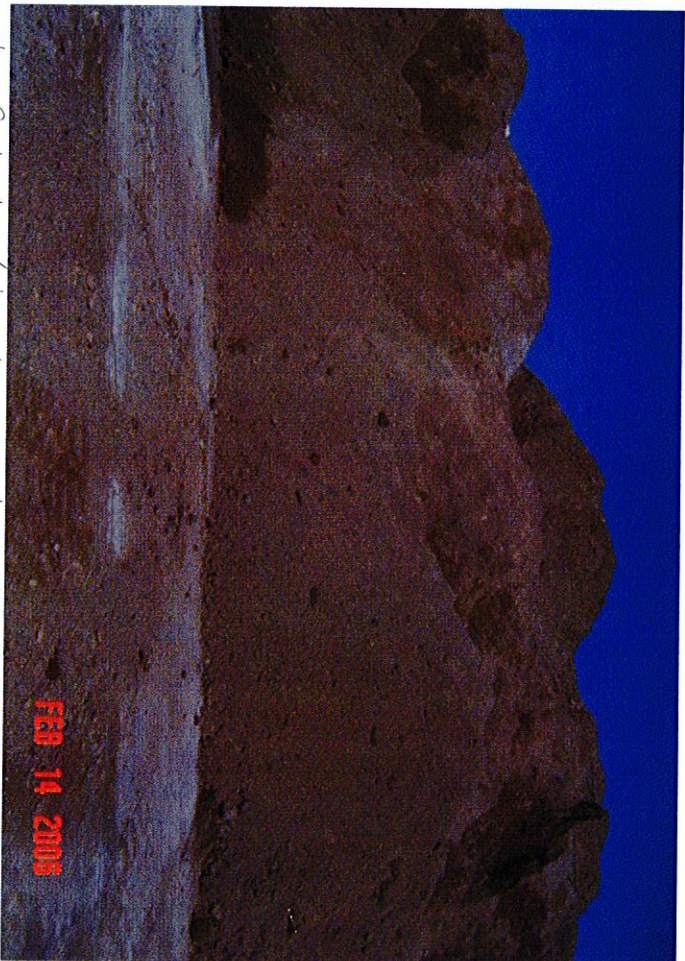
FCS Horwanda Co. BTG 2-14-06



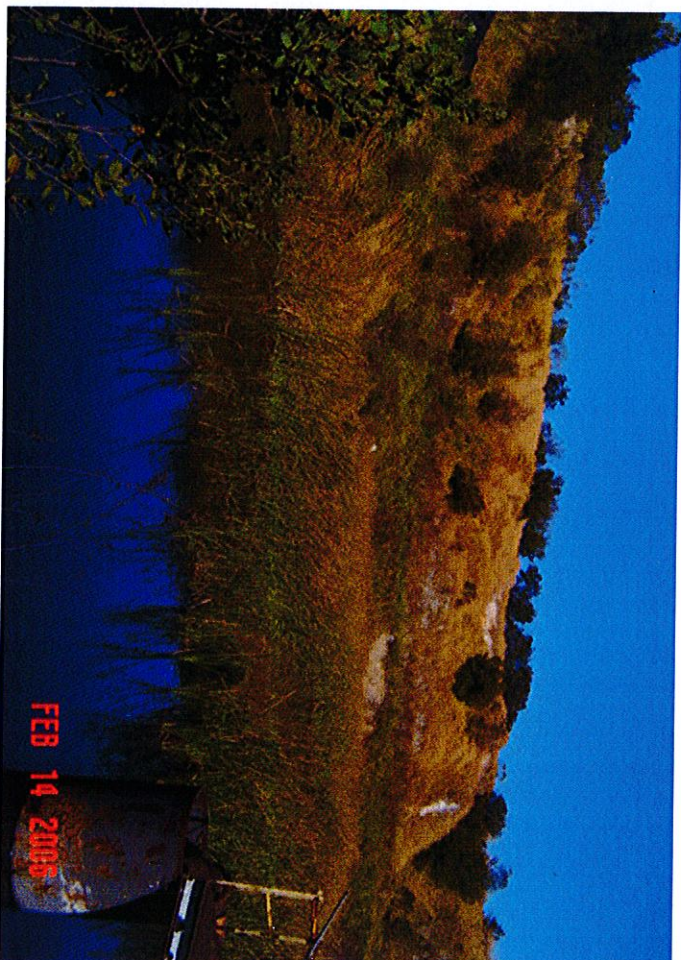
Sump for Iw pond



Iw pond



slag feed / ledge of cement



Iw pond





# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

Mr. Jim Daniel  
Rinker Materials  
10311 Cement Plant Road  
Brooksville, Fl. 34601

October 11, 2005

RE: Response to request for information dated June 15, 2005  
Solid waste and industrial by-product management

Dear Mr. Daniel:

The Department has received the response dated July 13, 2005 (received July 14, 2005) prepared by Coastal Engineering Associates concerning the Department's June 15, 2005 letter regarding the management of industrial by-products at the FCS/Rinker facility in Brooksville. The Department apologizes for the delay in responding to your letter. After review of the response letter, additional information is needed to clarify the management of industrial by-products and solid wastes at the facility. Please respond to the following comments:

1. Ditch cleanings. The information states, "ditch cleanings and petroleum contaminated soil... are not considered byproducts of planned use at the facility and are... not included in the inventory.... The ditch cleanings... consist of limestone fines that are recycled through the raw material feed to the Cement Plant." Please provide analysis for the ditch cleanings that demonstrates that they consist only of "limestone fines." Since this material is reused in the raw feed, please explain how this is "not considered [a] byproduct... of planned use at the facility."
2. Petroleum contaminated soil. Please provide analysis of, and disposal receipts for, the petroleum contaminated soils. Please specify the "licensed disposal facility in south Florida." In the event that all of these soils have not been removed for proper disposal, please provide a schedule for the completion of this activity.
3. Baghouse bags, former asphalt plant area.
  - a. The Department does not disagree that based on the analysis provided, the bag house bags do not appear to be hazardous. However, at the site inspection on April 5, 2005, the origin and previous use of the baghouse bags was not clear, but it was hypothesized that the bags may have originated from the asphalt processing facility that was formerly located in the area. Based on this, please explain why "it was determined unreasonable to expect the presence of semi-volatiles in the leachate from the filters...." Since asphalt processing may include semi-volatile and volatile compounds, it seems reasonable to expect that due to the proximity of the bags to this operation, that these constituents may be present in the bags or soils.
  - b. The results for sample SS-1 indicates that soils in the bag storage area may have been impacted by the improper storage of solid waste. Please provide a plan (including sampling locations, number of samples, parameters, and timeframe for implementation) for assessing the impacts to soil, ground and surface waters from this unauthorized activity.

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*Printed on recycled paper.*



**4. Solid waste and industrial by-products.**

a. Please provide the following information for each of the solid wastes and industrial by-products managed at the site, including, but not limited to Progress Energy Crystal River "conditioned" ash, imported slag, ditch cleanings, petroleum contaminated soils, material stored in the A-Frame building, and mill scale: chemical characterizations (analytical data), a detailed description of the current management practices (i.e., how/where material is stored and reused in the process), documentation that demonstrates that greater than 50% of the material received at the facility is reused each year, an estimate of the quantity of material currently stored onsite, and an description of the source (generator and process) for each material. The chemical characterizations should include parameters that are reasonably expected to be contained in the material, and should include a statistically representative number of samples based on the variability of the data.

b. Industrial byproducts inventory worksheet.

1) Please provide footnotes 1 (Material Supplier & Source) and 2 (Method of Storage).

2) The analyses provided in this table do not address the potential of the material to impact surface or groundwater quality. Although some materials are indicated to be stored on a "concrete pad," based on the site inspection, these pads do not appear to contain or collect runoff from the piles, and the material noted as stored "under A-frame storage" was observed spilling outside of the building. It should also be noted that the A-frame building reportedly does not have an impervious floor.

3) Since the Gannon ash has not been reused within the 3-year period authorized by the Department in its June 5, 2001 letter (attached for your reference), the Department considers this material to be solid waste, and its storage and management shall comply with Chapter 62-701, F.A.C., including permitting requirements. Please provide a plan and schedule for removal of this material for proper disposal, or a permit application for a solid waste processing facility to allow the continued storage/reuse of the material at the site.

It does not appear that the solid waste and/or industrial by-products are stored and managed within a groundwater monitoring system that meets the requirements of Chapter 62-701, F.A.C. Please be advised that based on the responses to above requested information, the management of the solid wastes and industrial by-products at the site may require new permits, modifications to the site's groundwater monitoring plan, stormwater management plan, BMPP, permits or authorizations.

Please provide all requested information within 30 days of the date of this letter. Please provide information that includes the signature and seal of the registered professional engineer or geologist (as appropriate) who prepared it. The Department appreciates your cooperation in providing the information needed to approve your request to include all site activities under the Power Plant Certification. If you have any questions, you may contact me at (813) 744-6100 x 386.

Sincerely,



Susan J. Pelz, P.E.  
Solid Waste Manager  
Southwest District

sjp  
Attachment

cc: Jim Morris, FCS/Rinker, 11430 Camp Mine Road, Brooksville, Fl. 34601, w/attachment  
Tom Mountain, Coastal Engineering, 966 Candlelight Blvd., Brooksville, Fl. 34601, w/attachment  
Buck Oven, FDEP Tallahassee  
Richard Tedder, P.E., FDEP Tallahassee  
William Kutash, Waste Program Administrator, FDEP Tampa  
Cindy Falandsyz, FDEP Tampa, IW Section





# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

June 5, 2001

Florida Crushed Stone Company  
c/o Mr. Charles E. Allen  
10311 Cement Plant Road (34601)  
P.O. Box 1508  
Brooksville, FL 34605-1508

RE: Reuse BMP for Dredge, Coal and Coal Ash Byproduct Recycling from  
the Ash Storage Area at TECO's Gannon Station at Florida Crushed  
Stone - dated April 2001 (received April 30, 2001)

Dear Mr. Allen:

The Department has reviewed the Best Management Practices (BMPs) and additional information submitted by ECT, Inc. outlining your proposal to use TECO Gannon Station ash and industrial dredge material in the manufacturing of cement. This Department reuse exemption does not include Ash Byproducts other than those normally collected and stored in the Ash Storage Area identified in attached Figure #1. Section 403.7045(1)(f), Florida Statutes (F.S.), provides that the following wastes or activities are not regulated by the Department as solid waste:

(f) Industrial byproducts, if:

1. A majority of the industrial byproducts are demonstrated to be sold, used, or reused within 1 year.
2. The industrial byproducts are not discharged, deposited, injected, dumped, spilled, leaked, or placed upon any land or water so that such industrial byproducts, or any constituent thereof, may enter other lands or be emitted into the air or discharged into any waters, including groundwaters, or otherwise enter the environment such that a threat of contamination in excess of applicable department standards and criteria is caused.

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3. The industrial byproducts are not hazardous wastes as defined under §403.703 and rules adopted under this section.

Based upon the information you have submitted, the Department has concluded that, if the conditions set forth below are complied with, this proposed reuse is expected to meet each of the three criteria of the statute and does not require a permit from the Department. Specifically, the Department agrees that the proposed project does constitute the use or reuse of the ash and industrial dredge materials; that the ash and industrial dredge materials is not a hazardous waste; and that the proposed reuse BMP provides adequate assurance that the ash and industrial dredge materials will not be discharged, deposited, injected, dumped, spilled, leaked, or placed upon any land or water so that the waste, or any constituent thereof, may enter other lands or be emitted into the air or discharged into any waters, including groundwaters, or otherwise enter the environment such that a threat of contamination in excess of applicable department standards and criteria would result. This conclusion is conditional upon your compliance with the BMPs and with the following conditions:

1) Florida Crushed Stone shall continue to test to ensure that the ash and industrial dredge materials are not a characteristic hazardous waste. The TECO Gannon Ash and industrial dredge material, before receipt at the facility, should be retested whenever there is reason to believe that the process or operation generating the waste has changed, and Florida Crushed Stone shall maintain records of such testing on site for three years

2) Stormwater runoff which contacts solid waste (i.e. slag/dredge material) in the staging area shall be managed as leachate and shall not be discharged to the soil, ground water or surface waters.



3) Waste quantity reports which detail the quantities received, stored and processed (i.e. used on site) shall be maintained at the facility and provided to the Department upon request.

4) Florida Crushed Stone specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the approved activity is located or conducted to:

(a) Have access to and copy any records provided for in the BMPs or above conditions;

(b) Inspect the facility, equipment, practices, or operations provided for in the BMPs or above conditions; and

(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with the BMPs, above conditions, or Department rules.

The Department's conclusion that the proposed reuse ash and industrial dredge materials is exempt from permitting under Section 403.7045(1)(f), F.S., is based upon compliance with the above conditions, and is applicable only for the specific processes and operations set forth in your submittals. If you fail to comply with these conditions and the proposed BMPs, or if you fail to meet any of the three criteria in Section 403.7045(1)(f), F.S., this conclusion will not be binding and the Department may initiate enforcement for disposal of solid waste without a permit.

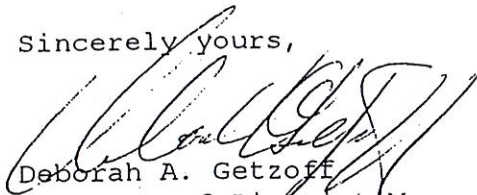
Qualification for the exemption under Section 403.7045(1)(f), F.S., does not mean that you qualify for exemptions from any other Department or local permits which may be required for this project. It does not authorize any injury to public or private property or any invasion of rights, nor any infringement of federal, State, or local laws or regulations. It does not relieve you from any liability for harm or injury to human health or welfare, animal or plant life, or



property caused by the construction or operation of this project, or from penalties therefore, nor does it allow you to cause pollution in contravention of Florida Statutes and Department rules. Finally, this exemption is based upon laws and rules currently in effect; if those laws or rules change in the future, you may be required to comply with those changed laws or rules within a reasonable period of time.

Thank you for your submittals and patience with this process. If you have any questions about this letter or other aspects of the waste reuse process, please contact William Kutash (813 744-6100 x353) in our Tampa District office.

Sincerely yours,



Deborah A. Getzoff  
Director of District Management  
Southwest District Office

RJB/ab

cc: Robert Stafford, TECO, Environmental Affairs  
F.J. "Paco" Amram, P.E., ECT, Inc.  
Mark Culbreth, P.G., ECT, Inc.  
Mary Jean Yon, BSHW, Tallahassee  
Chris Mcguire, OGC, Tallahassee  
Richard Teddar, BSHW, Tallahassee  
William Kutash, SWD Waste Div., Tampa  
Buck Oven, Power Plant Siting, Tallahassee



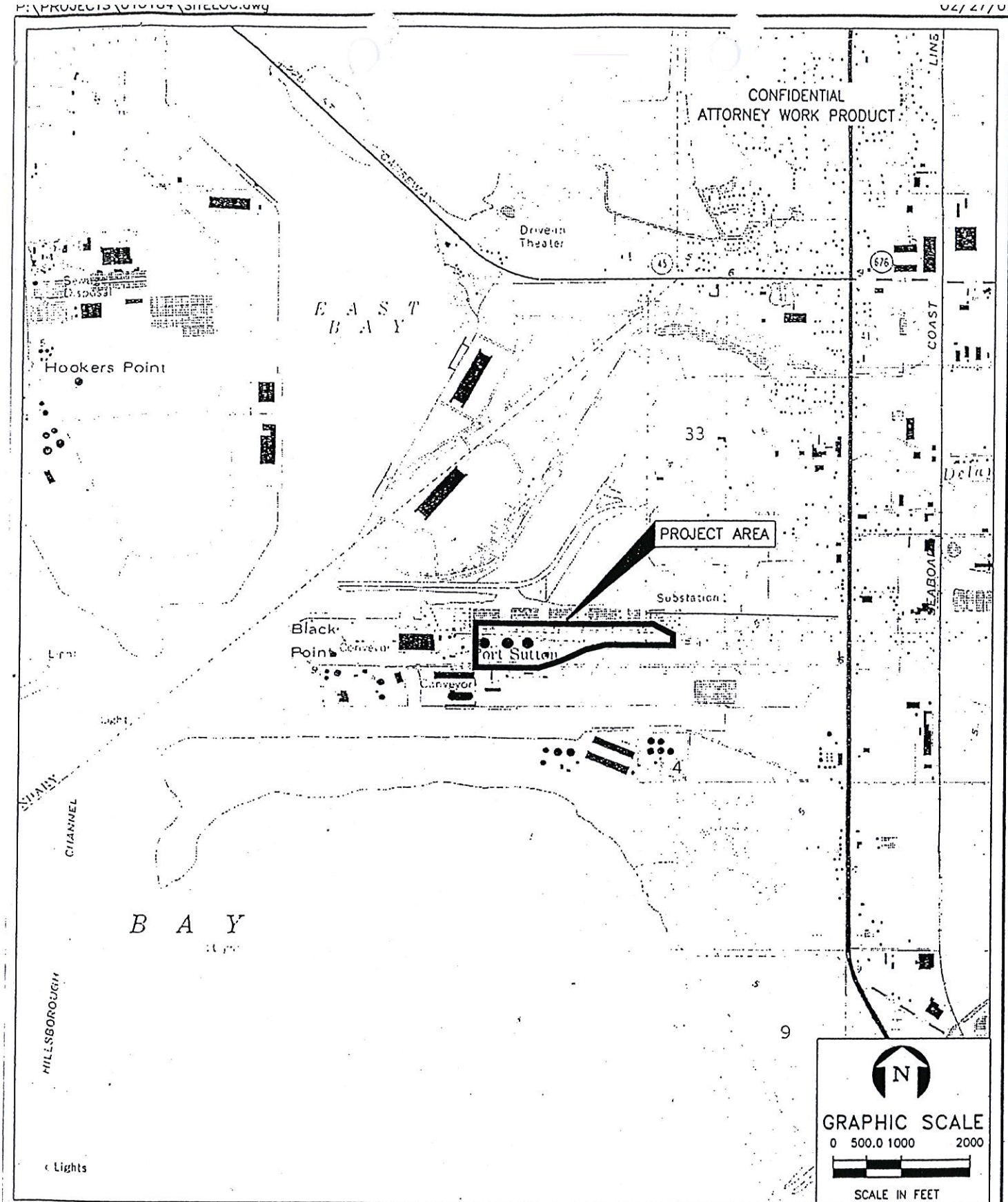


FIGURE 1.  
SITE LOCATION MAP  
TECO F.J. GANNON STATION  
PORT SUTTON ROAD  
TAMPA, FLORIDA

Sources: USGS Quad Map of Tampa, FL, 1981; ECT, 2001.

**ECT**  
Environmental Consulting & Technology, Inc.





Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
Secretary

## SITE INSPECTION REPORT

Sent Via Fax Only

**OWNER/OPERATOR:** Rinker Materials  
J.S. Daniel, Plant Manager  
**MAILING ADDRESS:** 10311 Cement Plant Rd.  
Brooksville FL, 34601

NOT  
Sent

**NAME OF SITE:** Florida Crushed Stone **INSPECTION DATE:** 2-14-06

### REASON FOR VISIT:

- COMPLIANCE INSPECTION   X
- PERMITTING INSPECTION
- COMPLAINT INVESTIGATION

**PERSONS PRESENT:** Bret Galbraith (FDEP), Joe Calamari (Coastal Eng.), Steve Tyler (Rinker), Steve Bassler (Rinker), Jim Daniel (Rinker)

### SUMMARY REPORT:

The purpose of this visit was to assist the owner/operator by providing feedback and a comprehensive evaluation of the facility as a whole. The Department has taken this opportunity to provide better communication with Rinker and Coastal Engineering, leading to continuous improvement of the facility, and its environmental operations.

Department personnel began the inspection by talking to Jim Daniel (Rinker) about the response for additional information from the Department dated October 11, 2005 received by Mr. Daniel. He informed staff that he had submitted a response recently to the Department with regards to the above-mentioned letter, and stated that he was asking for roughly 5 more years to use the remaining Gannon ash. This amount of time is plausible he explained due to the fact that an additional cement plant is being built at the facility that will help quicken the consumption of the ash.

The issue of which specific analytical tests should be done on the baghouse bags that were located previously in the asphalt processing facility was revisited. Mr. Daniel believed that based on the analytical tests previously submitted to the Department, that the bags are not harmful. But because the origin and previous use of the bags is unclear, the Department believes it reasonable to test the bags for semi-volatiles before disposal. Referencing the letter dated October 11, 2005 sent to Mr. Daniel from Susan Pelz (FDEP), *Since asphalt processing may include semi-volatile*

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*and volatile compounds, it seems reasonable to expect that due to the proximity of the bags to this operation, that these constituents may be present in the bags or soil.*

We then proceeded to Gannon Ash area/pile #3 in the northern portion of the facility. This pile was covered by a black tarp and weighted down with sand bags and tires around its perimeter. There was ponding seen around the southeastern end and around the loading area. Department staff observed two tears in the tarp around the loading area and noted that the tarp had not been securely closed before inspection for it was open and ash was visible.

Staff then went on to Gannon Ash area/pile #1 in the eastern portion of the facility. This pile was observed to be double tarped, with no visible ash openings seen by staff. Nearby was an unclosed railcar that was holding baghouse filters that had been moved from a previous location slightly north of its current locale. Certain maintenance equipment is also kept in this railcar. Mr. Daniel explained that once he gets permission from DEP staff to dispose of the baghouse filters he promptly would do such.

Steve Tyler then explained that the Gannon ash is mixed within the A-frame with rock from the site. This building (A-frame) has a roof, but is open to the air around the perimeter. Department staff also inspected the southern portion of the site that contained the slag feed storage area. The slag was placed, and entirely contained, on a cement pad within this area.

The site visit finished with an inspection of the waste tire processing area that was found to be in compliance of DEP permit #22787-002-WT. An inspection report was faxed to Mr. Daniel on February 22, 2006 with regards to waste tire processing facility at the site.

It does not appear that the solid waste and/or industrial by-products are stored and managed within a groundwater monitoring system that meets the requirements of Chapter 62-701, F.A.C. Please be advised that based on the responses to above requested information, the management of the solid wastes and industrial by-products at the site may require new permits, modifications to the site's groundwater monitoring plan, stormwater management plan, BMPP, permits or authorization.

Please provide all requested information within 30 days of the date of this letter. The Department appreciates your cooperation in providing the information needed to approve your request to include all site activities under the Power Plant Certification. If you have any questions, you may contact me at (813) 632-7600 x 375.

**FDEP REPRESENTATIVE:** \_\_\_\_\_

Bret Galbraith, E.S. I, Solid Waste Section

cc: Susan Pelz, FDEP



ATTACHMENT B

SCALE: 1 INCH EQUALS  
APPROXIMATELY 100 FEET

N

TO TIRE HANDLING AREA

INTERNAL PLANT ROAD

FULL  
(typical)  
8'x45'  
TRAILERS

EMPTY

CEMENT PLANT ROAD

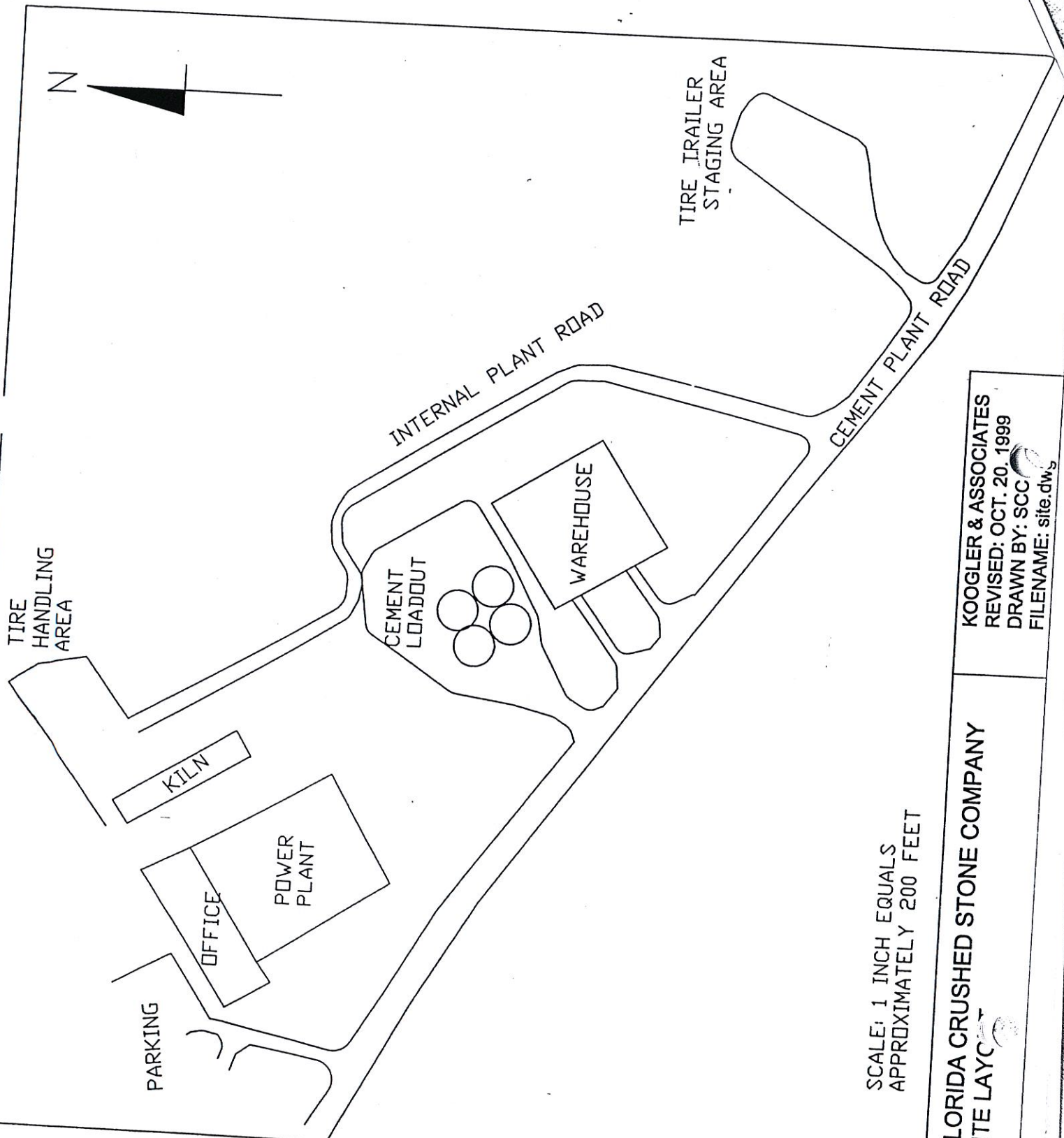
FLORIDA CRUSHED STONE COMPANY  
TIRE TRAILER STAGING AREA

KOOGLER & ASSOCIATES  
REVISED: OCT. 20, 1999  
DRAWN BY: SCC  
FILENAME: tirestage.dwg

10/21/99



ATTACHMENT A



SCALE: 1 INCH EQUALS  
APPROXIMATELY 200 FEET

FLORIDA CRUSHED STONE COMPANY  
SITE LAYC

KOGLER & ASSOCIATES  
REVISED: OCT. 20, 1999  
DRAWN BY: SCC  
FILENAME: site.dwg







# FLORIDA CRUSHED STONE PILES



- extend time period to around 5 yrs to get rid of ash
- Steve Tyler (Prod. Coord)
- Ops ✓
- Permit ✓



Date: 2-22-06

Number of pages, including cover page: 3

To: J.S. Daniel From: Bret Galbraith  
Phone: 352-799-7881 Phone: (813) 632-7600, Ext: 375  
Fax: 352-799-6088 Fax: (813) 632-7664  
cc: Joe Calamari

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Comments: No response needed

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813527996088	NORMAL	22,11:35	1'02"	3	* O K	
Telephone Number	Mode	Start	Time	Pages	Result	Note

P.1 Feb 22 2006 11:37

\*\* Transmit Conf. Report \*\*

WASTE MGT TAMPA SWD Fax: 8136327664





**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOLID WASTE MANAGEMENT FACILITY  
WASTE TIRE FACILITY INSPECTION CHECKLIST**

GMS/WACS I.D. No. SWD/271 40774 Facility Name: Florida Crushed Stone (Rinker)  
 Inspection Date: 2-14-06 Permit No.: 22787 -002-WT Expiration Date: 12/6/05  
 Facility Address: 10311 Cement Plant Rd  
 City: Brooksville County: Hernando Zip: 34601  
 Permittee or Operating Authority: Florida Crushed Stone Company  
 Telephone Number (Permittee or Operating Authority): (352) 799-7881

Inspection Participants (Include ALL Employees and Department Employees Specifying Titles):

Principle Inspector: Bret Galbraith  
 Other Participants: Steve Bessler, Joe Calamari

**TYPE OF FACILITY**

☒ Waste Tire Processing Facility ☐ Waste Tire Collection Center

**TYPE OF INSPECTION**

☐ Construction Completion ☐ Complaint Investigation ☐ Other \_\_\_\_\_  
☒ Operation ☒ Reinspection  
☐ Closure ☐ Facility File Review

**REQUIREMENTS**

THE REQUIREMENTS LISTED IN THIS INSPECTION CHECKLIST ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NO" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A VIOLATION OF THE CORRESPONDING DEPARTMENT RULES. EACH VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT.

I. Waste Tire Facilities	YES	NO	Unk	N/A
1. Unauthorized operation prohibited within 200' of any natural or artificial body of water including wetlands, except bodies of water which do not discharge off site? 62-711.540(3)(a)	✓			
2. Required signs for operational directions? 62-711.540 (1)(a)	✓			
3. Is attendant on duty when waste tires are received? 62-711.540(1)(c)	✓			
4. Adequate communication equipment on-site? 62-711.540(1)(i)	✓			
5. Acceptance of waste tires prohibited after permitted storage limit reached? 62-711.530(2)	✓			
6. Operations involving open flames prohibited within 25 feet of a waste tire pile? 62-711.540(1)(b)	✓			
7. Waste tire pile size dimensions and setback requirements maintained? 62-711.540(2) and (3)	✓			
8. Residuals from processing properly managed? 62-711.540(5)			✓	
9. Temperature control measures in processed tire piles maintained? 62-711.540(4)			✓	
10. Are storage areas free from vegetation and vectors? 62-711.540	✓			
For a Waste Tire Processing Facility: at least 75% of waste tires delivered to and contained on site	✓			
11. processed and removed within a calendar year? 62-711.530(3)				
For a Waste Tire Collection Center: All waste tires removed from site at least once a year? 62-	✓			
12. 711.550(1)(b)				✓
13. All permit Specific Conditions complied with? 62-701.320(1)	✓			
14. Adequate financial assurance? 62-711.500(3)	✓			
15. Annual fire safety survey conducted by local fire protection services? 62-711.540(1)(d)	✓			
16. Emergency preparedness manual available and annually updated? 62-711.540(1)(e)	✓			
17. Adequate operational records maintained? 62-711.530(4), 62-711.540(1)(g)	✓			
18. Are reporting requirements complied with? 62-711.530(5)	✓			



## VI. NARRATIVE

### NOTES:

Department staff observed a delivery of waste tires to the facility during the inspection by a commercial hauler. Rinker staff told Department staff that the facility only accepts commercial hauler waste tires. The facility was at low capacity (waste tires). Fire lanes were observed and there were no smells or vectors detected by staff during the inspection.

Operation manual and permit were on site and up to date, along with training certificates.

Signed: Bret G. Galt / 2-22-06  
DEP Representative Date

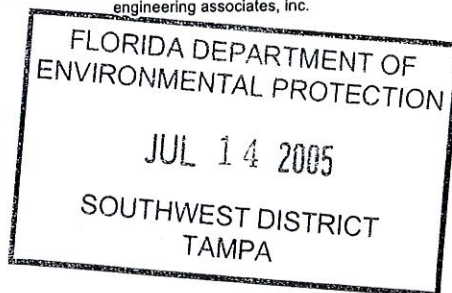
Received: Faxed to Facility / 2-22-06  
Site Representative Date

**No response needed in regards to this inspection letter.**



July 13, 2005

Ms. Susan J. Pelz, P.E.  
Solid Waste Management  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619



Re: Response to Request for Additional Information dated June 15, 2005.

Ms. Pelz:

The following information is being provided as requested in the above referenced letter.

**Response to Item #1:**

Attached is a worksheet entitled PA82-17 Industrial Byproduct Inventory, CPL Plant, FCS Cement. Also included is a current location map for the materials listed.

The ditch cleanings and petroleum contaminated soil referenced in your letter are not considered byproducts of planned use at the facility and are, therefore, not included in the inventory provided for your review. The ditch cleanings come from CPL Plant main ditch and consist of limestone fines that are recycled through the raw material feed to the Cement Plant. The petroleum contaminated soil was generated from mitigation clean up activities at the CPL Plant and is currently in process of being transferred and disposed at a licensed disposal facility in south Florida.

**Response to Item #2:**

Two separate deliverables have been prepared by Creative Environmental Solutions for the site where the baghouse filters were found. The first was a letter to James Morris of FCS (Rinker Materials) dated May 3, 2005 that discussed sampling of the soil at the site and of the filters themselves. A signed and sealed copy of the letter is attached. The second deliverable is the letter, referenced in the June 15, 2005 letter, to you dated June 5, 2005, which advised that Rinker/Central Power and Lime, Inc./Florida Crushed Stone, intended to dispose of the filters as non-hazardous solid waste.

Samples SS-1 and DB-1 are discussed in the May 3, 2005 letter. Both samples were solids; SS-1 was soil and DB-1 was filters. No photographs were taken of the samples. Regarding the source of the filters, it could not be determined where the bags



originated other than the previous facility that operated on the site at which they were found. Noteworthy is that the bags had retained their original color, which was an indication that they had not been used in a cement, lime, or aggregates application. It was determined unreasonable to expect the presence of semi volatiles in the leachate from the filters, so there was not a need to sample for such. The results for SS-1 were crossed out on the lab report attached to the June 5, 2005 letter because sample SS-1 was not relevant to the filter disposal issue. The TCLP lab results are presented for liquids rather than solids because the analyses were of leachates.

The filters are currently stored in plastic bags in dry storage in a tool trailer at the rail load out facility. With approval from the FDEP, the bags will be disposed at the Hernando County landfill via the routine collection of other solid waste generated at the facility.

**Response to Item #3:**

Stormwater runoff from the Gannon Ash Pile #3 is contained within a closed basin. The pile and stormwater containment systems are located within the internally drained sub-basin known as EAST-4 as identified in the PA82-17 Supplemental Environmental Management Plan, Section 3: Site Water Management Plan and Exhibit A: Facility Site Map. Stormwater runoff discharge from the immediate pile and stormwater containment system area is contained within this basin, which historically has received stormwater runoff from the FCS aggregate processing plant and storage areas.

Please call me at your convenience should you have any questions regarding the responses above.

Sincerely,



Tom Mountain  
Sr. Vice President

copy: James Morris, FCS/Rinker, 11430 Camp Mine Rd., Brooksville, FL 34601  
Cindy Falandsyz, FDEP Tampa, IW Section, 3804 Coconut Palm Dr. Tampa, FL 33619  
Jim Daniel, FCS/Rinker, 10311 Cement Plant Rd., Brooksville, FL 34601  
George Foster, CES, 611 N Broad St., Brooksville, FL 34601-2938



PA82-17 / INDUSTRIAL BYPRODUCTS INVENTORY WORKSHEET  
CPL PLANT  
FCS Cement  
July 13, 2005

ITEM	TYPE OF BYPRODUCT	MATERIAL SUPPLIER & SOURCE <sup>1</sup>	LAST 12 MONTH USED (TONS)	LAST 12 MONTH DEL. (TONS)	% OF MAT. USED / DELIVERED	TONS TYPICALLY STORED	% OF MAT. USED / STORED	METHOD OF STORAGE <sup>2</sup>	Where used in CMT prod	Normal Analytical Parameters					
										SiO2	Al2O3	Fe2O3	CaO	MgO	SO3
1	SLAG	A	62602	63678	98%	1,000	6260%	5	Cement	36.30	11.70	0.20	41.60	7.50	1.30
2	GANNON ASH	D	3600	0	#DIV/0!	162,889	2%	4	Klin Feed	44.80	16.50	13.20	23.20	1.93	1.47
3	CONDITIONED ASH	B	38500	39000	99%	500	7700%	2	Klin Feed	43.80	26.90	8.77	15.08	1.63	0.00
4	FLY ASH	D	78169	78285	100%	1,500	5211%	1	Klin Feed	45.10	21.60	20.00	8.20	0.91	1.49
5	CPL FLY ASH	C	25684	25684	100%	500	5137%	1	Klin Feed	43.13	20.70	5.06	25.17	0.81	0.68
6	CPL BOTTOM ASH	C	7817	7817	100%	500	1563%	2	Klin Feed	44.77	21.97	4.97	24.17	0.81	0.68
7	TIRES	E, F, G	5885	6024	98%	150	3923%	2	Clinker	3.63	0.00	0.00	44.21	0.00	48.70
8	WASTE	D	72075	71958	100%	1,500	4805%	3	Cement	1.00	0.00	95.00	1.00	0.00	0.00
9	IRON MILL SCALE	A	14104	17649	80%	10,000	141%	5	Klin Feed	43.50	17.60	22.22	11.00	2.20	0.03
10	BLACK BEAUTY	E	10568	8247	128%	500	2114%	5	Klin Feed						0.02

NOTE #1:

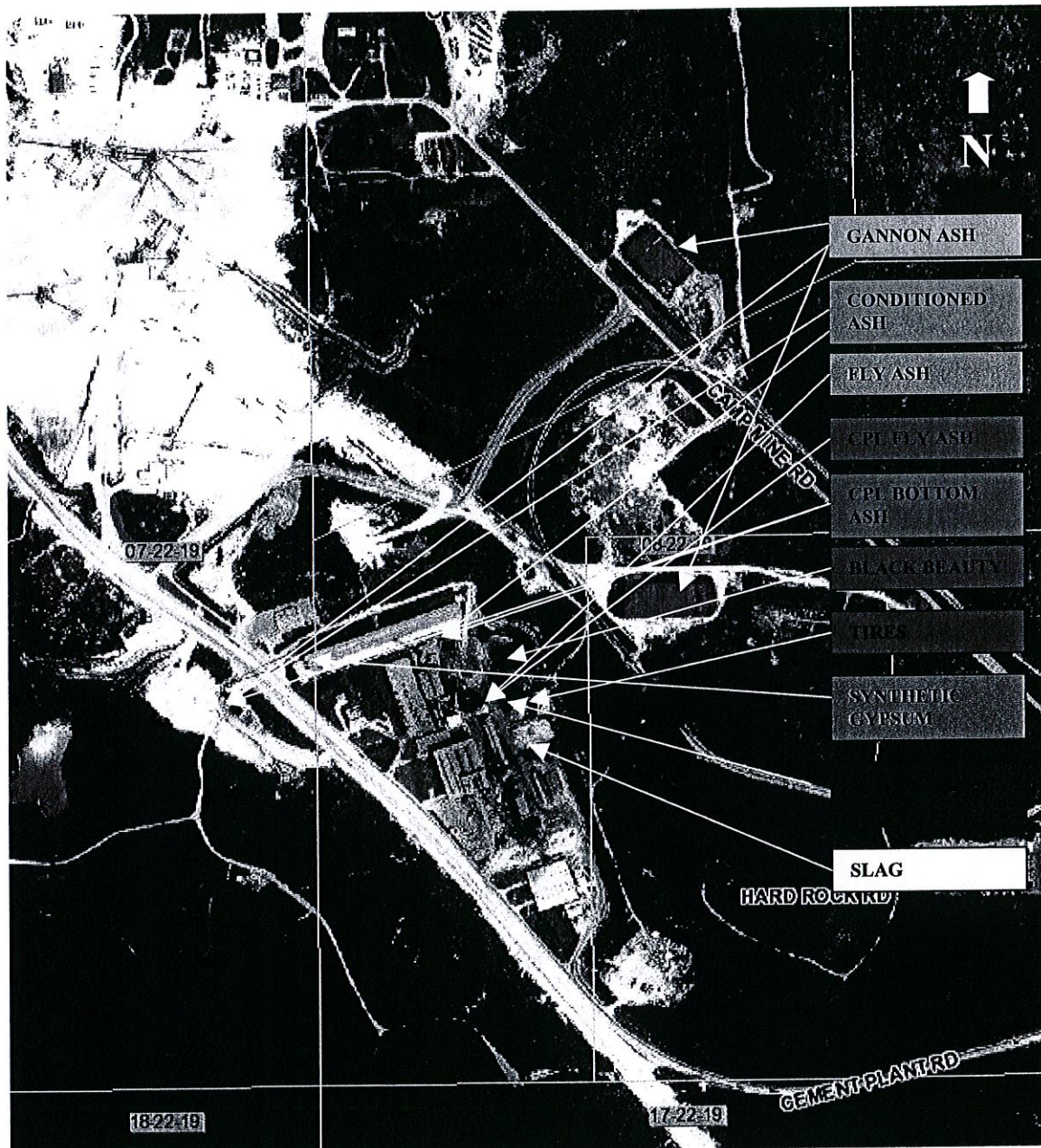
- A Bulk Materials 153 S. Main St. Newtown, CT. 06470
- B Progress Energ 15760 West Powerline Rd. Crystal River, FL 34428
- C Central Power 10311 Cement Plant Rd. Brooksville, FL 34601
- D TECO Big Ben 13031 Wyandotte Rd. Apollo Beach, FL 33572
- E Quicksilver F&F Environmental 1102 N. Rome Ave. Tampa, FL 33607
- F Griner Waste T 852 Minneola, FL 34755
- G Mid Florida Tire 12422 Brierwood Point Floral City 34436

NOTE #2:

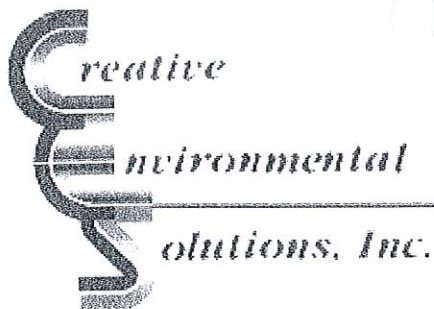
- 1 Concrete Silo
- 2 Concrete Pad
- 3 Under A-Frame storage
- 4 Taped
- 5 Perimeter Berm



**PA82-17 / Industrial Byproducts Inventory Map**  
**CPL Plant**  
**FCS Cement**  
**July 13, 2005**







Engineers, Environmental Scientists, and Geologists

611 North Broad Street • Brooksville, FL • 34601

May 3, 2005

James Morris  
Florida Crushed Stone Company  
P.O. Box 1508  
Brooksville, FL 34605-1508

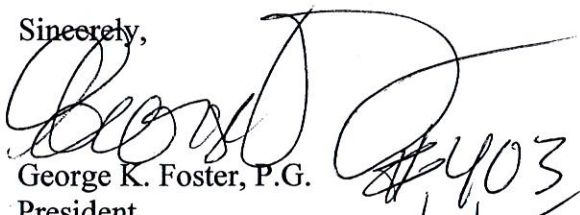
Re: Soil and Materials Sampling and Analysis  
Former Used Baghouse Filter Storage Area

Dear James:

On April 6, 2005, CES collected a composite sample of the surface soil at the location formerly used for storage of baghouse filters. This same date, CES collected a composite sample of the filters themselves. Both samples were analyzed for TCLP arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver. Trace amounts of leachable barium were found in both samples, and a trace amount of lead in the soil sample only, but all levels were orders of magnitude below TCLP limits.

It is clear that neither the soil in the former filter storage area nor the filters themselves are characteristic hazardous wastes based on the TCLP results. No further assessment is warranted. Please call with any questions or comments.

Sincerely,

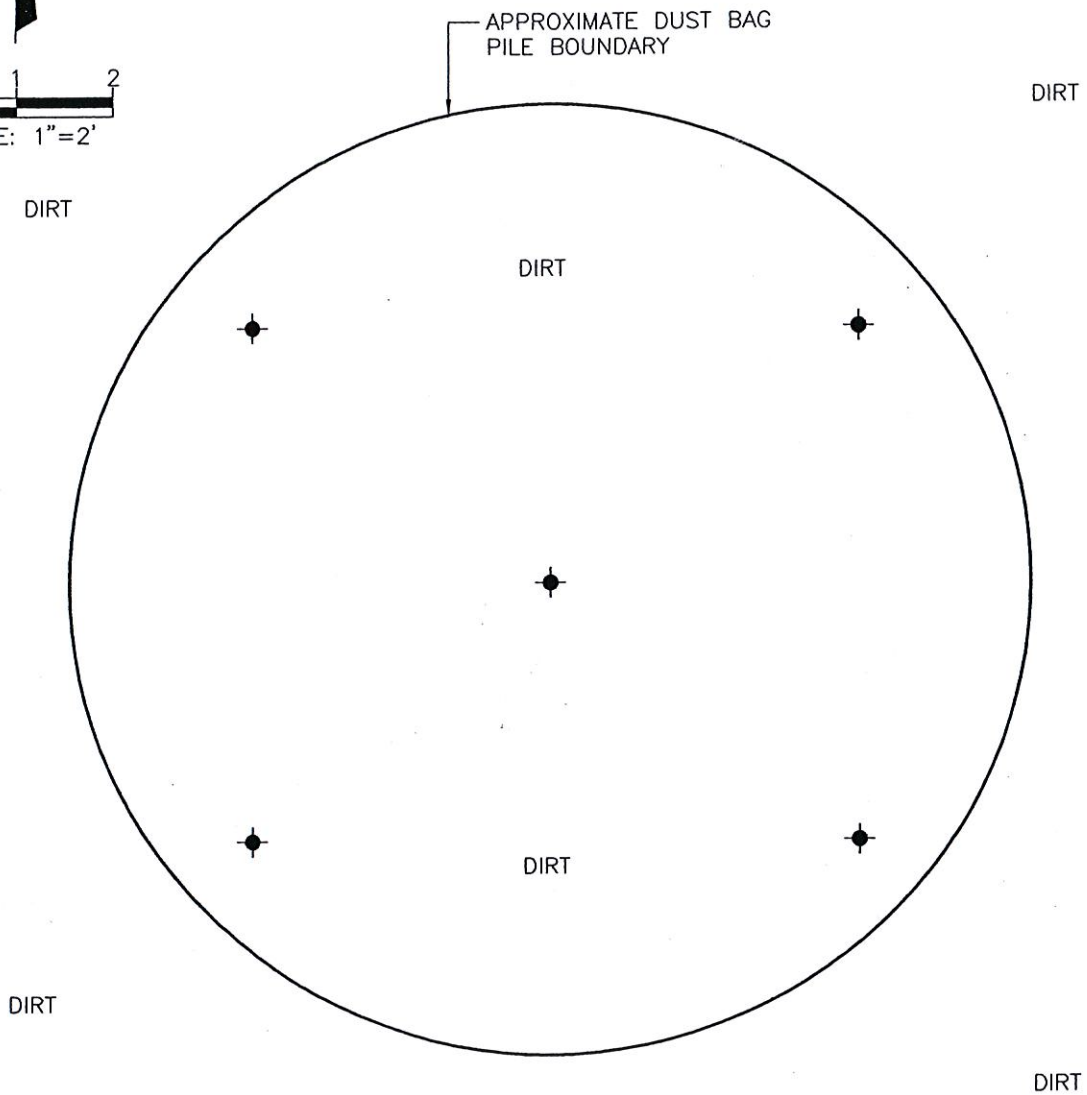
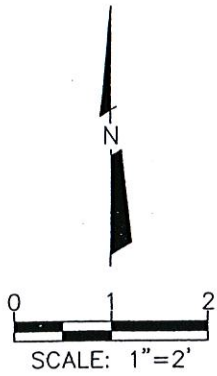
  
George K. Foster, P.G.  
President  
#403  
7/6/05

attachments

Brooksville Office  
(352) 796-3374  
Fax (352) 796-2449  
e-mail: cesinc20@tampabay.rr.com

Gainesville Office  
(352) 371-4333  
Fax (352) 371-0020





### LEGEND

✦ - COMPOSITE SOIL SAMPLE LOCATION



*Creative  
Environmental  
Solutions, Inc.*

611 NORTH BROAD STREET  
BROOKSVILLE, FL. 34601  
PHONE: (352) 796-3374  
FAX: (352) 796-2449

FACILITY NAME

DATE PREPARED

FIGURE NO.

FIGURE TITLE



Facility Name: **Delta Power**  
Facility Address: **Brooksville, Florida**

[illegible]



# **Analytical Report 251965**

**for**

**Creative Environmental Solutions**

**Project Manager: George Foster**

**Delta Power (CP&L)**

**17-APR-05**



**2618 South Falkenburg, Riverview, FL 33569 Ph:(813) 620-2000 Fax:(813) 620-2033**

**NELAC certification numbers:**

**Houston, TX E87603 - Miami, FL E86678 - Tampa, FL E86675**

**Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America**





17-APR-05

Project Manager: **George Foster**  
**Creative Environmental Solutions**  
611 N. Broad St  
Brooksville, FL 34601

Reference: XENCO Report No: **251965**  
**Delta Power (CP&L)**  
Project Address: Brooksville, FL

**George Foster:**

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Chain of Custody Numbered 251965. All results being reported under this Chain of Custody apply to the samples analyzed and properly identified with a Laboratory ID number.

The results for the quality control samples were reviewed. All parameters for data reduction and validation were reviewed. Estimation of Data uncertainty for this report is found in the quality control section of this report unless otherwise noted. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, completeness or properly flagged. Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. 251965 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

---

**Michelle Williams**  
Laboratory Manager

*Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.  
Certified and approved by numerous States and Agencies.  
A Small Business and Minority Status Company that delivers SERVICE and QUALITY  
Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America*





# Certificate of Analysis Summary 251965

Creative Environmental Solutions, Brooksville, FL



Project Name: Delta Power (CP&L)

Project Id:

Date Received in Lab: Apr-07-05 08:50 am

Contact: George Foster

Report Date: 17-APR-05

Project Location: Brooksville, FL

Project Manager: Michelle B. Williams

Analysis Requested	Lab Id:	251965-001	251965-002		
	Field Id:	SS-1	DB-1		
	Depth:				
	Matrix:	WATER	WATER		
	Sampled:	Apr-06-05 12:00	Apr-06-05 12:30		
TCLP Metals by SW 6020A	Extracted:	Apr-11-05 09:18	Apr-11-05 09:18		
	Analyzed:	Apr-15-05 16:21	Apr-15-05 16:25		
	Units/RL:	mg/L RL	mg/L RL		
Arsenic		U 0.050	U 0.050		
Barium		0.094 0.050	0.134 0.050		
Cadmium		U 0.050	U 0.050		
Chromium		U 0.050	U 0.050		
Lead		0.062 0.050	U 0.050		
Mercury		U 0.0050	U 0.0050		
Selenium		U 0.050	U 0.050		
Silver		U 0.050	U 0.050		

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Since 1990 Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America

Michelle Williams  
Laboratory Manager





## Flagging Criteria



Data were reviewed by the  
Department Supervisor and QA Director

- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to effect the recovery of the spike concentration. This condition could also effect the relative percent difference in the MS/MSD.
- B A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- D The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F RPD exceeded lab control limits.
- J The target analyte was positively identified below the MQL and above the SQL.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.

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*A Small Business and Minority Status Company that delivers SERVICE and QUALITY*

Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America

11381 Meadowglen Lane Suite L Houston, Tx 77082-2647  
11078 Morrison Rd., Suite D, Dallas, TX 75229  
5309 Wurzbach, Ste 104 San Antonio TX 78238  
2618 South Falkenburg, Riverview, FL 33569  
5757 NW 158th St, Miami Lakes, FL 33014

Phone	Fax
(281) 589-0692	(281) 589-0695
(972) 481-9999	(972) 481-9998
(210) 509-3334	(201) 509-3335
(813) 620-2000	(813) 620-2033
(305) 823-8500	(305) 823-8555





## Blank Spike Recovery



Project Name: Delta Power (CP&L)

Work Order #: 251965

Project ID:

Lab Batch #: 662845

Sample: 474858-1-BKS

Matrix: Water

Date Analyzed: 04/15/2005

Date Prepared: 04/11/2005

Analyst: TOH

Reporting Units: mg/L

Batch #: 1

### BLANK /BLANK SPIKE RECOVERY STUDY

TCLP Metals by SW 6020A Analytes	Blank Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Control Limits %R	Flags
Arsenic	<0.020	1.00	0.870	87	75-125	
Barium	<0.100	1.00	0.950	95	75-125	
Cadmium	<0.010	1.00	0.874	87	75-125	
Chromium	<0.100	1.00	0.911	91	75-125	
Lead	<0.020	1.00	0.901	90	75-125	
Mercury	<0.0040	0.1000	0.1110	111	75-125	
Selenium	<0.100	1.00	0.929	93	75-125	
Silver	<0.100	1.00	0.854	85	75-125	

Blank Spike Recovery [D] =  $100 * [C] / [B]$

All results are based on MDL and validated for QC purposes.







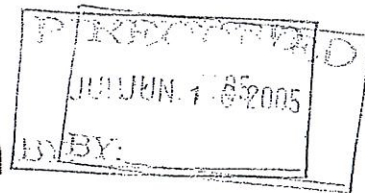


Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary



Mr. Jim Daniel  
Rinker Materials  
10311 Cement Plant Road  
Brooksville, Fl. 34601

June 15, 2005

RE: Site Inspection April 5, 2005, Solid waste and industrial by-product management

Portland cement baghouse bags disposal, information provided by Creative Environmental Solutions, dated June 5, 2005 (received June 6, 2005)

Dear Mr. Daniel:

On April 5, 2005, Department solid waste staff (Susan Pelz and Lora Ross) and industrial wastewater staff (Cindy Falandysz) conducted an inspection of the above-referenced facility. The facility has recently requested that all activities not regulated by federal programs be authorized through the site's Conditions of Certification issued through the Department's Power Plant Siting office in Tallahassee. The purpose of our inspection was to conduct the routine inspection of the waste tire processing facility and also to gather information concerning the management of other solid wastes and industrial by-products at the site to support the request to authorize activities through Power Plant Siting.

During the inspection we observed areas throughout the site where solid wastes were being stored and managed predominantly on the ground. These areas and materials included: Teco Gannon ash (2 areas), Progress Energy Crystal River ash (1 area), ditch cleanings (1 area), petroleum contaminated soils (1 area), bags from an asphalt processing plant, and slag from steel production. The locations of these materials were obtained using handheld a GPS unit, and two aerial photographs with these locations noted are attached for your reference. Following is a summary of the observations and discussions we had for each of these areas:

#### **Teco Gannon ash piles:**

Although it appeared that a few areas of the tarp had been recently repaired, the cover on Pile #3 appeared to be in disrepair in several locations. Ponded water was observed at the edges of the pile and possible leachate seepage was observed. It appears that the stormwater runoff from the pile drains to a engineered stormwater management system located to the northeast of the pile. The stormwater system in this area does not appear to be connected to the permitted industrial wastewater surface water management system. Gannon pile #1 appeared to be adequately covered.

#### **Progress Energy Crystal River Power Plant "conditioned" ash:**

This material was observed stored on the ground, northwest of the cement plant. The pile was not covered and portions of the pile were not accessible due to topography. As discussed during the site inspection, this material is being fed into the A-Frame building and is mixed with limestone and other solid wastes industrial by-products for use in the cement manufacturing process.

#### **Ditch cleanings:**

This material was stored on the ground, without cover, and was located south of Gannon Pile #1. It is not clear where this material originated or what its intended reuse is.

*"More Protection, Less Process"*



**Petroleum contaminated soil:**

This material was observed stored on the ground north of the cement plant area (at the top part of the cliff) and was only partially covered. As you indicated during the site visit, this material has been stored onsite for greater than 3 years in anticipation of possibly reusing it in the cement manufacturing process. The Department considers the contaminated soil to be solid waste that must be characterized and disposed of properly.

**A-Frame building:**

Although the *Best Management Practices Plan* submitted to the Department in October 2004 (Section 3.5) indicated that only lime (calcium carbonate) is stored in the "A" Frame building, during the site visit it was determined that several materials were stored in the A-Frame building, including Gannon and Crystal River power plant ash, "spill material" cleaned up from throughout the cement plant, dredge material from the onsite industrial wastewater surface water management system, and lime. The submittal in October 2004 also claimed that all material was contained inside the A-Frame building. However, during the inspection, material was observed spilling out the south side of the building. It was also noted that the A-Frame building does not have an impervious floor.

**Ash staging areas:**

The ash staging area south of the A-Frame building did not appear to be appropriately used. A truck was observed dumping ash on the ground outside the staging area concrete containment. Staging Area #2 (near the infeed conveyor to the A-Frame building) was being used at the time of the inspection. It appeared that the ash was not contained in the staging area, but was discharged by the equipment moving material to the infeed conveyor.

**Former asphalt processing plant area (near Gannon Pile #1):**

A couple of piles of milled asphalt, one pile of limerock, and a couple of box trailers were observed in this area. A pile of an unknown material was also observed. On closer inspection, it was determined that the material was a pile of baghouse bags. You indicated that the operation that previously leased this part of the property (i.e., the asphalt processing plant) must have left the bags. Stained soils were observed in the vicinity of the bags.

**Imported slag**

A pile of this material was observed stored on the ground, without cover. This material was stored in the vicinity of the waste tire processing facility and ash Staging Area #1. You indicated that this material is used in the cement manufacturing process.

As discussed at the site inspection, one of the purposes of the inspection was to gather information concerning the management of solid wastes and industrial by-products at the site. In order to fully evaluate the current management of these materials, please provide the following information:

1. **Solid waste and industrial by-products.** Please provide the following information for each of the solid wastes and industrial by-products managed at the site, including, but not limited to Progress Energy Crystal River "conditioned" ash, imported slag, ditch cleanings, petroleum contaminated soils, material stored in the A-Frame building, and mill scale: chemical characterizations (analytical data), a description of the current management practices (i.e., how/where material is stored and reused in the process), documentation that demonstrates that greater than 50% of the material received at the facility is reused each year, an estimate of the quantity of material currently stored onsite, and an description of the source (generator and process) for each material. The chemical characterizations should include parameters that are reasonably expected to be contained in the material, and should include a statistically representative number of samples based on the variability of the data.



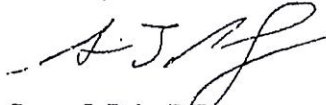
2. **Baghouse bags, submittal from Creative Environmental Solutions dated June 5, 2005.** Since the Chain of Custody does not indicate the matrix that was analyzed, please provide photographs of the samples taken. Please explain the sample designations "SS-1" and "DB-1." At the inspection, it was indicated that the process that generated the bags was likely an asphalt processing facility, and not cement production. Please provide additional leaching results for semi-volatiles parameters. Please explain why the results for sample SS-1 were crossed out on the "Certificate of Analysis Summary 251965." Are these results invalid? If so, why? Please explain why the Chain of Custody does not indicate the matrix analyzed, but the "Certificate of Analysis Summary 251965" indicates that the samples were water. Please provide receipts from the disposal facility for disposal of the baghouse bags. Please provide a signed and sealed copy of the report from Creative Environmental Solutions.

3. **Gannon Pile #3.** Please clarify where the stormwater runoff from this area is discharged and provide a copy of the permit that authorizes this discharge.

It does not appear that the solid waste and/or industrial by-products are stored and managed within a groundwater monitoring system that meets the requirements of Chapter 62-701, F.A.C. Please be advised that based on the responses to above requested information, the management of the solid wastes and industrial by-products at the site may require modifications to the site's groundwater monitoring plan, stormwater management plan, BMPP or permits or authorizations.

Please provide all requested information **within 30 days of the date** of this letter. The Department appreciates your cooperation in providing the information needed to approve your request to include all site activities under the Power Plant Certification. If you have any questions, you may contact me at (813) 744-6100 x 386.

Sincerely,



Susan J. Pelz, P.E.  
Solid Waste Manager  
Southwest District

sjp

Attachments

cc: Jim Morris, FCS/Rinker, 11430 Camp Mine Road, Brooksville, Fl. 34601  
Tom Mountain, Coastal Engineering, 966 Candlelight Blvd., Brooksville, Fl 34601  
William Kutash, Waste Program Administrator, FDEP Tampa  
Cindy Falandsyz, FDEP Tampa, IW Section











**Pelz, Susan**

---

**From:** Ross, Lora  
**Sent:** Thursday, June 16, 2005 3:42 PM  
**To:** 'tom@coastal-engineering.com'  
**Cc:** Morgan, Steve; Pelz, Susan; Morris, John R.  
**Subject:** Florida Crushed Stone aerials

Tom,  
Please see the attached jpegs as requested for Florida Crushed Stone. Please feel free to contact me if you have any further questions. Thank you.

Lora Ross  
Environmental Specialist I  
Solid Waste Section  
3804 Coconut Palm Dr  
Tampa, FL 33619  
813-744-6100 ext 375

10/11/2005



## FLORIDA CRUSHED STONE PILES

Pile 3

Bag house disposal

Conditioned ash- Crystal River

Contaminated soil

Ground Asphalt pile

Pile 1

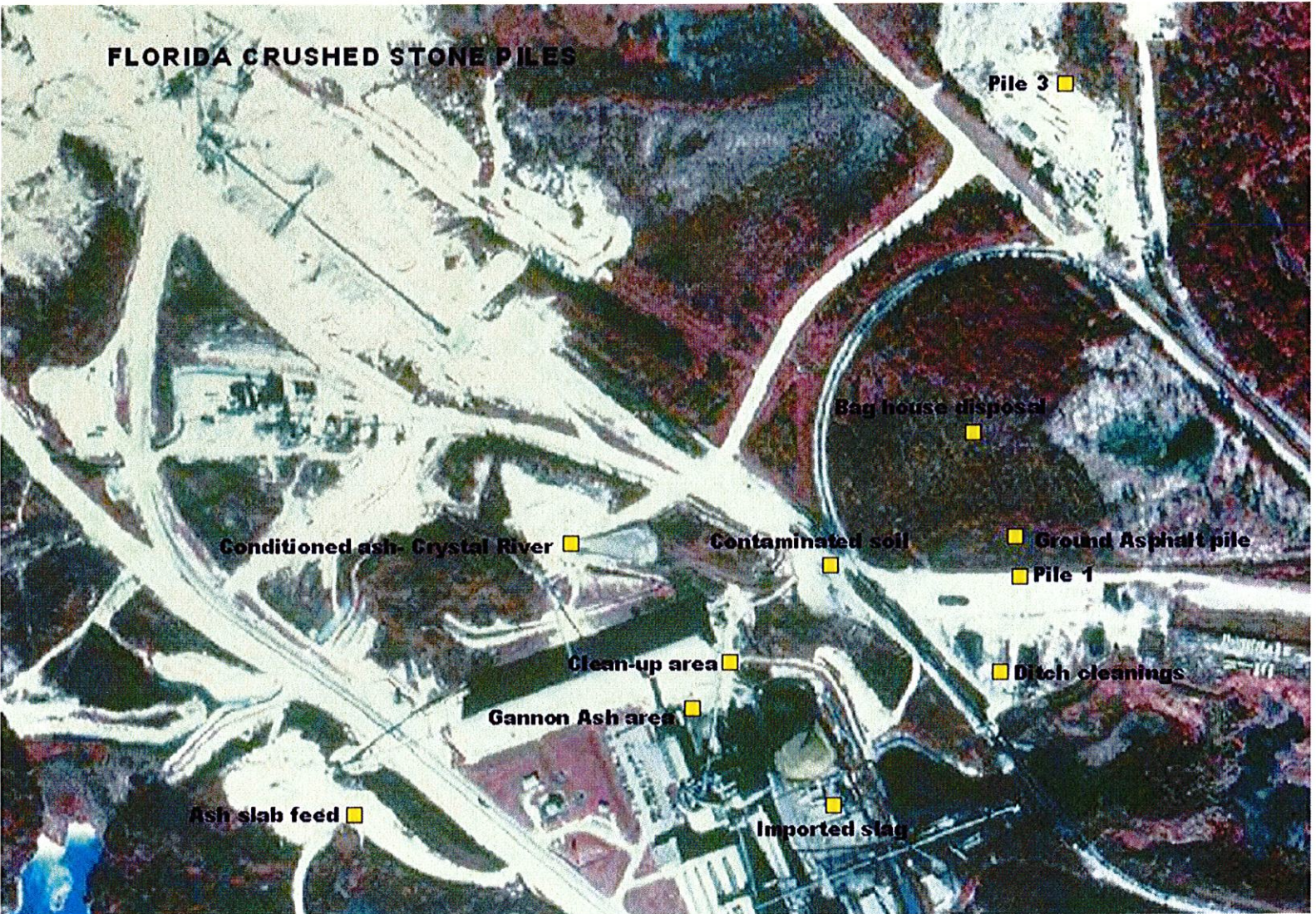
Clean-up area

Ditch cleanings

Gannon Ash area

Ash slab feed

Imported slag





**FLORIDA CRUSHED STONE PILES**

● **EMERGENCY SPILLWAY  
FROM POND # 7**

■ **Pile 3**

■ **Bag house disposal**

○ **EFA-11**  
■ **Conditioned ash, Crystal River**

■ **Contaminated soil**

■ **Ground Asphalt pile**  
■ **Pile 4**

■ **Clean-up area**  
■ **Gannon Ash area**

■ **Ditch cleanings**

■ **Ash slab feed**

■ **Imported slag**

● **MWC-PL3** ● **MWC-PL8**

● **MWC-PL1**

● **MWC-PL6**

● **MWC-PL5**

○ **ring well**

● **POND # 4**

● **MWC-PL4**







# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

Mr. Jim Daniel  
Rinker Materials  
10311 Cement Plant Road  
Brooksville, Fl. 34601

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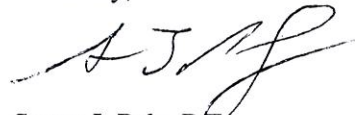
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Sincerely,

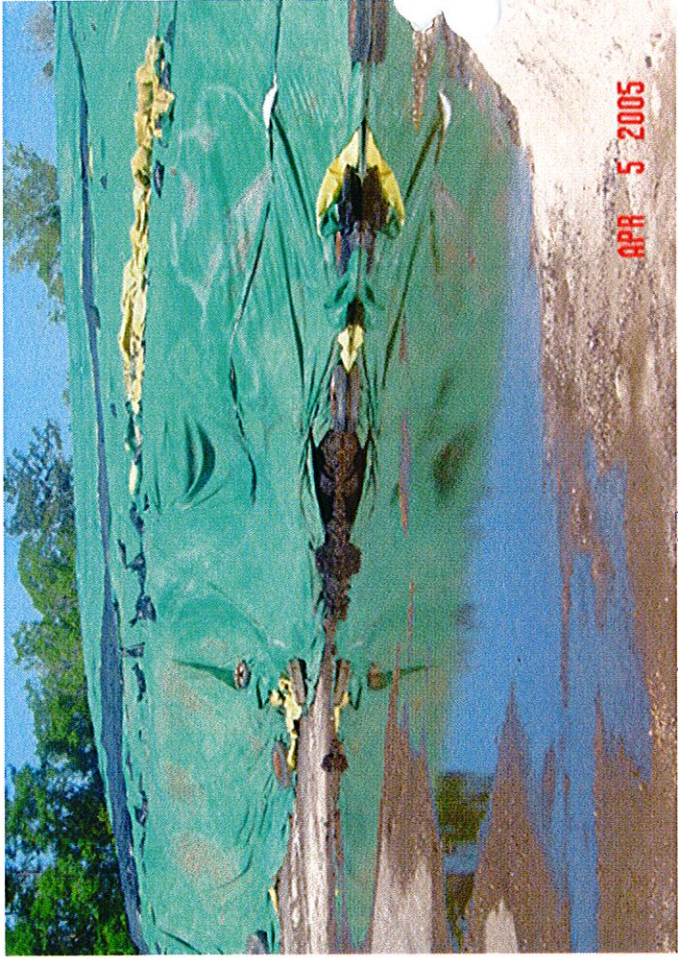
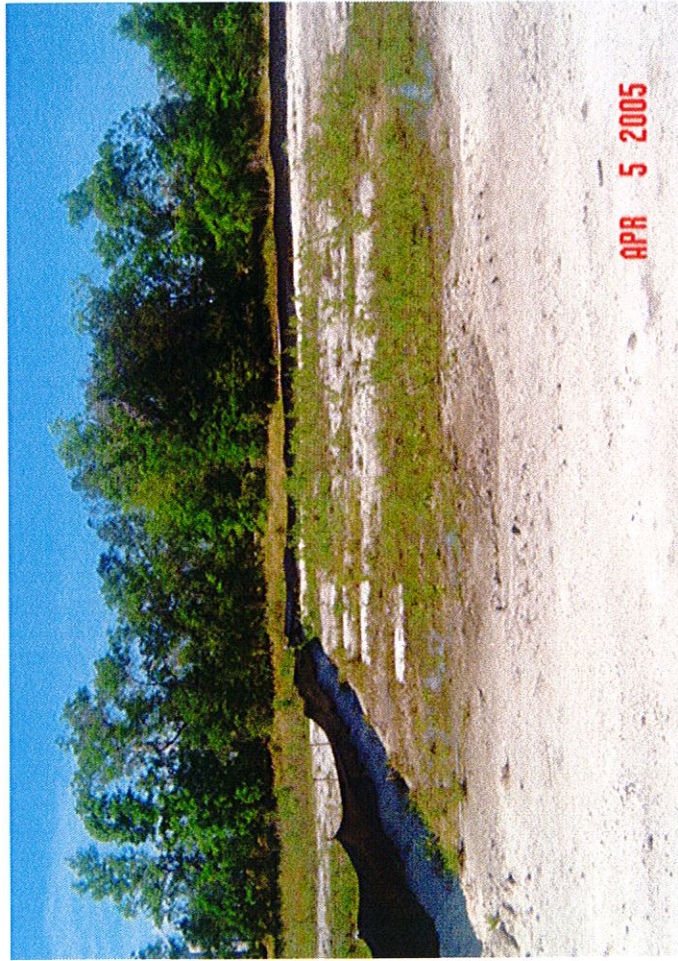


Susan J. Pelz, P.E.  
Solid Waste Manager  
Southwest District

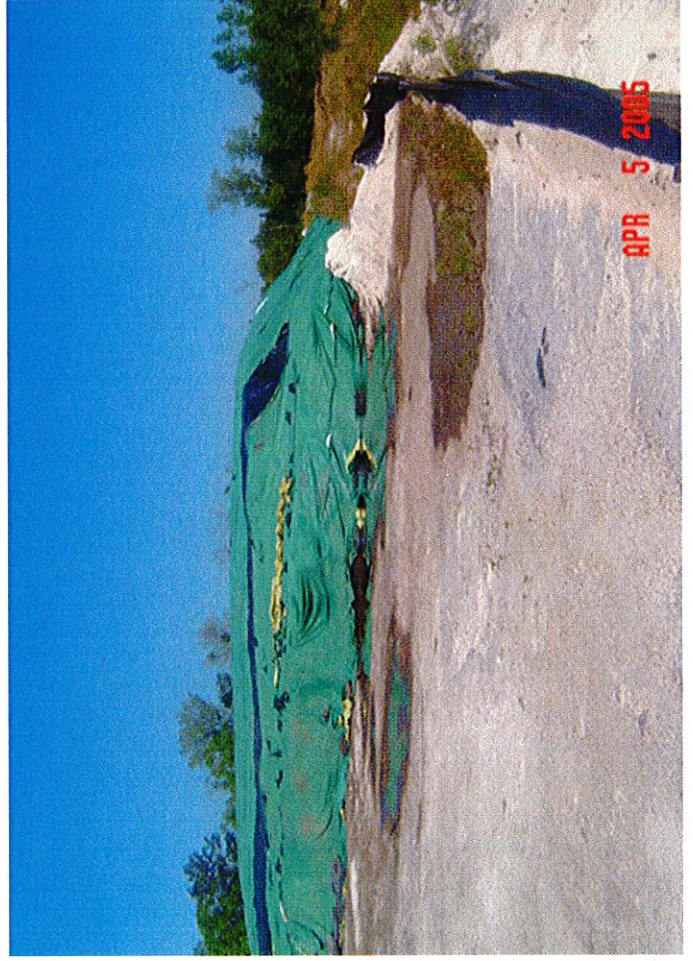
sjp  
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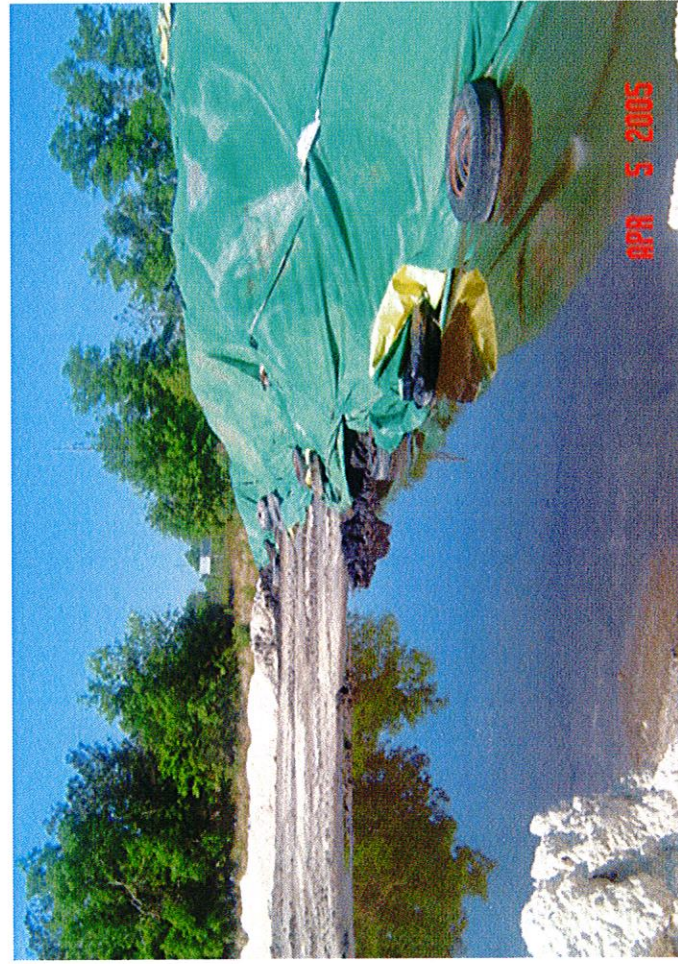
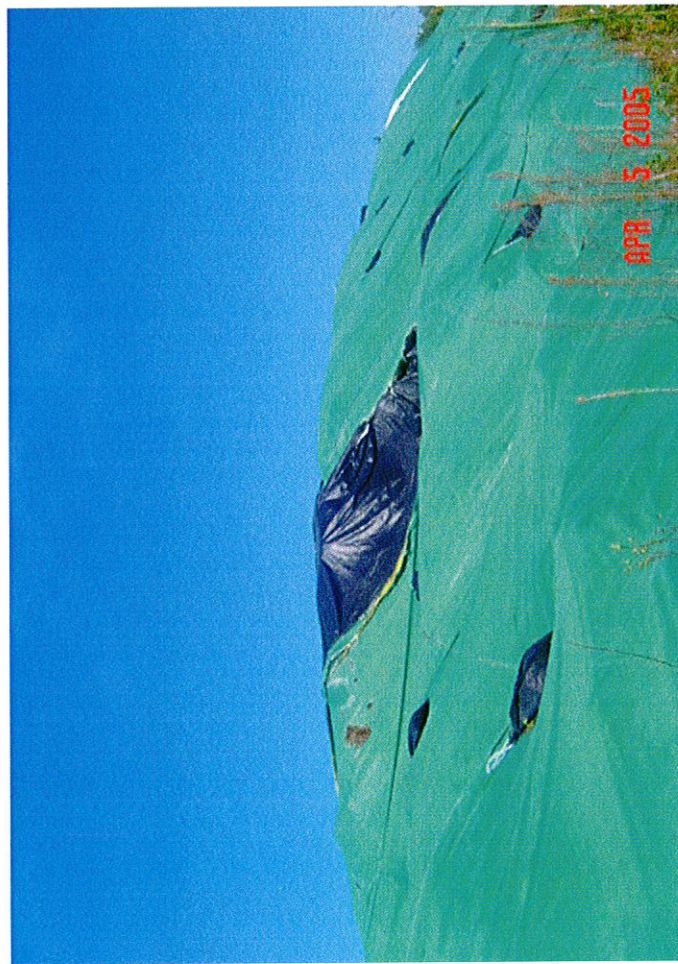
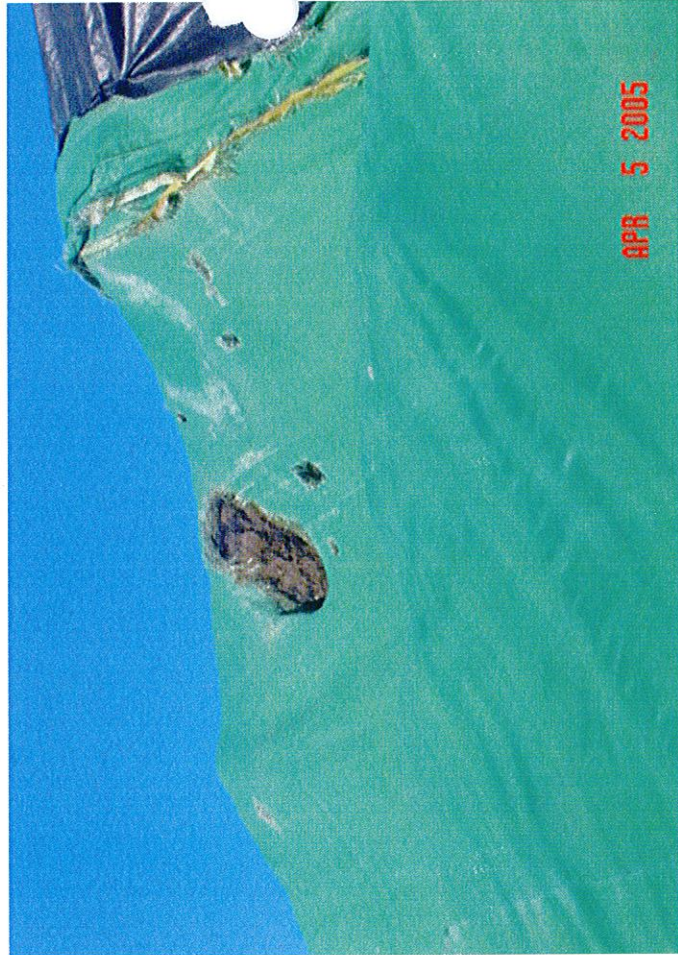




Garden Pile #3



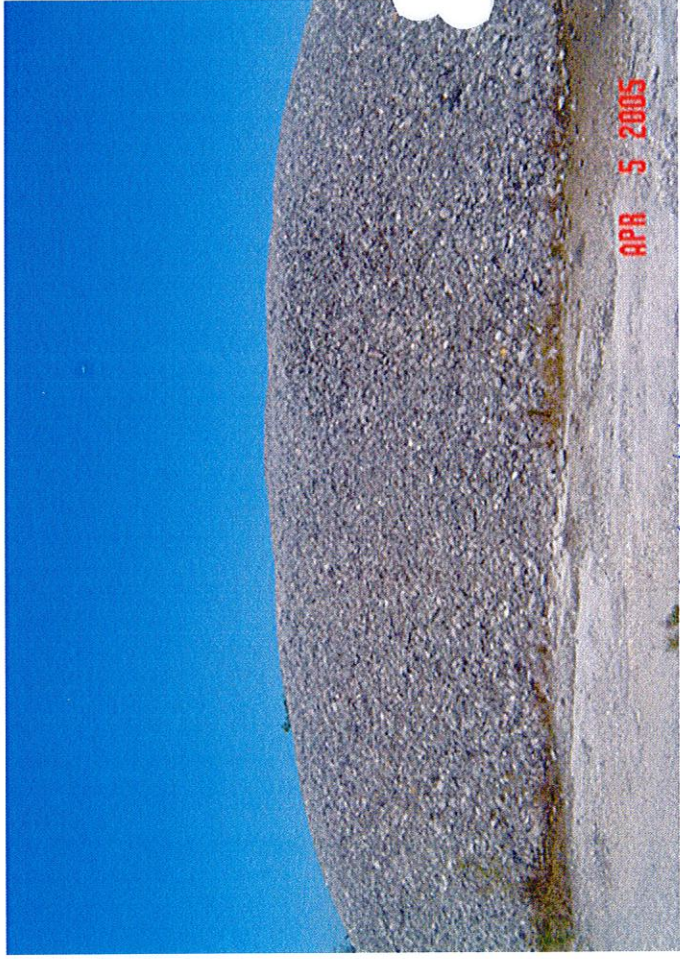
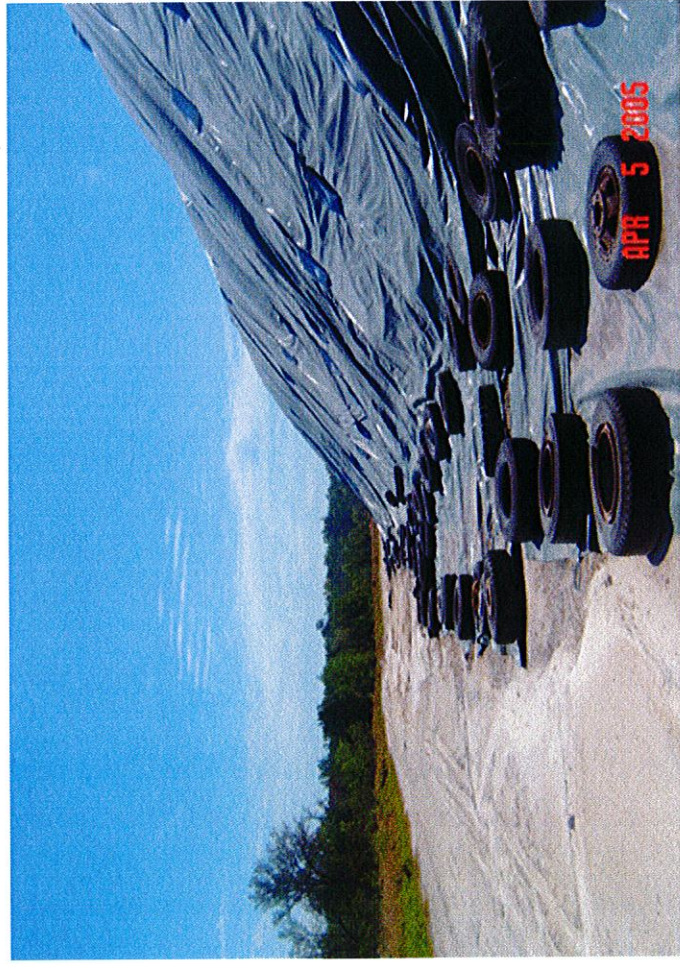




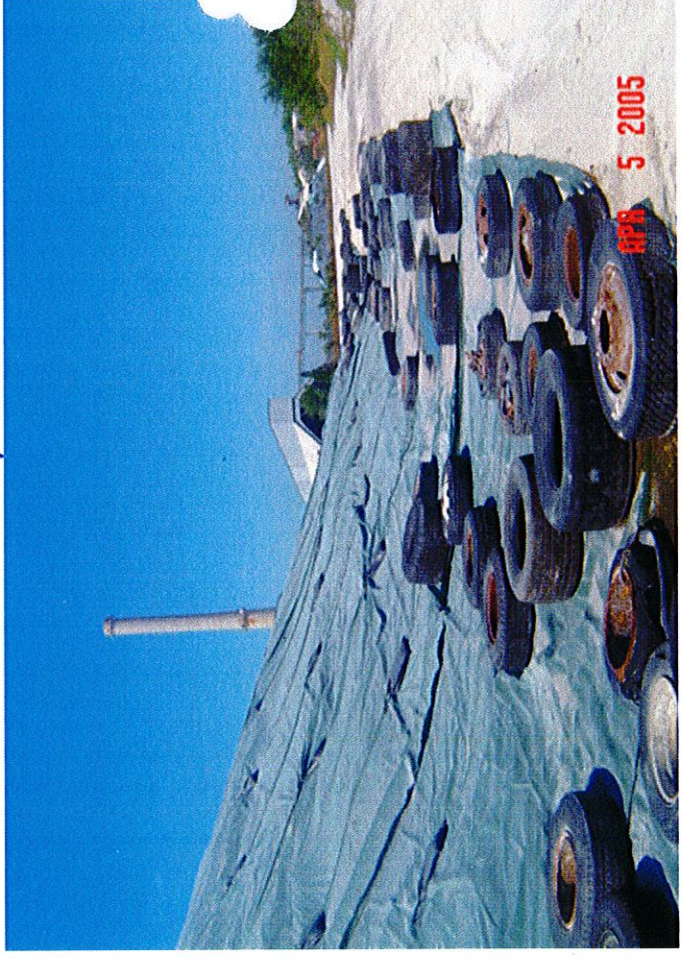
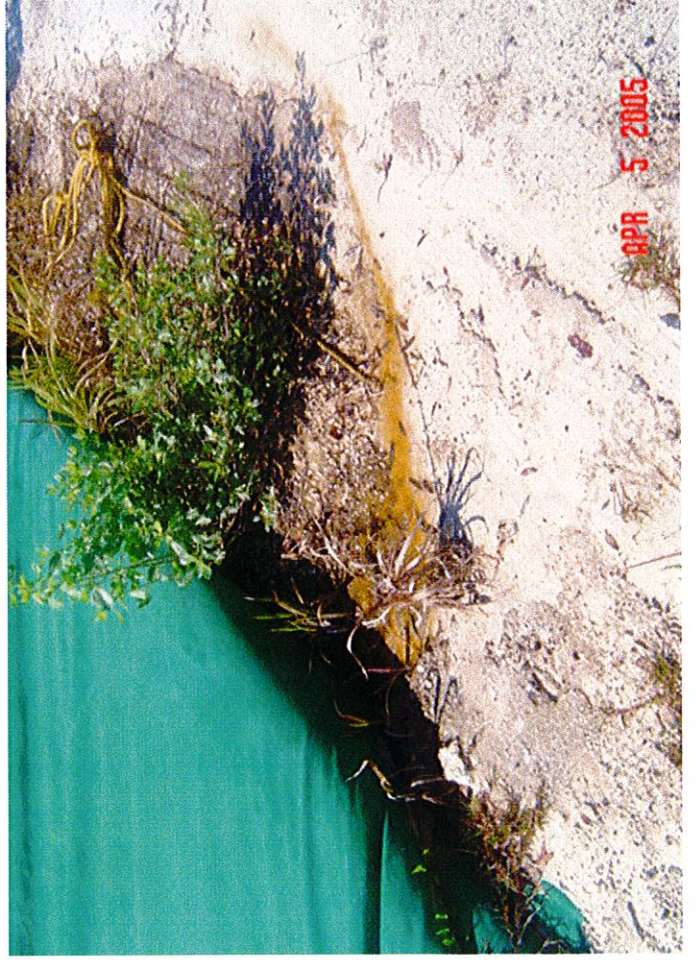




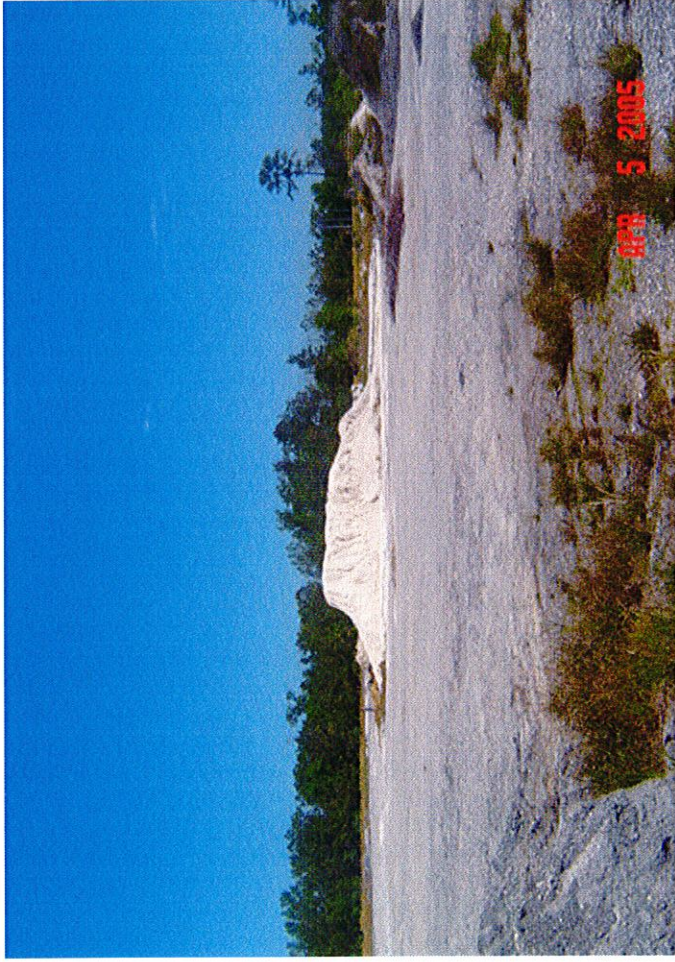




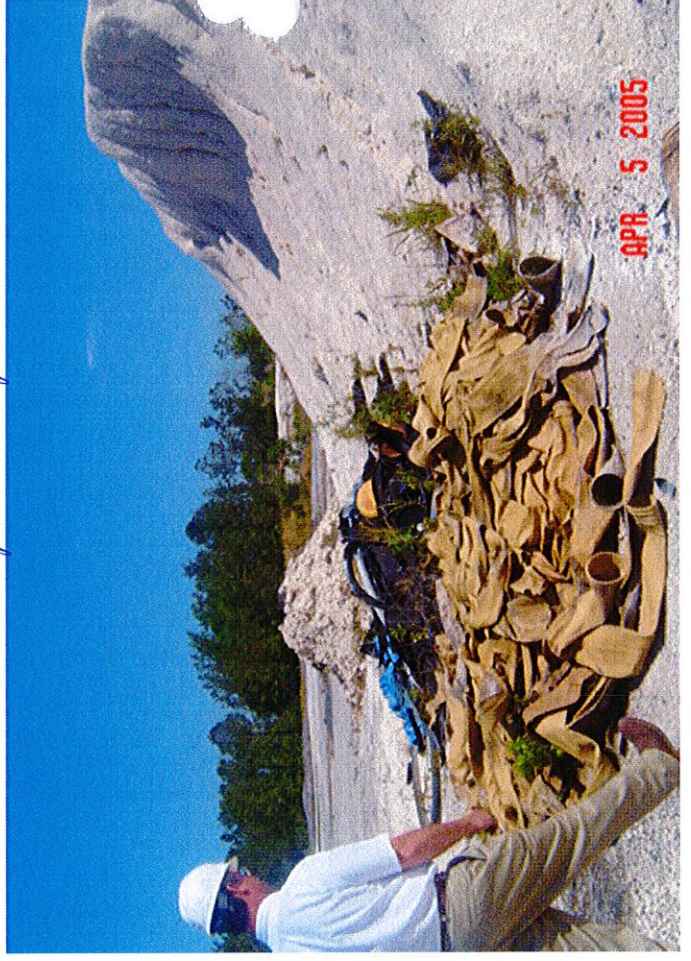
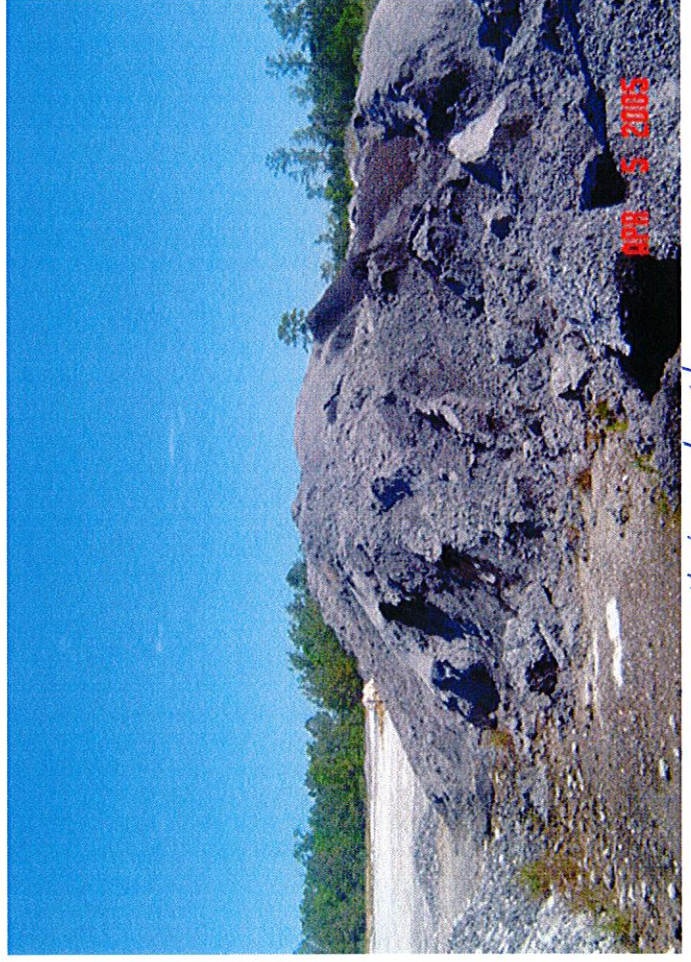
Recycled Asphalt





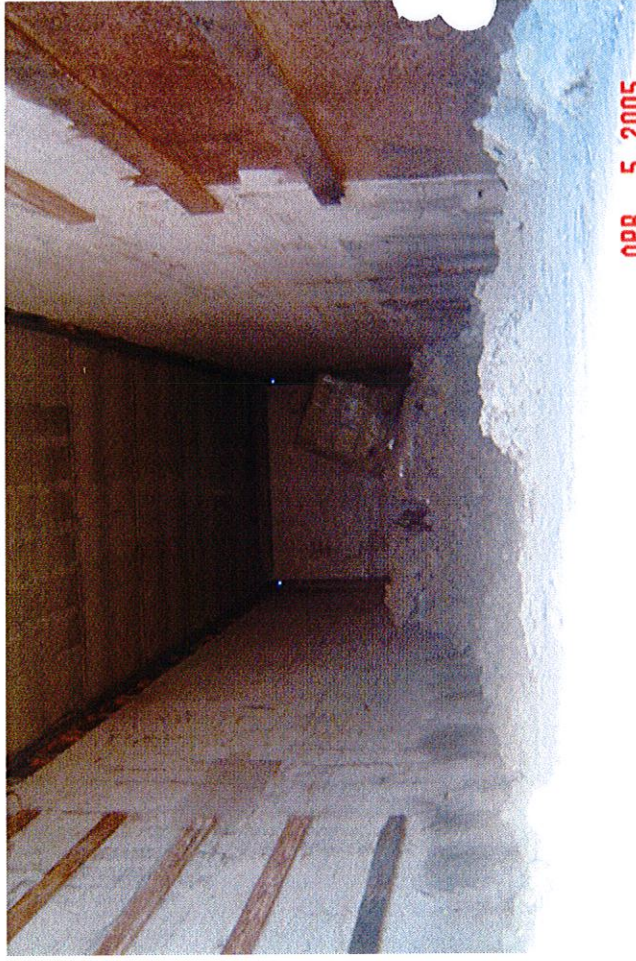
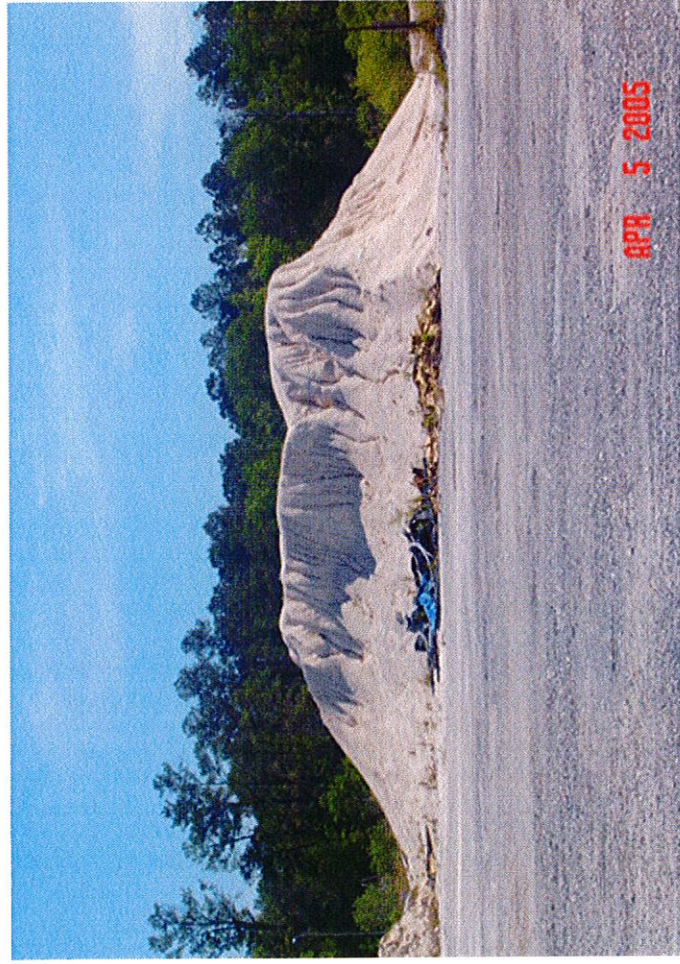


btyhase bags

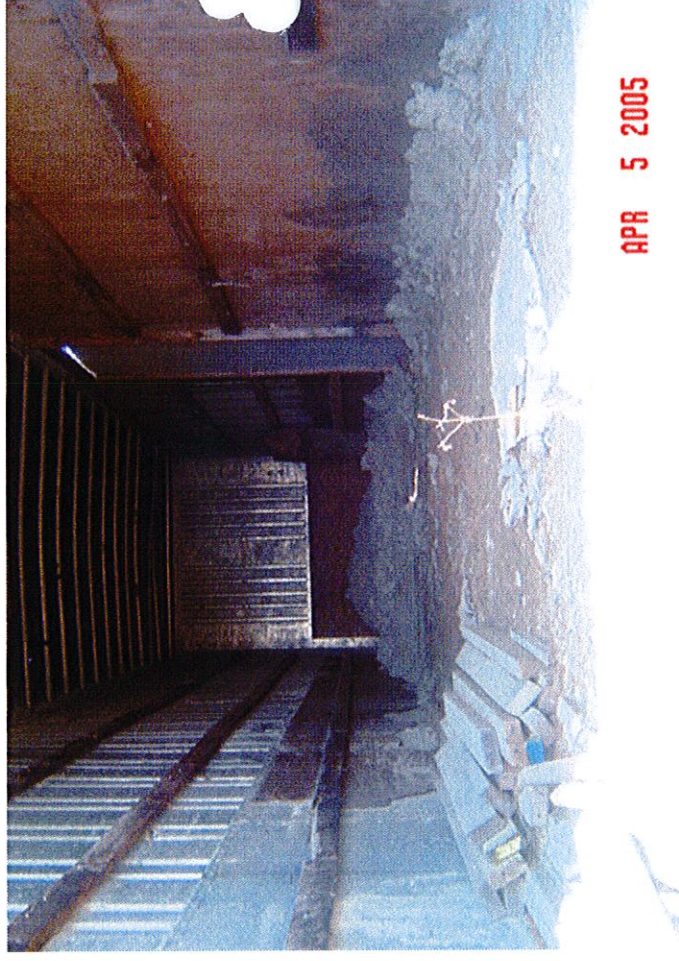


milled asphalt

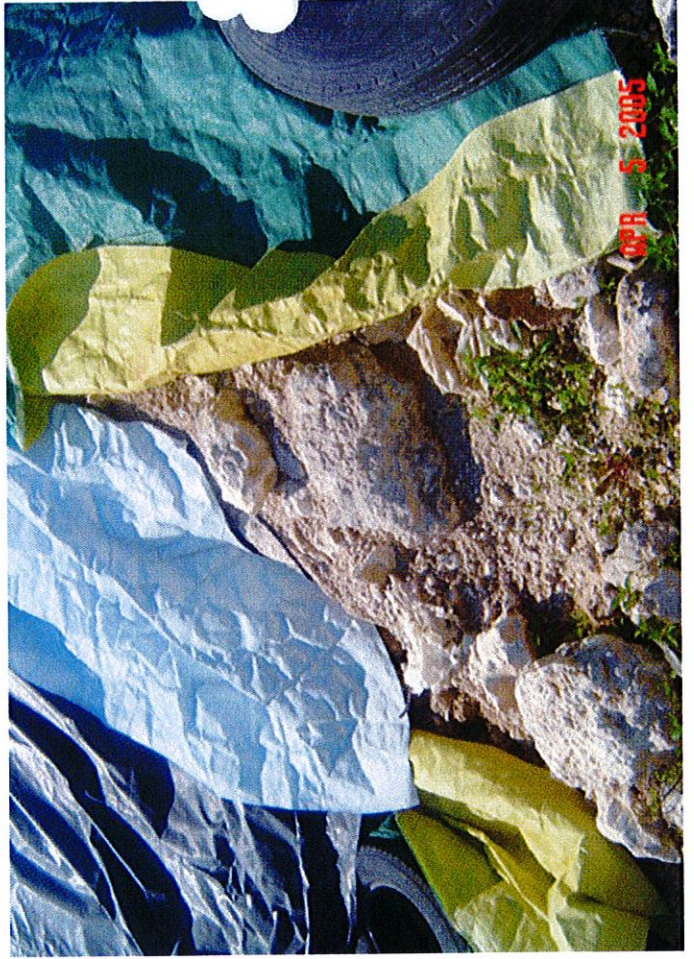
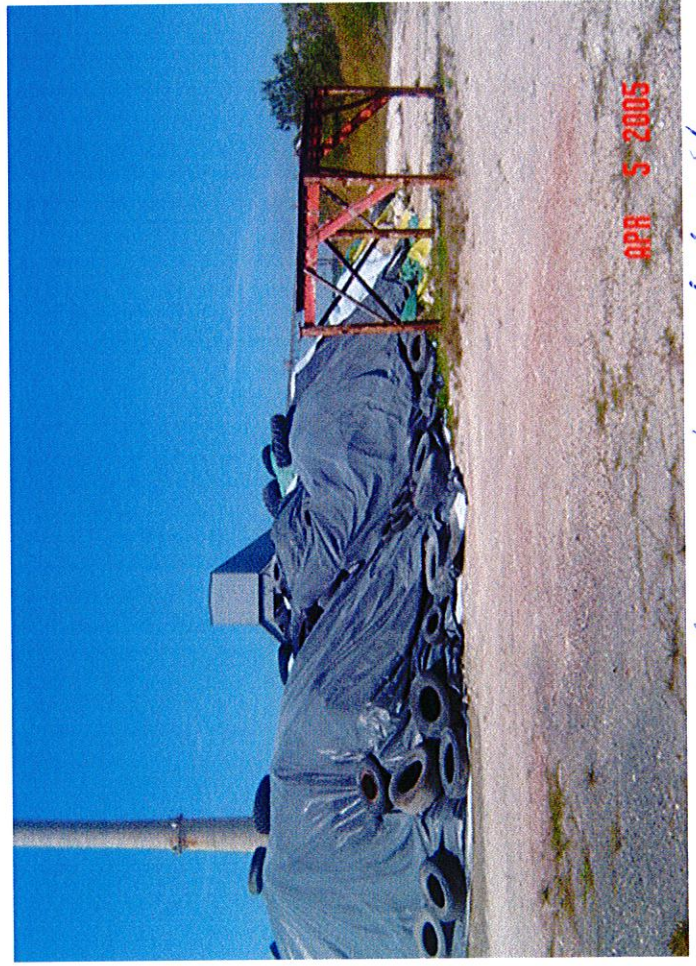
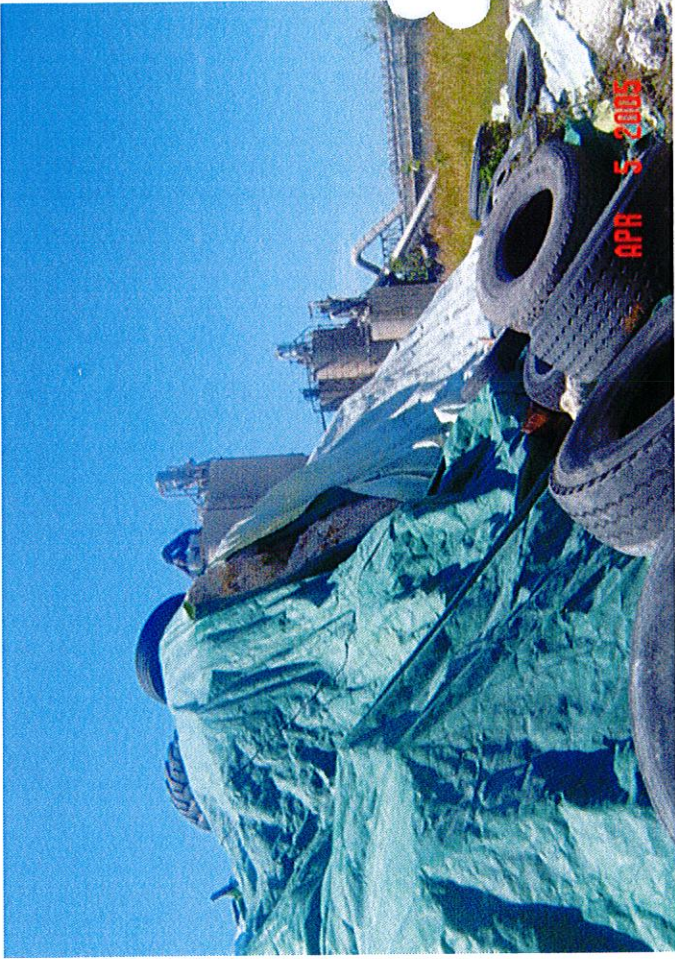




*linerock >*





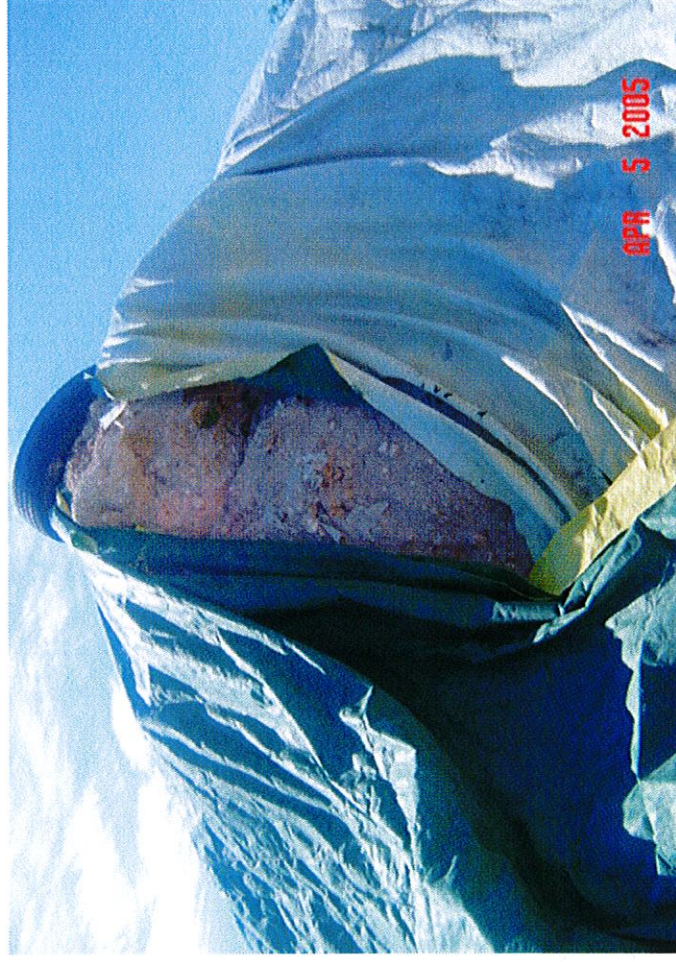


*petroleum contaminated soil*





*ditch cleanings*



*pet. contaminated soil*



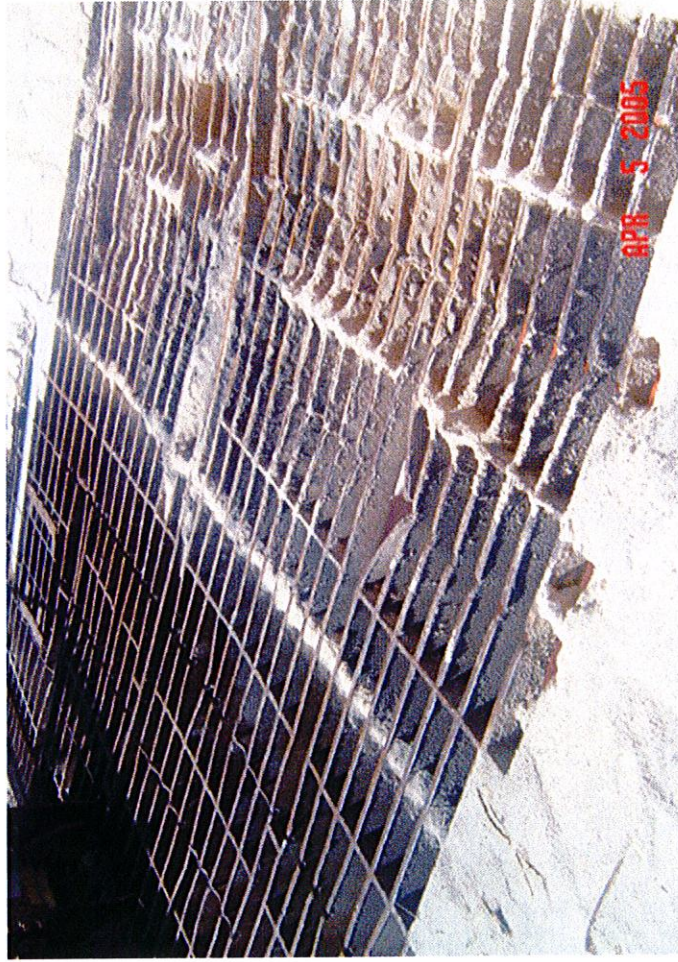


Coal yard

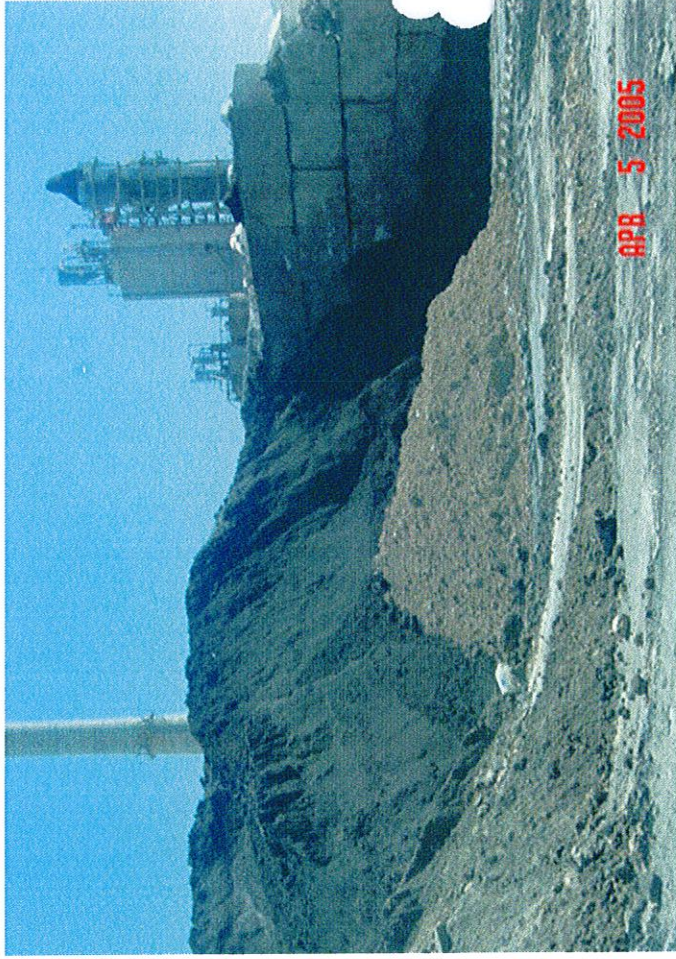


Coal yard sump

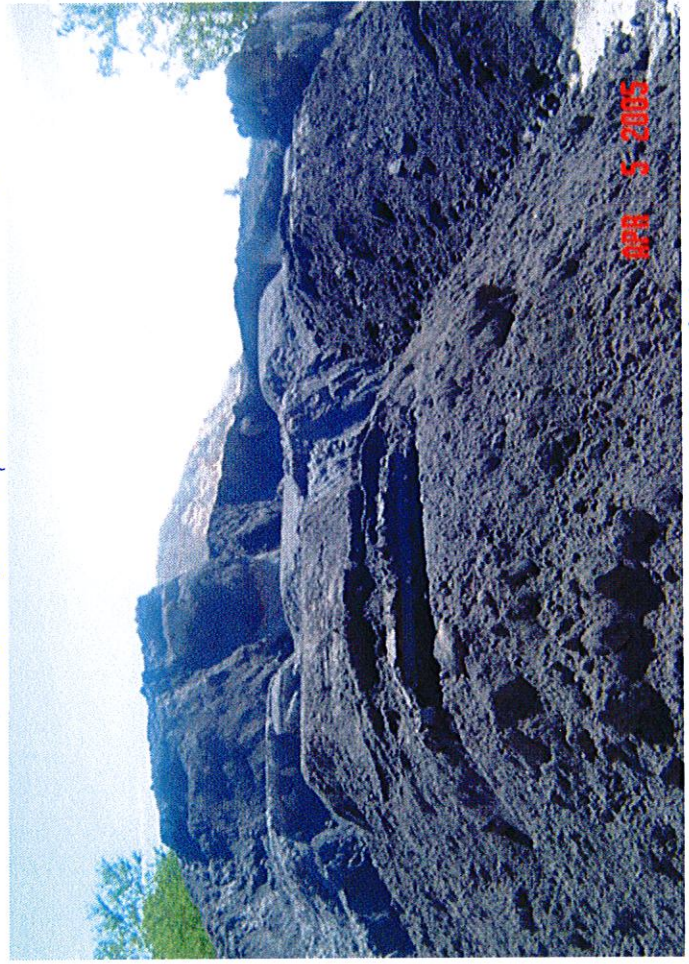




Feed for Crystal River Ash



Ash Staging Area #2



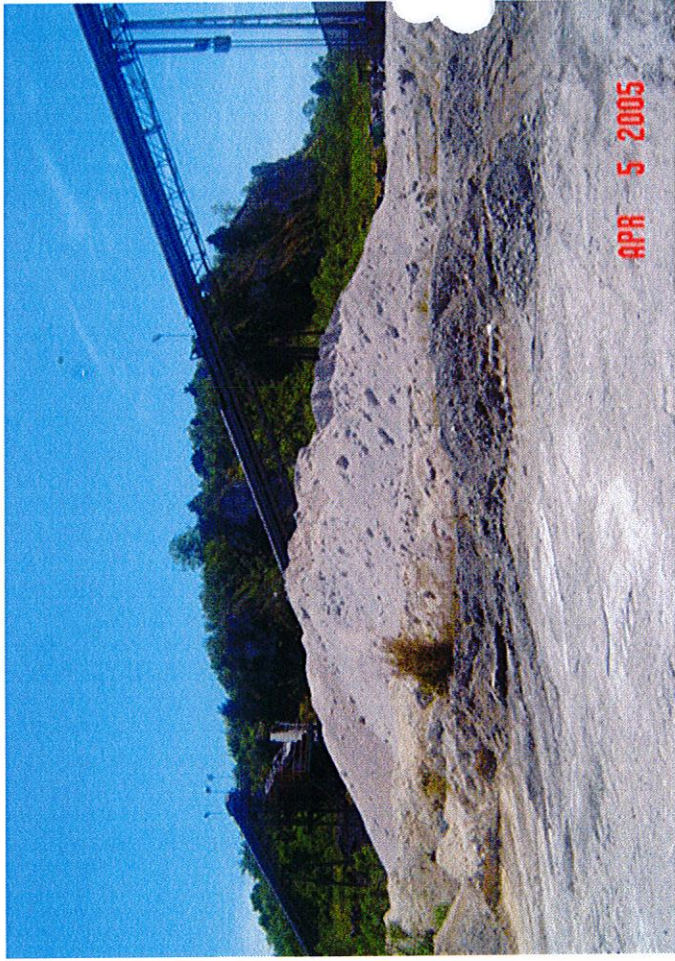
Crystal River "conditioned" Ash







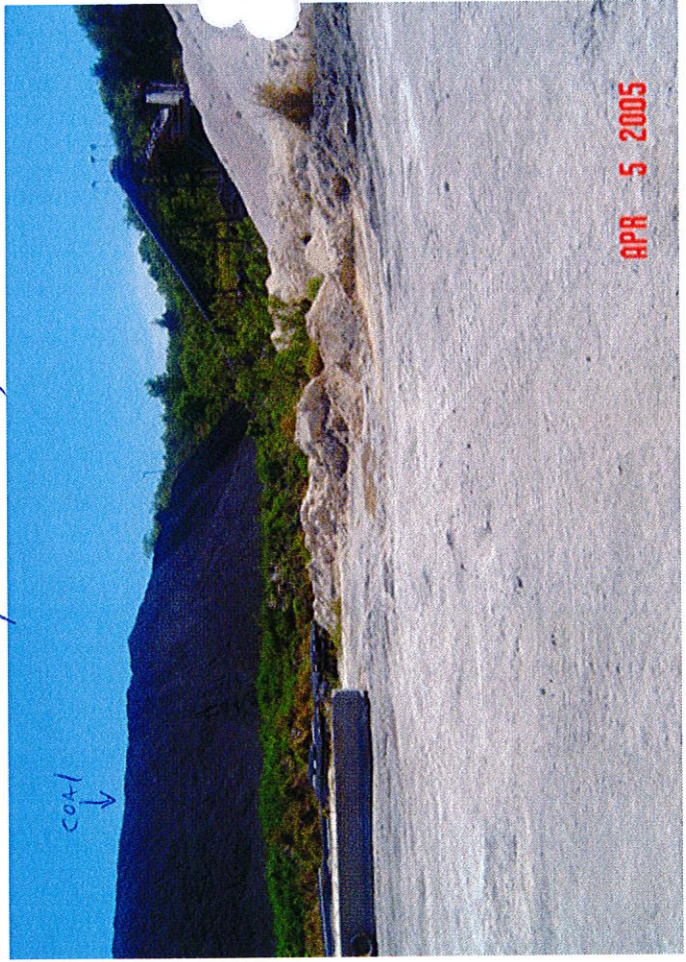
Ash staging area #2



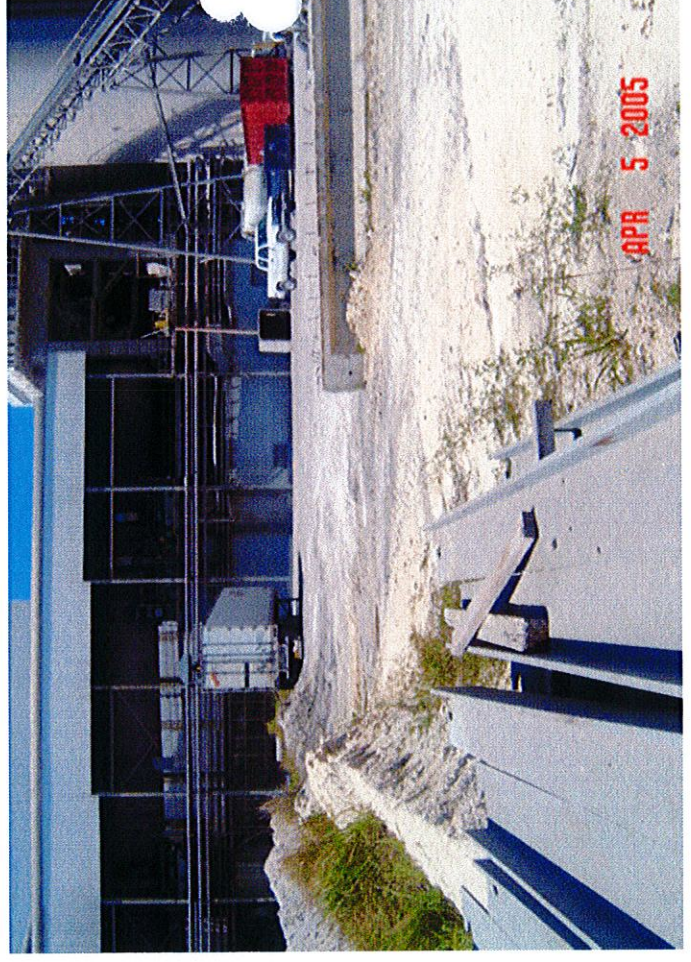
Imported slag



Ash staging area #2



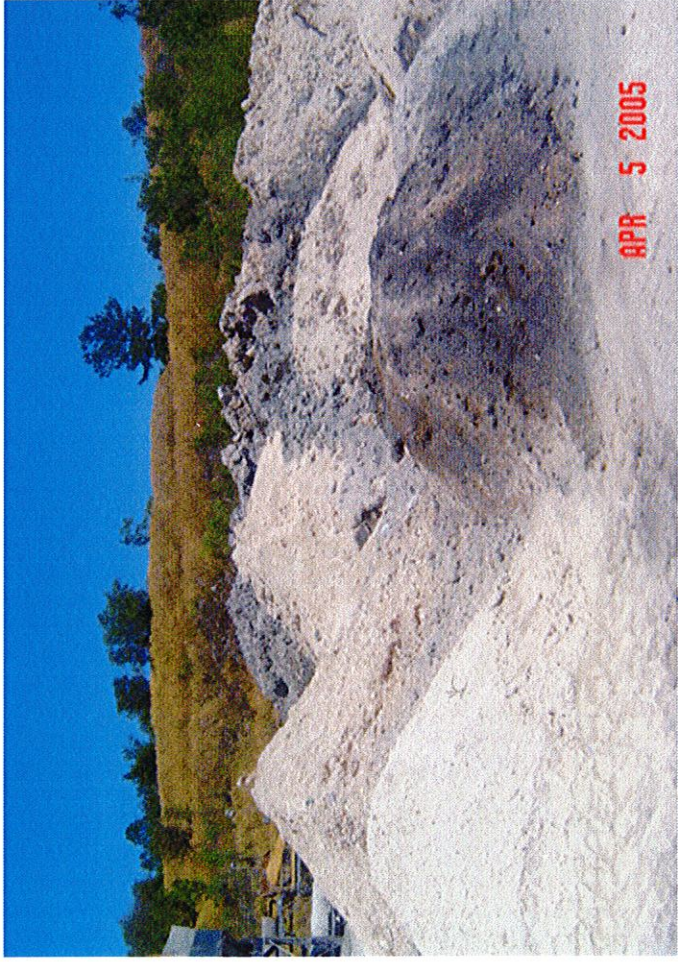




*Few ditch*

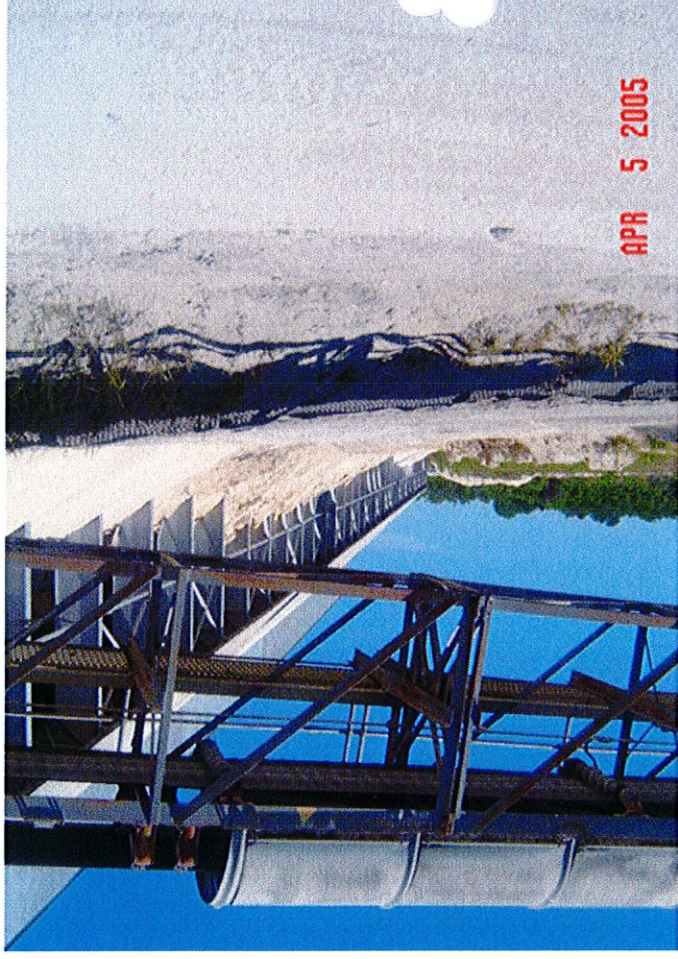






APR 5 2005

imported slag



APR 5 2005

material inside A-frame



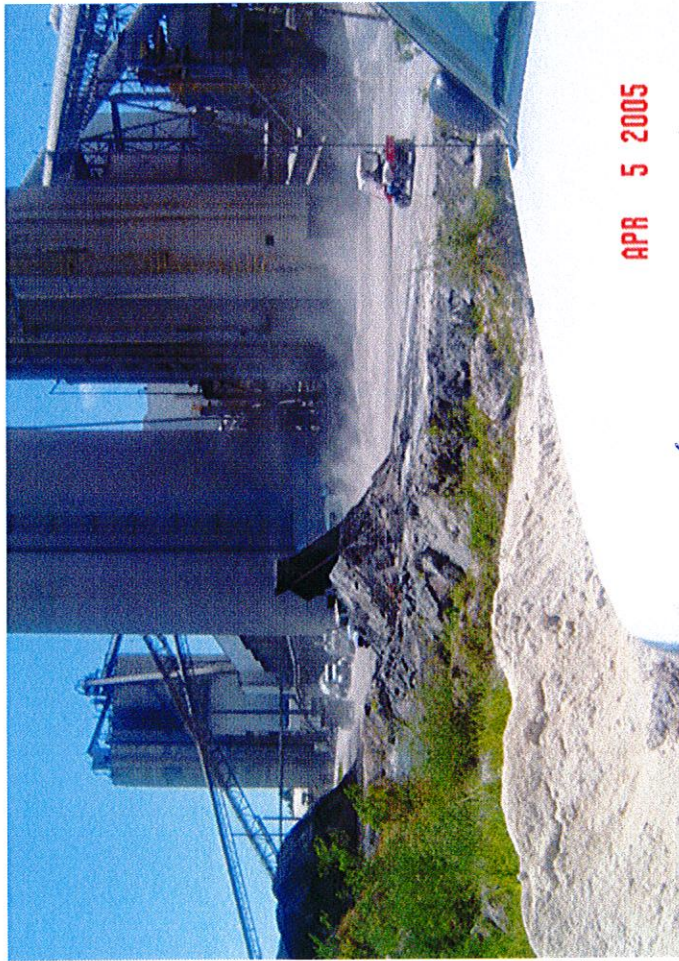
APR 5 2005



APR 5 2005

coal yard (Fw) ditch



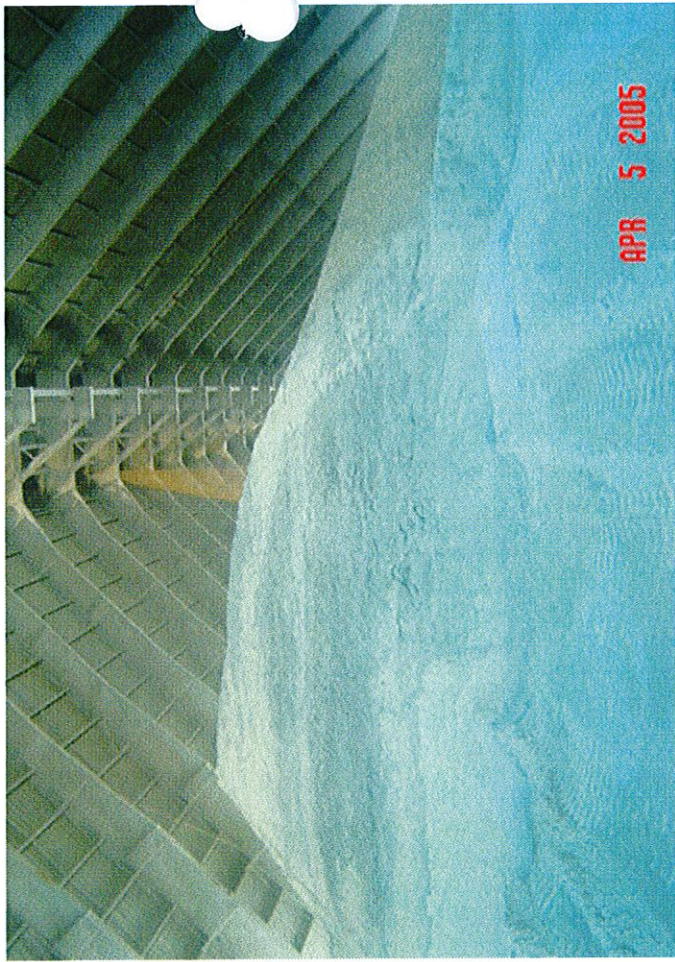


APR 5 2005

truck dumping ash/slag on ground



APR 5 2005



APR 5 2005

inside A-frame



FCS

4/5/05

street sweeper - stone in A frame  
sludge from truck wash - A frame

\* Cannon Ash - pile #3  
trap found in some spots  
SW runs to N+NE

~~baghouse bags~~

Pile #1

\* contaminated soil - #2 fuel oil stored ~ 3 yrs  
"spill material"  
finished cement in silos

spillage A-frame - all "reclaimed" stuff -  
land scraping

GPS Crystal river - "conditioned ash" Flyash

A-frame → raw grind → silos/blending →  
Kiln feed silos → Kiln (trans it into clinker) →  
clinker silo (on pile near office) → finish mill →  
~~store it for~~ 90 days & grinds to finished product

→ finished product silo → trucks

flyash from PP directly into silo  
bottom ash to "staging area #1"

Clinker near rd not covered.

white pile near tires - blast furnace slag





Engineers, Environmental Scientists, and Geologists ▼

611 North Broad Street • Brooksville, FL • 34601



June 5, 2005

Susan Pelz  
FDEP—Solid Waste Section  
3804 Coconut Palm Drive  
Tampa, FL 33619

Re: Re: Disposal of Spent Portland Cement Baghouse Filters  
Rinker/Delta Power/Florida Crushed Stone Facility, Brooksville

Dear Ms. Pelz:

On April 6, 2005, CES collected a composite sample of the cement baghouse filters and analyzed the samples for TCLP arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver. A trace amount of leachable barium was found in the sample, but none of the other metals was detected. The barium concentration was well below the TCLP limit. The lab report is attached.

It is clear that the filters are not a characteristic hazardous waste based on the TCLP results. We assume that these filters can be disposed with other non-hazardous solid waste generated at the facility. Please advise us immediately if this is not the case.

Thank you very much for your time and consideration. Please call with any questions or comments.

Sincerely,

A blue ink handwritten signature, likely of George K. Foster, written over the word 'Sincerely,'.

George K. Foster, P.G.  
President



# **Analytical Report 251965**

**for**

## **Creative Environmental Solutions**

**Project Manager: George Foster**

**Delta Power (CP&L)**

**17-APR-05**



**2618 South Falkenburg, Riverview, FL 33569 Ph:(813) 620-2000 Fax:(813) 620-2033**

**NELAC certification numbers:**

**Houston, TX E87603 - Miami, FL E86678 - Tampa, FL E86675**

**Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America**





17-APR-05

Project Manager: **George Foster**  
**Creative Environmental Solutions**  
611 N. Broad St  
Brooksville, FL 34601

Reference: XENCO Report No: **251965**  
**Delta Power (CP&L)**  
Project Address: Brooksville, FL

**George Foster:**

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Chain of Custody Numbered 251965. All results being reported under this Chain of Custody apply to the samples analyzed and properly identified with a Laboratory ID number.

The results for the quality control samples were reviewed. All parameters for data reduction and validation were reviewed. Estimation of Data uncertainty for this report is found in the quality control section of this report unless otherwise noted. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, completeness or properly flagged. Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. 251965 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

---

**Michelle Williams**

Laboratory Manager

***Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.***

*Certified and approved by numerous States and Agencies.*

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# Certificate of Analysis Summary 251965

Calative Environmental Solutions, Brooksville, FL



Project Name: Delta Power (CP&L)

Project Id:

Date Received in Lab: Apr-07-05 08:50 am

Contact: George Foster

Report Date: 17-APR-05

Project Location: Brooksville, FL

Project Manager: Michelle B. Williams

Analysis Requested	Lab Id:	251965-001	251965-002		
	Field Id:	SS-1	DB-1		
	Depth:				
	Matrix:	WATER	WATER		
	Sampled:	Apr-06-05 12:00	Apr-06-05 12:30		
TCLP Metals by SW 6020A	Extracted:	Apr-11-05 09:18	Apr-11-05 09:18		
	Analyzed:	Apr-15-05 16:21	Apr-15-05 16:25		
	Units/RL:	mg/L RL	mg/L RL		
		U 0.050	U 0.050		
		0.094 0.050	0.134 0.050		
Arsenic		U 0.050	U 0.050		
Barium		0.094 0.050	0.134 0.050		
Cadmium		U 0.050	U 0.050		
Chromium		U 0.050	U 0.050		
Lead		0.062 0.050	U 0.050		
Mercury		U 0.0050	U 0.0050		
Selenium		U 0.050	U 0.050		
Silver		U 0.050	U 0.050		

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Since 1990 Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America

Michelle Williams  
Laboratory Manager



Data were reviewed by the  
Department Supervisor and QA Director

- X** In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to effect the recovery of the spike concentration. This condition could also effect the relative percent difference in the MS/MSD.
- B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E** The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F** RPD exceeded lab control limits.
- J** The target analyte was positively identified below the MQL and above the SQL.
- U** Analyte was not detected.
- L** The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.

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11381 Meadowglen Lane Suite L Houston, Tx 77082-2647  
11078 Morrison Rd., Suite D, Dallas, TX 75229  
5309 Wurzbach, Ste 104 San Antonio TX 78238  
2618 South Falkenburg, Riverview, FL 33569  
5757 NW 158th St, Miami Lakes, FL 33014

Phone	Fax
(281) 589-0692	(281) 589-0695
(972) 481-9999	(972) 481-9998
(210) 509-3334	(201) 509-3335
(813) 620-2000	(813) 620-2033
(305) 823-8500	(305) 823-8555



**Project Name: Delta Power (CP&L)**

**Work Order #: 251965**

**Project ID:**

**Lab Batch #: 662845**

**Sample: 474858-1-BKS**

**Matrix: Water**

**Date Analyzed: 04/15/2005**

**Date Prepared: 04/11/2005**

**Analyst: TOH**

**Reporting Units: mg/L**

**Batch #: 1**

**BLANK /BLANK SPIKE RECOVERY STUDY**

<b>TCLP Metals by SW 6020A</b>	<b>Blank Result [A]</b>	<b>Spike Added [B]</b>	<b>Blank Spike Result [C]</b>	<b>Blank Spike %R [D]</b>	<b>Control Limits %R</b>	<b>Flags</b>
<b>Analytes</b>						
Arsenic	<0.020	1.00	0.870	87	75-125	
Barium	<0.100	1.00	0.950	95	75-125	
Cadmium	<0.010	1.00	0.874	87	75-125	
Chromium	<0.100	1.00	0.911	91	75-125	
Lead	<0.020	1.00	0.901	90	75-125	
Mercury	<0.0040	0.1000	0.1110	111	75-125	
Selenium	<0.100	1.00	0.929	93	75-125	
Silver	<0.100	1.00	0.854	85	75-125	

Blank Spike Recovery [D] =  $100 * [C] / [B]$

All results are based on MDL and validated for QC purposes.





- ☐ 11281 Meadowlark, Suite L, Houston TX 77062 281-599-0992  
☐ 3328 Hurbach, Suite 104, San Antonio, TX 78236 210-599-3334  
☐ 11078 Morrison Lane, Suite D, Dallas, TX 75229 972-481-9999

# ANALYSIS REQUEST & CHAIN OF CUSTODY RECORD

- ☐ 5357 N.W. 158th Street, Miami Lakes, FL 33014 305-828-4300  
☒ 2818 South Falmouth Rd., Fort Myers, FL 33909 813-420-5000

LAB ONLY  
251965-T

Serial #: 165367 Page 1 of 1

Company: CREATIVE ENVIRON. SOLUTIONS 796-3374 Phone: 352  
Project Name: DELEA POWER (CP&L) Site: BRACKVILLE, FLORIDA  
Project ID: 165367

Proj. Manager (PM): G. FOSTER  
Fax Results to: [ ] or [ ]  
Invoice to: [ ] Accounting [ ] Inc. Invoice with Final Report [ ] Invoice must have a P.O.  
Bill to: [ ]  
Quote No.: [ ] P.O. No.: [ ] Call for a P.O.  
Reg Program: CUP AFCEE TRRP OW USF State Other  
Target DLE (DWH CROL TRRP OAPP MOLA See Lab PM Attached Call)  
TRRP PCLs: Tier 1 Tier 2 Residential Initial

LPST No.: [ ] (Required)  
Sampler Name: Roy Traynor Signature: [ ]

Sample ID: 55-1 4-6-05 12:00  
DB-1 4-6-05 12:30

Sampling Date: 4-6-05 12:00  
Time: 12:30

Depth: 0.5  
Matrix: [ ]

Containers: 2 B C  
X 2 B C  
X 1 MA RA D

Preservatives: [ ]  
Container Type: [ ]  
Container Size: [ ]

FL Preserv. - Revised: Virgin Non-Virgin  
SVOCs by 8270 625 PAHs BMA TCL PPS  
VOOCs by 8021 8260 624 VOA VOH PPS TCL  
PAHs by 8270 8310  
TPH by TX1005 FL-Pio 1664 8015DRO 8015DRO 418.1  
RTEX-MTBE by 8021 8260 624 Other  
BTEX by 8021 8260 602 624 Other

Notes: [ ]  
PATs by 8270 8310  
Notes by 8020 2008 BRCA for PPS TCPS RPP 237AL  
VOOCs by 8021 8260 624 VOA VOH PPS TCL  
SVOCs by 8270 625 PAHs BMA TCL PPS  
FL Preserv. - Revised: Virgin Non-Virgin

Hold Disposal: Hold Analysis (Surrogate will apply)  
Addn: PAH Above: [ ]  
TAT: 5h 12h 24h 48h 3d 5d 7d 10d 21d

Sample Clean-ups are pre-approved

Remarks: [ ]

Relinquished (Initials and Sign): [ ] Date & Time: 4-6-05 16:00

Relinquished to (Initials and Sign): [ ] Date & Time: 4-6-05 16:00

Instructions: [ ]  
At XENCO Standard Testing and Conditions Apply.  
Cooler Temperature: 40°C

Preservatives: Various (V), HCl pH2 (H), H2SO4 pH2 (S), HNO3 pH2 (N), AOC AOCALOH (A), Zinkaloh (Z), Kool, <40 (C), Nont (NA), See Label (L), Other (O)  
Cont. Size: 4oz (4), 8oz (8), 32oz (32), 40ml VOA (V), 1L (1), 500ml (5), Teller Bay (B), Wipe (W), Other

Matrix: Air (A), Product (P), Solid (S), Water (W)

SDSE Committed to Excellence in Service and Quality since 1990

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\*\* Transmit Conf. Report \*\*

P.1

Apr 12 2005 12:41

Telephone Number	Mode	Start	Time	Pages	Result	Note
813527996088	NORMAL	12,12:39	1'13"	3	* O K	



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
3804 COCONUT PALM DRIVE  
TAMPA, FL 33619-1352**

**FAX**

Date: 4-12-2005  
Number of pages including cover sheet: 3

TO: <u>Jim Daniels</u>	FROM: <u>Susan Pelz</u>
<u>Rinker</u>	
PHONE:	PHONE: (813) 744-6100, <u>386</u>
FAX #: <u>352-799-6088</u>	FAX #: (813) 744-6125
CC:	
REMARKS: <u>Urgent</u> <u>For your review</u> <u>Reply ASAP</u> <u>Please comment</u>	





Date: 4-12-2005  
Number of pages including cover sheet: 3

[illegible]





**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOLID WASTE MANAGEMENT FACILITY  
WASTE TIRE FACILITY INSPECTION CHECKLIST**

GMS/WACS I.D. No. SWD187140778 Facility Name: Florida crushed stone  
 Inspection Date: 4/15/05 Permit No.: 22787-002-WT Expiration Date: 12/6/05  
 Facility Address: 10311 cement Plant Road  
 City: Brooksville County: Hernando Zip: 34601  
 Permittee or Operating Authority: Florida crushed stone company  
 Telephone Number (Permittee or Operating Authority): (352) 799-7881  
 Inspection Participants (Include ALL Employees and Department Employees Specifying Titles):  
 Principle Inspector: Lora Pross, Susan Pelz, Cindy Falandysz  
 Other Participants: Jim Daniel

**TYPE OF FACILITY**

☒ Waste Tire Processing Facility ☐ Waste Tire Collection Center

**TYPE OF INSPECTION**

☐ Construction Completion ☐ Complaint Investigation ☐ Other \_\_\_\_\_  
☒ Operation ☒ Reinspection  
☐ Closure ☐ Facility File Review

**REQUIREMENTS**

THE REQUIREMENTS LISTED IN THIS INSPECTION CHECKLIST ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NO" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A VIOLATION OF THE CORRESPONDING DEPARTMENT RULES. EACH VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT.

I. Waste Tire Facilities	YES	NO	Unk	N/A
1. Unauthorized operation prohibited within 200' of any natural or artificial body of water including wetlands, except bodies of water which do not discharge off site? 62-711.540(3)(a)	<input checked="" type="checkbox"/>			
2. Required signs for operational directions? 62-711.540 (1)(a)	<input checked="" type="checkbox"/>			
3. Is attendant on duty when waste tires are received? 62-711.540(1)(c)	<input checked="" type="checkbox"/>			
4. Adequate communication equipment on-site? 62-711.540(1)(i)	<input checked="" type="checkbox"/>			
5. Acceptance of waste tires prohibited after permitted storage limit reached? 62-711.530(2)	<input checked="" type="checkbox"/>			
6. Operations involving open flames prohibited within 25 feet of a waste tire pile? 62-711.540(1)(b)	<input checked="" type="checkbox"/>			
7. Waste tire pile size dimensions and setback requirements maintained? 62-711.540(2) and (3)	<input checked="" type="checkbox"/>			
8. Residuals from processing properly managed? 62-711.540(5)		<input checked="" type="checkbox"/>		
9. Temperature control measures in processed tire piles maintained? 62-711.540(4)	<input checked="" type="checkbox"/>			
10. Are storage areas free from vegetation and vectors? 62-711.540	<input checked="" type="checkbox"/>			
For a Waste Tire Processing Facility: at least 75% of waste tires delivered to and contained on site	<input checked="" type="checkbox"/>			
11. processed and removed within a calendar year? 62-711.530(3)				
For a Waste Tire Collection Center: All waste tires removed from site at least once a year? 62-				
12. 711.550(1)(b)				<input checked="" type="checkbox"/>
13. All permit Specific Conditions complied with? 62-701.320(1)		<input checked="" type="checkbox"/>		
14. Adequate financial assurance? 62-711.500(3)	<input checked="" type="checkbox"/>			
15. Annual fire safety survey conducted by local fire protection services? 62-711.540(1)(d)	<input checked="" type="checkbox"/>			
16. Emergency preparedness manual available and annually updated? 62-711.540(1)(e)	<input checked="" type="checkbox"/>			
17. Adequate operational records maintained? 62-711.530(4), 62-711.540(1)(g)	<input checked="" type="checkbox"/>			
18. Are reporting requirements complied with? 62-711.530(5)	<input checked="" type="checkbox"/>			



V. OTHER SOLID WASTE FACILITY		YES	NO	Unk	N/A
1.	WTE facility in compliance with all permit conditions and applicable requirements? 62-701.320(1)				
2.	Compost facility in compliance with all permit conditions and applicable requirements? 62-701.320(1)				

## VI. NARRATIVE

Explanation for all "NO" responses and other comments (continue on separate sheet if necessary)

I. 8, 13 → There did not appear to be an earthen berm around the waste tire site. Please be advised that any residues created from a fire must be contained. As discussed during the inspection, a berm can be constructed with a culvert / valve to manage stormwater +/or residues (SC 15, OPS pg 5)

### GANNON ASH-PILES:

- Pile One appeared to be OK. However, Pile Three had a few holes in the tarp + the ash was partly ~~not~~ uncovered + in standing water. Also, a few possible leachate seeps around the perimeter of Pile Three.

### REMINDERS

- The next waste tire processing quarterly report is due 4/10/05
- The renewal application is due 9/6/05

### NOTES

- Please remove the contaminated soil needs to be removed + the area may possibly need to be assessed.

Signed: Lara Boss / \_\_\_\_\_  
DEP Representative Date

Received: hand delivered 4/12/05  
mailed to facility / \_\_\_\_\_  
Site Representative Date

PLEASE RESPOND TO THE ABOVE DEFICIENCIES IN WRITING TO THE DEPARTMENT WITHIN 15 DAYS STATING CORRECTIVE ACTIONS.



logged 8/12/05



## Complaint

## Florida Department of Environmental Protection

COMPLAINT #: \_\_\_\_\_ PROGRAM AREA: SW OFFICE: Tampa COUNTY: Hernando  
OPEN DATE: 01/27/05 STATUS: \_\_\_\_\_ PRIORITY: \_\_\_\_\_ REVIEWER: \_\_\_\_\_

### \*\*\*COMPANY OR PERSON LODGING THE COMPLAINT\*\*\*

COMPANY: \_\_\_\_\_ JOB TITLE: \_\_\_\_\_  
NAME: Jimmy Justin  
ADDRESS: \_\_\_\_\_ TYPE: \_\_\_\_\_  
CITY: \_\_\_\_\_ ST: FL ZIP: \_\_\_\_\_ - \_\_\_\_\_ PHONE: 352-303-6598  
COUNTRY: USA

### \*\*\*COMPANY OR PERSON AGAINST WHOM THE COMPLAINT IS LODGED\*\*\*

COMPANY: Cliff's septic service JOB TITLE: \_\_\_\_\_  
NAME: \_\_\_\_\_  
ADDRESS: camp mine road TYPE: \_\_\_\_\_  
CITY: \_\_\_\_\_ ST: \_\_\_\_\_ ZIP: \_\_\_\_\_ - \_\_\_\_\_ PHONE: \_\_\_\_\_  
COUNTRY: USA

### \*\*\*COMPLAINT DETAILS\*\*\*

DESCRIPTION: dumping dumpsters onsite, mountain of tires on property, garbage & C&D being dumped on property;

DIRECTIONS: located on FCS property off camp mine road

RECEIVED BY: PELZ MODE: Phone RECONTACT REQUESTED: YES  
TIME EXISTED: \_\_\_\_\_ INITIAL DISPOSITION: \_\_\_\_\_



INVESTIGATION PROCEDURE & FINDINGS: inspected 4/5/05

- operating a sw TS w/o permit
  - numerous spills of oily substances, stained soils
  - pile of tires
  - ~~Beaver~~ <sup>Bellevue</sup> Hills full of waste
  - filling in "low spots" on property w/ non-clean debris
    - vegetation, asphalt, styrofoam, plastic,  
~~chain pipe~~
  - operating a truck/equipment wash w/o permit
  - open burning of paper from septic service w/o permit
- (see inspection report)

CONCLUSION/ACTION inspection report to be sent

- Warning Letter w/ SW, FW, poss. Air & ERP violations

INVESTIGATION DATES: 4/5/05

TIME SPENT FIELD: 200-430 OFFICE: \_\_\_\_\_ TOTAL HOURS: \_\_\_\_\_

INVESTIGATED BY: CMR, SSP, Cindy Falandysz

INVESTIGATION CLOSED: \_\_\_\_\_ DATE: \_\_\_\_\_

INFORMATION REFERRED TO: \_\_\_\_\_ DATE: \_\_\_\_\_