

4014 NW 13th STREET GAINESVILLE, FL 32609-1923 352/377-5822 • FAX/377-7158

Mr. Steven G. Morgan Florida Department of Environmental Protection Southwest District - Waste Management Section 13051 N. Telecom Parkway Temple Terrace, FL 33637-0926

Re: CEMEX South Cement Plant Alternative Fuel/Material Processing Facility

Pending Permit #22787-004-SO/31

WACS: 40778, Brooksville, Hernando County, Florida

Dear Steven:

Thank you for meeting with representatives of CEMEX Construction Materials Florida, LLC (CEMEX) and Koogler and Associates, Inc. (Koogler) on January 16, 2012 to discuss the Department's request for additional information (RAI) dated December 13, 2012. On behalf of CEMEX, Koogler is responding to the RAI. The RAI items and our responses are as follows:

"As discussed in the cover letter for this application, it is the intent of applicant to separate operation of the Cement Plant form the Conditions of Certification for Site Certification #PA82-17P. In addition to waste tire processing and management and storage of alternative fuels, part of the operation of the cement plant is the management and storage...".

Response: The Department references "...part of the operation of the cement plant is the management and storage of other waste materials utilized in cement plant operation (e.g. synthetic gypsum, slag, power plant ash, etc.)" and "...ongoing compliance concerns with the storage of some of these materials at the facility (e.g. TECO Gannon ash)...". This references materials at the Plant which are not the subject of this application. This was further discussed during the meeting on January 16, 2013. The original application submittal addressed the management and storage of alternative fuel materials.

2. "Part A.5.: The DEP ID number for this facility is 40778. Please revise this part of the application form to reflect this number."

Response: The DEP ID number has been revised as noted, and Part A.5. of the application is provided as Attachment 1.

3. "Section 3.1: In accordance with Rule 62-701.320(1), F.A.C., the storage of alternative fuel materials (AFM) at the Gregg Mine would require a solid waste management facility...".

Response: Acknowledged.

4. "Section 3.3: Please identify the location of the AFM handling/injection feeder system on Figure 1 – Site Plan."

Response: Figure 1 has been revised to include the location of the AFM handling/injection feeder system (Attachment 2).

- 5. "Section 3.4.
 - a. Please provide the support information, calculations, and/or assumption utilized in determining the storage capacity for each proposed AFM storage location identified in this section.

Response: The support information for the storage capacities of each proposed AFM storage location is provided as Attachment 3.

b. <u>A-Frame Building (AFB)</u>: Please revise this section to specifically describe the construction details of the floor (e.g. material type, thickness, sealant, ...".

Response: The floor of the A-Frame Building is an impervious surface which according to boring logs varies in composition of:

- between 6 inches and 1 foot 6 inches of compacted limestone, beneath which lies between 2 feet 6 inches to 4 feet 6 inches of clay; or
- over 4 feet of clay

Either hard rock or limestone was encountered at each boring at a depth of between 4 and 5 feet. Two permeability tests were performed at depths of 12 to 14 inches below the existing ground surface which resulted in the determination that the floor of the A-Frame Building is impervious. The report with boring logs and methodology of the soil sampling is provided as Attachment 4.

To address the possibility of windblown rain coming into contact with AFM, the materials will not be stored within approximately 6 feet from the edges of the building.

c. <u>"Additive Storage Building (ASB):</u> Please revise this section to specifically describe the construction details of the clay floor (e.g. clay type, thickness, ...".

Response: The floor of the ASB is compacted subgrade material overlain by 10 inches of compacted graded aggregate which is overlain by 12 inches of clay. We believe that the permeability tests performed on the floor of the A-Frame Building, which is constructed of similar materials, provides a basis for assurance that the floor of the ASB is also impervious. The structural details of the ASB are provided as Attachment 5.



To address the possibility of windblown rain coming into contact with AFM, the materials will not be stored within approximately 6 feet from the edges of the building.

d. "Alternative Fuels/Materials Storage Processing Slab (AFM Slab): This section indicates that runoff from this slab is "directed to the drainage ditch which outfalls...".

Response: Only untreated biomass and agricultural materials (i.e. peanut hulls, etc.) will be stored outside. Run-off from these materials should not require additional review/approval as an industrial wastewater run-off for the following reasons:

- These materials are to be stored on the CEMEX property as the primary fuel source for the biomass power plant (Florida Power Development).
- Water sampling is already being conducted on the drainage ditch and outfall ponds. These materials do not contain hazardous waste or additional parameters of concern not already covered by the current monitoring program.
- These materials will not be "processed" as defined in 62-701.200(88) FAC.
- 6. "Section 3.6. Please revise this section to provide a specific reference (document title, section, date of submittal) to where and when boundary surveys were previously provided to the Department".

Response: Copies of the boundary surveys are provided in this submittal as Attachment 6.

"Section 3.8. Section 3.1(i) indicates that engineered fuels may include such potential "non-dry" materials as on-spec used oils, "other non-hazardous liquids", processed MSW, paint filter cake, cosmetics, etc. In addition, while the presence of a roof significantly...".

Response: Engineered Fuels (EFs) are expected in the next few years to comprise approximately 30 percent of the AFMs to be utilized at the facility, and they will be kept undercover. EFs are generally dry materials, with less than 10% moisture. As explained during the meeting on January 16, 2013, when confiscated AFMs are brought on-site, they are escorted directly to the kiln and are not stored on site.

To reduce the possibility of windblown rain from coming into contact with any AFMs stored undercover, they will be staged no closer than 6 feet from the edges of the building. Additionally, two sides of the ASB building are enclosed with a 10 foot wall, and the building is partitioned lengthwise by a 12 foot interior wall which will assist with keeping the AFMs separated.



- 8. "Section 3.9: Please provide the Contingency Plan referenced in this section or copies of the parts of the plan that address the requirements of Rule 62-701.320(16), ..."

 Response: A Contingency Plan is provided as Attachment 7.
- 9. "Section 3.10.4: Greenway Recycling, Inc. operates a Class III/C&D debris waste processing facility and as such is not permitted to accept the AFM at their facility. The Greenway...".

Response: A revised Closure Plan with third party estimates, and revised Form 62-701.900(28), Closure Cost Estimating Form is provided as Attachment 8. Included as Attachment A within Attachment 8 is a revised cost estimate for the disposal of Class I waste at a facility permitted to accept Class I waste for management or disposal.

Additionally, during the meeting on January 16, 2013, the Department requested that the applicant confirm that the wood based material obtained from Greenway Recycling does not contain residue, and if it did, it would be considered an engineered fuel and Class III fines. Koogler obtained confirmation from the Clearwater Facility of Greenway Recycling, Inc. on March 20, 2013, that their wood based material is picked and screened and therefore, should not contain residues.

10. "Rule 62-701.320(8), F.A.C. Please publish the attached Notice of Application and provide proof of publican to the Department."

Response: The Notice of Application will be published upon the Department's confirmation that the application has been deemed complete except for this item.

We trust this response sufficiently addresses the RAI so that processing of this permit may proceed. Thank you for your continued assistance with this permit application. If you have any further questions, please contact Tammy Reed at 352-377-5822 or treed@kooglerassociates.

Best regards,

Maxwell R. Lee, Ph.D., P.E.

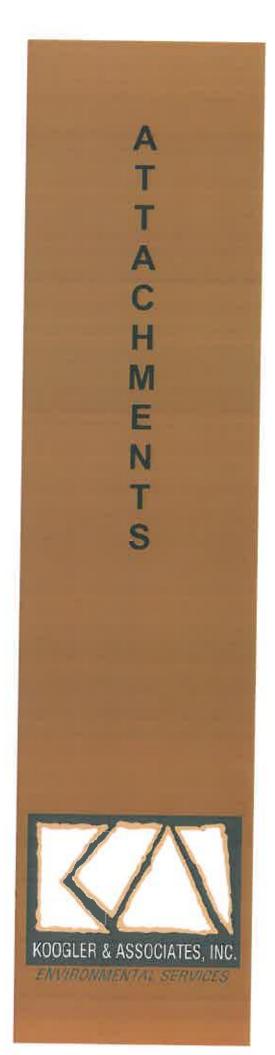
MRL/tr

Enclosures

cc: George Townsend - CEMEX (Email)



- 1. Application Form, Revised Page 1
- 2. Figure 1 Site Plan
- 3. Table of Storage Capacity
 Calculations
- 4. A-Frame Permeability and Boring Report
- 5. ASB Building Drawings
- 6. Boundary Surveys
- 7. Contingency Plan
- 8. Closure Plan



REVISED Page 1





Florida Department of **Environmental Protection**

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 DEP Form #: 62-701.900(4), F.A.C.

Form Title: Application to Construct, Operate, or Modify a Waste Processing Facility

Effective Date: January 6, 2010

Incorporated in Rule; 62-701.710(2), F.A.C.

APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

GENERAL REQUIREMENT: Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with Rule 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

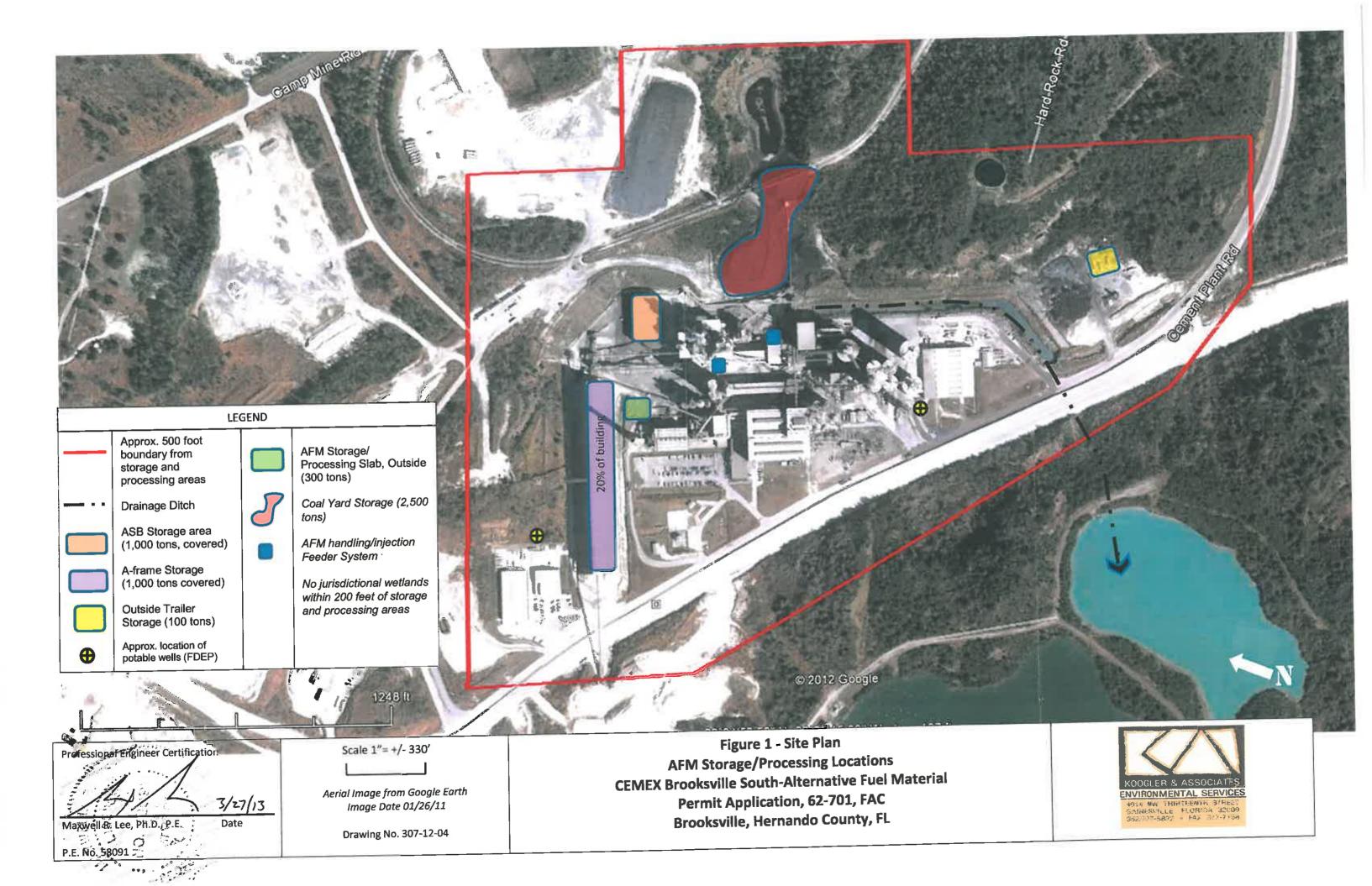
Please Type or Print in Ink

A.	GENERAL INFORMATION				
1.	Type of facility (check all that apply):				
	☐Transfer Station				
	☐ Materials Recovery Facility:				
	☐ C&D Recycling				
	☐ Class III MRF				
	☐ MSW MRF				
	☐ Other Describe:				
	☐ Other Facility That Processes But Does Not Dispose Of Solid Waste On-Site:				
	☐ Storage, Processing or Disposal for Combustion Facilities (not addressed in another permit)				
	☐ Other Describe: AFM Storage and Processing Facility				
	NOTE: C&D Disposal facilities the	nat also recycle C&D, shall apply on DEP FORM 62-701.900(6), F.A.C.			
2.	Type of application:				
	☐ Construction/Operation				
	☐ Operation without Additional Construction				
3.	Classification of application:				
	Ճ New	☐ Substantial Modification			
	□ Renewal	☐ Intermediate Modification			
		☐ Minor Modification			
4.	Facility name: CEMEX Brooksville South Cement Plant				
5.	DEP ID number: 40778	County: Hernando			
3.	Facility location (main entrance): 10311 Cement Plant Road Brooksville, FL 34601				
	<u></u>				

FIGURE 1

SITE PLA





TABLE

OF

STORAGE

CAPACITY

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1

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CEMEX Construction Materials Florida, LLC Brooksville South Alternative Fuel Material, DEP ID No. 40778

Area	Calculation of Storage Capacity	Storage Use/Tons
	25	
l	(180' - 6' length) * (110' - 6' width ²) * 10' height ¹	
ASB Storage Area	= 180960 cu. ft. * 0.025 = 4524 Tons	1,000 Tons, Covered
	(780' - 6' length) * (95' - 6' width ²) * 6' height	
	(max.) = 413,316 cu. ft. * .20 (area use) = 82,663	
A-Frame Storage	cu. ft. * 0.025 = 2066 Tons	1,000 Tons, Covered
Outside Trailer Storage	Walking Floor Trailer = 25 Ton * 4 Trailers	100 Tons
	65' length * 40' width * 8' height (max.) =	
AFM Storage/Processing Slab	·	300 Tons
	82,765 sq. ft * 10' height (max.) = 827,650 cu ft.	
Coal Yard Storage	* 0.025 = 20,691.25 Tons	2,500 Tons

Area calculations are approximate, but are equal to or less than actual dimensions.

¹ Material will be stored maximum of 8' high

² Material will be stored at least 6' from the edge of building floor

A-FRAME

PERM. AND BORING

REPORT



Engineering & Materials Testing

Reply to:

Inverness

February 28, 2013

Coastal Engineering Associates, Inc. 966 Candlelight Boulevard Brooksville, FL 34601 (352) 796-9423 (352) 799-8359 fax

Attn: Joe Calamari

jcalamari@coastal-engineering.com

(352) 279-1022

Subject:

Permeability Tests & Auger Borings

Proposed Bio-Mass Storage Facility

10206 Cobb Road

Brooksville, Hernando County, Florida

CTL Project No. 1381056,100

Dear Mr. Calamari:

Central Testing Laboratory (CTL) has completed the requested testing services for the referenced project site. The auger borings were performed in general accordance with the applicable ASTM standard procedures. A copy of this procedure is attached for your review. Boring AB-1 was advanced with a hand auger. Due to the stiffness of the clay soils and encountered limestone materials, a truck mounted drill rig was mobilized to perform auger boring AB-2, AB-3 and AB-4.

The auger borings and field permeability tests were performed within the footprint of the proposed project. The approximated locations are shown on the attached Figure No. 1.

As requested, CTL has performed two (2) vertical permeability tests and four (4) auger borings at the above referenced site. The permeability test was performed at depths of 12 and 14 inches below the existing ground surface. The soil profiles were obtained from auger borings advanced to depths of between 4.0 and 5.0 feet below existing site grade.



Florida Registration No. 48173

The field vertical permeability tests were performed at locations shown on Figure No. 1. The resulting measured permeability is included in the following table. The permeability test standpipe was filled with water and after 30 minutes the water level did not move. This is an indication that the soils being tested are generally considered impervious.

LOCATION	VERTICAL PERMEABILITY (fl/day)	DEPTH OF PERMEABILITY TEST (in)
P-1	None - Impervious	12
P-2	None - Impervious	14

CTL appreciates this opportunity to provide these services for you and looks forward to working with you on the next phase of your project. Should you have any questions regarding this report, please contact our Inverness office at (352) 726-6447, by fax at (352) 726-6385 or by e-mail at inverness@ctlfl.com.

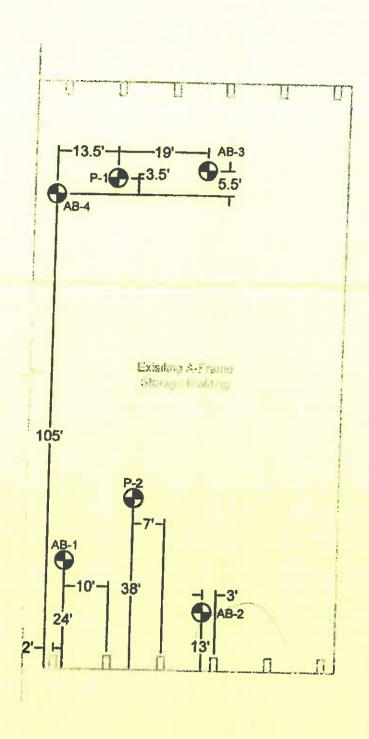
Respectfully submitted, Central Testing Laboratory

Terry D. Bland Branch Manager

Jordan P. Bjorn Staff Engineer

cc: File

CMK/tap





Auger Boring



Permeability



Not to Scale **Central Testing Laboratory Engineering & Materials**

5400 South Florida Avenue inverness, FL 34450

Subsurface Soil Exploration **TEST LOCATIONS Bio-Mass Storage Facility** 10206 Cobb Road Brooksville, FL 34601

Drawn by: JPB Checked by: TDB

CTL Project No.: 1381056.200

Coastal Engineering Associates, Inc. 966 Candlelight Blvd Brooksville, FL 34601

Figure No. 1

PROJECT: Bio-Mass Storage Facility, 10206 Cobb Road, Brooksville

BORING LOCATION: see Figure No. 2

ELEVATION: N/A

BORING METHOD: ASTM D-4700

DRILLER: JB

CTL PROJECT No.: 1381056.200

DATE: 2-25-13

CLIENT: Coastal Engineering Associates, Inc. DEPTH TO - Water: N/E

EL EMATION			(new title)
DEPTH (FT)	SOIL SYMBOLS SAMPLER SYMBOLS AND FIELD TEST DATA	FIELD CLASSIFICATION	PLASTIC LIMIT
[o		Very Pale Brown Weathered	10 20 30 40
-1		Limestone 10yr 7/3	
	-	Pale Brown Sandy Clay w/Limestone Fragments 10yr	
-2		6/3 (CL)	
-3		Light Yellowish Brown Sandy Clay w/Limestone Fragments 10yr 6/4 (CL)	
-4		Terminated due to rock.	
-5			
-6			
-7			1

PROJECT: Bio-Mass Storage Facility, 10206 Cobb Road, Brooksville

BORING LOCATION: see Figure No. 2

DATE: 2-26-13 ELEVATION: N/A

DRILLER: JB

CTL PROJECT No.: 1381056.200

BORING METHOD: ASTM D-4700 DR CLIENT: Coastal Engineering Associates, Inc.

DEPTH TO - Water: N/E

ELEVATION/	SOIL SYMBOLS SAMPLER SYMBOLS AND FIELD TEST DATA		(new title)
DEPTH (FT)		FIELD CLASSIFICATION	TEST RESULTS PLASTIC LIMIT LIQUID LIMI PERCENT PASSING # 200 MOISTURE % * HC-VALUE
[°		Very Pale Brown Weathered Limestone 10yr 7/4	10 20 30 40
		Brown Sandy Clay w/Limestone Fragments 10yr 4/3 (CL)	
-1			
-2			
-3			
-4			
		Very Pale Brown Weathered Limestone 10yr 7/3	
-5			
-6			
-7			

Notes:

PROJECT: Bio-Mass Storage Facility, 10206 Cobb Road, Brooksville

BORING LOCATION: see Figure No. 2

ELEVATION: N/A CTL PROJECT No.: 1381056.200

DATE: 2-26-13

BORING METHOD: ASTM D-4700 DR CLIENT: Coastal Engineering Associates, Inc. DRILLER: JB

DEPTH TO - Water: N/E

DE	PTH (FT) -1	SAMPLER SYMBOLS AND FIELD TEST DATA	Pale Brown Sandy Clay w/Limestone Fragments 10yr 3/3 (CL)	PLASTIC LIMIT LIQUID LII PERCENT PASSING # 200 MOISTURE % * HC-VALUE 10 20 30 46
	-1		w/Limestone Fragments 10vr	10 20 30 40
	-2			
	-3			
	-4			
	-5		White Weathered Limestone 10yr 8/1	
	-6			
	-7			

Control Taction Laboratory

Ocala Elorida

DRILLER: JB

PROJECT: Bio-Mass Storage Facility, 10206 Cobb Road, Brooksville

BORING LOCATION: see Figure No. 2

DATE: 2-26-13 **ELEVATION: N/A**

BORING METHOD: ASTM D-4700 DR CLIENT: Coastal Engineering Associates, Inc. DEPTH TO - Water: N/E

CTL PROJECT No.: 1381056.200

Notes:

F1 F14 A THINAS	SOIL SYMBOLS SAMPLER SYMBOLS AND FIELD TEST DATA		(new title)
DEPTH (FT)		FIELD CLASSIFICATION	TEST RESULTS PLASTIC LIMIT
Co		Light Yellowish Brown Sandy Clay Mixed w/Limestone 10yr 6/4 (CL)	19 20 30 40
-1		Very Pale Brown Weathered Limestone 10yr 8/2	
- 2		Yellowish Brown Sandy Clay Mixed w/Limestone 10yr 5/4 (CL)	
-3			
-4		Terminated due to hard rock.	
-5			
-6			
-7			

Control Tacting Laboratory Ocola Clorida

KEY TO SYMBOLS

Symbol Description

Strata symbols

LIMESTONE



INORGANIC CLAYS MEDIUM PLASTICITY

Soil Samplers



Bulk sample taken from 6 in. auger

Notes:

- 1. ELEVATIONS REPORTED ON LOGS PROVIDED BY CLIENT.
- 2. THESE LOGS ARE SUBJECT TO THE LIMITATIONS, CONCLUSIONS, AND RECOMMENDATIONS IN THIS REPORT. DUE TO POSSIBLE VARIANCES IN THE SUBSURFACE BETWEEN THE LOCATIONS OF THE BORINGS, AND THE VARYING DEGREE OF DISTURBANCE, THE DESCRIPTIONS GIVEN ARE GOOD ONLY FOR THE MATERIALS REMOVED DURING THE CONSTRICTION OF EACH BORING.
- 3. RELATIVE DENSITY (sand-silt)

VERY LOOSE - Less than 4 blows/ft. LOOSE - 4 to 10 blows/ft. MEDIUM - 10 to 30 blows/ft.

DENSE - 30 to 50 blows/ft.

VERY DENSE - More than 50 blows/ft.

4. CONSISTENCY (clay)

VERY SOFT - Less than 2 blows/ft. SOFT - 2 to 4 blows/ft. MEDIUM - 4 to 8 blows/ft.

STIFF - 8 to 15 blows/ft.

VERY STIFF - 15 to 30 blows/ft.

HARD - More than 30 blows/ft.

- 5. COLORS ARE DETERMINED BY USING THE MUNSELL SOIL COLOR CHART AND THE VALUES ARE GIVEN IN CODE SUCH AS 10YR 3/4.
- 6. L.O.I. LOSS OF ORGANICS UPON IGNITION ORGANIC CONTENT.

CENTRAL TESTING LABORATORY

ENGINEERING - MATERIALS TESTING - QUALITY CONTROL

INVERNESS - LEESBURG - OCALA



STANDARD GUIDE FOR SOIL SAMPLING FROM THE VADOSE ZONE ASTM D 4700

Sampling vadose zone soil involves inserting into the ground a device that retains and recovers a sample. Devices and systems for vadose zone sampling are divided into two general groups, namely the following: samplers used in conjunction with hand operated devices; and samplers used in conjunction with multipurpose or auger drill rigs. Vadose zone sampling is useful for a variety of reasons including the following; stratigraphic description, hydraulic conductivity testing, moisture content measurement, moisture release curve construction, geotechnical testing, soil gas analyses, microorganism extraction, or pore liquid and soil chemical analyses. Depths of investigations are limited by groundwater conditions, soil characteristics and the equipment used.

Sampling with Hand Operated Devices - Barrel augers used include the following: regular barrel auger, stainless steel barrel auger and post-hole barrel auger. The auger is rotated to advance the barrel into the ground. The operator may have to apply downward pressure to keep the auger advancing. When the barrel is full, the unit is withdrawn from the soil cavity and a sample may be collected from the barrel.

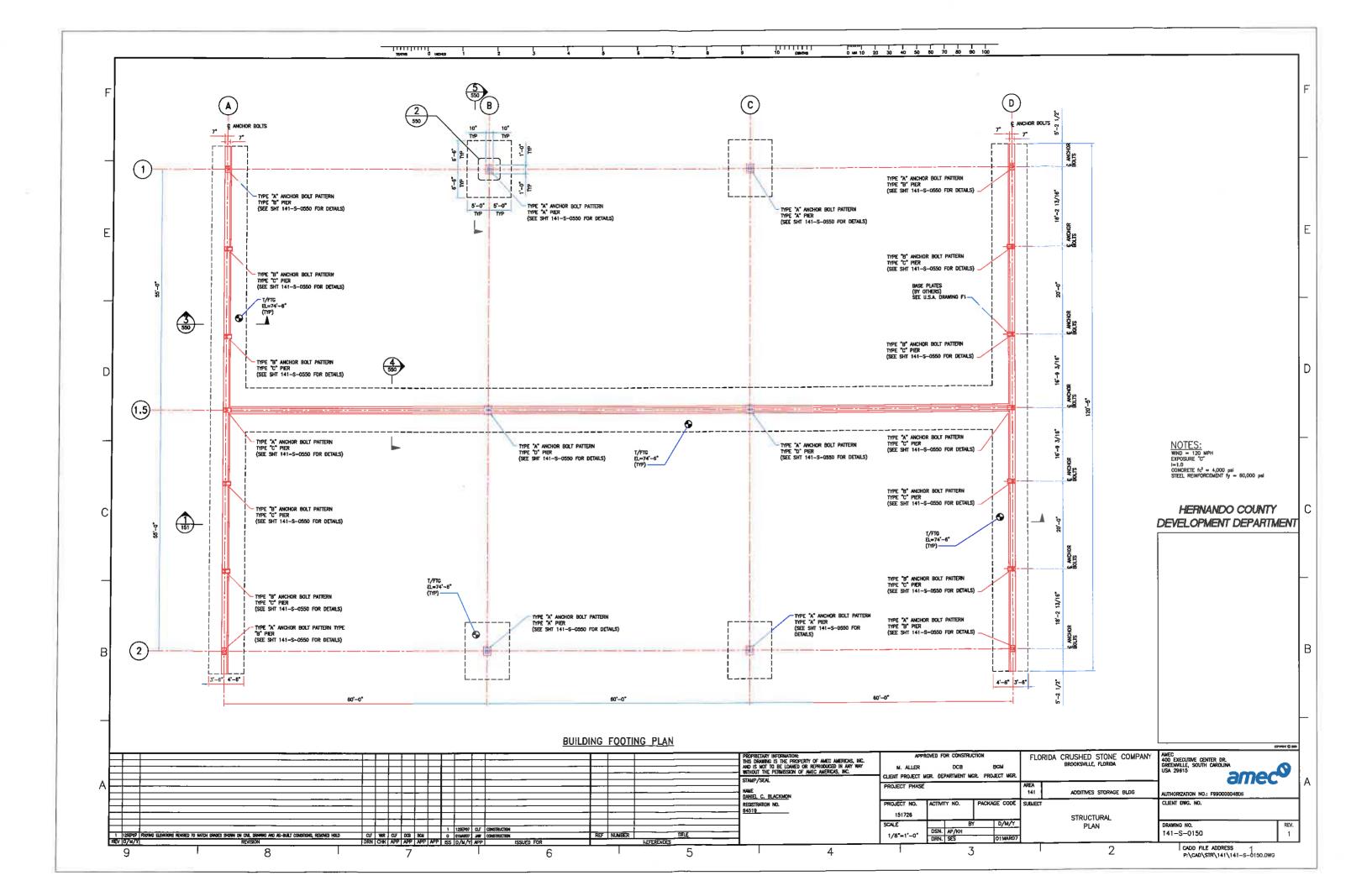
Sampling with Multipurpose and Auger Drill Rigs - Multipurpose and auger drill rigs are generally equipped with rotary power and vertical feed control to advance both hollow-stem augers and continuous flight (solid stem) augers. Sampling is accomplished by rotating the auger column into the soil, retaining the cuttings on the flights. Samples from solid stem augers are termed disturbed and are not suitable for analyses requiring undisturbed samples, such as hydraulic conductivity tests. When representative samples from discrete depths are desired, the borehole should be made large enough to insert a smaller diameter auger or another sampler (for example, a thin-walled tube) to the bottom of the borehole, without touching the sides of the borehole, to collect a discrete sample from the interval ahead. Hollow-stem augers may be used to advance a borehole to a desired sampling depth. Sampling is done by inserting the sampler through the hollow stem of the auger column. The drilling rig operated by Central Testing Laboratory is equipped with four (4) inch solid stem flight augers and six (6) inch hollow-stem flight augers.

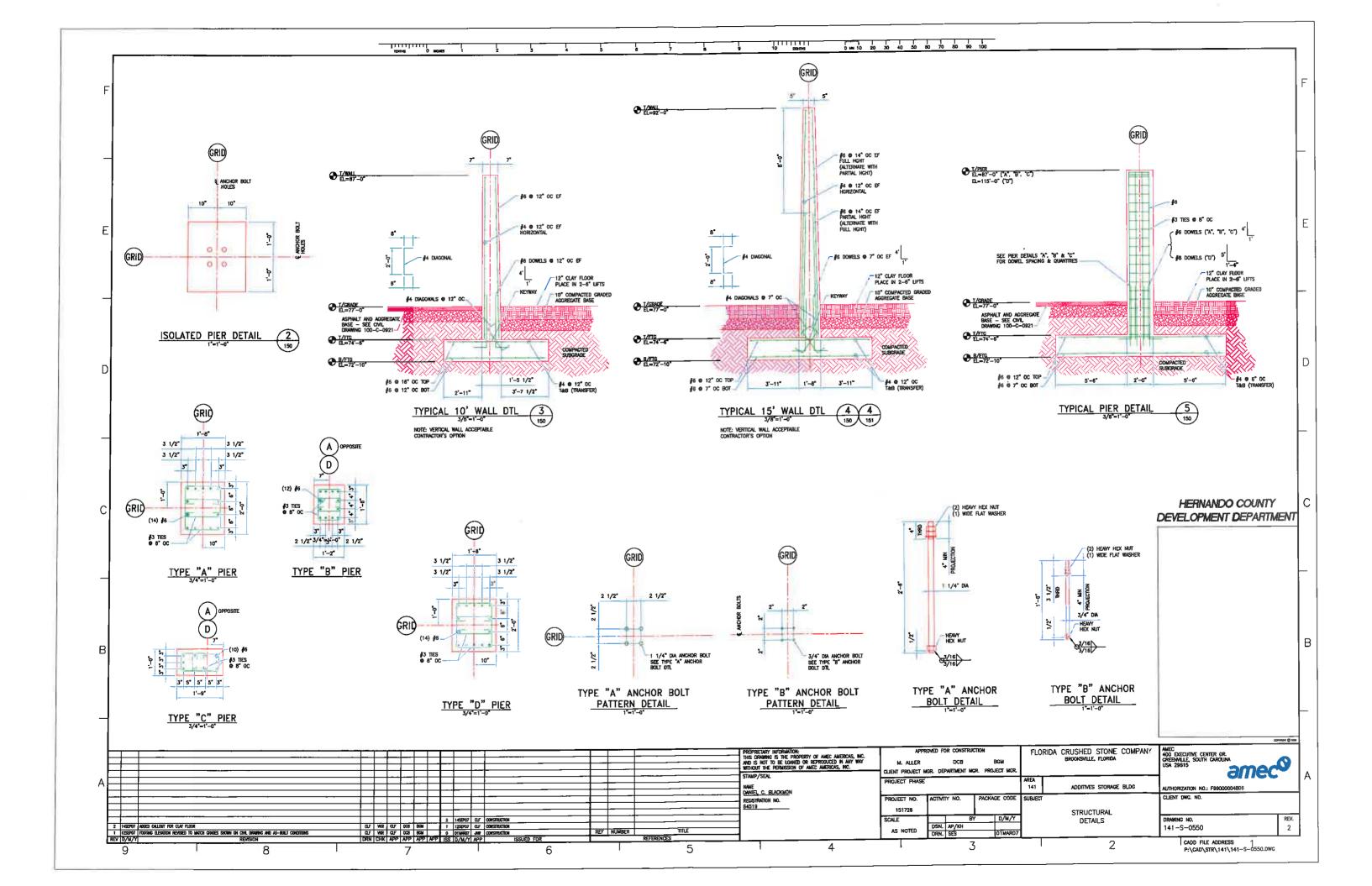
MEMBER OF THE AMERICAN SOCIETY FOR TESTING AND MATERIALS

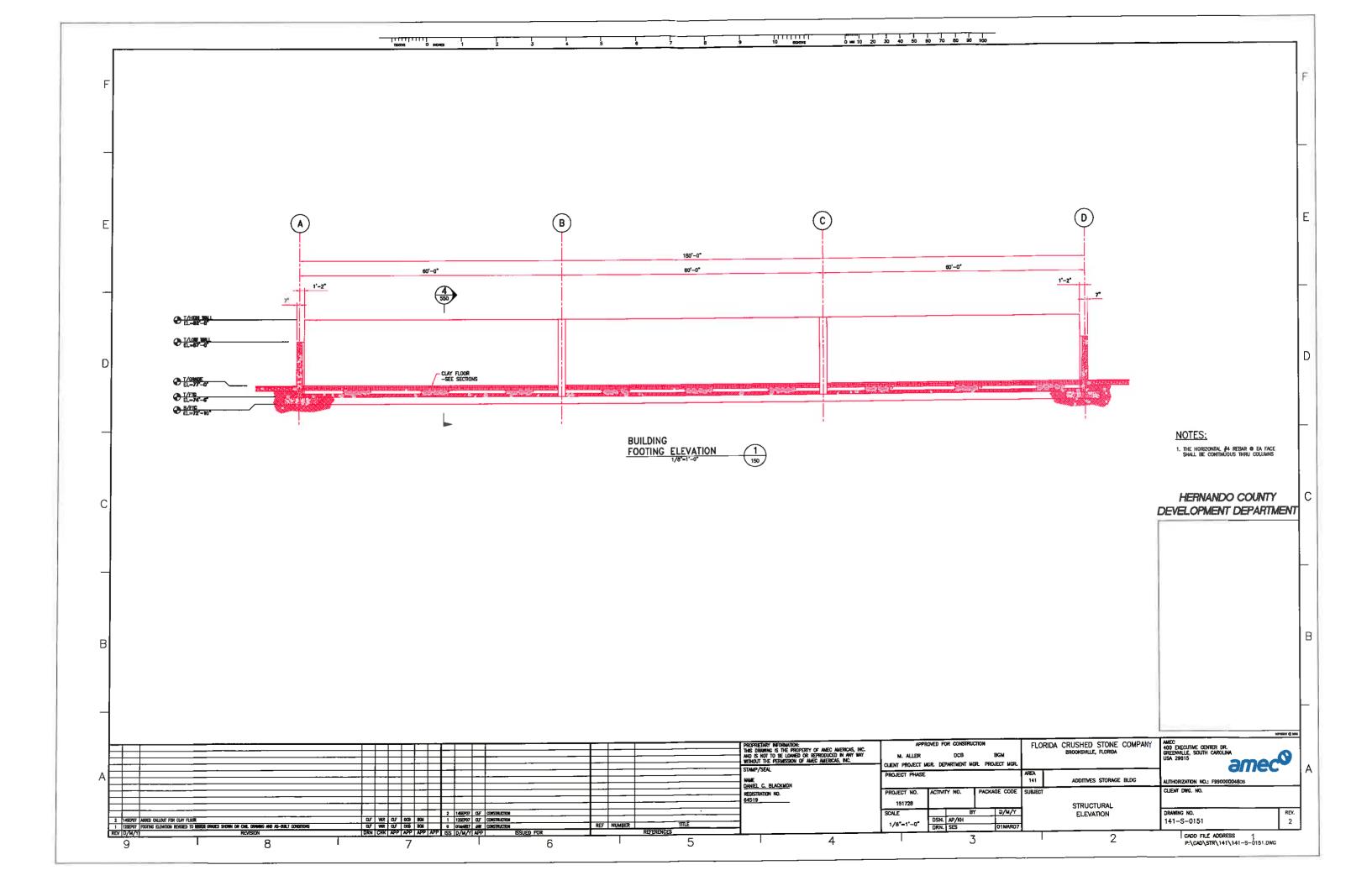
ASB BUILDING

DRASIZGS









BOUNDARY

SURVEYS



Specific Purpose Survey
For Gregg Mine

Section 36, Township 21 South, Range 18 East
Section 31, 32, 33, Township 21 South, Range 19 East
Section 1, 11, 12-15, 24, Township 22 South, Range 18 East
Section 4-8, 15-20, Township 22 South, Range 19 East
Hernando County, Florida



0' 3500' 7000' 10500' Scale: 1''' = 3500'

Specific Purpose Survey
PREPARED FOR:
Gregg Mine

PROJECT NO.: 20040010 PHASE: 116



Specific Purpose Survey For Gregg Mine

Section 36. Township 21 South, Range 18 East Section 31, 32, 33, Township 21 South, Range 19 East Section 1, 11, 12-15, 24, Township 22 South, Range 18 East Section 4-8, 15-20, Township 22 South, Range 19 East Hernando County, Florida

Legal Description

Florida Crushed Stone, Rinker Materials Corporation, Rinker Materials S of Florida Inc., Camp Phosphate Company, & Brooksville Rock Company, Inc, by Warranty Deeds, Quit Claim Deeds and Tax

Recorded in Folio Number R36-421-18-0000-0080-0000 Deed Book 82, Page 147, Deed Book 84, Page 283, Deed Book 87, Page 359, O.R. Book 7, Page 372, OR. Book 84, Page 24, O.R. Book 304, Page 284, O.R. Book 478, Page 1760, Folio Number R01-422-18-0000-0020-0000 Deed Book 75, Page 366, Deed Book 80, Page 349, Deed Book 82, Page 63, Deed Book 83, Page 549, Deed Book 84, Page 283, Deed Book 87, Page 448, Deed Book 92, Page 403, Deed Book 120, Page 166, O.R. Book 7, Page 372, O.R. Book 8, Page 69, O.R. Book 290, Page 465, O.R. Book 303, Page 178, O.R. Book 304, Page 284, O.R. Book 551, Page 1021, Folio Number R17-422-19-0000-0010-0000 O.R. Book 9, Page 414, O.R. Book 114, Page 109, O.R. Book 173, Page 454, O.R. Book 184, Page 504, O.R. Book 255, Page 788, Q.R. Book 331, Page 432, O.R. Book 331, Page 775, O.R. Book 946, Page 614, Folio Number R04-422-19-0000-0100-0000 Deed Book 80, Page 516, O.R. Book 6, Page 126, Q.R. Book 18, Page 325, Folio Number R33-421-19-0000-0160-0000 Deed Book 74, Page 105, Deed Book 116, Page 523, 0.11, Book 6, Page 126, O.R. Book 17, Page 572, O.R. Book 24, Page 308, Folio Number R18-422-19-0000-0010-0000 Deed Book 80, Page 323, Deed Book 82, Page 99, Deed Book 82, Page 147, Deed Book 84, Page 283, Deed Book 87, Page 448, O.R. Book 8, Page 545, OR. Book 18, Page 543, O.R. Book 27, Page 423, O.R. Book 144, Page 32, Folio Number R08-422-19-0000-0050-0000 Deed Book 74, Page 40, Deed Book 74, Page 41, Deed Book 74, Page 42, Deed Book 74, Page 118, Deed Book 74, Page 43, Deed Book 74, Page 47, Deed Book 74, Page 45, Deed Book 74, Page 105, Deed Book 74, Page 107, Deed Book 74, Page 118, Deed Book 74, Page 132, Deed Book 74, Page 158, Deed Book 74, Page 226, Deed Book 80, Page 510, Deed Book 87, Page 359, Deed Book 116, Page 422, O.R. Book 6, Page 124, O.R. Book 71, Page 574, Folio Number R07-422-19-0000-0010-0000 Deed Book 74, Page 38, Deed Book 74, Page 40, Deed Book 74, Page 46, Deed Book 74, Page 47, Deed Book 74, Page 105, Deed Book 74, Page 158, Deed Book 74, Page 225, Deed Book 74, Page 226, Deed Book 77, Page 146, Deed Book 77, Page 147, Deed Book 80, Page 562, Deed Book 80, Page 323, Deed Book 82, Page 58, Deed Book 82, Page 65, Deed Book 82, Page 134, Deed Book 117, Page 480, Deed Book 122, Page 294, O.R. Book 1, Page 465, O.R. Book 2, Page 420, O.R. Book 5, Page 556, O.R. Book 19, Page 72, Folio Number R12-422-18-0000-0020-0012 Deed Book 82, Page 63, Deed Book 84, Page 50, Deed Book 111, Page 351, Deed Book 119, Page 30, O.R. Book 19, Page 52, Folio Number R11-422-18-0000-0080-0010 O.R. Book 1, Page 465, O.R. Book 20, Page 599, Folio Number O.R. Book 9, Page 414, O.R. Book 23, Page 257, Folio Number R08-222-19-1550-0010-0010 Deed Book 74, Page 113, Deed Book 74, Page 158, Deed Book 96, Page 544, Deed Book 114, Page 19, Deed Book 116, Page 422, O.R. Book 33, Page 344, O.R. Book 33, Page 346, O.R. Book 45, Page 639, R12-422-18-0000-0020-0000 Deed Book 80, Page 323, Deed Book 82, Page 63, Deed Book 84, Page 50, Folio Number R32-421-19-0000-0010-0000 Deed Book 82, Page 99, Deed Book 84, Page 283, Deed Book 87, Page 359, Deed Book 91, Page 243, Deed Book 91, Page 244, Deed Book 96, Page 285, Deed Book 108, Page 180, Deed Book 116, Page 424, Deed Book 116, Page 523, Deed Book 122, Page 292, O.R. Book 7, Page 74, O.R. Book 15, Page 335, O.R. Book 16, Page 73, O.R. Book 16, Page 103, O.R. Book 133, Page 694, O.R. Book 746 Page 1891, O.R. Book 760, Page 745, Folio Number R06-421-19-0000-0030-0010 O.R. 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The above descriptions being the same land described in a Title Report prepared by Johnston & Sasser PA, File Number: 40-2007-98, bearing an effective date of: February 9, 2007 at 11:00 PM.

Specific Purpose Survey PREPARED FOR: Gregg Mine

PROJECT NO.: 20040010 PHASE: 116



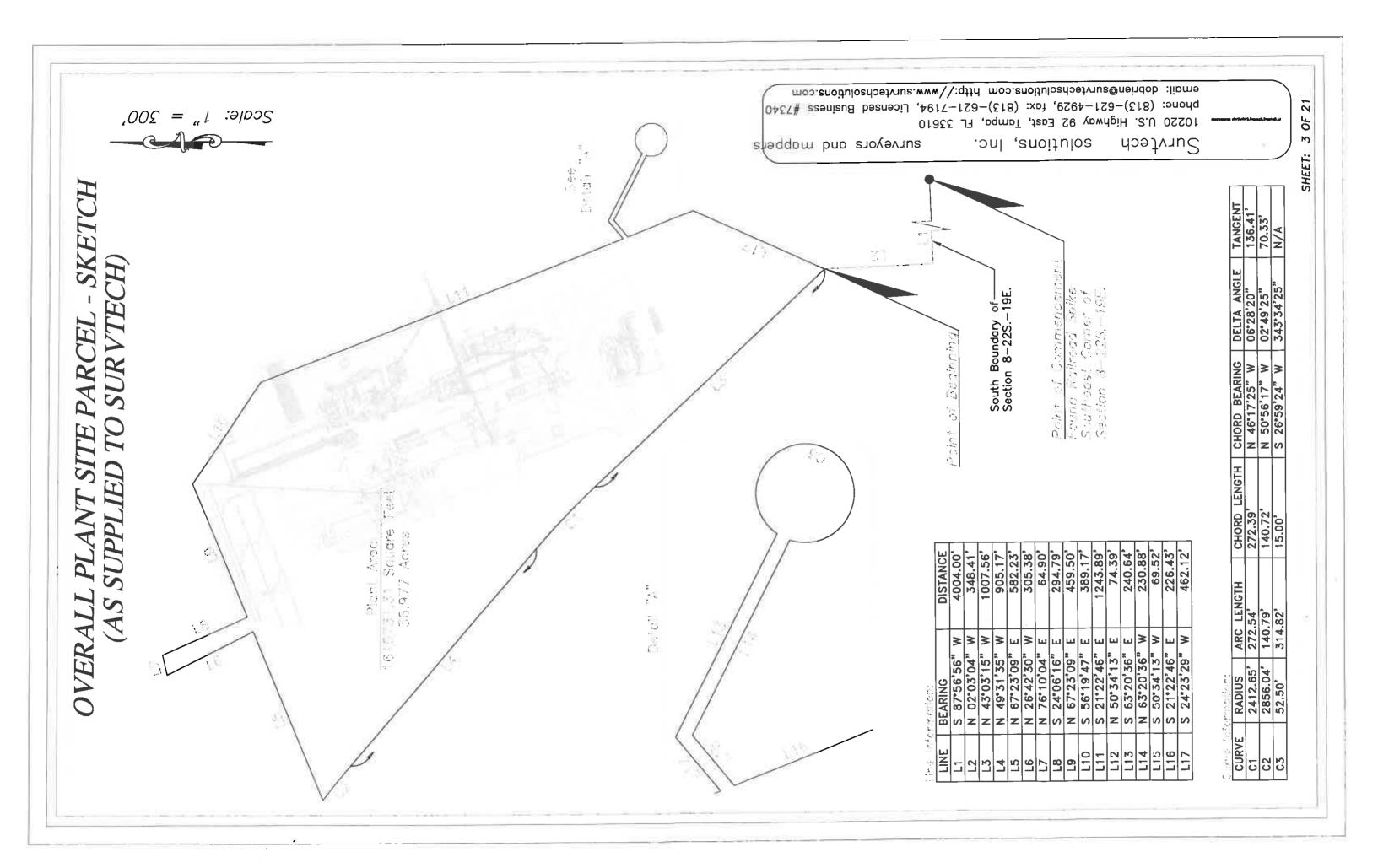
SURVEYORS AND MAPPERS

SOLUTIONS, INC.

33610 -7194,

Tampa, (813)–(

U.S. Highway 92 (813)-621-4929,



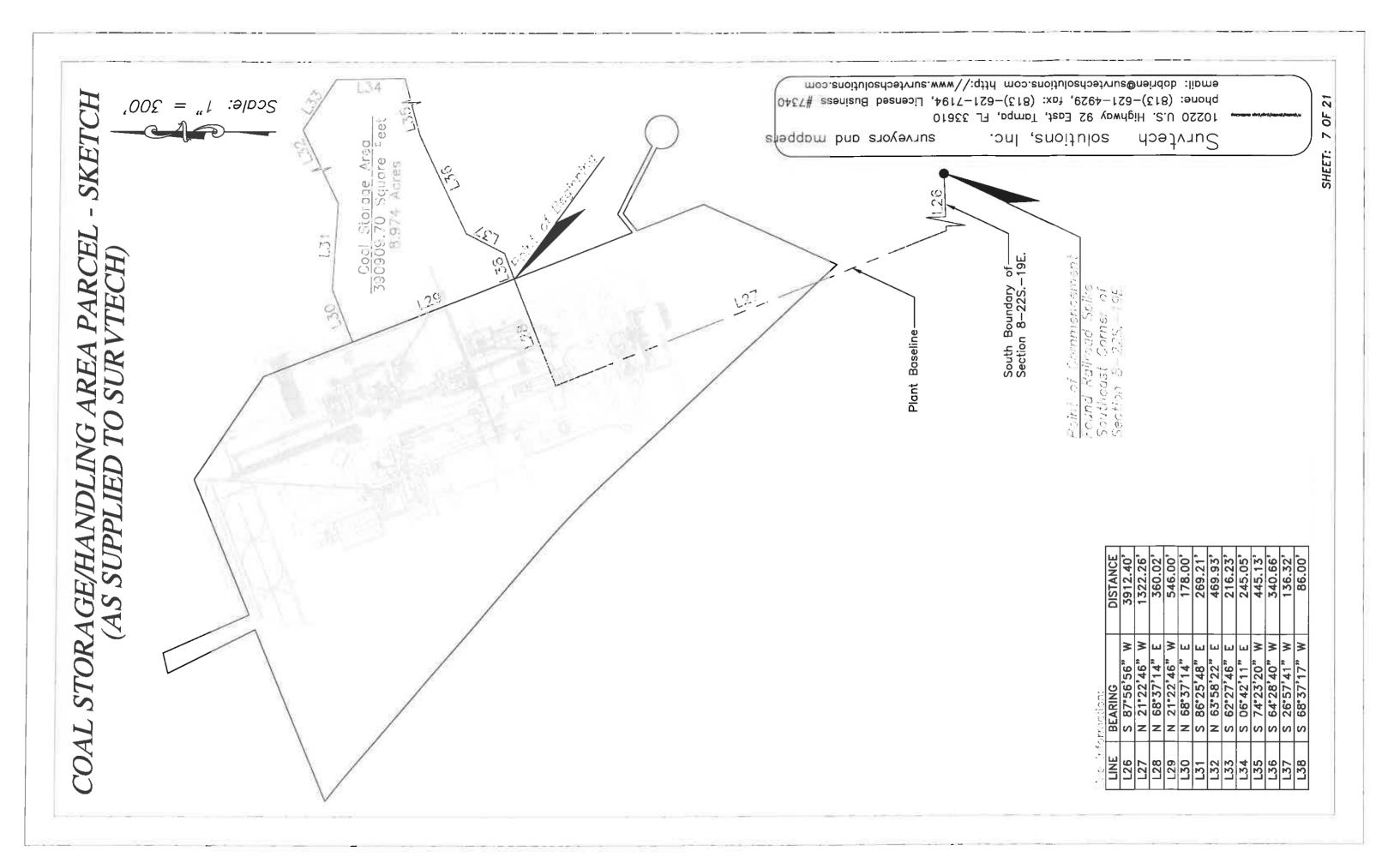
OVERALL PLANT SITE PARCEL - DESCRIPTION (AS SUPPLIED TO SURVTECH)

to the southwest containing the following elements: a delta of 06'28'20"; a radius of 24'12.65 feet; a tangent of 136.41 feet; a chord bearing of north 46'17'25" west, and a chord distance of 272.54 feet; thence run north 49'31'35" west, and a chord distance of 272.54 feet; thence run north 49'31'35" west, a distance of 905.17 feet to a point on a curve concave to the southwest containing the following elements: a delta of 02'49'25"; a radius of 2856.04 feet; a tangent of 70.33 feet; a chord bearing of north 50'56'17" west, and a chord distance of 140.72 feet; thence run along the arc of said curve, a distance of 140.79 feet; thence run north 67'23'09" east, a distance of 582.23 feet; thence run north 50'4.30 west, a distance of 294.79 feet; thence run north 67'23'09" east, a distance of 294.79 feet; thence run north 67'23'09" east, a distance of 294.79 feet; thence run south 56'19'47" east, a distance of 124.39 feet; thence run north 50'34'13" east, a distance of 124.39 feet; thence run north 50'34'13" east, a distance of 240.64 feet to a point on a curve containing the following elements: a delta of 343'34'25"; a radius of 52.50 feet; thence run north 65'320'36" west, a distance of 230.88 feet; thence run north 65'32'13" east, a distance of 240.64 feet to a point on a curve containing the following elements: a delta of 343'34'25"; a radius of 52.50 feet; thence run north 63'20'36" west, and a chord distance of 15.00 feet; thence run north 63'20'36" west, a distance of 230.88 feet; thence run north 63'20'36" west, a distance of 230.88 feet; thence run north 63'20'36" west, a distance of 230.88 feet; thence run north 63'20'36" west, a distance of 230.88 feet; thence run north 63'20'36" west, a distance of 230.88 feet; thence run north 63'20'36" west, a distance of 230.88 feet; thence run north 63'20'36" west, a distance of 230.88 feet; thence run north 63'20'36" and 8, Township 22 South, Range cribed as follows: Commence at the railroad spike in the centerline of "west, along the south line of said thence run north 02°03'04" west, a DF BEGINNING; thence run north ō distance Section 8, a distance of 4004.00 feet; thence run north 02°03'04" distance of 348.41 feet to the POINT OF BEGINNING; thence run no 43°03'15" west, a distance of 1007.56 feet to a point on a curve east, ō south 21°22'46" 24°23'29" west. 0 o County, Florida, described a of said Section 8, a railroad on run south 87'56'56" west, described along the arc of said curve, a distance of 63'20'36" west, a distance of 69.52 feet; thence run distance of 226.43 feet; thence run south 3462.12 feet to the Point of Beginning; located in Yontz Road; thence run A parcel of land lo 19 East, Hernando southeast corner

Surviech solutions, Inc. surveyors and mappers 10220 U.S. Highway 92 East, Tampa, FL 33610
phone: (813)-621-4929, fax: (813)-621-7194, Licensed Business #7340

email: dobrien@survtechsolutions.com http://www.survtechsolutions.com

SHEET: 4 OF 2



COAL STORAGE/HANDLING AREA -DESCRIPTION (AS SUPPLIED TO SURVTECH)

A parcel of land located in Section 8, Township 22 South, Range 19 East, Hernando County, Florida, described as follows: Commence at the southeast corner of said Section 8, a railroad spike in the centerline of Yontz Road; thence run south 87'56'56" west along the south boundary line of said Section 8, a distance of 3912.40 feet; thence run north 21'22'46" west, along the plant baseline, a distance of 1322.26 feet; thence run north 68'37'14" east, a distance of 360.02 feet to the POINT OF BEGINNING; thence run north 68'37'14" east, a distance of 178.00 feet; thence run north 68'37'14" east, a distance of 178.00 feet; thence run south 86'25'48" east, a distance of 269.21 feet, to a point on the centerline of the Railroad Spur Track; thence run north 63'58'22" east, a distance of 245.05 feet; thence run south 74'23'20" west, a distance of 445.13 feet to a point on the centerline of the Railroad Spur Track; thence run south 64'28'40" west, a distance of 340.66 feet; thence run south 26'57'41" west, a distance of 136.32 feet; thence run south 68'37'14" west, a distance of 86.00 feet to the Point of Beginning; A parcel of land located in S Hernando County, Florida, des corner of said Section 8, a r run south 87.56'56" west alor distance of 3912.40 feet; the

Survtech solutions, Inc. surveyors and mappers phone: (813)-621-4929, fax: (813)-621-7194, Licensed Business #7340 email: dobrien@survtechsolutions.com http://www.survtechsolutions.com

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SHEET:

- ZGEZCY

PLAN



CONTINGENCY PLAN (EMERGENCY PROCEDURES)

CEMEX Construction Materials Florida, LLC Brooksville South Cement Plant Brooksville, Hernando County, Florida

FDEP Alternative Fuel/Material Processing Facility Renewal of Permit No. 22787-004-SO/31 WACS No. 40778

Plan Date: December 2012

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1.0 INTRODUCTION

This Contingency Plan (Plan) has been developed in support of the pending permit #22787-004-SO/31 for the CEMEX Brooksville South Cement Plant Alternative Fuel/Material Processing Facility in accordance with Chapters 62-701 and 62-711 F.A.C.

This Plan addresses practical measures to be implemented by CEMEX Construction Materials Florida, LLC at the Brooksville South Cement Plant in the event of an emergency. This Plan shall be kept at the Facility at all times and shall be accessible to Facility operators.

2.0 FACILITY DESCRIPTION

The Brooksville South Cement Plant (Facility) is owned and operated by CEMEX Construction Materials Florida, LLC (CEMEX). The Facility is located at 10311 Cement Plant Road in Brooksville, Hernando County. The entire property owned by CEMEX (Site) occupies approximately 10,000 acres. Most of the land use surrounding the Site is rural agriculture with some residential developments.

Onsite operations include cement manufacturing plant (Plant) and active mining operations that remove limestone, sand and clay. The Plant is situated in an old quarry and includes two dry-process rotary kilns, clinker coolers, finish mills, and numerous blending and storage silos. Mining operations are situated in the western and southern portions of the site. CEMEX mines soft limestone for the cement manufacturing operation and operates a rock crushing operation that processes hard limestone rock for road and building construction materials.

Raw materials used in the production of cement include but are not limited to limerock (calcium carbonate), limestone tailings (calcium carbonate and silica), and other mineral aggregates such as bauxite, power plant ash, mill scale and slag. The Cement Plant consists of Kiln No. 1 (not currently in operation) and Kiln No. 2, which utilize coal, used tires, and a variety of alternative fuel materials as fuel sources to heat the raw materials in a kiln to produce "clinker." The clinker is ground into a powder and incorporated with gypsum in order to produce cement. The finished cement products are stored in silos from which tanker trucks are load for shipping.

3.0 CONTINGENCY PLAN (EMERGENCY PROCEDURES) [62-701.320(16) F.A.C.]

This Contingency Plan has been developed to provide information on emergency preparedness and response at the Facility. This Plan covers operational interruptions and emergencies such as fires, explosions, and natural disasters.

3.1 Responsible Persons – Emergency Coordinators

Primary Emergency Coordinator

George Townsend – Environmental Manager (352) 799-7881 – Office; (352) 238-9102 (Mobile)

Secondary Emergency Coordinator

James Daniel – Plant Manager (352) 799-7881 – Office; (352)

Back-up Emergency Coordinator

Oliver Sohn – Production Manager (352) 799-7881 – Office; (352)

3.2 Procedures for Notification and Contact Information

The key person responsible for implementing this Contingency Plan is the Primary Emergency Coordinator. In the event that the Primary Emergency Coordinator is unavailable, the Secondary Emergency Coordinator or Back-up Emergency Coordinator (in that order) are the responsible parties to implement this Contingency Plan. The Emergency Coordinators have the complete authority to commit the resources of the Facility in the event of an emergency. If needed, the Emergency Coordinators may summon the assistance of outside organizations to assist with an emergency situation. The protocol for contacting the Emergency Coordinators and their duties are described below.

- Individuals aware of an emergency condition subject to this Contingency Plan should immediately contact their supervisor who, in tum, should contact the Primary Emergency Coordinator. If the Emergency Coordinator is unavailable, one of his alternates should be contacted.
- The Emergency Coordinator or his designee will be responsible for Agency notifications when this Contingency Plan is implemented, where applicable.
- Whenever the Emergency Coordinator is advised of an emergency condition, he will immediately assess the potential hazards to on-site personnel and the potential impacts off-site. Factors to be considered include:
 - the materials involved in the incident;
 - the need for rescues;
 - potential hazards from gases or explosions:
 - surface water run-off from fire control; and,
 - the possibility of heat induced explosions.

Upon assessment, should the Emergency Coordinator determine that the possibility exists for serious danger to plant employees or to the surrounding community, the Emergency Coordinator will coordinate with plant operating personnel to shut down and/or isolate the area or process unit involved. If evacuations of the surrounding area are needed, the Hernando County Sheriff offices/Brooksville Police Department and Brooksville Fire Department will be advised of the situation. They will recommend and coordinate the evacuation of affected citizens in the adjacent community if necessary. A list of Emergency Contacts is provided in Table 1.

3.3 Emergency Procedures and Minimization of Impacts

The primary goal of the emergency response procedures is to eliminate potential harm or threat to Facility employees and the surrounding population. In general, this is accomplished by the following steps:

- 1. Contact the Emergency Coordinator.
- 2. Contact the Control Room Operator (CRO) to alert employees, if employees need to go to Rally Points. The CRO will assign a scout to meet emergency services at the Facility entrance if needed.
- 3. Managers or supervisors will:
 - Conduct a roll call
 - Organize search for any persons missing from roll call.
 - Treat all injured personnel
 - Access property damage
 - Remain at designated area until released by the Emergency Coordinator
- 4. Shut down work in the affected area.
- 5. Shut down feed lines and additional equipment in the area as soon as necessary and practical.
- 6. Clear the area of all employees not actively involved in managing the contingency Situation.
- 7. Utilize barrier tape or barricades to prevent entry of unnecessary persons into the area.

3.4 Shut Down Procedures and Notification of Closure

In the event of an emergency, these provisions should be followed for those parts of the facility affected by the emergency:

• Contact the CRO. The CRO will contact the Emergency Coordinator and will notify all personnel, if employees should proceed to the Rally Points.

- Clear the area of all employees not actively involved in assisting with the emergency (e.g. fire-fighting) and direct them to the nearest Rally Point.
- Shut down work in the immediate area of the emergency, where needed.
- Shutdown any feed lines and equipment, as needed
- The Emergency Coordinator will contact neighbors and local/state/federal officials as necessary and applicable to notify them of the potential impacts of the emergency.

3.5 Equipment

The following equipment is available at the Facility to implement this Plan:

- Fire extinguishers are available throughout the Facility.
- Hoses are available in cabinets placed in ER#7, located directly under the #2 kiln main drive area.
- Earth moving equipment for excavating, spreading, compacting, and covering AFM
- Soil stockpile
- Reserve equipment is available at adjacent operations of the CEMEX facility in the event of a breakdown.
- Fire extinguishers are available throughout the Facility.
- Communications devices include a siren warning system, cell phones, and walkie-talkies.

3.6 Fire Protection and Fire Fighting Capabilities

In the case of a fire within an AFM pile at the Facility, all reasonable efforts shall be made to immediately extinguish or control the fire. If the fire cannot be extinguished or controlled within an hour, the Environmental Coordinator shall immediately implement this contingency plan.

3.6.1 Unplanned Ignition of AFM Materials Including Stored Tires in Trailers or Inside Tire Feed Equipment:

- Contact the CRO. The CRO will contact the Emergency Coordinator and the Production Supervisor. In addition, the Control Room Attendant will sound the alarms, if employees should proceed to the Rally Points.
- Clear the affected area of all employees and contractors and account for persons known to have been involved in the operations.
- Shut down work in the immediate area of the emergency.
- Shutdown any feed lines and equipment as needed.
- Using the stored material pile, the plant loader operator will build a containment berm around the area of fire to make sure water and burnt material is not allowed to enter the storm water ditches.
- Focus firefighting techniques on the concept of the "Fire Triangle". Specifically, eliminate/minimize fuel to the fire, reduce temperatures, and lower oxygen concentrations, where possible and practical.
- Establish fire watch.
- Remember, to extinguish a fire you must interrupt one or more of the essential elements of the fire triangle. You must reduce the temperature, eliminate the fuel, or

CEMEX Brooksville South Cement Plant AFM Processing Facility Permit 22787-004-SO/3 Contingency Plan – December 2012

- eliminate the oxygen.
- The Emergency Coordinator will promptly notify all appropriate agencies of the Incident.
- If the fire cannot be extinguished or controlled within 48 hours, the Emergency Coordinator shall notify the local fire protection agency and seek its assistance, and shall also notify the local government and any neighbors likely to be affected by the fire.

TABLE 1 - EMERGENCY CONTACT INFORMATION

Agency	Contact Information	Action
For ALL Emergencies	911	Contact in cases of <i>all</i> emergency situations.
George Townsend – Environmental Manager & Primary Emergency Coordinator	(352) 799-7881 – Office (352) 238-9102 - Mobile	Contact in cases of <i>all</i> emergency situations (fire, natural disaster, serious injury, etc.).
Florida Department of Environmental Protection SW District – Waste Management Section	Steve Morgan 13051 North Telecom Pkwy Temple Terrace, FL 33637 (813) 632-7600 x385	Contact in cases of fires or other emergencies that pose unanticipated threat to the public health or the environment.
Brooksville Fire Department	85 Veterans Ave. Brooksville, FL 34601 (352) 540-3840	Contact in cases of fire emergencies.
Hernando County Sheriff's Office	18900 Cortez Blvd Brooksville, FL 34601 (352) 754-6830	Contact in case of emergency.
Brooksville Police Department	87 Veterans Ave. Brooksville, FL 34601 (352) 754-6800	Contact in case of emergency.
Brooksville Regional Hospital	17240 Cortez Blvd. Brooksville, FL 34601 (352) 796-5111	Contact in cases of serious personal injury.
Springbrook Hospital	7007 Grove Road Spring Hill, FL 34609 (352) 596-4306	Contact in cases of serious personal injury.

CLOSURE PLAN KOOGLER & ASSOCIATES, INC. CEMEX Brooksville South Cement Plant Alternative Fuel/Material Processing Facility Permit Application No. 40778

Revised Closure Plan

1.0 Notification and Closing Process

Prior to ceasing operations, notification will be provided to the Department and contracted waste suppliers and generators of the intent to close and the expected time frame. Access to the facility is controlled through the use of plant personnel on-site 24 hours per day, 7 days per week, by the use of surveillance cameras, fences, and natural barriers. All vehicles are logged in and out. When the facility is no longer going to function as an AFM processing facility, the plant personnel will deny access of AFM to the facility. A notice will be posted at the entrance to the property stating that the facility is closed.

Prior to closing the facility, any remaining AFM from the storage areas will be combusted in the **ce**ment kilns or removed from the facility by a permitted hauler and management facility or returned to the supplier(s).

2.0 Quantity of Alternative Fuel Material (AFM)

The maximum quantity of AFM to be stored at the facility is 4,900 tons. There is no disposal of ash from the combustion of AFM in the cement manufacturing process. Maximum usage for the kiln system is estimated at 240 tons/day, with an average expected usage of 150 tons/day. The expected average inventory turnaround is therefore approximately 33 day's supply based on 4,900 tons per day of storage and 150 tons per day usage. For the CEMEX Brooksville South Cement Plant facility, that amount is as follows:



CEMEX Brooksville South Cement Plant Alternative Fuel/Material Processing Facility Permit Application No. 40778

150 tons/day x 33 days = 4.900 tons of AFM

At a higher usage rate, the AFM storage would be for a shorter period of time.

3.0 Closure Scheduling

At the time a decision is made to close the facility, it is estimated that the total time necessary for closure will be as follows:

Notification Period - 60 days

The Notification Period is expected to be 60 days to allow time for collectors to revise their routing and notify the facilities to receive the AFM.

Combust All AFM At Facility - 60 days

After the 60 day Notification Period ends, the facility will be closed to incoming AFM. As the facility will be managed to ensure that approximately less than 30 times the daily capacity of the equipment is stored, approximately 30 days of normal operations are necessary to combust all AFM. To cover any unforeseen circumstances (i.e., down time), this phase of closure is estimated to be 60 days.

Removal of Residues - 30 Days

Although significant quantities are not expected, any residues at the facility will be removed to a permitted facility or receiver.

Restore Facility to its Pre-Permit Condition

If facility rehabilitation in accordance with 62-711.700(3)(c) is deemed necessary by the Department, CEMEX will work with the Department to develop and

implement a plan for action. Part of the plan development will address adequate time for completion. Without a scope of work, the time frame to complete this task is unknown.

Department Notification

CEMEX will notify the Department when the closing of the facility is complete. CEMEX understands that the Department will inspect the site to ensure that all closing procedures have been correctly implemented and completed. Upon Department inspection and approval of the facility closing, the Department shall provide CEMEX approval of the closing in writing. It is further understood that the Department Secretary or his designee shall release the financial instrument within 30 days of closing approval.

4.0 Closure Cost Estimates

The estimated closing costs for the facility are based on current third party estimates. The third parties are not subsidiary or parent companies and their estimates are based on performing the work and are reported on a per unit basis. Closing costs include removal and disposal of AFM, manual labor for facility cleanup, facility re-grading (if necessary), and inspection by a Professional Engineer registered in the state of Florida. The cost estimates are certified by a Professional Engineer. The cost estimate is reestimated at least annually and submitted to the Department at least 60 days prior to the anniversary date of the instrument.



CEMEX Brooksville South Cement Plant Alternative Fuel/Material Processing Facility Permit Application No. 40778

To demonstrate financial assurance of the facility closing costs, CEMEX will obtain a guarantee bond that meets or exceeds the required amount of money for the closure costs.

The actual estimated cost of closing the facility at the time of development of this Closure Plan is \$263,073.60, plus the contingency estimate of \$52,614.72 for a total of \$315,688.32. The closing estimates are provided as Attachments.

Removal/Disposal of AFM

The closing cost estimate for this task is based on the quantity of AFM that is permitted for the facility at the amount that would be expended to remove, process, and dispose of AFM at the facility and to close the related operations at the facility. The estimate was obtained from Greenway Recycling and is provided as Attachment A. The estimate was obtained for 4,400 tons of AFM, not 4,900 tons as currently proposed. Therefore, a cost estimate for the transport and disposal at a Class I waste facility of 4,900 tons of AFM based on the Greenway Recycling estimate is as follows:

4,900 tons @ approximately \$58.50 ton = \$286,650

Professional Engineer Services

This cost estimate is for an inspection by a professional engineer registered in Florida. A professional engineer will visit the facility to determine if there are spills or any AFM remaining after the removal of residues. The engineer will

provide an inspection report detailing the findings and if applicable, will direct the cleanup effort. The closure cost estimate includes the cost for the inspection and reporting (see Attachment B). The estimate for professional engineering services is as follows:

• Site Inspection and Reporting - 8 hours at \$175/hour = \$1,400.00

Manual Labor

The cost of manual cleaning and debris removal is based on the United States Bureau of Labor Statistics for Occupational Employment and Wages, May 2011 for Cleaners of Vehicles and Equipment.¹ The cost of rough grading was obtained from RSMeans.² The costs for manual labor for facility clean-up and regrading (if necessary) are estimated as follows:

- Cleanup \$25/man hour x 80 hrs. = \$2,000.00
- Rough Grading Equipment Operator \$51.00/8 hr. day and
 Backhoe \$728.80/day for two 8 hour days = \$2,273.60.

5.0 Summary of Closure Plan

CEMEX has developed this Closure Plan in accordance with Rule 62-701.320(10)(b) (F.A.C.). Closing cost estimates were obtained from independent third parties, and



¹ US DEPARTMENT OF LABOR, OCCUPATIONAL EMPLOYMENT STATISTICS, Occupational Employment and Wages, May 2011. http://www.bls.gov/oes/current/oes537061.htm

² RSMeans. Assemblies Cost Data, 28th Annual Edition; 2003.

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appropriate proof of financial responsibility will be provided upon the Department's approval of this closure plan and closure cost estimates. The total current estimated cost of closing the facility including a contingency fee is \$315,688.32. A Financial Assurance Cost Estimate Form is provided as Attachment C.

6.0 **Financial Assurance**

Unless exempted by Rule 62-701.710(10)(a) FAC, provide the financial assurance documentation required by Rule 62-701.710(7) FAC (Rule 62-701-710(2)(j) FAC).

CEMEX will provide the required financial assurance upon the Department's review and approval of the closing cost estimates, and no later than sixty days prior to accepting AFM at the site under this solid waste permit. CEMEX will add a 20 percent contingency fee (\$52,614.72) to the estimated closing costs for financial assurance to be provided totaling \$315,688.32.



ATTACHMENT A GREENWAY RECYCLING ESTIMATE





January 7th, 2013

George Townsend

Production Manager - United States of America

CEMEX

10311 Cement Plant Road Brooksville

Florida 34601

RE: Cost estimate for Hauling and Disposal of 4,400 Tons Class I material from Cemex Brooksville Plant.

Dr. Mr. Townsend,

The following is a cost breakdown of what Greenway Recycling, Inc. would charge to haul and dispose of materials in the Brooksville Plant Alternative Fuel Storage Areas. All materials will be transported in 120 CY walking floor trailers. The materials will be disposed at a properly permitted Class 1 waste facility and documented for your records.

Class 1 Material (4,400 Tons)

Costs Per Ton

Transport:

\$20.00

Disposal:

\$38.50

Unit Total:

\$58.50

Total Cost:

\$58.50 x 4,400 tons = \$257, 400.00

Total Material Disposal Cost:

\$257,400.00

Vice President

Greenway Recycling, Inc.

ATTACHMENT B ENGINEERING COST ESTIMATE





4014 NW 13th STREET GAINESVILLE, FL 32609-1923 352/377-5822 • FAX/377-7158

Mr. George Townsend CEMEX Construction Materials Florida, LLC PO Box 1508 Brooksville, FL 34605-1508

Re: Closing Cost Estimate - Professional Engineering Services CEMEX Brooksville South Cement Plant AFM Facility

Brooksville, Hernando County, Florida

Dear George:

Thank you for the opportunity to present this cost estimate for Professional Engineering services for the Brooksville South Cement Plant, Alternative Fuel/Material Facility.

A Professional Engineer (P.E.), registered in Florida, will visit the Facility to conduct a site inspection to determine if there are any spills of any solid wastes or other clean-up activities necessary to meet the closure requirements as described in the Closure Plan and in accordance with Rule 62-701.600 (F.A.C.). The engineer will provide an inspection report detailing the findings and directing clean-up efforts if necessary. The professional engineer's inspection will also include a visual evaluation of the Facility elevations. The inspection report will detail these findings, and will provide direction of re-grading if necessary. The costs for Professional Engineering services as described above are as follows:

Site Inspection by P.E., 4 hours at \$175.00/hr. = \$700.00

Report of findings and direction clean-up and re-grading as necessary,
4 hours at \$175.00/hr.=
\$700.00

TOTAL \$1,400,00

We look forward to assisting you with this project in the future.

Best regards,

Maxwell R. Lee., Ph.D., P.E.

President, Koogler and Associates, Inc.

MRL/tlr

ATTACHMENT C

DEP FROM 62-701,900(28) FAC CLOSURE COST ESTIMATE





Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 DEP Form # 62-701.900(28), F.A.C.

Form Title: Closure Cost Estimating Form For Solid Waste Facilities

Effective Date: January 6, 2010

Incorporated in Rule 62-701.630(3), F.A.C.

CLOSURE COST ESTIMATING FORM FOR SOLID WASTE FACILITIES

				Date of I	DEP Approval:		
I. GENERA	L INFORMATION:				•••		
Facility Nar	ne: <u>CEMEX Broo</u>	ksville Sou	uth Cement Pla	ant_		WACS ID:	
Permit App	lication or Consent	Order No.:	40778			ation Date:	
Facility Add	lress: <u>10311 Cer</u>	nent Plant I	Road; Brooksv	ille, FL 34601			
Permittee o	r Owner/Operator:	CEMEX	Construction	Materials Florida, L	LC		
Mailing Add	iress: <u>10311 Ce</u> n		Road; Brooksv				
		_		_	<u>.</u>		
Latitude:	28 °	34'	54 "	Longitude:	82°	25'	56 "
Coordinate	Method: Degree	s/Minutes/S	Sec D	oatum: <u>NAD83 (ass</u>	umed)		
Collected by	y: <u>Unknown</u> /From	Original F		ompany/Affiliation		_	
		_				_	
Solid Waste	Disposal Units Inc	luded in Es	timate:				
			Date Unit Began	Active Life of Unit From Date	If active:	If closed: Date last	If closed: Official
			Accepting	of Initial Receipt	Remaining	waste	date of
Pr	nase / Cell	Acres	Waste	of Waste	life of unit	received	closing
	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	· ·						
• • •		<u> </u>					
Total dispos	al unit acreage incli	uded in this	estimate:	Closure: N/A	Lon	g-Term Care:	N/A
Fac	cility type: □	Class I	□ С	lass III	C&D Debris	Disposal	
	all that apply)	Other: N/			OGD Deblis	Disposal	
		107					
I. TYPE OF	FINANCIAL ASSU	JRANCE D	OCUMENT (C	heck tyne)			
	Letter of Credit*			e Certificate	□ Fsc	ow Account	
	Performance Bond	•	□ Financia			n 29 (FA Defe	rral)
	Guarantee Bond*			ind Agreement	L 1011	II = V (I A Dele	iiai)
,	* - Indicates mechanisms	that require th		-			
				,			
Manthagas Dia	defect Manufacture	District	D. 4 (D) (1)				

Northwest District 160 Government Center Pensacola, FL 32502-5794 850-595-8360 Northeast District 7825 Baymeadows Way, Ste. B200 Jacksonville, FL 32256-7590 904-807-3300

Central District 3319 Maguire Blvd., Ste. 232 Orlando, FL 32803-3767 407-894-7555 Southwest District 13051 N. Telecom Pky. Temple Terrace, FL 33637 813-632-7600 South District 2295 Victoria Ave., Ste. 364 Fort Myers, FL 33901-3881 239-332-8975 Southeast District 400 N. Congress Ave., Ste. 200 West Palm Beach, FL 33401 561-681-6600

III.	ESTIM	ATE	AD.II	JSTMENT
1111-		A 1 E	AP31	20 1 MILIT

40 CFR Part 264 Subpart H as adopted by reference in Rule 62-701.630, Florida Administrative Code, (F.A.C.) sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closure in current dollars. Select one of the methods of cost estimate ajustment below.

☐ (a) Inflation Factor Adjustment

(b) Recalculated or New Cost Estimates

Inflation adjustment using an inflation factor may only be made when a Department approved closure cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflatory by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste website www.dep.state.fl.us/waste/categories/swfr or call the Financial Coordinator at (850) 245-8706.

This adjustment is based on the	Department approved closing	g cost estimate da	ted:	To Be Approved
Latest Department Approved Closing Cost Estimate:	Current Year Inflation Factor, e.g. 1.02		=	Inflation Adjusted Closing Cost Estimate:
		<u>.</u>		
This adjustment is based on the	Department approved long-to	erm care cost estir	nate dated:	N/A
Latest Department Approved Annual Long-Term Care Cost Estimate:	Current Year inflation Factor, e.g. 1.02		=	Inflation Adjusted Annual Long-Term Care Cost Estimate:
Number of Years of I	ong Term Care Remaining:		×	
	ong-Term Care Cost Estim	ate:	=	
Signature by:	Owner/Operator	□ Engineer	(check what a	
Signat	Ura	. 10311	Cement Plant Ro	ad
James Daniel, Facility Manager		Brooks	sville, FL 34601	
Name & 3/25/12	3	jdaniel	@cemexusa.com	tate, Zip Code
/ Date	•		E-Ma	ail Address
352-799-7881				
Telephone	Number	-		

IV. ESTIMATED CLOSING COST (check what applies)

Recalculated Cost Estimate	

Notes: 1. Cost estimates for the time period when the extent and manner of landfill operation makes closing most ext

- 2. Cost estimate must be certified by a professional engineer.
- 3. Cost estimates based on third party suppliers of material, equipment and labor at fair market value.

4. In some cases, a price quote in support of individual item estimates may be required.

		Number		
Description	Unit	of Units	Cost / Unit	Total Cost
1. Proposed Monitoring Wells	(Do not incl	ude wells already	in existence.)	
	EA			
			roposed Monitoring Wells:	
2. Slope and Fill (bedding layer		te and barrier laye	r):	
Excavation	CY		\$2,273.60	\$2,273.60
Placement and Spreading	CY			
Compaction	CY			
Off-Site Material	CY			
Delivery	CY			
			Subtotal Slope and Fill:	\$2,273.60
3. Cover Material (Barrier Layer)	:		_	
Off-Site Clay	CY			
Synthetics - 40 mil	SY			
Synthetics - GCL	SY			
Synthetics - Geonet	SY			
Synthetics - Other (explain)				
			Subtotal Cover Material:	
4. Top Soil Cover:	-		_	
Off-Site Material	CY			
Delivery	CY			
Spread	CY			
			Subtotal Top Soil Cover:	
5. Vegetative Layer			· -	
Sodding	SY			
Hydroseeding	AC			
Fertilizer	AC			
Mulch	AC	V		
Other (explain)				
		_ 	Subtotal Vegetative Layer:	
6. Stormwater Control System:				
Earthwork	CY			
Grading	SY	<u></u>		
Piping	LF			
Ditches	LF			
Berms	LF			
Control Structures	EA			
Other (explain)				
, , , , , , , , , , , , , , , , , , , ,		Subtotal Sto	rmwater Control System:	
		Cabloidi Gio	mmater control system:	

Description		Unit	Numbe of Unit		Total Co
7. Passive Gas Cont	rol:			OOST OHIL	lotal Co
Wells		EA			
Pipe and Fittings		LF			
Monitoring Probe		EA			
NSPS/Title V req		LS	1	\$0.00	
				Subtotal Passive Gas Contro	ol:
B. Active Gas Extract	tion Contro	l:		Contotal 1 assive Cas Collin	or
Traps		EA			
Sumps		EA			-
Flare Assembly		EA			
Flame Arrestor		EA	-		
Mist Eliminator		EA			
Flow Meter		EA			
Blowers		EA			-
Collection System	1	LF			
Other (explain)	•				
· · / <u>-</u>	_	·	Subtota	Active Gas Extraction Contro	
. Security System:		-	Oublota	Active Gas Extraction Contro)i:
Fencing		LF			
Gate(s)		EA	_		
Sign(s)		EA	-		
		_,		Subtotal Security System	a.
0. Engineering:				outional occurry bystem	
Closure Plan Rep	ort	LS	1	\$0.00	
Certified Engineerin	g Drawings	LS	1	\$0.00	
NSPS/Title V Air F	Permit	LS	1	\$0.00	
Final Survey		LS	1	\$0.00	
Certification of Clo	sure	LS	1	\$0.00	
Other (explain) Dis	posal		1	\$257,400.00	
Contractor (Greenway I	Recyclina)			Subtotal Engineering	\$257,400.00
(4.44.)	tooy oming/			outotal Engineering	\$257,400.00
escription	Hours	Cost	/ Hour	Hours Cost / Hour	Total Cost
I. Professional Service	ces				
		<u>Management</u>		Quality Assurance	
P.E. Supervisor	4	<u>\$17</u>	'5.0(4 \$175.00	\$1,400.00
On-Site Engineer		-			
Office Engineer					
On-Site Technician					
Other (explain)	80	\$25	5.00		\$2,000.00
Clean-up Tech					<u> </u>
					
escription		Unit	Number of Units	Cost / Unit	Tetal O
Quality Assurance	Testing	LS	1	COSt / Unit	Total Cost

			Subtotal of 1-11 Above: _	\$263,073.60
12.	Contingency	20 % of Subtotal	l of 1-11 Above	\$52,614.72
			Subtotal Contingency:	\$52,614.72
			Estimated Closing Cost Subtotal: _	\$315,688.32
	Description			Total Cost
13.	Site Specific Costs			
	Mobilization			
	Waste Tire Facility		-	
	Materials Recovery Fa	acility	_	
	Special Wastes	•	_	
	Leachate Managemen	nt System Modification	on _	
	Other (explain)		-	
			Subtotal Site Specific Costs:	
		TOTAL	ESTIMATED CLOSING COSTS (\$):	\$315,688.32

Ann	mi-Annually nually er (explain)	2 1 ———————————————————————————————————	Subto	tal Leachate Monitoring	Annual Cost
Ser Ann	mi-Annually nually			tal Leachate Monitoring	
Ser Ann	mi-Annually nually		Subto	tal Leachate Manitoring	
Ser Ann	mi-Annually nually	1	_		
Ser	mi-Annually	2			
	•	?			
0	arterly	4			
IVIQI	-	12			
T. LEAC	mate Monitoring (t inthly	62-701.510(5), (6)(b) and 6	oz-/U1.51U(8)c]		
4 620	hate Monitorine f	82_704_640/6_/6\/\\\\\\	19 704 E4040) -	Subtotal Gas Monitoring	:
AIII	ilidaliy	12)	*****	Subtatal On the St.	
	nually	Ä	-		
	mi-Annually	2			
	arterly	4	77		
	onthly	12			
3. Gas I	Monitoring [62-701	1.400(10)]	Subtotal St	anace water wonitoring	
	- ···· y	,	Subtotal S	urface Water Monitoring	
	nually	1			
	mi-Annually	2			
	ıarterly	4			
	onthly	12	- /*/d		
2. Surf	ace Water Monito	ring [62-701.510(4), and (8)(b)1	Cicanawater Monitotill	J
	•	-	Subtotal	Groundwater Monitoring	·
	nually	1			
	emi-Annually	2	<u> </u>		
Qu	uarterly	4			
	onthly	12	/\ /-		
1. Grou	undwater Monitori	ng [62-701.510(6), and (8	i)(a)]		
Desc	cription	(Events / Year)	Number of Wells	(Cost / Well) / Event	Annual Cost
		Sampling Frequency	Maruah an as	(O	
		ssed. Attach a detailed ex			

Description Unit Units / Year Cost / Unit Annual Cost Leachate Collection/Treatment Systems Maintenance Maintenance Collection Pipes LF Sumps, Traps EA Lift Stations EA Cleaning LS 1 Tanks EA

Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
5. (continued)				
<u>Impoundments</u>				
Liner Repair	SY			
Sludge Removal	CY	S		
Aeration Systems				
Floating Aerators	EA			
Spray Aerators	EA			
<u>Disposal</u>				
Off-site (Includes	1000 gallon			
ransportation and disposal)		Subtotal Leachat	e Collection / Treatment	
		oustaid: Eddonig	Systems Maintenance:	
6. Groundwater Monitoring W	ell Maintenance		- January Manifest and Co.	
Monitoring Wells	LF			
Replacement	EA			
Abandonment	EA			
	Subto	tal Groundwater Monito	oring Well Maintenance:	
7. Gas System Maintenance				
Piping, Vents	LF			
Blowers	EA			<u> </u>
Flaring Units	EA			
Meters, Valves	ĒΑ	· · · · · ·		
Compressors	EA	 _		
Flame Arrestors	EA			
Operation	LS	1		
		Subtotal Ga	\$0.00 s System Maintenance:	
. Landscape Maintenance			- Joseph Mantenance.	
Mowing	AC			
Fertilizer	AC			
		Subtotal La	Indscape Maintenance:	
Erosion Control and Cover	Maintenance			
Sodding	SY			
Regrading	AC			
Liner Repair	SY			
Clay	CY			
	Sub	total Erosion Control ar	nd Cover Maintenance:	
). Storm Water Management	System Maintenan	ice		
Conveyance Maintenance	LS	1	\$0.00	
		rm Water Management	\$0.00 System Maintenance:	
. Security System Maintena	nce			
Fences	LS	1	00.00	
Gate(s)	EA		\$0.00	
Sign(s)	EA			

			Number of		
	Description	<u>Unit</u>	Units / Year	Cost / Unit	Annual Cos
12.	Utilities	LS	1	\$0.00	
40		_		Subtotal Utilities	:
	Leachate Collection/Tre	atment Systems C	peration		
<u>Ope</u>	eration				
	P.E. Supervisor	HR			
	On-Site Engineer	HR			
	Office Engineer	HR			
	OnSite Technician	HR			
	Materials	LS	1	\$0.00	
		Subtotal Lea	achate Collection/Treatm	nent Systems Operation:	
14.	Administrative				
	P.E. Supervisor	HR			
	On-Site Engineer	HR			
	Office Engineer	HR			
	OnSite Technician	HR			
	Other				
				Subtotal Administrative:	
			s	ubtotal of 1-14 Above:	
15. (Contingency		% of Subtotal of 1-14 Ab	ove	
				Subtotal Contingency:	
			Number of		
	scription	Unit	Units / Year	Cost / Unit	Annual Cost
6. 8	ite Specific Costs			<u> </u>	
			Subto	otal Site Specific Costs:	
		AN	NUAL LONG-TERM CA	ARE COST (\$ / YEAR):	
			Number of Yea	ars of Long-Term Care:	
			TOTAL LONG-TI	ERM CARE COST (\$): _	

VI. CERTIFICATION BY ENGINEER

This is to certify that the Cost Estimates pertaining to the engineering features of this solid waste management facility have been examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing and/or long-term care of the facility and comply with the requirements of Rule 62-701.630 F.A.C. and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Cost Estimates shall be submitted to the Department annually, revised or adjusted as required by Rule 62-701.630(4), F.A.C.

Signature

Maxwell R. Lee, Ph.D., P.E.
Name and Title (please type)

Signature

Maxwell R. Lee, Ph.D., P.E.
Name and Title (please type)

City, State, Zip Code

mlee@kooglerassociates.com
E-Mail address (if available)

58091

Florida Registration Number
(please affix seal)

VII. SIGNATURE BY OWNER/OPERATOR

Signature of Applicant

James Daniel, Plant Manager
Name and Title (please type)

10311 Cement Plant Road

Mailing Address

Brooksville, FL 34601

City, State, Zip Code

S-Mail address (if available)

352-799-7881

Telephone Number