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263-15-04
May 13, 2015

Sent via Email to: veqajo@miamidade.gov and USPS
Priority

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MAY 15 2015

DERM
POLLUTION REGULATION
AND
ENFORCEMENT DIVISION

Rashid Z. Istambouli, P.E., Chief
Miami-Dade County Regulatory and Economic Resources
Pollution Regulation Division
701 NW 1st Court, 7th Floor
Miami, FL 33136-6893

RE: Request for Information - Soil Treatment Facility Closure
CEMEX Construction Materials Florida LLC – CEMEX Miami Cement Plant
FDEP Permit No. 0133892-009-SO/WACS No. 59293
RER Permit No. SW-1117

Dear Mr. Istambouli:

On behalf of CEMEX Construction Materials, LLC, Koogler and Associates, Inc. is responding to your request for additional information (RAI) for the CEMEX Miami Soil Treatment Facility dated April 13, 2015. The RAI item and are responses are provided below.

1. Pursuant to Rule 62-713.600(1) through (4) FAC, provide the following:

- a) Confirmation that all tanks, piping, secondary containment and ancillary equipment of the soil treatment operation will be (or have been) cleaned or removed from the site.

Response: The Storage Hall Building previously had 1 bay dedicated for the storage of contaminated soil and 1 bay that stored the clean soil from the drier. All contaminated and clean soil has since been processed in the kiln. These bays are now being used to store sand, which is a locally purchased high quality sand used as a raw material. The east side of the Contaminated Soil Storage Building is scheduled for cleaning by pressure washing in the near future. The wash water will be pumped into a truck and properly disposed of off-site. All tanks, lines, piping and any ancillary equipment are stored in place in a dry covered area and will be cleaned at a future date (by September 1, 2015). Upon completion of the clean-up activities, documentation and photographs will be submitted.

- b) As applicable, confirmation that storage and process tanks and integral piping will be (or have been) closed in accordance with Chapter 62-761 FAC.

Response: Chapter 62-761 FAC is not applicable to this facility as there are no underground tanks.

- c) Confirmation that any remaining soils or leachate on the site, including in situ soils that have become contaminated during facility operations, will be (or have been) treated or removed so that it poses no significant threat to human health or the environment.

Response: As of the end of May 2014, all soils were treated for use as a silica source for the kiln and no soils remain on-site.

- d) The date that the final shipment of contaminated soil was received at the site for treatment purposes.

Response: CEMEX has been in continued and detailed communication with the County, primarily through Ryan S. Briggie, regarding the ongoing details of the closure process of the soils treatment facility. We appreciate his time and efforts through on-going site visits and email correspondence during this process. During the life of the permit, there have been no violations of the conditions of the permit regarding receipt, storage, and processing of contaminated soils. The last shipment of contaminated soil was received on September 27, 2013. However, due to the heavy content of oil in that shipment, over a period of several months, it was mixed with clean material prior to being used in the kiln. Processing was further delayed due to the status of the kiln, which only operated intermittently between September 2013 and April 2014 (and did not operate at all in February 2014) at which time the notice of closure was submitted to the County.

- e) Closure activities shall be completed within one hundred eighty (180) days after receiving the final shipment of contaminated material. Upon completion of closure activities, the permittee shall provide a written certification that closure is complete. Said certification shall be signed, dated and sealed by a professional engineer registered under Chapter 471 F.S. Be advised that the Department will conduct an inspection within 30 days after receipt of the closure certification report to verify that closure was conducted in accordance with the provisions of Rule 62-713.600 FAC.

Response: Written certification signed and sealed by a professional engineer registered in Florida, that the closure of the facility is complete and that addresses long term care requirements will be provided when the closure activities (cleaning and documentation) are complete, which is estimated to be by September 1, 2015.

2. Pursuant to Rule 62-713.600(5) F.A. C. long term care requirements are applicable to the facility unless the responsible official can demonstrate that site-specific conditions make it unlikely that any ground water or surface water standards or criteria will be violated. This

demonstration shall be signed, dated and sealed by a professional engineer registered under Chapter 471 F.S., or a professional geologist....

Response: Long term care requirements will be addressed, including submittal of a signed and sealed statement by a professional engineer, as applicable, along with the closure certification after clean-up activities are complete, which is estimated to be by September 1, 2015. Ground water monitoring will continue as per the permit conditions until the County approves a revision or termination of the long term care requirements.

3. The referenced submittal indicates that the storage building is currently being used for the storage of Alternative Fuel Materials (AFMs) such as "dried wood, tire fluff" and that other "additional AFMs and non-hazardous material" may be stored there in the future. Based on this information, be advised that CEMEX is hereby required to submit permit modification applications to modify both the DERM permit No. SW-1808 and FDEP Permit No. 0146251-005-WT to reflect the necessary operational modifications. Said permit applications shall be accompanied by their respective review fees made payable to Miami-Dade County".

Response: DERM Permit No. SW-1808 is in the process of being modified. In review of FDEP Permit No. 0146251-005-WT, Koogler could not identify any conditions in that permit that would require modification and is requesting further information as to what the County deems to be necessary to modify.

As requested, two copies of this response are enclosed and an electronic copy was emailed to Johnny Vega on this date, May 13, 2015. If you have any questions regarding this submittal, please contact me at (352) 377-5822 or treed@kooglerssociates.com.

Best regards,



Tammy L. Reed
Environmental Scientist
KOOGLER AND ASSOCIATES, INC.

/tlr

Enclosures

cc: Johnny Vega – P.E. – Miami-Dade County RER (*Email*)
Charles Walz – CEMEX Miami (*Email*)
Maxwell R. Lee – Koogler and Associates, Inc. (*Email*)
SW Financial Coordinator – FDEP (*Email*)