690-18-15
January 14, 2019

KOOGLER & ASSOCIATES, INC.
Mailing: Post Office Box 5127
Gainesville, FL 32627-5127
Physical: 4014 NW 13th Street
Gainesville, FL 32609-1923
www.kooglerassociates.com
352.377.5822

Sent via Email: DEP_CD@dep.state.fl.us and FEDEX

Solid Waste and Air Permitting
Florida Department of Environmental Protection
3319 Maguire Blvd. Ste 232
Orlando, FL 32803-3767

RE: Suwannee American Cement Company, LLC - Tire Permit Renewal
Sumterville, Sumter County, Florida
FDEP Permit No. 297136-002-WT-02

Dear Solid Waste Staff:

On behalf of Suwannee American Cement Company, LLC, Koogler and Associates, Inc. is submitting this application package to renew the Suwannee American Cement Company's Tire Processing permit for their facility in Sumterville in Sumter County. The current permit expires on April 7, 2019.

A copy of this application package is being submitted electronically and one hard copy is being mailed to your attention. The permit application fee of $1250 is enclosed with the hard copy. If you have any questions regarding this submittal, please contact me at (352) 377-5822 or tgarcia@kooglerssociates.com.

Best regards,

Tammy L. Garcia
Environmental Scientist II

/tlg
Enclosure
cc: Kim Rush and Nathan Hess – FDEP Central District
George Townsend – Suwannee American Cement Company, LLC
Maxwell R. Lee, P.E. – Koogler and Associates, Inc.
FDEP – Solid Waste Financial Coordinator – *(w/Attachment 8 only)*

Bank of America
ACH R/T 063100277

38744

63-4/630 FL
2480

KOOGLER AND ASSOCIATES, INC.
4014 NW 13TH ST
GAINESVILLE, FL 32609-1923
(352) 377-5822
WWW.KOOGLERASSOCIATES.COM

1/14/2019

PAY TO THE ORDER OF Florida Dept. of Environmental Protection $ **1,250.00

One Thousand Two Hundred Fifty and 00/100 ********** DOLLARS

Florida Dept. of Environmental Protection

MEMO Waste Tire Permit Renewal 297136-002-WT-02

KOOGLER AND ASSOCIATES, INC. 38744

Florida Dept. of Environmental Protection	1/14/2019	
Waste Tire Permit Renewal 297136-002-WT-02		1,250.00

1020 Bank of America Waste Tire Permit Renewal 297136-002-WT-02 1,250.00

KOOGLER AND ASSOCIATES, INC. 38744

Florida Dept. of Environmental Protection	1/14/2019	
Waste Tire Permit Renewal 297136-002-WT-02		1,250.00

COPY

1020 Bank of America Waste Tire Permit Renewal 297136-002-WT-02 1,250.00

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(23)
Form Title: Waste Tire Processing Facility Permit Application
Effective Date: January 6, 2010
Incorporated in Rule 62-711.530(6)

Waste Tire Processing Facility Permit Application

Permit No. 0297136-002-WT-02

Renewal ■ Modification ☐ Existing unpermitted facility ☐ Proposed new facility ☐

Part I-General Information:

A. Applicant Information:

1. Applicant Name: Suwannee American Cement Company, LLC
2. Applicant Street Address: 4750 East County Road 470
3. City: Sumterville County: Sumter Zip: 33585
4. Applicant Mailing Address: P.O. Box 445
5. City: Sumterville County: Sumter Zip: 33585
6. Contact person: George Townsend Phone: **352-569-2217** FEID No:
7. Have any enforcement actions been taken by the Department against the applicant relating to the operation of any solid waste management facility in this state? This includes any Complaint, Notice of Violation, or revocation of a permit or registration, as well as any Consent Order in which a violation of Department rules is admitted. It does not include a Warning Letter, Warning Notice, Notice of Noncompliance, or other similar document which does not constitute agency action.
   Yes ☐ **No** ■ **If yes**, attach a history and description of the enforcement actions.

B. Facility Information:

1. Facility Name: Suwannee American Cement Tire Processing Facility
2. Facility Street Address (Main Entrance): 4750 East County Road 470
3. City: Sumterville County: Sumter Zip: 33585
4. Facility Mailing Address: P.O. Box 445
5. City: Sumterville State: FL Zip: 33585
6. Contact Person: George Townsend Phone: (352) 569-2217
7. Facility Location Coordinates:
   Section: 8 Township: 20S Range: 23E
   Latitude: 28 45' 38" N Longitude: 82 01' 35" W
8. Anticipated date for starting construction N/A and for completion of construction N/A
9. Anticipated date for receipt of tires N/A and for start of processing N/A

Mail completed form to appropriate district office listed below

Northwest District
160 Government Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way, Ste. 200 B
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
813-632-7600

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33902-2549
239-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

C. Land Owner Information (if different from applicant):

1. Owner's name: Same as Applicant
2. Land owner's mailing address: _____
3. City: _____ State: _____ Zip: _____
4. Authorized Agent: _____ Agent's phone (___) _____
5. Current lease expires: _____

D. Facility Operator Information (if different from applicant):

1. Operator's name: Same as Applicant
2. Operator's mailing address: _____
3. City: _____ State: _____ Zip: _____
4. Contact person: _____ Phone: (___) _____

E. Preparer of Application:

1. Name of person preparing application: Tammy L. Garcia, Koogler and Associates, Inc.
2. Mailing address: P.O. Box 527
3. City: Gainesville State: FL Zip: 32627-5127
4. Phone: (352) 377-5822
5. Affiliation with facility: Environmental Consultant

Part II-Operations:

A. Facility type (check appropriate box):

☐ Waste tire processing facility.

☐ Waste tire processing facility with on-site disposal of processed tires or processing residuals.

■ Waste tire processing facility with on-site consumption of waste tires or processing residuals.

☐ Permitted solid waste management facility modification to allow waste tire site and processing.

B. Type of processing facility (check as many as apply):

☐Shredder ☐Cutter ☐Chopper ☐Incinerator only ☐Incinerator with energy recovery
☐Pyrolysis ■Supplemental fuel user ☐Other, explain _____

C. Storage: Indicate the maximum quantities of whole waste tires, processed waste tires, and processing residuals, expressed in tons, to be stored at the facility, in accordance with Rule 62-711.530(2), F.A.C.

	Outdoor Storage(tons)	Outdoor Storage (sq.ft)	Indoor Storage (tons)	Indoor Storage (sq.ft)	**Total Storage (tons)**
Whole waste tires:	65	1,800	15.4		80.4
Processed tires:					
Processing residuals:					
TOTALS:	65	1,800	15.4		

D. For reporting quantity of tires in tons, tires will be: weighed on site ■ weighed off site ☐ weights will be calculated ☐

E. Facilities that will not be disposing of processed tire s or processing residual on the facility site must indicate the permitted solid waste management facility where processed tires or residuals will be disposed.

1. Name of facility N/A - while tires used as upplemental fuel for cement kiln
2. Street address: _____
3. City: _____ County: _____ Zip: _____

F. Facilities that will be delivering processed tires to consuming facilities must describe the existing or proposed markets for those processed tires.

N/A - consuming facility using while tires as supplement fuel for cement kiln

Part III-Attachments:

A. Facility design

NOTE: All maps, plan sheets, drawings, isometrics, cross sec tions, or aerial photographs shall be legible; be signed and sealed by a registered professional engineer responsible for their preparation; be of appropriate scale to show clearly all required details; be numbered, referenced to narrative, titled, have a legend of symbols used, contain horizontal and vertical scales (where applicable), and specify drafting or origination dates; and use uniform scales as much as possible, contain a north arrow and use NGVD for all elevations.

1. A topographic or section map of the facility, including the surrounding area for one mile, no more than one year old, showing land use and zoning within one mile of the facility
2. A plot plan of the facility on a scale of not less than one inch equals 200 feet. At a minimum, the plot plan shall include
   a. The facility design, including the location and size of all storage and processing areas for used tires, unprocessed waste tires,processed waste tires, and waste tire processing residuals;
   b. All wetlands and water bodies within the facility or within 200 feet of any storage area;
   c. Stormwater control measures, including ditches, dikes, and other structures;
   d. Boundaries of the facility, legal boundaries of the land containing the facility, and any easements or rights of way that are within the facility or within 200 feet of any storage area;
   e. Location, size, and depth of all wells within the facility or within 200 feet of any storage area;
   f. All structures and buildings that are, or will be, constructed at the fac ility; include those used in storage and processing operations;
   g. All areas used for loading and unloading;
   h. All access roads and internal roads, including fire lanes;
   i. Location of all fences, gates, and other access control measures; and
   j. Location of all disposal areas within the facility.

B. Facility operation.

1. A description of the facility's operation, process and products including how waste tires will be received and stored.
2. A description of the equipment used for processin g tires. This description shall include the make, model, and hourly capacity of each piece of equipment.
3. Description of the waste from the process, the amount of waste expected and how and where this waste will be disposed of.
4. Statement of the maximum daily throughput and the planned daily and annual throughput.
5. A description of how the operator will maintain compliance with each of the storage requirements of Rule 62 - 711.540, F.A.C.
6. A copy of the emergency preparedness manual for the facil ity with a statement of the on site and off site locations where that manual will be maintained.
7. A copy of the fire safety survey
8. A description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling.

C. Completed closing plan for the facility as required by Rule 62 -711.700(2) and (3), F.A.C.

D. Attach proof of financial responsibility as requirement by Rule 62 -711.500(3) OR a calculation showing that financial assurance documents, currently on file with the Department, are sufficient to assure closing of the waste tire site as well as any other solid waste management facility at that location.

E. A letter from the land owner (if different from applicant) authorizing use of the land as a waste tire pr ocessing facility.

F. If waste tires will be consumed or diposed of at the facility, attach a description of the other environmental permits that the applicant has for this use, including, permit number, date of issue, and name of issuing agency

G. The permit fee as required in Rule 62-4, F.A.C.

Part IV-Certification:

A. Applicant:

The undersigned applicant or authorized representative of Suwannee American Cement Company, LLC is aware that statements made in this form and attached information are an application for a Waste Tire Processing Facility Permit from the Florida Department of Environmental Protection and certifies that The information in this application is true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chap ter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Department will be notified prior to the sale or legal transfer of the facility.

Signature of Applicant or Authorized Agent

Natacha Lago, Plant Manager
Name and Title

01/11/2019
Date

B. Professional Engineer registered in Florida.

This is to certify that the engineering features of this waste tire processing facility have been Designed/examined by me and found to conform to engineering principals applicable to such facilit ies. In my professional judgment, this facility, when properly maintained and operated will comply with all applicable statues of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions for proper maintenance and operation of the facility.

Signature

Maxwell R. Lee, Ph.D., P.E. and Project Engineer
Name and Title

58091
Florida Registration Number

P.O. Box 5127
Mailing Address

Gainesville, FL 32627-5127
City, State, Zip

352-377-5822
Telephone number

(please affix seal)

1/11/19
Date

PART III – ATTACHMENTS

SECTION A – FACILITY DESIGN

Attachment 1: Topographic Map
Attachment 2A: Land Use and Zoning Map
Attachment 2B: County Future Land Use Map
Attachment 3: Facility Plot Plan
Attachment 4: Tire Feed System Plan View Layout

SECTION B – FACILITY OPERATION

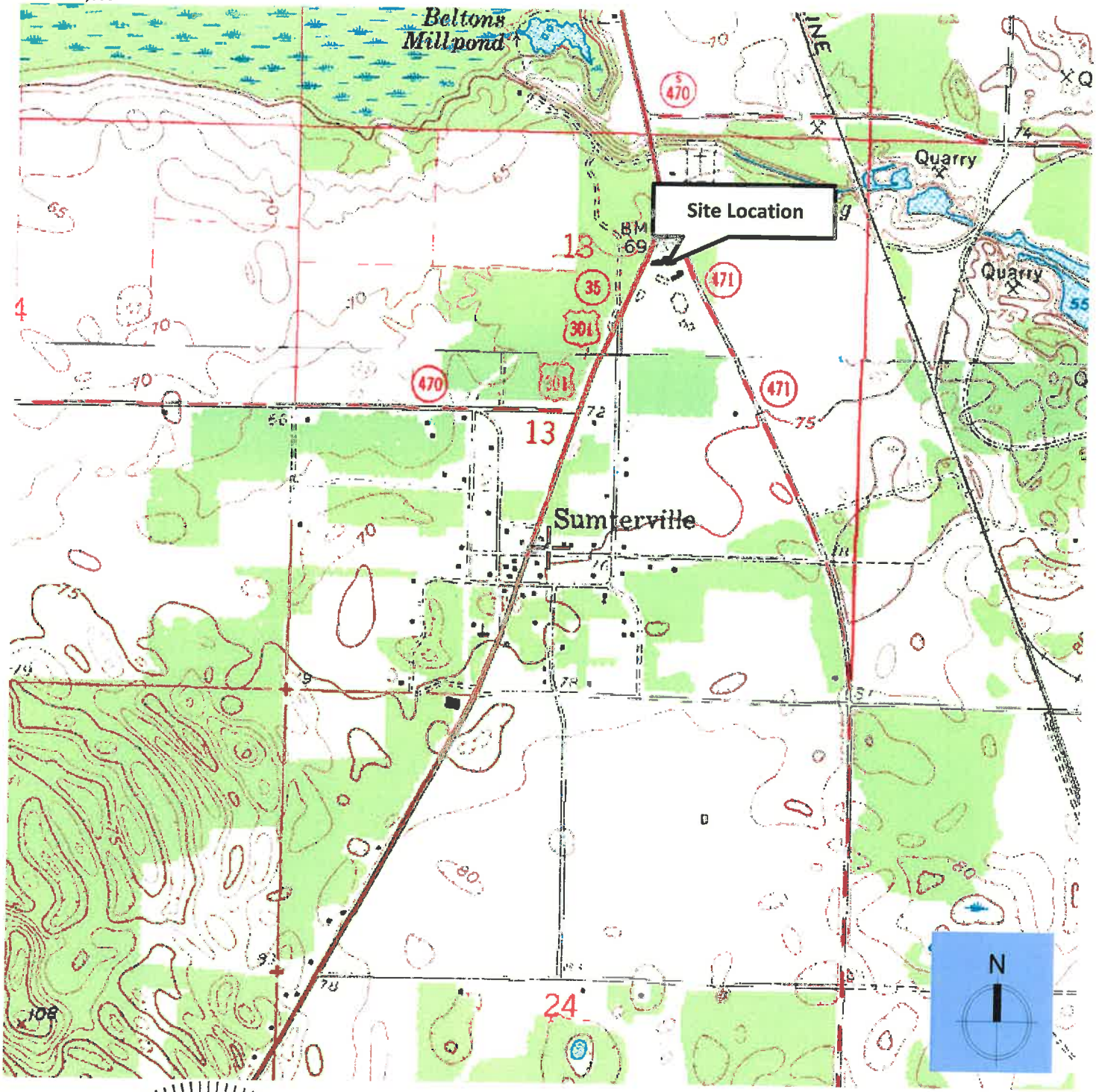
Attachment 5: Comprehensive Operations Plan
Attachment 6: Hazardous Materials Emergency and Contingency Plan
Attachment 7: Fire Safety Survey

SECTION C– CLOSING COST ESTIMATES
SECTION D - FINANCIAL ASSURANCE

Attachment 8: Closing Costs and Financial Assurance

USGS Map Name: Bushnell, FL
MAP MRC: 28082F1
MapCenter: N28.74499° W82.06342°
Datum: NAD83 Zoom: 4m/pixel
Scale 1:24,000

NOTE: Topographic map was accessed on 10/10/2018 from:
https://www.topoquest.com/map.php?lat=28.74499&lon=-82.06342&datum=nad83&zoom=4&cross=on



Drawing No. 690-18-15

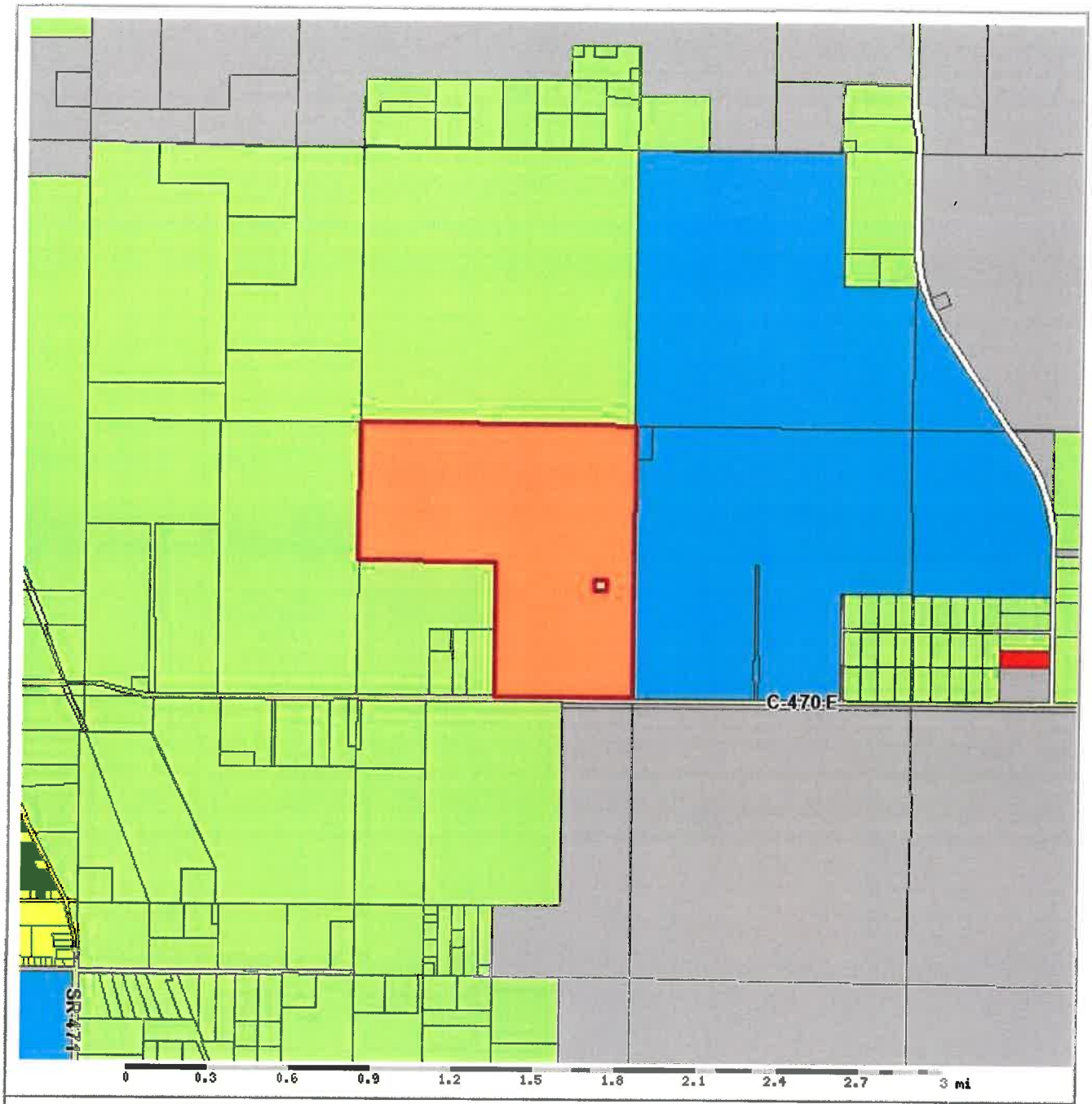
Professional Engineer Certification:
I, the undersigned, hereby certify, except as particularly noted herein*, that based on information and belief formed after reasonable inquiry, to the best of my knowledge, the statements and information in this document are true, accurate, and complete.
*Any exceptions are attached.

STATE OF FLORIDA — MAXWELL R. LEE — LICENSE No. 58091 — PROFESSIONAL ENGINEER

1/9/19
Maxwell R. Lee, P.E. (Florida P.E. No. 58091) Date

Attachment 1
USGS Topographic Map
Suwannee American Cement Co, LLC
Sumterville, Sumter County, Florida
Tire Processing Permit Renewal
WACS ID No. SWD/60/98523
Permit No. 297136-002-WT/02

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX 377-7158



Sumter County BOCC - GIS

BOCC - Bushnell, FL 33513 | 352-689-4400

Parcel ID:**K08-001**

AMERICAN CEMENT COMPANY LLC
PO BOX 445 SUMTERVILLE, FL

Street: 4750 E C-470

S/T/R:08/20/23 N1/2 AND SE1/4 LESS COMM AT SE COR OF SE 1/4 RUN N 50 FT TO N R/W OF CR 470 THENCE W 75 FT N 2086.94 FT W 469.38 FT TO POB S 61

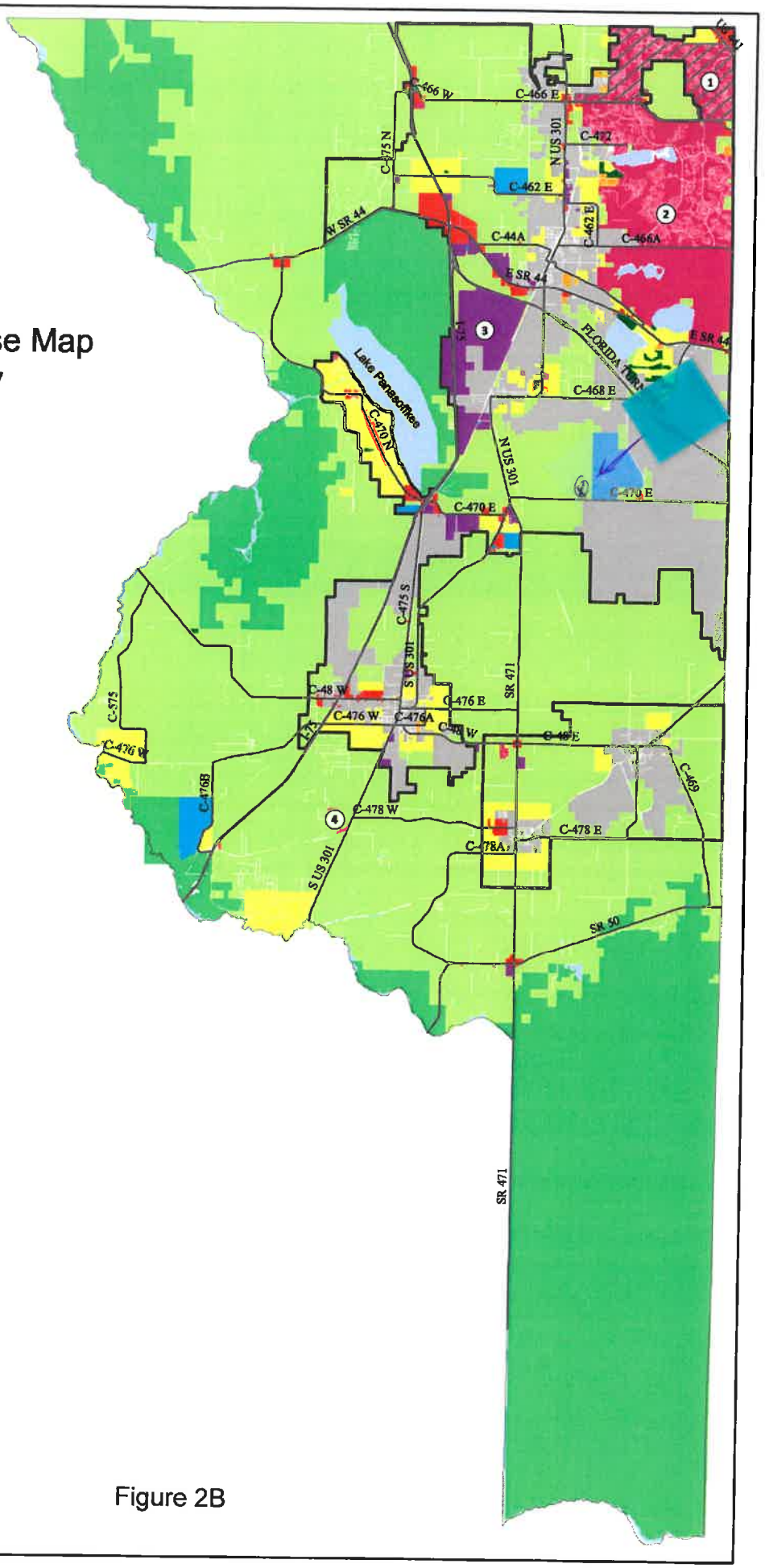
Sales

6/1/2006	1612/517	Vacant	$2,300,000.00
1/1/1990	400/306	Vacant	$2,300,000.00

NOTES:

Figure 2A

2035 Future Land Use Map
Sumter County
Map 1-1



Legend

- Major Roads
- Urban Development Boundary
- Overlay Subject to Policy Restrictions

Designation/Allowable Densities

- Agricultural (AGR); 1 unit/10 acres
- Rural Residential (RR); 1 to 2 units/acre
- Urban Residential (UR); 4 to 6 units/acre
- Commercial (COM)
- Industrial (IND)
- Public, Institutional (PI)
- Conservation (CON)
- Recreation (REC)
- Municipal Jurisdiction (MUN)
- Mixed Use (MU)
- Water Features

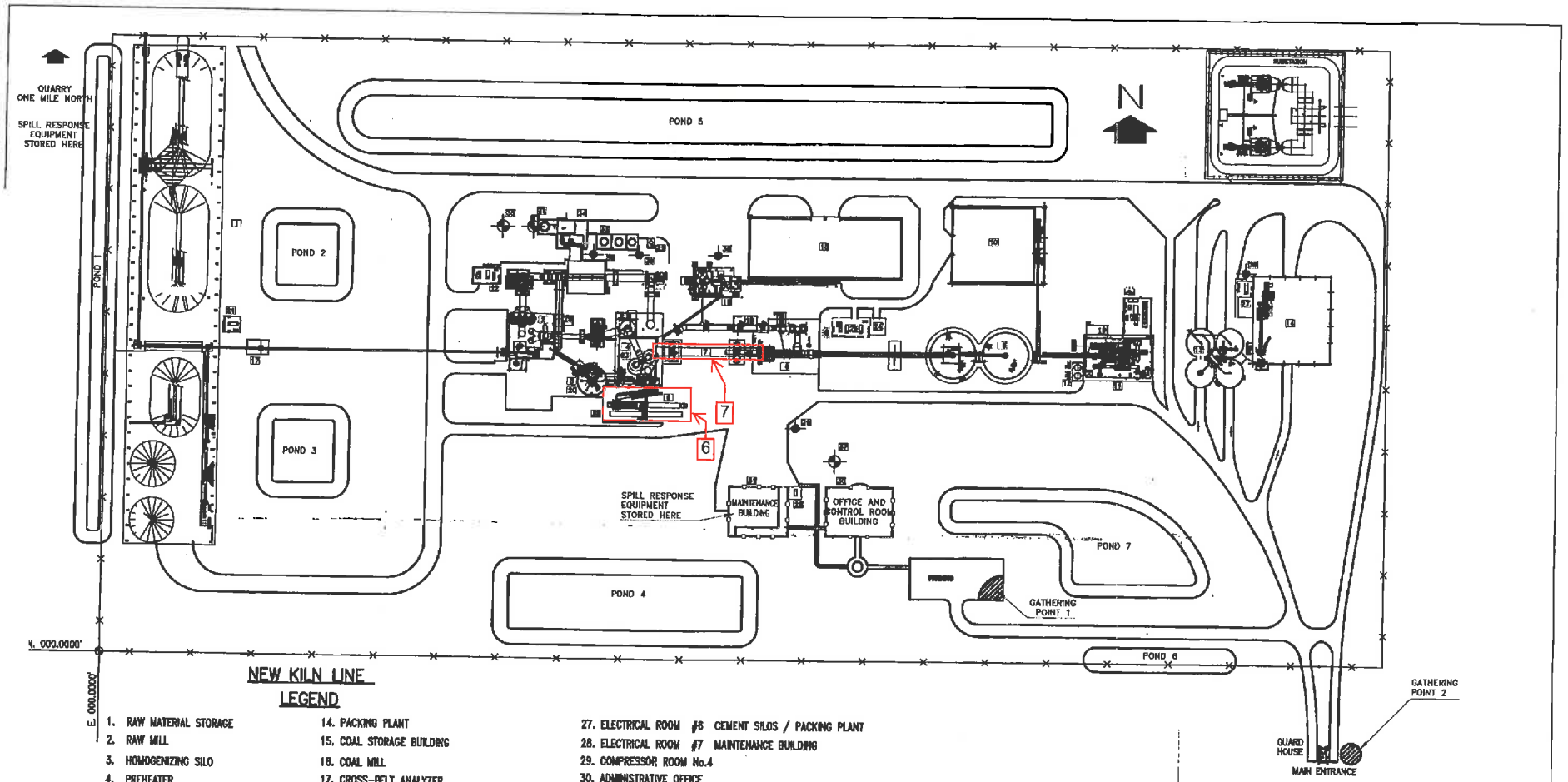
OVERLAYS SUBJECT TO POLICY RESTRICTIONS
1 Tri-County Villages DRI (policy 1.3.1U)
2 Villages of Sumter County DRI (Policy 1.3.2U)
3 Monarch Ranch (Policy 1.1.5U)
4 Southern Villas RV Resort (Policy 1.1.6U)

Sumter County BOCC
Geographic Information System
(352) 569-6732 or 689-4479

Revised June 15, 2018

Figure 2B

Attachment 3



NEW KILN LINE
LEGEND

1. RAW MATERIAL STORAGE
2. RAW MILL
3. HOMOGENIZING SILO
4. PREHEATER
5. GAS CONDITIONING TOWER
6. TIRE FEED SYSTEM
7. ROTARY KILN
8. COOLER & BURNER BUILDING
9. CLINKER STORAGE SILOS
10. GYPSUM STORAGE
11. FINISH MILL
12. GRINDING AID TANKS
13. CEMENT STORAGE SILOS
14. PACKING PLANT
15. COAL STORAGE BUILDING
16. COAL MILL
17. CROSS-BELT ANALYZER
18. COMPRESSOR ROOM No.1
19. COMPRESSOR ROOM No.2
20. COMPRESSOR ROOM No.3
21. ELECTRICAL ROOM #1 R.M.S. BUILDING
22. ELECTRICAL ROOM #2 RAW MILL
23. ELECTRICAL ROOM #3 PREHEATER
24. STAND-BY GENERATOR & FUEL TANK
25. ELECTRICAL ROOM #4 CLINKER COOLER
26. ELECTRICAL ROOM #5 FINISH MILL
27. ELECTRICAL ROOM #6 CEMENT SILOS / PACKING PLANT
28. ELECTRICAL ROOM #7 MAINTENANCE BUILDING
29. COMPRESSOR ROOM No.4
30. ADMINISTRATIVE OFFICE
31. MAINTENANCE BUILDING (SPILL EQUIPMENT INSIDE)
32. AMMONIA TANK 19.5%
33. FUEL TANKS
34. WATER COOLING TOWER
35. PROCESS WATER WELL #1: 12 inch casing, 500 feet deep
36. PROCESS WATER WELL #2: 12 inch casing, 500 feet deep
37. POTABLE WATER WELL: 5 inch casing, 200 feet deep
38. GAS CYLINDER STORAGE
39. FIRE HYDRANT

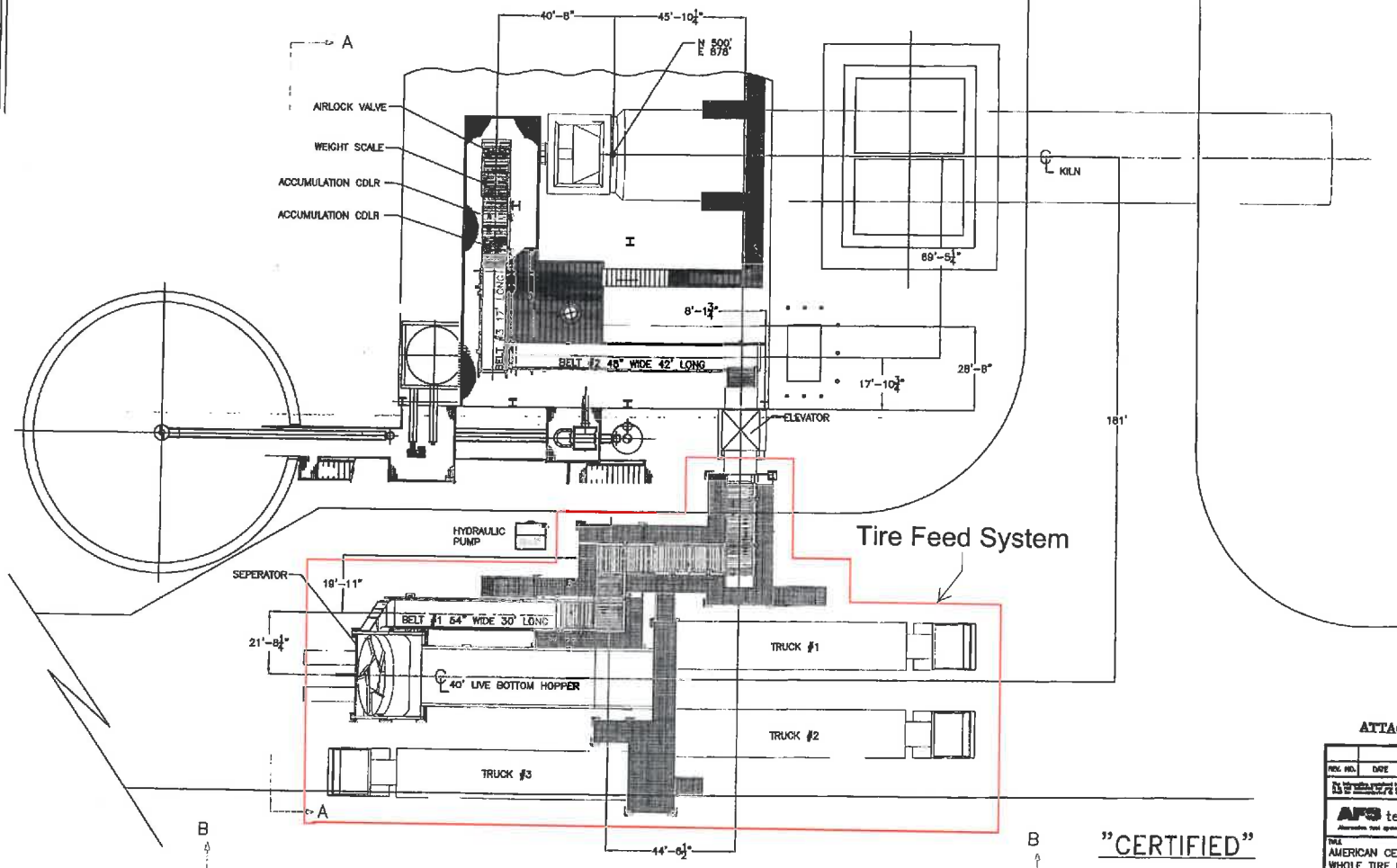
DWN:	DOR	10/23/09	SCALE: SCALE	PROJECT:
CHKD:				
APPD:				

DRAWING TITLE: PLANT_LAYOUT
ATTACHMENT 3

REFERENCE: | DRAWING NO: | SHEET: 0 OF 0 | SHEET SIZE: 0 | REV: REV

COMPUTER GENERATED DRAWING

Attachment 4



PLAN VIEW

"CERTIFIED"

CONTRACTOR NAME : AMERAFA
CONTRACTOR NO. : 7401-7758
POLYSIUS P.O. NO. : 58727
POLYSIUS AAT NO. : 461.BC01
POLYSIUS DOC. I.D. : 2557

ATTACHMENT 4

REV. NO.	DATE	BY	DESCRIPTION

AFS technology
Alternative fuel systems solutions for industry
4080 Gibson Dr
Tipp City, Ohio 45371
USA

TITLE
AMERICAN CEMENT, SUMTERVILLE FLORIDA
WHOLE TIRE FEED SYSTEM
PLAN VIEW LAYOUT

DRAWN BY	SCALE	DATE
A.BOWMAN	NONE	10/10/07
CHECKED BY	APPROVED	PROJECT
DWG. NO.		SHEET NO.
603GA02		2 OF 6

RECEIVED
NOV 20 2007
AIR PERMITTING

PART III
SECTION B – FACILITY OPERATION

1. **A description of the facility's operation, process and products including how waste tires will be received and stored.**

The Suwannee American Cement Plant produces Portland cement using a dry process kiln with a preheater and calciner. The cement kiln is authorized to burn tires and tire-derived fuel as a supplemental fuel. Pre-sorted tires are delivered to the facility from a single contractor in container trailers. A copy of the facility's Comprehensive Operations Plan is provided as Attachment 5.

2. **A description of the equipment used for processing tires. This description shall include the make, model, and hourly capacity of each piece of equipment.**

Not applicable – tires are not processed on site.

3. **Description of the waste from the process, the amount of waste expected and how and where this waste will be disposed of.**

No wastes are generated from the process. The organic components of the tires are combusted in the high-temperature kiln, providing heat value (Btu's) to the process. The inorganic components are incorporated into the kiln production (clinker). Handling of residuals is described in the Comprehensive Operations Plan provided as Attachment 5.

4. **Statement of the maximum daily throughput and the planned daily and annual throughput.**

The maximum daily throughput is 60 tons/day. The planned daily throughput is 60 tons/day and the planned annual throughput is 21,900 tons per year.

5. **A description of how the operator will maintain compliance with each of the storage requirements of Rule 62-711.540, FAC.**

Storage requirements are discussed in the Comprehensive Operations Plan provided as Attachment 5.

6. **A copy of the emergency preparedness manual for the facility with a statement of the on site and off site locations where that manual will be maintained.**

Refer to the Hazardous Materials Emergency and Contingency Plan (Attachment 6), which contains emergency preparedness procedures for the facility. The local authorities have been notified of the facility's emergency procedures. A copy of the Plan is maintained onsite in the Environmental Manager's office and the Front Gate Guard House. The off-site locations are the home addresses of:

- Natacha Lago, Plant Manager
- George Townsend, Environmental Manager

7. A copy of the fire safety survey.

An updated Fire Safety Survey has been requested from the Fire Chief of the Sumter County Fire and EMS and will be provided upon completion. It is anticipated that it will be completed and submitted to the Department prior to the expiration of the current permit, April 7, 2019.

8. A description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling.

Removal of the annual accumulation of tires is discussed in the Comprehensive Operations Plan provided as Attachment 5.

ATTACHMENT 5

COMPREHENSIVE OPERATIONS PLAN

COMPREHENSIVE OPERATIONS PLAN

SUWANNEE AMERICAN CEMENT COMPANY, LLC
SUMTERVILLE CEMENT PLANT

TIRE PROCESSING FACILITY

4750 East Sumter County Road 470
Sumterville, Sumter County, Florida 33585

TABLE OF CONTENTS

INTRODUCTION

This Comprehensive Operations Plan provides a description of the facility's operation, process and products including how tires will be received and stored. A copy of the emergency preparedness manual for the facility is included with this submittal.

The on site and off site locations where the emergency preparedness manual will be maintained are as follows:

The on-site locations for the emergency preparedness manual will be the Environmental Manager's office and the Front Gate Guard House. The off-site locations for the emergency preparedness manual will be the home addresses of:

- Natacha Lago, Plant Manager
- George Townsend, Environmental Manager

This section includes a statement of the maximum daily throughput and the planned daily and annual throughput.

The applicant is the land owner and has authorized the use of the land as a tire processing facility.

Facility Name:	Suwannee American Cement Company, LLC Sumterville Tire Processing Facility
Facility Owner/Operator:	Suwannee American Cement Company, LLC
Mailing address:	Post Office Box 445 Sumterville, Florida 33585 Sumter County
Telephone:	(352) 569-5393
Facsimile:	(352) 569-5397

Physical Location:	4750 East Sumter County Road 470 Sumterville, Sumter County, Florida 33585 Section 8, Township 20 South, Range 23 East Latitude 28°45'38" North, Longitude 82°01'35" West
Facility Contact:	Natacha Lago – Plant Manager

This facility is a Tire Processing Facility with on-site consumption of tires as supplemental fuel for a cement kiln. The maximum quantity of tires to be stored at the facility is 80.4 tons. The maximum daily throughput is 60 tons/day. The planned daily throughput is 60 tons/day and the planned annual throughput is 21,900 tons per year. See Pages 12-15 for Engineering Calculations.

OPERATIONS AND ACCESS

Tires for this facility will be supplied from suppliers that are registered tire collectors. Tires will not be accepted from the general public, or from someone that is not a registered tire collector.

Suwannee American Cement Company, LLC will maintain recordkeeping consistent with the applicable portions of Rule 62-711.530(4), F.A.C., as follows:

> *(4) The owner or operator of a waste tire processing facility shall record and maintain for three years the following information regarding their activities, which records shall be available for inspection by Department personnel during normal business hours:*
>
> *(a) For all waste tires shipped from the facility, the name and waste tire collector registration number of the waste tire collector who accepted the waste tires for transport, and the quantity of waste tires shipped with that collector.*
>
> *(b) For all waste tires received at the facility, the name and waste tire collector registration number of the collector who delivered the waste tires to the facility, and the quantity of waste tires received from that collector.*

Suwannee American Cement Company, LLC will also maintain recordkeeping consistent with Rule 62-711.540(1)g., F.A.C., as follows:

> *(g) The operator of the site shall maintain records of the quantity of waste tires received at the site, stored at the site, and shipped from the site.*

The Environmental Manager will record the tonnages of tires received at the site and maintain the other records specified above.

Tires are stored at one location at the site, as shown on the tire facility plot plan:

- Tire trailer storage area – tires in enclosed trailers

All of the tires are stored in trailers until manually loaded into the 40' Live Bottom Hopper.

Access to the facility is controlled through the use of security personnel on site 24 hours per day, 7 days per week, fences and natural barriers.

When tires arrive at the facility during normal business hours the incoming vehicles check in with the receiving department, who checks for a current tire collector permit decal. Any vehicle that does not have a valid tire collector permit decal will not be accepted at the site. For off-hour deliveries, the control room operator will have a plant attendant check the truck in, and direct the driver where to leave the trailer at the storage area.

Records of the daily tonnages received, combusted, and returned to vendor will be reviewed weekly to ensure that the facility does not exceed the allowable storage quantity.

PROCESSING

This section provides a description of the equipment used for processing tires. The facility is defined as a tire processing facility by Rule 62-701.200(129), F.A.C., because equipment is used to burn tires so that they are no longer whole. However, the facility burns only whole tires – not processed tires. Coarse separation means separating the tires into a single file. "Refinement" of the tires means rejecting tires not meeting size specifications and spacing the tires along the conveyor to meet the supplemental fuel needs of the kiln.

The truck drivers are employees of the tire collector. The tire delivery arrangement with the tire collector requires that only whole tires are delivered to prevent unacceptable tires from being loaded into the 40' Live Bottom Hopper.

Tires are manually unloaded from trailers into the 40' Live Bottom Hopper. The trailers are backed up to the 40' Live Bottom Hopper. The 40' Live Bottom Hopper conveys the tires to the Rotary Disk Tire Separator. The Rotary Disk Tire Separator is for coarse separation, to separate tires that may have stuck together, and feeds them onto the Separator Inclined Discharge Belt, which conveys tires and debris up to a platform where the debris drops off the end of the conveyor, into a receptacle, and the tires are conveyed onto the Tire Separation, Refinement, and Accumulation Roller Conveyor used for the separation and refinement, for automatic sensing of the tires are of proper size for continued feeding in the system and to ensure the tires are in a single-file row and accumulated. The level of tire accumulation will also control the Rotary Disk Tire Separator by turning it on when the level is low and off when the level is high. The Tire Separation, Refinement, and Accumulation Roller Conveyor allows only one tire at a time to be discharged onto the Tire Rejection Roller Conveyor for tire sizing in this area. Any tires not meeting the proper specification regarding size are discharged from the Tire Rejection Roller Conveyor. When a tire is located on the Tire Rejection Roller Conveyor and does not meet the size specifications the conveyor diverts the reject tire to the reject bin for return to the tire vendor. The system is equipped with opposed-mode photo

sensors for determining dimensionally oversized and undersized tires. Tires of undesirable size will be diverted from the Tire Rejection Roller Conveyor. This is a motor-driven automatic process. Undesirable size as it is used in this section means tires with a diameter larger or smaller than the typical passenger car size tire. Incoming tires removed by the "Tire Rejection Roller Conveyor" are discharged into the collection area, for manual loading into the tire vendor's trailer and returned to the vendor.

The tires meeting size specifications are then conveyed to the kiln preheater by two inclined belt conveyors in series, the Upper Elevation Belt #1 and the Upper Elevation Belt #2. The tires are then transferred to a Weight Scale at the kiln to accurately supply the kiln with the necessary tire fuel quantity. The tires are then inserted into the kiln via an Airlock Valve.

The combustion rate of tires is limited by the facility's Air Construction Permit to 15% of the maximum fuel firing rate or a total BTU input equivalent to 2.5 tons per hour of whole tires. The 40' Live Bottom Hopper has a capacity of approximately 1000 car passenger tires. The typical feed rate is approximately 3-4 tires per minute. See pages 12-15 for Engineering Calculations

- 40' Live Bottom Hopper
- Rotary Disk Tire Separator
- Separator Inclined Discharge Belt
- Tire Separation, Refinement, and Accumulation Roller Conveyor
- Tire Rejection Roller Conveyor
- Upper Elevation Belt #1
- Upper Elevation Belt #2
- Weight Scale
- Airlock Valve

STORAGE

This section provides a description of how the operator will maintain compliance with each of the storage requirements of Rule 62-711.540, F.A.C. This section also provides a description of how 75% of the annual accumulation of tires will be removed for disposal or recycling.

Tires are stored at one location at the site, the tire trailer storage area in enclosed trailers. The total tire storage at the site is limited to 80.4 tons at any time, and tires are typically received and stored in 8' by 45' enclosed trailers. The trailers typically hold approximately 13 tons of tires. Obviously, load sizes and trailer capacities vary. All of the tires are stored in trailers and are not unloaded until they are used. The facility storage capacity may be described by the following scenarios:

A. 80.4 tons/13 tons/trailer = 5 trailers plus 15.4 tons in handling system
B. Combination of trailer storage and tire handling system not to exceed 80.4 tons facility-wide total.

Tires not meeting the required specifications are returned to a trailer for removal by the tire vendor. This trailer is included in the five trailer calculation above. During steady-state operation, the storage limit can be met by limiting onsite storage as follows:

5 full trailers x 13 tons/trailer =	65 tons
15.41 tons of tires in system =	15.4 tons
Total =	**80.4 tons**

This section provides calculations that include all tire storage in the handling system (including hoppers, accumulation conveyors, etc.).

Item	Qty. Tires
Live Bottom Hopper	1000
Rotary Disk Tire Separator	30
Separator Inclined Discharge Belt	15
Tire Separation & Refinement Roller Conveyor	35
Tire Rejection Roller Conveyor	60
Upper Elevation Belt #1	150
Upper Elevation Belt #2	150
Weight scale	1
Rejected tires	100
TOTAL	1541
Tons @ 20 lbs/tire	**15.41**

Market conditions will dictate the quantity of tires received. The quantity of tires stored at the facility will not exceed 80.4 tons. This amount is more limiting than that allowed by Rule 62-711.530(2)(a), F.A.C., which allows that amount of tires that the equipment is capable of combusting over a thirty (30) day period.

2.5 tons/hour x 24 hours/day x 30 days = 1800 tons of tires

Since no more than 80.4 tons of tires can be stored on site the requirement of 75% of disposal or recycling of annual accumulation is easily met. 75% of the maximum number of tires can be used as fuel within 24 hours, or returned to the tire collector in five trailers. See page 12-15 for Engineering Calculations.

Suwannee American Cement Company, LLC will not need to provide control of mosquitoes and rodents to protect the public health and welfare since the tires will be store inside enclosed trailers until placed into the tire feed system as fuel.

All the tires remain in the trailers until just before they are loaded onto the 40' Live Bottom Hopper and none will be stored on the ground. The handling area is managed in such a way as to divert stormwater or floodwaters around, off and away from the Tire Trailer Storage Area and the Tire Processing Facility. These areas are contained within the drainage area for Pond 4, as shown on the Facility Plot Plan.

RESIDUALS

There is no waste from the combustion of whole tires as a fuel in the cement manufacturing process. Entire whole tires are combusted within the kiln environment. Particulate matter captured by the kiln system control device remains in the system, and becomes integral to finished cement. Rejected tires are loaded into a trailer for disposal by the tire vendor. Wooden pallets and waste rags are not encountered in the operation of the tire processing facility.

Suwannee American Cement Company, LLC contracts with registered tire collectors for whole tires, and retains the right of refusal for any tires that are unsuitable for combustion in the cement kiln. Whole tires rejected by the system are loaded back into the trailer and returned to the vendor. These items are loaded by plant personnel or tire vendor driver. The rejected tire area is checked at least once every 8 hours, and rejected tires are loaded into a trailer as necessary. Where possible, such tires are loaded into the same trailer they are delivered in.

Each trailer is logged into the computer system. The computer will allow the tracking of materials for returns. There will be no piles of rims or scraps. The storage time for rejected tires in a trailer for removal by the tire vendor will be less than one month. This trailer is included in the five trailer maximum storage quantity.

OTHER ENVIRONMENTAL PERMITS

As tires will be consumed at the facility, this section provides a description of the other environmental permits that the applicant has for this use. The current Air Permit allows the use of tires as fuel.

Air Permit No. PSD-FL-361/Project No. 1190042-016-AV
Date of expiration: November 28, 2021

Name of issuing agency: Florida Department of Environmental Protection, Division of Air Resource Management

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS

Subsection C. Emissions Unit No. 003, Pyroprocessing System

The calciner burners and main kiln burner are capable of burning pulverized coal (primary fuel), petroleum coke, natural gas, on-specification used oil, No. 2 fuel oil, and certain categories of alternative fuel materials. The alternative fuels include, but are not limited to, tire-derived fuel (TDF), plastics, roofing materials, agricultural biogenic materials, untreated and treated cellulosic biomass, carpet-derived fuel, alternative fuel mix, biosolids, and engineered fuel (EF). A kiln tire feed mechanism with an airlock/gate system is capable of feeding TDF into the kiln system at the transition section between the base of the calciner and the point where gases exit the kiln.

ENGINEERING CALCULATIONS

ENGINEERING CALCULATION SYNOPSIS

1. Title V Air Construction Permit Firing Capacity Limits

    - 1,440 MMBtu/day
    - 60 MMBTU/ hour

2. Tire Btu Characteristics

    - 0.24 MMBtu/tire
    - Max Feed Rate = 2.5 tons tires/hour

3. Supply/Storage Trailer Characteristics

    - 1,300 tires/trailer or 13 tons/trailer
    - Max Feed Rate = 4.6 trailers/day

4. Tire Feed System Characteristics

    - Design Max Feed Rate = 6.0 tires/minute
    - Permitted Max Feed Rate = 4.17 tires/minute

5. Tire Storage Characteristics

    - Four (4) full trailers and a partial trailer of tires/day for fuel
    - One (1) partial trailer for accumulation of off-spec size tires

6. Maximum Amount of Tires Onsite

    - 8,041 tires on site
    - 80.41 tons tires on site

7. Tires Onsite vs. Daily Tire Feed Rate

    - 1.34 Days of tire supply on site

8. 75% Tire Removal/Usage Requirements

    - Removal of 75% of tires with 5 trailers
    - Usage of 75% of tires in 24.1 hours

1. Title V Air Construction Permit Firing Design Capacity:

- Pyroprocessing (Kiln and Calciner) firing capacity:
  - 9,600 MMBtu/day
  - 9,600 MMBtu/day / 24 hr/day = 400 MMBtu/hr
- Title V Pyroprocessing tire fuel offset:
  - 15% of maximum firing capacity
  - 9,600 MMBtu/day x 15% = 1,440 MMBtu/day
  - 1,440 MMBtu/day / 24 hr/day = 60 MMBtu/hr

2. Tire Btu Characteristics:

- TireBtu:
  - 12,000 Btu/lb
- Tire weight (Passenger) = 20 lb/tire
  - 2,000 lb/ton / 20 lb/tire = 100 tires/ton
- Tire Btu Value:
  - 12,000 Btu/lb x 20 lb/tire = 240,000 Btu/tire
  - 240,000 Btu/tire / 1,000,000 = 0.24 MMBtu/tire
- Design Tire Throughput:
  - 1,440 MMBtu/day / 0.24 MMBtu/tire = 6,000 tires/day
  - 60 MMBtu/hr / 0.24 MMBtu/tire = 250 tires/hr
  - 250 tires/hr / 100 tires/ton = 2.5 tons tires/hr

3. Supply / Storage Trailer Characteristics:

- Trailer contains:
  - 1,300 tires (1,30 tires x 20 lb/tire) / 2000 lb/ton = 13 tons of tires
- 1,300 tires/trailer / 250 tires/hr = 5.2 hr/trailer
  - 24 hr/day / 5.2 hr/trailer = 4.6 trailers/day

4. Tire Feed System Characteristics:

- Design throughput = 6 tires/min
- Required throughput:
  - 250 tires/hr / 60 min/hr = 4.17 tires/min

- Tire Capacity of Tire Feed System:

Equipment	Number of Tires
Live Bottom Hopper	1,000
Rotary Disk Tire Separator	30
Separator Incline Discharge Belt	15
Tire Separation & Refinement Roller Conveyor	35
Tire Rejection Roller Conveyor	60
Upper Elevation Belt #1	150
Upper Elevation Belt #2	150
Weight Scale	1
Rejected Tires	100
Total Number of Tires in System	1,541

(1,541 tires x 20 lb/tire) / 2,000 lb/ton = 15.41 tons tires

5. Tire Storage Characteristics:

- To supply throughput of 1,440 MMBtu/day with 6,000 tires/day contained in trailers with 1,300 tires each would require five (5) trailers available onsite. The Tire Feed System rejects tires not within size specifications and conveys them into a holding bin. This holding bin is then emptied into the trailer the reject tires were delivered in for return to the supplier.
- Maximum Onsite Storage = 5 trailers with up to 13 tons tires/trailer
- Maximum 5 trailers x 13 tons tires/trailer = 65 tons of tires onsite in trailers

6. Maximum Amount of Tires Onsite:

- Supply and Reject Trailers:
  - 5 Trailers x 1,300 tires/trailer = 6,500 tires

- Tire Feed System (completely full)
  - 1,541 tires

- Maximum Tires Onsite:
  - 6,500 supply tires + 1,541 tires in system = 8,041 tires onsite
  - (8,041 tires / 20 lb/tire) / 2,000 lb/ton = 80.41 tons tires onsite

7. Tires Onsite vs. Daily Tire Feed Rate:

- 80.41 tons tires onsite - 60.00 tons tires/day throughput = 20.41 tons tires onsite at end-of-day

- With maximum onsite storage and design tire feed system throughput there is 1.34 day's supply of tires onsite.
  - 20.41 tons tires / 60.00 tons tires/day = 34% of daily throughput

8. 75% Tire Removal/Usage Requirement:

- 75% of maximum number of tires onsite:
  - 8,041 tires onsite x 75% = 6031 tires requiring removal/usage
  - (6,031 tires x 20 lb/tire) / 2,000 lb/ton = 60.31 tons tires

- 75% Removal:
  - The 60.31 tons of tires onsite can be removed with five (5) trailers.
  - 60.31 tons of tire / 13 tons tire/trailer= 4.64 trailers

- 75% Usage:
  - The 60.31 tons of tires onsite can be used as kiln fuel in 24.1 hours.
  - 60.31 tons of tires onsite / 2.50 tons tires/hr throughput = 24.12 hr.

ATTACHMENT 6

EMERGENCY PREPAREDNESS PLAN
(Hazardous Materials Emergency and Contingency Plan)

Suwannee American Cement Company, LLC.

Hazardous Materials Emergency and Contingency Plan

September 2014
Revised January 9, 2019

TABLE OF CONTENTS

Introduction

This Hazardous Materials Emergency and Contingency Plan details the minimum steps that must be taken by all employees when responding to an incident involving a hazardous material spill or other emergencies. The goal of the plan is to provide employees with safe and effective methods to prevent and control hazardous material spills, which pose a potential threat the human health and/or the environment and to notify the appropriate emergency service provider for assistance, where necessary. The provisions of this plan must be carried out immediately whenever there is a fire, explosion, or unplanned sudden or non-sudden release of a hazardous substance to air, soil, or water is noticed. Intentional or negligent spills of hazardous materials will not be tolerated and may result in disciplinary action in accordance with company policies.

Employee awareness and management support are essential to spill prevention and the control of spills that may occur. This Plan is presented as a general guideline to minimize adverse effects to human health and the environment in the event of an unintended release of a hazardous material.

Emergency Services Coordination

The Sumterville Fire Department will respond to fire and medical emergencies and facilitate the care and transportation of injured personnel to appropriate medical facility. Local medical facilities are aware of the potential emergency needs through the routine activities of worker's compensation care and claims. Direct contact has been made with the Urgent Care of Sumterville, and Leesburg Regional Medical Center.

Spill Prevention

The prevention of hazardous material spills is the ultimate goal, however, the areas where large quantities of hazardous materials are stored and/or dispensed are susceptible to minor spills during normal operations. The periodic inspection of tanks and associated pumps, valves, piping, hoses, and containment structures, is essential to good spill prevention measures. Minor leaks at or near these locations can be managed with absorbent materials and/or drip pans while arrangements are made to repair or replace defective parts.

At locations where bulk loads of hazardous material are unloaded, there must be adequate provisions to control the potential of spillage during the coupling and uncoupling of hoses. The unloading must be monitored at all times. The drivers will typically monitor the offloading pump, hoses and coupling during this process. A key element of this process is to make sure that there is adequate space in the tank or container for the delivery volume. In the event the tank is not equipped with automatic overfill protection, care must be taken to prevent over filling the tank.

A competent person must inspect designated hazardous material storage locations, at least once a month and more frequently as warranted by site conditions. The results of the inspection must be documented, and any deficiencies must be corrected as soon as possible.

Good housekeeping around hazardous material storage areas must be maintained clean and tidy at all times. The accumulation of combustible or incompatible materials must not be allowed. Minor spills from dispensing hoses, pumps, valves, or piping must be addressed immediately upon discovery and the source of the leak must be controlled. Minor spills on metal or concrete surfaces may present a slip hazard and should be cleaned up as soon as practical. The spill of a combustible material may present a fire hazard. It is the responsibility of all employees to report and/or take immediate corrective action regarding spills or potential spills of hazardous materials.

Spill Reporting

An emergency coordinator should be contacted, whenever there is an imminent or actual emergency. These individuals will be responsible for insuring employee safety, spill cleanup/recovery, coordinating the appropriate emergency services, and the initial reporting of the spill. The safety and wellbeing of all employees will be the first priority. The emergency coordinator will have the authority to commit the resources necessary to control, contain, and/or cleanup the spilled material. When it becomes necessary, contacting the emergency coordinator will proceed in accordance with the following mandatory notification list.

Emergency Coordinators	Order of Contact	Contact Phone Number
Natacha Lago Plant Manager	1	(352) 870-8839 - Cellular Radio
Juan Yanez Production Manager	2	(832) 653-1681 - Cellular Radio
Dave Reed E&I Manager	3	(352) 216-0064 - Cellular Radio
George Townsend Environmental Manager	4	(352) 569-2217 - Office (352) 603-5334 - Cellular

The progression of notification shall proceed as indicated until an emergency coordinator is contacted, that is available for immediate response. Once on scene, the emergency coordinator will determine the need for contacting additional emergency coordinators. However, the Environmental Manager shall be contacted in all cases. The Environmental Manager will determine the need for and make the appropriate notifications and reports to regulatory agencies.

Spill Response Equipment Location

The attached plot plan (Appendix 3) identifies buildings, process locations, hazardous material storage areas, and the location of spill equipment. In addition to the spill equipment, the operation has several types of heavy equipment such as dozers and front-end loaders that may be used to construct berms and impoundments to contain large spills and facilitate cleanup, when necessary.

Storm Water Management System

This facility is designed to manage the storm water from rainfall events with zero discharge to off property surface water features. A series of Stormwater retention ponds collect all, in plant, rainfall run off. Furthermore, the perimeter elevation of the facility is higher than adjacent land surfaces to prevent any off-site runoff.

Hazardous Materials Storage

The various hazardous materials stored in the facility are listed below and their location is depicted on the plot plan (Appendix 3). Tanks are all constructed of materials compatible with the contents and are of double walled construction or have other appropriate secondary containment for potential spills. Where required, storage tanks are equipped with leak detection, high-level alarm, overfill protection, and/or a level indicator. All tanks are above ground and are inspected at least once a month for product tightness and housekeeping.

- Above Ground Storage Tanks: Plot Plan #34

  20,000 Gal. On-Spec Fuel Tank
  20,000 Gal. On-Spec Fuel Tank
  10,000 Gal. Off-Road Diesel Tank
  10,000 Gal. 19.5% Ammonia Tank
  10,000 Gal. Grinding Aid Tank
  10,000 Gal. Masonry Additive Tank
  600 Gal. Off-Road Diesel Fuel Tank, GEN Set
  500 Gal. Unleaded Gasoline Tank

- Coal Storage Building: Plot Plan #15
  6,000 tons Coal

Oil Storage Areas:

- Finish Mill Building: Plot Plan #11
  4,000 Liter (1,056 Gal.) Finish Mill Gearbox
  2,000 Liter (528 Gal.) Hydraulic Oil Tank
  540 Liter (143 Gal.) Hydraulic Oil Tank

- Clinker Cooler Hydraulic Room: Plot Plan #8
  1,600 Liter (422 Gal.) Hydraulic Oil Reservoir

- Coal Mill Hydraulic Room: Plot Plan #16
  160 Liter (42 Gal.) Hydraulic Oil Tank

- Coal Mill Gearbox: Plot Plan #16
  460 Liter (121 Gal.) Coal Mill Gearbox

- Raw Mill Building: Plot Plan #2
  2,450 Liter (647 Gal.) Raw Mill Gearbox
  240 Liter (63 Gal.) Hydraulic Oil Tank
  240 Liter (63 Gal.) Hydraulic Oil Tank
  240 Liter (63 Gal.) Hydraulic Oil Tank
  240 Liter (63 Gal.) Hydraulic Oil Tank
  400 Liter (105 Gal.) Hydraulic Oil Tank
  400 Liter (105 Gal.) Hydraulic Oil Tank

- Raw Material Storage (RMS) Reclaimer: Plot Plan #1
  200 Liter (53 Gal.) Chain Lube Tank

- Quarry Maintenance Shop: One (1) Mile North of RMS Building
  6 – 55-gallon drums of oil

Gas Cylinder Storage Areas:

- South of Homogenizing Silo, Ground Floor: Plot Plan #3
  Hydrogen
  Propane
  Oxygen
  Acetylene
  Nitrogen

- Preheater Tower 5th Floor: Plot Plan #4
  CEMS Gasses

- Preheater Tower 6th Floor: Plot Plan #4
  Hydrogen
  CEMS Gasses

Emergency Spill Materials

Emergency spill materials are located in the Maintenance Warehouse for easy access and availability. Emergency spill materials are located at the Quarry Maintenance Shop.

Spill Quantity

A spill is defined as an unexpected and unplanned release of a hazardous material from a container or tank, to the ground or surface water. Operationally, spills of hazardous materials will be divided into two categories, small and large. A small spill is defined as greater than one (1) gallon but less than five (5) gallon. A small spill should be cleaned up immediately, by the employee(s) involved, and then reported to the Environmental Manager for follow up.

A large spill is defined as greater than five (5) gallons. In the case of a large spill, efforts must be made to stop the flow of material and contain the spill. The area of the spill should be barricaded immediate to keep personnel and/or equipment out of the area until cleanup activities are initiated. Report the incident to an emergency coordinator. The emergency coordinator will then determine the next level of response and take the actions necessary to insure spill containment and cleanup of the spill. The Environmental Manager must always be contacted so appropriate regulatory notifications can be made, if required, and oversight of the clean-up.

The unexpected or unplanned release of compressed gas will be treated as large spill. In the case of compressed gas, where there is no safe provision to turn off the flow of the gas, do not approach the tank. Notify all personnel that may be exposed to the gas, evacuate as needed, and allow the gas to vent. If the gas is flammable, be sure that potential sources of ignition are extinguished, and that mobile equipment is not allowed to enter the area where the gas is venting.

A leak or a release from a container via a puncture or other small opening or a weak spot in the container must be sealed or the material must be placed in another appropriate container. Container leaks will be treated as small spills unless they result in a rapid discharge of material in excess five (5) gallons.

Spill Response

Prior to the spill response, obtain proper personal protective equipment (PPE) suitable for the material involved. If there are any questions as to the type of PPE needed, refer to the material safety data sheet for the material. Binders containing MSDS sheets are located outside the safety office. The level of protection required may be influenced by the quantity and type of material spilled. When there are valves/piping involved, and if can safely be done, an attempt should be made to stop the flow of the material and then limit the dispersal of the material with absorbent materials or soil. All employees that are not involved in the spill response must be kept out of the spill area. Whenever it is practical, any usable hazardous material should be recovered and retained for its intended use.

Spill Recovery/Cleanup

All material used for cleanup and any contaminated soil, resulting from the spill, should be containerized as soon as possible. Generally, a fifty-five (55) gallon open top drum, with a lid and lock ring, should be used for this purpose. Larger containers such as roll-off boxes may be needed to minimize the number of drums needed. Based on product knowledge and/or the MSDS

sheet, a determination will be made as to the type of waste generated. Non-hazardous and hazardous will be managed in accordance with applicable local, state, and federal regulations.

Fire/Explosion

Immediately report any fire or explosion to the shift supervisor and if any injuries are involved, the well being of those involved is the first concern. Only after reporting the fire should you attempt to extinguish it; again, evacuate those not involved in controlling the fire. If it can safely be performed, approach the fire with available portable fire extinguishers. Preferably, there should be at least two people involved in extinguishing the fire to minimize the potential for a single person to need aid or assistance and there is no one around. If the fire has not been extinguished with one (1) or two (2) fire extinguishers, the fire department should be called using the 911 emergency services number and follow the instructions below:

Fire Reporting to Sumterville Fire Department

When an employee becomes aware a fire cannot be extinguished with fire extinguishers then:

- Contact the Control Room via radio
- Control Room personnel will dial 911 to notify the Sumter County Fire Department
- Control Room personnel will contact all Emergency Coordinators via radio or telephone
- All personnel near the fire shall be evacuated to a safe gathering point.
- Personnel will be accounted for, if possible, prior to Fire Department arrival.
- The guard on duty will be notified at telephone extension 2042 to allow entry of Fire Department personnel and equipment.
- An Emergency Coordinator or designee will meet Fire Department to direct to fire location via most expedient route, and report of personnel not accounted for.
- If the fire involves the Waste Tire System the Environmental Manager will contact FDEP, Central District, Solid Waste Program, of the incident via telephone (attachment 1, Verbal Form), and follow-up with a written report (attachment 2, Written Form) within two weeks.

Emergency Coordinators	Order of Contact	Contact Phone Number
Natacha Lago Plant Manager	1	(352) 870-8839 - Cellular Radio
Juan Yanez Production Manager	2	(832) 6531681 - Cellular Radio
Dave Reed E7I Manager	3	(352) 216-0064 - Cellular Radio
George Townsend Environmental Manager	4	(352) 569-2217 - Office (352) 603-5334 – Home

Injuries

If a serious injury results, from any incident, the emergency services number, 911, should be call immediately. A victim should not be moved unless they are in a position or location that exposes them to further injury. If the victim must be moved, *always* assume a neck/spinal injury and handle them accordingly to prevent movement of the head, neck, or spine. When placing the call give brief description of the incident, the number of employees involved, your location or address, your name, and telephone number. Again, do not hang up until you are sure the person on the other end of the line has all the information they need. They may also give you instructions on the care of the injured until the arrival of emergency services. When the emergency service personnel have attended to the injured, ask them to which medical facility they will be transporting the injured. Be sure that a family member of the injured person(s) is notified of their injury and the facility they were transported, as soon as possible.

Container Management

For the purposes of this plan, a container will be defined as 65 gallons or less. All containers shall be of substantial construction and compatible with the material stored and must be labeled as to the contents, regardless of the size of the container. The label of a container must be maintained in legible condition until it is empty. Whenever, material is transferred from the original container into another container. The receiving container must be labeled with names of the material. All containers must be capable of being sealed with a cap or lid, free of holes, and in good condition. When open top containers are used to drain fluids or oil from equipment, it should be filled no more that three-quarters (3/4) full. The materials should be immediately transferred, after sealing with lid and ring tightened, to a tank or closed top container. Do not leave open top containers at the job site or in areas not protected from the rain or other sources of water.

When a container is empty, and intended to be used as a storage container, it should be labeled empty. If the drum is returnable for deposit if should be transported to the approved holding location for return drums. If the drum is not returnable transport to the nearest waste / recyclable materials storage area for re-use.

Employee Awareness Program

This plan will be distributed to managers and supervisors and will be incorporated into routine training session for plant employees.

Record keeping

The Environmental Manager will maintain records relating this plan and when necessary make the required reports to regulatory agencies.

APPENDIX 1

VERBAL EMERGENCY INCIDENT REPORT

FDEP, Central District, Solid Waste Program at telephone number: 407-897-4300

Date of Incident: _____

Verbal Notification by: _____

Verbal Notification to: _____

Description of Emergency: _____

_____

_____

_____

_____

Actions Being Taken to Deal with Emergency: _____

_____

_____

_____

_____

Follow-up:

Within two weeks of any emergency, the operator of the site shall submit to the Department (FDEP Solid Waste Program) a written report on the emergency.

- F.A.C. 62-711.540(f)

APPENDIX 2

WRITTEN EMERGENCY INCIDENT REPORT

Date of Incident: _____

Verbal Notification by: _____

1. Describe origins of emergency:

2. Actions taken to deal with emergency:

3. Results of actions taken:

4. Success and Failure Analysis of event:

   a. Successes:

   b. Failures:

   c. Analysis and Improvements:

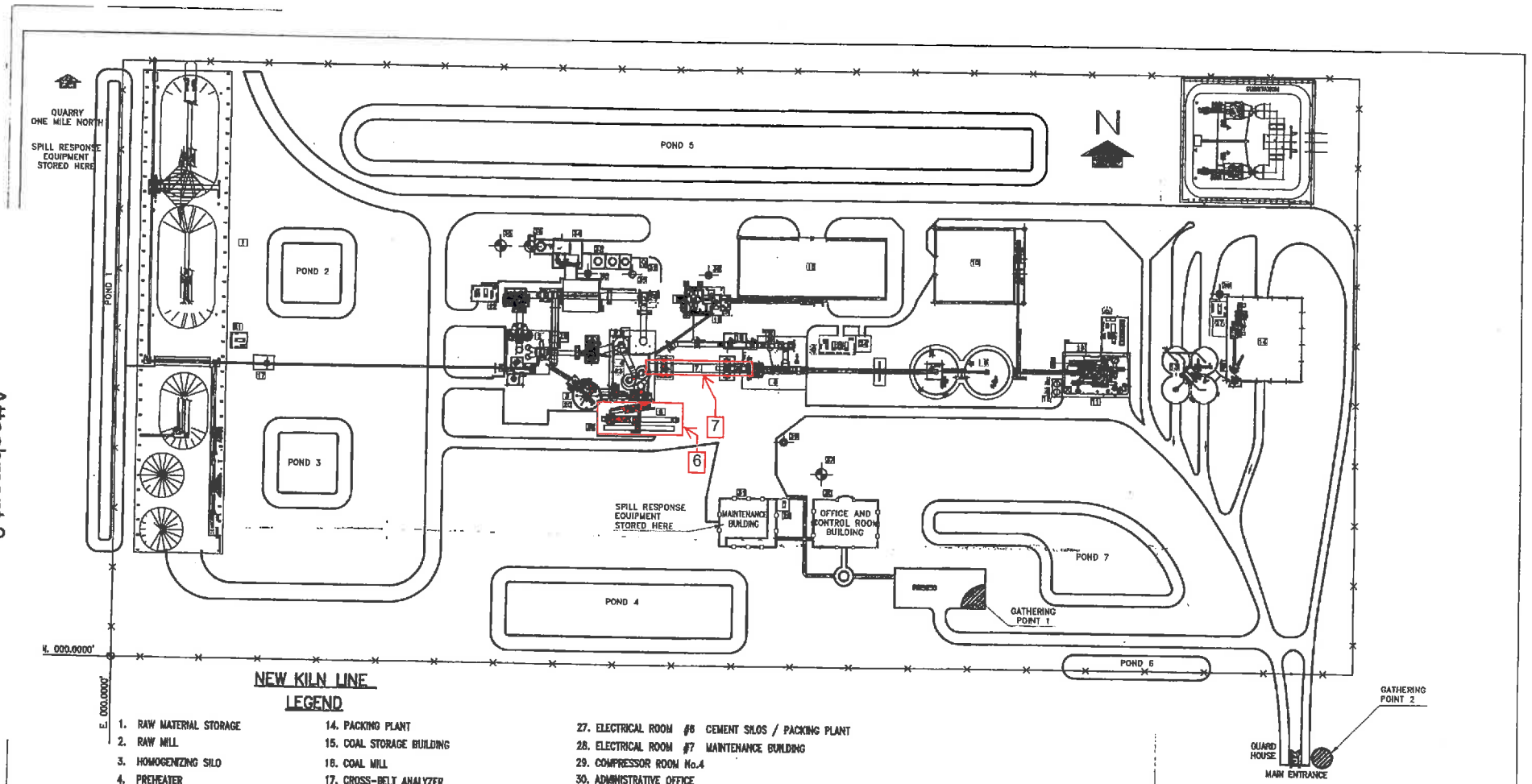
Instructions for use:

Within two weeks of any emergency, the operator of the site shall submit to the Department (FDEP Waste Section) a written report on the emergency.

- F.A.C. 62-711.540(f)
- FDEP, Central District, Solid Waste Program
  3319 Maguire Blvd., Suite 232
  Orlando, FL 32803-3767

APPENDIX 3

Attachment 3



NEW KILN LINE
LEGEND

1. RAW MATERIAL STORAGE
2. RAW MILL
3. HOMOGENIZING SILO
4. PREHEATER
5. GAS CONDITIONING TOWER
6. TIRE FEED SYSTEM
7. ROTARY KILN
8. COOLER & BURNER BUILDING
9. CLINKER STORAGE SILOS
10. GYPSUM STORAGE
11. FINISH MILL
12. GRINDING AID TANKS
13. CEMENT STORAGE SILOS
14. PACKING PLANT
15. COAL STORAGE BUILDING
16. COAL MILL
17. CROSS-BELT ANALYZER
18. COMPRESSOR ROOM No.1
19. COMPRESSOR ROOM No.2
20. COMPRESSOR ROOM No.3
21. ELECTRICAL ROOM #1 R.M.S. BUILDING
22. ELECTRICAL ROOM #2 RAW MILL
23. ELECTRICAL ROOM #3 PREHEATER
24. STAND-BY GENERATOR & FUEL TANK
25. ELECTRICAL ROOM #4 CLINKER COOLER
26. ELECTRICAL ROOM #5 FINISH MILL
27. ELECTRICAL ROOM #6 CEMENT SILOS / PACKING PLANT
28. ELECTRICAL ROOM #7 MAINTENANCE BUILDING
29. COMPRESSOR ROOM No.4
30. ADMINISTRATIVE OFFICE
31. MAINTENANCE BUILDING (SPILL EQUIPMENT INSIDE)
32. AMMONIA TANK 19.5%
33. FUEL TANKS
34. WATER COOLING TOWER
35. PROCESS WATER WELL #1: 12 inch casing, 500 feet deep
36. PROCESS WATER WELL #2: 12 inch casing, 500 feet deep
37. POTABLE WATER WELL: 5 inch casing, 200 feet deep
38. GAS CYLINDER STORAGE
39. FIRE HYDRANT

COMPUTER GENERATED DRAWING

DRN:	DOR	10/23/09	SCALE: SCALE	PROJECT:
CHKD:				
APPD:				
DRAWING TITLE: PLANT_LAYOUT ATTACHMENT 3				
REFERENCE:		DRAWING NO:	SHEET: 0 OF 0	REV: REV
			SHEET SIZE: 0	

Received NOV 2 8 2009

ATTACHMENT 7

FIRE SAFETY SURVEY

An updated Fire Safety Survey has been requested from the Fire Chief of the Sumter County Fire and EMS and will be provided upon completion. It is anticipated that it will be completed and submitted to the Department prior to the expiration of the current permit, April 7, 2019.

PART III

SECTION C– CLOSING COST ESTIMATES and SECTION D - FINANCIAL ASSURANCE

Note: Rule 62-711.700(2) and (3) was repealed on February 16, 2012. Therefore this section addresses the required closing cost estimates and financial assurance as required by the applicable sections of the current Rule 62-711.500(3).

C. Completed closing cost estimates as required by Rule 62-711.500(3) FAC.
The facility's closing cost estimates are provided as Attachment 8.

D. Proof of financial assurance as required by Rule 62-711.500(3)(a)
Copies of the most recent documents associated with the financial assurance update are provided in Attachment 8. The closing cost estimate was increased from $4824 to $6432. Based on the updated cost estimate prepared for the 2014 permit renewal application, and to cover inflation adjustments and future estimates required by the permit, American Cement updated the financial assurance instrument (bond) from $4298 to $10,000 by obtaining a Rider for the permit renewal in 2014. The amount is still valid and sufficient for the 2019 permit renewal. The proof of financial assurance, including the Rider, is provided in Attachment 8.

ATTACHMENT 8

CLOSING COSTS AND PROOF OF FINANCIAL ASSURANCE

KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES

690-18-15
January 10, 2019

ATTACHMENT 8

Suwannee American Cement Company, LLC –Sumterville Tire Processing Facility
FDEP File No. 297136-002-WT/WACS No. SWD/60/98523

Closing Cost Estimate
January 10, 2019

The purpose of this submittal is to fulfill the requirements of Rule 62-711.500(3) F.A.C., to provide a re-estimate of the closing costs for tires at the Suwannee American Cement, Sumterville Tire Processing Facility. Koogler and Associates, Inc. is providing this closing cost estimate for the cost to remove, process, and dispose of the maximum amount of waste tires that is permitted to be stored at the facility at any time.

ESTIMATED CLOSING COSTS:

Tire Disposal
The estimated cost to remove, process, and dispose of the maximum permitted amount of tires stored at the facility at any time (8,040 tires/80.4 tons) is as follows:

80.4 tons @ $80/ton = $6432 (or $0.80/tire)

This cost estimate is backed by a third party cost estimate from McGee Tire Company, Inc. (attached).

Professional Engineer Certification

Signature

1/11/19
Date

Maxwell R. Lee, Ph.D., P.E.
Koogler and Associates, Inc.
PO Box 5127
Gainesville, FL 32627-5217
352-377-5822
mlee@kooglerassociates.com

Seal No. 58091

MAXWELL R. LEE LICENSE No. 58091 STATE OF FLORIDA PROFESSIONAL ENGINEER

McGee Tire Co. Inc

130 E. 7th Street
Apopka, FL. 32703
Phone (407)889-9250 Fax (407)889-5505

January 9, 2019

Suwannee American Cement Company, LLC
4750 County Road 470
Sumterville, FL 33585

Mr. George Townsend,

McGee Tire Co. Inc is willing and able to clean-up any whole tires that may be on site at the Suwannee American Cement Company located in Sumterville, Florida in the event your facility no longer consumes tires or discontinues operations.

McGee Tire Co. Inc. would collect, transport and dispose of all whole waste tires left on the site for the following cost:

Waste Tires – Total expected tons 80.4 at $80 per ton

Please let me know if you need any additional information.

Sincerely,

Buddy McGee
McGee Tire Co. Inc.
130 E. 7th Street
Apopka, Florida 32703

THE HARTFORD

RIDER

Attached to and forming part of Bond # 13BSBFQ9243 ,

on behalf of American Cement Company, LLC

of 4750 E C 470, P.O. Box 445, Sumterville, FL 33585

in favor of Florida Department of Enviormental Protection

and in the amount of Four Thousand Two Hundred Ninety-Eight ($4,298.00) Dollars.

It is understood and agreed that effective September 19, 2014

The Bond Amount shall be changed

from $4,298

to $10,000

All other conditions and terms re main as originally written.

Signed, Sealed, and Dated September, 24th , 2014

Hartford Fire Insurance Company

By: Leslie Clifton

Leslie Clifton , Attorney-in-Fact

The above rider is hereby agreed to and accepted:

By: _____

David Osmus - Vice President

American Cement Company, LLC

PART III
SECTION E – LETTER FROM LANDOWNER

E. A letter from the land owner (if different from applicant) authorizing use of the land as a waste tire processing facility.
Not applicable – Suwannee American Cement owns the land.

PART III
SECTION F – OTHER ENVIRONMENTAL PERMITS

F. If waste tires will be consumed at the facility, attach a description of the other environmental permits that the applicant has for this use, including, permit number, date of issue, and name of issuing agency.

Tires are burned in the cement kiln as a supplemental fuel. Therefore, the facility must be authorized under an air permit to burn tires in the kiln. The facility is permitted to burn whole tires and tire-derived fuels in the kiln under Title V Permit No. 1190042-016-AV (issued on November 29, 2017). This information is also provided in the Comprehensive Operations Plan provided as Attachment 5.

PART III
SECTION G – PERMIT FEE

G. The permit fee as required in Rule 62-4, FAC.
The required permit fee of $1,250 (per Rule 62-4.050(4)(j)10, FAC) is enclosed with this application submittal.

PART IV – CERTIFICATION

Except as particularly noted herein, based on information and belief formed after reasonable inquiry, to the best of my knowledge, the statements and information in this document are true, accurate, and complete.

Exceptions to the professional engineering certification are presented below.

1. Attachment 1 – USGS Topographic Map: The topographic map was accessed on 10/10/2018 from http://www.topoquest.com/map.php?lat=28.74499&lon=-82.06342&datum=nad83&zoom=4&cross=on. The map was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control.
2. Attachment 2A – Zoning and Land Use Map: The Zoning and Land Use map was accessed on 10/10/2018 from Sumter County's GIS Department (http://www.sumtergis.com). The information contained in the map was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control.
3. Attachment 2B – Sumter County Future Land Use Map: The Future Land Use Map was accessed on 10/10/2018 from the Sumter County website. (http://www.sumtercountyfl.gov/index.aspx?NID=238). The information contained in the map was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control.
4. Attachment 3 – Facility Plot Plan: The plot plan was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control. The attached plot plan was part of the original submission dated November 19, 2009. According to facility personnel, the plot plan is accurate. For clarity, Koogler and Associates outlined and labeled the tire injection system on the figure for this permit renewal.
5. Attachment 4 – Tire Feed System Plan View: The Tire Feed System Plan View was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control. The attached plot plan was part of the original submission dated November 19, 2009. According to facility personnel, the plot plan is accurate. For clarity, Koogler and Associates outlined and labeled the tire injection system on the figure for this permit renewal.