



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

December 17, 2020

Zahid Paz, Plant Manager
CEMEX
10311 Cement Plant Road
Brooksville, FL, 34601
zahidiran.rangel@cemex.com

Re: Warning Letter #WL20-193AS27SWD
CEMEX Brooksville South Plant
Facility ID No. 40778, FLA012073, 0530021
Hernando County

Dear Mr. Paz:

A compliance inspection was conducted at your facility on November 20, 2020. During this inspection, possible violations of chapter 403, Florida Statutes, chapter 62-210, 62-212, 62-520, 62-701, 62-711, 62-620 and 62-296, Florida Administrative Code were observed.

On December 7, 2020, a review of additional information indicates possible violations may continue to exist:

- Sediment accumulation was observed in the stormwater ditch adjacent to A-Frame building and appeared to be impeding on flow.
- Alternative Fuel Material (Tire Fluff) was observed within 1 foot of the edge of the Additive Storage Building (ASB).
- The facility was unable to provide an in-compliance fire inspection survey resolving previous violations noted by the Hernando County Fire Department in 2019.
- Visible emissions in excess of 20% were noted to be discharging from the access road east of Line 2.
- Both water spray/dust suppression systems were observed to be removed from each Clinker Recovery System on Lines 1 and 2. No alternative dust mitigation agent or system were observed in its place.

- Finish Mill Bucket Elevator (EU054) was observed to be dropping clinker due to a leak. Particulate matter emissions in excess of 25% were observed to be emanating from this area.
- Excess particulate emissions were noted from the L22 Tunnel near Line 1 due to a malfunctioning switch.
- Excess particulate emissions were noted from the DB-100/running backside of the cooler on Line 2 while in operation.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to sections 403.161, Florida Statutes.

Please contact Kaitlyn Newsome, at (813) 470-5877 or via email at Kaitlyn.Newsome@FloridaDEP.gov, within **15 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with section 120.57(5), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,



Mary E. Yeargan, P.G.
Southwest District Director
Florida Department of Environmental Protection

cc: Kelley Boatwright, DEP, Kelley.M.Boatwright@FloridaDEP.gov
Steven Tafuni, DEP, Steven.Tafuni@FloridaDEP.gov
Michael Lynch, DEP, Michael.Lynch@FloridaDEP.gov
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Robin Simons, CEMEX, Robing.Simons@cemex.com
David Singer, CEMEX, Davidt.Singer@cemex.com

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT

Facility Name and Physical Address CEMEX Brooksville South Cement Plant 10311 Cement Plant Road Brooksville, FL 34601	WAFR ID FLA012073	County Hernando	Entry Date 11/20/2020	Entry Time 10:00 AM
	Facility Phone # (352) 799-7881		Exit Date 11/20/2020	Exit Time 03:05 PM

LAT	28	°	34	'	50.57	"
LONG	82	°	25	'	48.32	"

Name(s) of Field Representatives(s) and Title Robin Simons, Environmental Manager David Singer, Environmental Specialist	Operator Certification #	Email robing.simons@cemex.com davidt.singer@cemex.com	Phone (863)-602-8024 (352) 799-7881
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Name & Address of Permittee / Designated Rep. Zahid Rangel Paz 10311 Cement Plant Road Brooksville, FL 34601	Title Plant Manager	Email zahidiran.rangel@cemex.com	Phone 352-799-7881
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Inspection Type		C	E	I	Samples Taken(Y/N): N	Sample ID#: N/A	Samples Split (Y/N) : N
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☐ **Domestic** ☒ **Industrial**

FACILITY COMPLIANCE AREAS EVALUATED							
IC = In Compliance; MC = Minor Out of Compliance; NC = Out of Compliance; SC = Significant out of Compliance; NA = Not Applicable; NE = Not Evaluated Significant Non-Compliance Criteria Should be Reviewed when Out of Compliance Ratings Are Given in Areas Marked by a "♦"							
	PERMITS/ORDERS		SELF MONITORING PROGRAM		FACILITY OPERATIONS		EFFLUENT/DISPOSAL
IC	1. ♦ Permit	IC	3. Laboratory	MC	6. Facility Site Review	IC	9. ♦ Effluent Quality
IC	2. ♦ Compliance Schedules	IC	4. Sampling	NA	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		IC	5. ♦ Records & Reports	MC	8. ♦ Operation & Maintenance	NA	11. Biosolids
						MC	12. ♦ Groundwater
NA	14. Other					NA	13. ♦ SSO Survey

Facility and/or Order Compliance Status:	<input type="checkbox"/> In-Compliance	<input checked="" type="checkbox"/> Out-Of-Compliance	<input type="checkbox"/> Significant-Out-Of-Compliance
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Recommended Actions: Please contact Ms. Kaitlyn Newsome within 15 days of receipt of WL#20-193AS27SWD to arrange a meeting to discuss these matters.

Name(s) and Signature(s) of Inspector(s) Kaitlyn Newsome 	District Office/Phone Number Southwest/813-470-5877	Date 12/07/2020
Name and Signature of Reviewer Erica Peck 	District Office/Phone Number Southwest/813-470-5906	Date 12/15/2020

Single Event Violations (*SNC SEVs)				
Check for Yes	Evaluation Area	Description	Finding Description	Finding ID
<input type="checkbox"/>	Permit	Effluent Violations - Unapproved Bypass	Wastewater was diverted from a portion of the treatment process without department approval.	UNBY
<input type="checkbox"/>	*Permit	Permit Violations - Discharge Without a Valid Permit	The facility was operating without a permit or with an expired permit.	UPHI
<input type="checkbox"/>	Permit	Permit Violations - Failure to Submit Timely Permit Renewal Application	The permittee failed to submit an application to renew the existing permit at least 180 days prior to expiration.	PFSA
<input type="checkbox"/>	Laboratory	Management Practice Violations - Laboratory Not Certified	The laboratory was not certified by the Florida Department of Health and therefore is not certified to meet NELAC standards.	LNCE
<input type="checkbox"/>	Sampling	Monitoring Violations - Analysis not Conducted	The facility failed to collect and/or analyze samples as required by permit or enforcement action.	ANCV
<input type="checkbox"/>	Sampling	Monitoring Violations - Failure to Monitor for Toxicity Requirements	The facility failed to collect and/or analyze routine or follow-up toxicity samples.	FTOX
<input type="checkbox"/>	Records and Reports	Management Practice Violations - Failure to Develop Adequate SPCC Plan	The facility failed to develop or maintain their Spill Prevention Control and Countermeasures (SPCC) plan.	FSPC
<input type="checkbox"/>	Records and Reports	Management Practice Violations - Failure to Maintain Records	The facility failed to maintain records for the required retention period.	FMRR
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to Notify	The permittee failed to notify the department of any event or activity that requires notification as required by permit or rule.	RSWP
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to Submit DMRs	The permittee failed to submit any DMR required by rule, permit, or enforcement action in a timely manner.	FDMR
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to submit required report (non-DMR, non-pretreatment)	The facility failed to submit any report required by rule, permit, enforcement action or inspection activity except for DMRs.	FRPT
<input type="checkbox"/>	Facility Site Review	Management Practice Violations - Improper Land Application (non-503, non-CAFO)	The land application system was not being maintained.	LASN
<input type="checkbox"/>	Flow Measurement	Monitoring Violations - No Flow Measurement Device	The facility failed to install a flow measurement device, an approved flow measurement device, or a working flow measurement device.	NOFL
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - Improper Operation and Maintenance	The facility failed to follow their operation and maintenance plan/manual or their Biosolids Nutrient Management Plan.	IONM
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - Inflow/Infiltration (I/I)	The facility had an inflow and infiltration problem causing collection system issues and/or operational issues.	ININ
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - No Licensed/Certified Operator	The facility was being operated without a certified operator or by an operator that is not licensed for the size of plant.	ONCO
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent acute toxicity has been documented through follow-up tests.	EATX
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent chronic toxicity has been documented through follow-up tests.	ECTX
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent acute or chronic toxicity has been documented in the effluent through the use of routine and follow-up tests.	ETOX
<input type="checkbox"/>	Effluent Quality	Effluent Violations - Narrative Effluent Violation	The facility violated a permit or enforcement narrative effluent limit.	XNEV
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Reported Fish Kill	The facility had a discharge of wastewater that resulted in a fish kill.	XFSH
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Discharge to Waters	A sewage spill from any components of a collection/transmission system or from a treatment plant reached surface waters including stormwater conveyance system or drainage ditch.	SSO1
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to Maintain Records or Meet Record Keeping Requirements	The facility failed to keep routine documentation and reporting records of spills, and/or operation and maintenance activities on the collection/transmission system.	SSO2
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to monitor	The facility failed to collect and/or analyze bacteriological samples for sewage spills that reached surface waters.	SSO3
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to report violation that may endanger public health 122.41(1)(7)	The facility failed to report a sewage spill within 24 hours of discovery.	SSO4
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Improper Operation and Maintenance	The facility failed to perform routine preventative maintenance to keep the collection/transmission system in good working order.	SSO5
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Overflow to Dry Land	A sewage spill from any part of a collection/transmission system or treatment plant that did not make it to surface waters, i.e., stormwater collection system, drainage ditch, stream, pond, or lake.	SSO6

Facility Treatment Summary: The plant utilizes their permitted well water as other non-contact cooling water for various processes in their two, cement plant kiln process lines, including but not limited to pump seal water and bearing cooling water. This spent non-contact cooling water is routed to and discharged into the perimeter ditch prior to being pumped to cooling pond 5. The CEMEX coal storage area includes a runoff collection sump designed to contain the 100-storm. Any additional stormwater exceeding the sump's holding capacity is pumped to the perimeter ditch. The truck wash wastewater is routed to the perimeter ditch (D-001) as well. No water leaves the site.

1. ♦Permit: In-Compliance

Current Permit available on-site?	Yes
Date Permit issued	07/08/2020
Date Permit Expires	07/07/2025
Permit Renewal Application due by	01/08/2025
Administrative or Judicial Orders?	N/A

- 1.1 Observation: Industrial wastewater requirements are determined through the FL Power Plant Siting Coordination Office, Conditions of Certification (CoC), PA 82-17.
- 1.2 Observation: The CoC and supporting documents were onsite and readily available for inspection.

2. ♦Compliance Schedules: In-Compliance

Compliance Schedule in Permit met?	Yes
Compliance Schedules in Order are being met?	Not Applicable

- 2.1 Observation: The only applicable improvement action required per Section VI. Schedules is the requirement for the facility to continue implementing the existing BMP Plan. Please see Section 5, Records and Reports for additional details associated with this compliance item.

3. Laboratory: In-Compliance

Contract Lab Name and Certification #	Phoslab Environmental Services
Facility NELAC Certification #	E84925

4. Sampling: In-Compliance

Sampling conducted during inspection?	No
Sampling observed during inspection?	No
Sampling conducted at locations identified by the permit?	Yes
Safe access to sampling locations?	Yes

- 4.1 Observation: No scheduled sampling was conducted or performed during the time of this CEI.

5. ♦Records and Reports: In-Compliance

Documents/Records reviewed	Time frame
Discharge Monitoring Reports (DMRs)	From July 2017 through June 2020
Surface Water Management System Plan	Last Revised November 10, 2017

Spill Prevention Plan	Last Revised May 5, 2019
Annual Berm/Dam Inspections	2019-2020
Employee Training Logs	2018-2020
Emergency Crisis Management Booklet	Last Revised October 2016
Pond Staff Gauge Readings	2019; January – June 2020
Groundwater Monitoring Plan	Last Revised November 2017
Sweeper Log	2019-2020

5.1 Observation: The most recent Annual Berm/Dam Inspection was performed in March 2020.

5.2 Observation: Employee Training Logs were reviewed for July 2018, July/August 2019 and May/June 2020.

6. Facility Site Review: Minor-Out-Of-Compliance

6.1 Deficiency: At the time of inspection, Department personnel spot-checked MW-1, MW-3 and MW-8 to confirm each monitoring well was secured and properly labeled. Overgrowth of vegetation was noted surrounding MW-3 and MW-8R impeding on safe access to sampling locations.

Rule/Permit Reference: Permit Condition I.B.2.

Corrective Action: Following discussion with Mr. Singer, the facility requested for their contracted mowing company to mow around these sampling locations. On November 30, 2020, Mr. Singer provided photo documentation demonstrating that the area near the monitoring wells had been mowed. Please see photo log #WIN_20201120_14_10_27_Pro, MW Mowed-01, and MW Mowed-2 for reference. *No additional actions are required by the Permittee at this time.*

6.2 Observation: A site walk-through was completed to inspect Cooling Pond #4 and #5, the perimeter ditch and a representative sample of groundwater monitoring wells located onsite (MW-1, MW-3, MW-8R). Per discussion with Ms. Simons, the truck wash area was out of operation due to a recent vehicular collision event. No evidence of erosion or bypass was noted.

7. Flow Measurement: Not Applicable

8. ♦Operation and Maintenance: Minor-Out-Of-Compliance

Facility being operated as per permit?	See Observation
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8.1 Deficiency:
Additional Comments: At the time of inspection, sediment was observed to be accumulating in the ditches adjacent to the A-Frame building impeding on proper flow. A review of the provided Surface Water Management System Plan indicates “*When necessary, debris is removed from the perimeter ditch and properly disposed of in accordance with permitted or regulatory requirements*”. The provided SWMS/BMP however, does not indicate a frequency in which this activity will occur to ensure regular maintenance. Please see photo log #WIN_20201120_13_46_26_Pro for reference.
Rule/Permit Reference: Permit Condition VII.3.

Corrective Action: Please update the facility's SWMS/BMP to indicate a frequency in which debris shall be removed from the perimeter ditch. In addition, please remove the debris from the perimeter ditch and provide photo documentation to the Department within 60 days of this inspection report's issuance.

9. ♦Effluent Quality: In-Compliance

DMRs review period	From 07/01/17 to 06/30/20
Any exceedances?	No

- 9.1 Observation: No water leaves the site. Part A of the DMRs for the facility's Industrial Wastewater Permit No. FLA012073-002-IW2N-NR requires semi-annual sampling of Cooling Ponds 4 and 5 (G-001) as well as annual sampling from the onsite perimeter ditch (D-001) and monitoring wells included in Permit Condition III.B.5. No exceedances were noted in Part A of the reviewed DMRs. Please refer to Section 12 – Groundwater Quality for exceedances noted in Part D of the DMRs.

10. ♦Effluent Disposal: In-Compliance

Facility discharging?	No
Discharge location(s) as per permit?	Not Applicable

- 10.1 Observation: Effluent is not permitted to leave the site.

11. Biosolids: Not Applicable

12. ♦Groundwater Quality: Minor-Out-Of-Compliance

DMRs review period	From 07/01/17 to 06/30/20
Any exceedances?	Yes
All monitoring wells accessible, secured & locked?	No

- 12.1 Deficiency: A review of groundwater monitoring reports associated with the above review period indicate the following exceedances tabulated below.

Monitoring Group	Date	Monitoring Location	Description	Result	Limit	Units
MWC-3	12/31/2017	MWC-3	pH	6.41	6.5-8.5	s.u.
MWC-8R	12/31/2017	MWC-8R	pH	6.29	6.5-8.5	s.u.
MWC-8R	9/30/2017	MWC-8R	pH	6.37	6.5-8.5	s.u.
MWC-8R	9/30/2017	MWC-8R	Solids, Total Dissolved (TDS)	560	500.0	mg/L

Rule/Permit Reference: Permit Condition III.B.6 and Rule 62-520.600(11)(b)

Corrective Action: Following review of the provided DMRs for the above referenced periods, the facility has indicated that pH has only fallen below the 6.5 S.U. minimum

four times since 1997. As of December 2017, the facility did not believe the recorded drop to 6.41 S.U. to be a chronic problem but would continue to monitor for any developing trends. In addition, the facility's explanation for exceedances of pH and TDS in MWC-8R (provided in October and December 2017) indicated that pH had fallen just below the 6.5 S.U. on five occasions and 500 mg/L twice since 1997. The provided explanation stated that the facility did not believe the drop to 6.29 S.U. to be a chronic problem but would continue to monitor for any developing trends. To date, no additional exceedances of pH or TDS have been recorded in MWC-3 or MWC-8R. *The Department has determined that the Permittee has provided adequate explanations regarding the above detections, thus no further actions are required at this time.*

- 12.2 Observation: From the groundwater monitoring plan, the following groundwater wells were visibly inspected: MWC-1, MWC-3, MWC-8R.

13. ♦SSO Survey: Not Applicable

14. Other: Not Applicable



Florida Department of Environmental Protection

Inspection Photo Log



Permit No.: FLA012073-002-IW2N-NR
Facility/Site Name: CEMEX Brooksville South Cement Plant



Photo #: WIN_20201120_14_10_27_Pro
Date: Nov 20, 2020
Time: 02:10 PM
Captured by: Kaitlyn Newsome

Details:

Photo of vegetation overgrowth surrounding MW-8R.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA012073-002-IW2N-NR
Facility/Site Name: CEMEX Brooksville South Cement Plant



Photo #: WIN 20201120 14 26 07 Pro
Date: Nov 20, 2020
Time: 2:26 PM
Captured by: Kaitlyn Newsome

Details:

Photo of unlabeled MWC-1.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA012073-002-IW2N-NR
Facility/Site Name: CEMEX Brooksville South Cement Plant



Photo #: WIN_20201120_13_46_26_Pro
Date: Nov 20, 2020
Time: 1:46 PM
Captured by: Kaitlyn Newsome

Details:

Photo of ditch adjacent to A-Frame Building with sediment accumulation present.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA012073-002-IW2N-NR
Facility/Site Name: CEMEX Brooksville South Cement Plant

Photo #: MW Mowed - 01
Date: Nov 30, 2020
Time: 02:28_PM
Captured by: David Singer

Details:

Photo provided by Mr. David Singer via email on November 30, 2020 demonstrating MWC-8R mowed.



Florida Department of Environmental Protection Inspection Photo Log



Permit No.: FLA012073-002-IW2N-NR
Facility/Site Name: CEMEX Brooksville South Cement Plant

Photo #: MW Mowed-2
Date: Nov 30, 2020
Time: 02:29_PM
Captured by: David Singer

Details:

Photo provided by Mr. David Singer via email on November 30, 2020 demonstrating MWC-3 mowed.



Facility Name: CEMEX BROOKSVILLE SOUTH CEMENT PLANT		AIRS ID: 0530021
Facility Location: 10311 CEMENT PLANT ROAD, BROOKSVILLE, 34601		County: Hernando
Responsible Official		Facility Contact
Name: ZAHID PAZ	Name: ROBIN SIMONS	Name: David Singer
Title: PLANT MANAGER	Title: ENVIRONMENTAL MANAGER	Title: Environmental Specialist
Phone: (352)-799-7881	Phone: (352) 799-7881	Phone: (352) 585-3226
E-mail: zahidiran.rangel@cemex.com	E-mail: robing.simons@cemex.com	E-mail: davidt.singer@cemex.com
Present for Inspection: No	Present for Inspection: Yes	Present for Inspection: Yes

Facility Description and Applicable Regulations:
Please see Section I of Air Permit No. 0530021-085-AV for details concerning the facility description, summary of emission units and applicable regulations.
Have any changes been made at the facility (administrative and/or physical) since the last inspection? Yes
If yes, describe the change(s), if the change(s) required notification to the Department, and if the notification was timely received:
The facility recently updated their Primary Responsible Official (Title V) on file with the Department to Mr. Zahid Paz, effective 06/01/2020.

Discover Date	DEP Violation Type	Status	Resolving Activity
08/04/2020	OTHER VIOLATION OF PERMIT COND	Closed - 08/13/2020	CWOE-Compliance W/O Formal Enforcement Action
08/04/2020	NO REPORTING OR RECORD KEEPING	Closed - 08/13/2020	CWOE-Compliance W/O Formal Enforcement Action
01/12/2020	OTHER VIOLATION OF PERMIT COND	Closed - 05/18/2020	CWOE-Compliance W/O Formal Enforcement Action
05/16/2016	EMISSIONS EXCEEDANCE	Closed - 08/15/2016	CWOE-Compliance W/O Formal Enforcement Action
02/01/2016	EMISSIONS EXCEEDANCE, INCOMPLETE REPORTING	Closed - 03/31/2016	CWOE-Compliance W/O Formal Enforcement Action

Inspection Summary
On November 20, 2020, Department staff conducted compliance inspections in association with the facility's active Solid Waste (22787-006-SO/31; 22787-007-WT/MM) and Industrial Wastewater (FLA012073-002-IW2N/NR) permits. During the inspection, multiple areas of Line 1 and 2 including the L22 Tunnel (Line 1) and DB-100 area (Line 2) were observed to be emitting a copious amount of particulate matter resulting in excess opacity of 25-30%. Please see Section IV.On Site Compliance Review for additional

details following the Department's inspection.

Regulated Source(s) Evaluated

Type	Source Number	Description	Status	Initial Compliance Status
FAC		Facility Wide		MINOR NON COMPLIANCE
EU	8	Clinker Receiving/handling System (S-04)	ACTIVE	MINOR NON COMPLIANCE
EU	54	Finish Mill Bucket Elevator	ACTIVE	MINOR NON COMPLIANCE

Is control equipment maintained per rule and/or manufacturers recommendations? No

Observations of non-compliance with maintenance requirements:

At the time of inspection, the water suppression systems were observed to be removed from the Clinker Recovery System on Lines 1 and 2. In addition, the panels associated with the Hopper on Line 2 were observed to be caved in with the water suppression system removed and no alternative dust mitigation agent utilized. Per discussion with Ms. Simons, the facility continues to utilize the Line 2 Hopper for daily operations without a water suppression system or agent utilized.

Were any compliance/stack tests being conducted at the time of the inspection? No

Was the facility in compliance with facility-wide conditions?:

- Pollutant emissions limiting standards for Objectionable odors? Yes
- Reasonable precautions to prevent unconfined PM properly maintained and VE standards? No
- General pollutant emission limiting standards for VOC/Organic Solvents? Yes
- Conditions for unregulated/insignificant/exempt units and/or activities? Yes

Explain any pertinent observations with regard to these Facility Wide requirements:

Department staff observed unconfined PM emissions from the tail section of DB-100 on Line 2 while the unit was recovering clinker. Per discussion with Ms. Simons, this activity has been ongoing for approximately 4 months. No alternative dust mitigation systems or agents were observed being utilized at the time of inspection. Per Ms. Simons, a switch in the L22 tunnel is currently malfunctioning thereby not allowing for operators to adjust a specific feed rate resulting in excess PM generation. She estimated that this activity had been occurring for about a month. In addition, dust exceeding the 20% opacity limitation defined in Specific Condition FW4 of Permit No. 0530021-085-AV was observed on the access road east of Line 2.

IV. ON-SITE COMPLIANCE REVIEW

Inspection Narrative

FW4/FW5 - General Visible Emissions, Unconfined Particulate Matter
OBSERVATIONS: Out of Compliance. At the time of inspection, visible emissions in excess of 20% were noted to be discharging from the access road east of Line 2. Ms. Simons indicated that the facility is currently unable to apply water or chemicals to control dust emissions due to the steep slope and potential safety issues associated with traction for large equipment. Ms. Simons indicated that the facility was evaluating the potential to pave the road but had no specific timeframe established.

EU008, 042, Clinker Receiving/Handling System.

B.4., Water Spray System
OBSERVATIONS: Out of Compliance. EU008 receives clinker from front-end loaders and transfers the clinker using a belt conveyor to the deep-bucket clinker conveyor system. Per Specific Condition B.4, a water spray system shall be used as necessary to control fugitive dust emissions during clinker unloading operations from train cars or trucks to the receiving hopper. The permitted unit description states that fugitive particulate matter emissions generated from the transfer of clinker from the receiving hopper to the belt conveyor are controlled by the use of an atomized water or equivalent, dust suppression system. At the time of inspection, water suppression systems were observed to be removed from both Clinker Recovery Systems on Line 1 and 2. Ms. Simons confirmed that the facility continues to utilize both lines without an alternative dust suppression agent. She indicated that this activity has been occurring for 3-4 months on Line 1 and 3-4 weeks on Line 2.

EU 054, Finish Mill Bucket Elevator
OBSERVATIONS: Out of Compliance. At the time of inspection, the Finish Mill Bucket Elevator was observed to be dropping clinker due to a leak. Particulate matter emissions in excess of 25% were observed to be emanating from this area. Ms. Simons indicated that the bucket elevator has been leaking for ~6 months. The facility plans to replace the bucket elevator in Spring 2021. Per FW11, "Excess Emissions which are caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure which may reasonable be prevented during startup, shutdown or malfunction shall be prohibited".

ADDITIONAL OBSERVATIONS:
Out of Compliance. Department staff noted excess emissions from the L22 Tunnel near Line 1. Per discussion with facility representatives, a switch in the L22 tunnel is currently malfunctioning resulting in excess PM generation. Ms. Simons stated that this issue had been occurring for a month. In addition, dust generation was observed in excess of 25% opacity from the tail section of DB-100/running backside of the cooler on Line 2 while in operation recovering clinker. Per discussion with Ms. Simons, this issue has been occurring for approximately 4 months. Per FW4, "No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to greater than 20% opacity". In addition, FW11 of Permit No. 0530021-085-AV states that "Excess Emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited".

V. OFF-SITE RECORDS REVIEW

Were all monitoring/reporting requirements met? NA

VI. ITEMS OF CONCERN

Non Compliance Items:

- 1) Lack of Preventative Maintenance for PM Emissions associated with Access Road East of Line 2.
- 2) Water Suppression System Removal from Line 1 and 2;
- 3) Active Use of Line 2 Hopper without dust mitigation agent.
- 3) DB-100 Leak on Line 2
- 4) Finish Mill Bucket Elevator

5) Malfunctioning Switch on L22 Tunnel near Line 1

Please contact the Department within 15 days of receiving this inspection report to schedule a Warning Letter Meeting as requested in #WL20-193AS27SWD

VII. COMMENTS

No additional comments.

VIII. SIGNATURES

Lead Inspector:	Newsome, Kaitlyn	
Lead Inspector Signature:	Kaitlyn Newsome	<small>Digitally signed by Kaitlyn Newsome Date: 2020.12.02 15:47:33 -05'00'</small>
Supervisor or Reviewer:	Lynch, Michael	
Supervisor or Reviewer Signature:	Michael Lynch	<small>Digitally signed by Michael Lynch Date: 2020.12.03 07:10:13 -05'00'</small>

IX. SUPPORTING DOCUMENTS AND IMAGES









**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)
On-site Inspection Start Date: 11/20/2020
On-site Inspection End Date: 11/20/2020
WACS No.: 40778
Facility Street Address: NEAR CEMENT PLANT RD
City: BROOKSVILLE
County Name: HERNANDO
Zip: 34601

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Kaitlyn Newsome, Environmental Specialist II

Other Participants: Tyler Nevins, Environmental Specialist I; Robin Simons, Environmental Manager;
David Singer, Environmental Specialist;

INSPECTION TYPE:

Routine Operation Inspection for WPF - Waste Tire Processing Facility

Routine Operation Inspection for WPF - Material Recovery Facility - Class I/III

ATTACHMENTS TO THE INSPECTION CHECKLIST:

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

Note: Checklist items with shaded boxes are for informational purposes only.

1.0 - SECTION 1.0 - FILE REVIEW

4.0 - SECTION 4.0 - WASTE PROCESSING FACILITIES

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

Inspection Date: 11/20/2020

1.0 - SECTION 1.0 - FILE REVIEW

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	FILE REVIEW (Pre- or Post-Inspection, as appropriate.)	Ok	Not Ok	Unk	N/A
1.1	For landfills and C&D disposal facilities, does the facility have a current plan for the method and sequence of filling wastes? 62-701.500(2)(f) for landfills; 62-701.730(7)(a) for C&D debris sites				✓
1.2	For landfills, are the following records being reported to the Department?(Check any that are Not OK) <input type="checkbox"/> Waste reports (annually) 62-701.500(4) <input type="checkbox"/> Annual estimate of remaining life 62-701.500(13)(c)				✓
1.3	Is gas monitoring being performed as required by the permit? 62-701.500(9), 62-701.530(2)				✓
1.4	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)(c)				✓
1.5	Is water quality sampling and testing performed according to standard procedures and at the required frequencies? 62-701.510(2) for landfills; 62-701.730(8) and 62-701.730(10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.6	Do the results of the water quality testing suggest there may be adverse impacts to water quality from the operation of the solid waste facility? 62-701.510(3) and (4); 62-701.730(4)(c) and (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.7	For closed landfills and C&D disposal facilities with final elevations higher than 20 feet above grade, has a final survey report verifying the final elevations and contours of the facility been submitted to the Department? 62-701.600(6)(b), 62-701.730(9)(e)				✓
1.8	Is financial assurance adequate? 62-701.630 for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(a) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities. NOTE: The Solid Waste Financial Coordinator in Tallahassee can assist with this information.	✓			
1.9	Are cost estimates current and adjusted every year? 62-701.630(4) for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(b) and 62-713.600(6)(c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.	✓			
1.10	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by February 1st of each year? 62-701.730(12)				✓
1.11	For C&D recycling facilities with no disposal, is an Annual Report for the recycling facility submitted to the Department by February 1st of each year? 62-701.710(8)(b)				✓
1.12	For compost facilities, has the compost product been sampled and analyzed every 20,000 tons or every 3 months (whichever is sooner)? 62-709.530(1)				✓
1.13	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				✓

CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

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4.0 - SECTION 4.0 - WASTE PROCESSING FACILITIES

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
4.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)		✓		
4.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
4.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
4.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event.) 62-701.300(2)(d)	✓			
4.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
4.5	Unauthorized open burning of solid waste prohibited, except in accordance with Department requirements? 62-701.300(3)	✓			
4.6	Are the following unauthorized wastes or special wastes properly managed? (Check any that are Not OK) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Used oil and oily wastes, except as exempted 62-701.300(11) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Liquids 62-701.300(10)	✓			
Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
4.7	For areas not enclosed, is litter controlled and are litter control devices maintained? 62-701.710(3)(a)	✓			
4.8	Is leachate collection and removal system maintained and operated as required? 62-701.710(3)(b)	✓			
4.9	Are all drains and leachate conveyances kept clean so that leachate flow is not impeded? 62-701.710(4)(g)	✓			
4.10	Are the following records or plans current and available on-site? (Check any that are Not OK) <input type="checkbox"/> Operation Plan 62-701.710(2)(e) <input type="checkbox"/> Contingency Plan 62-701.710(2)(g) <input type="checkbox"/> Operation records 62-701.710(8)(a)	✓			
4.11	Is the Operation Plan substantially followed? 62-701.710(4)(a)		✓		
4.12	Are putrescible wastes stored no longer than 48 hours or as otherwise allowed in the Operation Plan? 62-701.710(4)(b)	✓			
4.13	Are the operating hours posted at the facility? 62-701.710(4)(c)1	✓			
4.14	Is a trained operator on duty whenever the facility is operating? 62-701.710(4)(c)1				✓
4.15	Is at least one trained spotter on duty at all times that waste is received at the facility to inspect the incoming waste, unless exempt under 62-701.710(1)(d)1? 62-701.710(4)(c)2				✓
4.16	Are unauthorized wastes removed from the waste stream and placed into appropriate	✓			

CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

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Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
	containers for disposal at a permitted facility? 62-701.710(4)(c)2				
4.17	Is the facility operated to control objectionable odors? 62-701.710(4)(d)	✓			
4.18	Is adequate fire protection equipment available and operational? 62-701.710(4)(e)	✓			
4.19	Is access to the facility controlled by fencing or other effective barriers to prevent disposal of unauthorized solid waste? 62-701.710(4)(f)	✓			
4.20	If the facility is a Transfer Station and is claiming the financial assurance exemption, does it manage the waste on a first-in, first-out basis and store waste for no greater than 7 days? 62-701.710(1)(d)1				✓
4.21	Are all additional specific conditions (not otherwise addressed above) in the permit, Department order, or certification, if any, being followed? 62-701.320(1), 403.161, F.S.	✓			
4.22	If the facility has reached its permitted capacity for storage of wastes or recyclable materials, has the permittee stopped accepting additional waste for processing? 62-701.710(4)(i)		✓		
Item No.	WASTE PROCESSING FACILITY CLOSURE	Ok	Not Ok	Unk	N/A
4.23	Has the solid waste or residue been properly disposed of within 30 days after receiving the final solid waste shipment? 62-701.710(6)(b)				✓
4.24	Has closure been completed within 180 days after receiving the final solid waste shipment? 62-701.710(6)(c)				✓

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9.0 - SECTION 9.0 - WASTE TIRE FACILITIES**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
9.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)		✓		
9.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
9.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
9.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event) 62-701.300(2)(d)	✓			
9.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
9.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
9.6	If the facility accepts tires from the public, is a sign posted at the facility entrance stating operating hours, cost of disposal and site rules? 62-711.540(1)(a)				✓
9.7	Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(1)(b)	✓			
9.8	If the facility accepts tires from the public, is an attendant always present on site when the site is open for business? 62-711.540(1)(c)				✓
9.9	Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d)	✓			
9.10	Is an annual fire safety survey conducted? 62-711.540(1)(d)		✓		
9.11	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)		✓		
9.12	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	✓			
9.13	Does the EPM contain the following information? (Check all that are Not OK) <input type="checkbox"/> Contact names and numbers 62-711.540(1)(e)1 <input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540(1)(e)2 <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e)3	✓			
9.14	Is the operator at the facility maintaining records of the quantity of waste tires received at the site, stored at the site, and shipped from the site? 62-711.540(1)(g) and 62-711.400(5)		✓		
9.15	If the operator of the site is not the owner of the property, has written authorization been obtained from the property owner to operate the facility? 62-711.540(1)(h)				✓
9.16	Is adequate communications equipment available at the site? 62-711.540(1)(i)	✓			
9.17	Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.540(1)(j)	✓			

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Inspection Date: 11/20/2020

Item No.	WASTE TIRE FACILITY - STORAGE INDOORS	Ok	Not Ok	Unk	N/A
9.18	Are waste tire piles more than 50 feet in width? 62-711.540(2)(a)				✓
9.19	Are waste tire piles along a wall more than 25 feet in width? 62-711.540(2)(a)				✓
9.20	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)				✓
9.21	Is there less than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711.540(2)(c)				✓
9.22	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(d)				✓
9.23	If waste tires are stored up to 15 feet high, do walls between adjacent warehouse areas and between manufacturing and warehouse areas have at least a four-hour fire rating? 62-711.540(2)(e)				✓
9.24	If waste tires are stored over 15 feet high, do walls between manufacturing and warehouse areas have a fire rating of not less than six hours and do steel columns have one-hour fireproofing? If the top of storage exceeds 20 feet in height, do columns and their connections with other structural members have two-hour fireproofing? 62-711.540(2)(f)				✓
9.25	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h)				✓
Item No.	WASTE TIRE FACILITY - STORAGE OUTDOORS	Ok	Not Ok	Unk	N/A
9.26	Is the waste tire site operated within 200 feet from a body of water? 62-711.540(3)(a)	✓			
9.27	Does the waste tire pile have a width less than 50 feet? 62-711.540(3)(b)	✓			
9.28	Does the waste tire pile have an area less than 10,000 sq. ft? 62-711.540(3)(b)	✓			
9.29	Does the waste tire pile have a height less than 15 feet? 62-711.540(3)(b)	✓			
9.30	Is there a 50 feet wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c)	✓			
9.31	Is there unobstructed access to the fire lane? 62-711.540(3)(c)	✓			
9.32	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)	✓			
9.33	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f)	✓			
9.34	Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e)	✓			
9.35	Are residuals contained on-site and disposed of in a permitted solid waste management facility or properly recycled? 62-711.540(5)		✓		
9.36	Does the waste tire site qualify for the exceptions to the technical and operational standards as allowed by rule? 62-711.540(6)				✓
Item No.	WASTE TIRE FACILITY - COLLECTION CENTER	Ok	Not Ok	Unk	N/A
9.37	Are no more than 1,500 tires at the collection center at any one time? 62-711.550(1)(a)				✓
9.38	Are all waste tires, which are not used tires, removed from site yearly for recycling, processing, or disposal? 62-711.550(1)(b)				✓

CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

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Current Violations:

Rule: 62-701.300(1)(a)
Question Number: 4.1.1
Explanation: Please see Item 4.11.
Corrective Action: Please see Item 4.11.

Rule: 62-701.710(4)(i)
Question Number: 4.22
Explanation: Please see Item 4.11.
Corrective Action: Please see Item 4.11.

Rule: 62-711.540(1)(d)
Question Number: 9.10
Explanation: 1) Following the Solid Waste Compliance Inspection conducted on 11/20/2019, the Department requested for the facility to obtain a follow up inspection to address violations noted in the 05/16/2019 fire inspection report. At the time of inspection, Ms. Simons was unable to provide an in-compliance inspection report to demonstrate that the violations noted in the May 2019 report were resolved. In addition, the facility was unable to provide a copy of the 2020 fire inspection report completed by Hernando County Fire Department following a recent virtual inspection. Per discussion with Ms. Simons, the facility continues to attempt to make contact with the Fire Department to obtain each report.

2) On 11/25/2020, Mr. Singer provided the most recent Fire Hydrant Inspection Report conducted by Cintas Fire Protection on 08/27/2020. Following review of this inspection report, Department staff noted that Hydrant 14, Finish Mill 1 was reported as too stiff to operate and/or open fully. The inspection report recommends disassembly, cleaning, replacement of gaskets and the re-grease and re-assembly of the hydrant prior to re-testing. As of current, no documentation has been provided to the Department demonstrating that this remedial activity has occurred.

Corrective Action: 1) Please contact Hernando County Fire Department. Please submit these reports to the Department within 30 days of receiving this inspection report.

2) Please perform the recommended maintenance of Hydrant 14, Finish Mill 1 as noted in the 08/27/20 Fire Hydrant Inspection Report. Please provide the Department with documentation demonstrating that the fire hydrant underwent maintenance and testing within 30 days of receiving this inspection report.

Pre-existing Violations:

Rule: 62-701.710(4)(a)
Question Number: 4.11
Explanation: Per Specific Condition 11 of Permit No. 22787-006-SO/31 and Page 18 of the approved Operations Plan (last updated 11/27/2018), AFM should not be stored within 6 feet of the edge of the Additive Storage Building. At the time of inspection, tire fluff was observed to be located approximately 1 foot inside of the Additive Storage Building.

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Corrective Action: 1) On November 30, 2020, Mr. Singer provided photo documentation demonstrating that the tire fluff was relocated 6 feet within the edge of the Additive Storage Building.

2) Please contact the Department within 15 days of receiving this inspection report to schedule a Warning Letter Meeting as requested in #WL20-193AS27SWD.

Attachments:

Edge of ASB Building



Tire Fluff Bay



Tire Fluff Bay - Post Inspection



Tire Fluff Bay - Post Inspection

**Current Areas of Concern:**

Rule: 62-701.300(1)(a)

Question Number: 9.1.1

Explanation: Please see Item 9.35.

Corrective Action: Please see Item 9.35.

Rule: 62-711.540(1)(d)

Question Number: 9.11

Explanation: Please see Item 9.10.

Corrective Action: Please see Item 9.10.

CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

Inspection Date: 11/20/2020

Rule: 62-711.400(5), 62-711.540(1)(g)

Question Number: 9.14

Explanation: At the time of inspection, the facility was unable to provide documentation associated with the quantity of waste tire shipped from the site. Per discussion with Ms. Simons, the recent disposal of waste tires was managed by Corporate. As of the issuance of the inspection report, the Department has not received proof of receipts and/or documentation demonstrating the proper disposal or transfer of waste tires to a permitted waste tire processing facility and/or permitted solid waste management facility.

Corrective Action: Please provide tire disposal documentation and supporting receipts to the Department demonstrating proper waste tire disposal within 30 days of receiving this inspection report.

Rule: 62-711.540(5)

Question Number: 9.35

Explanation: Department staff noted a pile of waste tires and processed residuals located in the fuel yard outside of the authorized waste tire storage areas (last updated on 12/06/2018). Per email correspondence with Mr. Singer (dated 11/25/2020), these waste tires were scheduled to be transferred to an empty tire storage trailer during the week of 12/30/2020 prior to removal from the site.

Corrective Action: Once transferred to a tire storage trailer, please provide the Department with photo documentation of the waste tires/residuals moved from fuel yard into storage trailers. If removed from the property, please provide the Department with receipts/disposal records demonstrating proper disposal to another waste tire processing facility and/or a permitted solid waste management facility.

COMMENTS:

Item 4.10: At the time of inspection, Ms. Simons provided the current Operation Plans for both the Alt Fuel/MRF and WTPF (revised September 2017). The provided Alt Fuel/MRF Operation Plan indicated the most recent revision occurred in August 2018. Based on a review of Solid Waste Permit No. 22787-006-SO/31, the current approved Operation Plan was last revised on 11/27/2018. Please ensure that the facility maintains the latest version of the Operation Plan on-site.

Item 4.21/9.14: During the inspection, Department staff reviewed Bill of Lading Records for shipments of AFM received during May 2020 and November 2020. The physical waste tire inventory was reviewed and indicated zero tons located on-site. Alt Fuel Material Storage records were reviewed for May, October and November 2020. As of 05/31/2020, the Alt Fuel Material Storage records indicated an ending inventory of 43.35 tons of tire cubes and 41 tons of tire fluff. Ms. Simons indicated that the facility does not normally receive off-spec alt-fuel material. In addition, Ms. Simons stated that the facility has not received a load of waste tires since September 2019. Incoming Fuel Cube and Tire Fluff documentation was reviewed for 01/01/2020-11/18/2020 (fuel cubes; 19,310 tons) and 01/01/2020-11/05/2020 (tire fluff; 3589 tons).

ATTACHMENTS:

CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

Inspection Date: 11/20/2020

ASB Building



Tire Trailer Storage Area



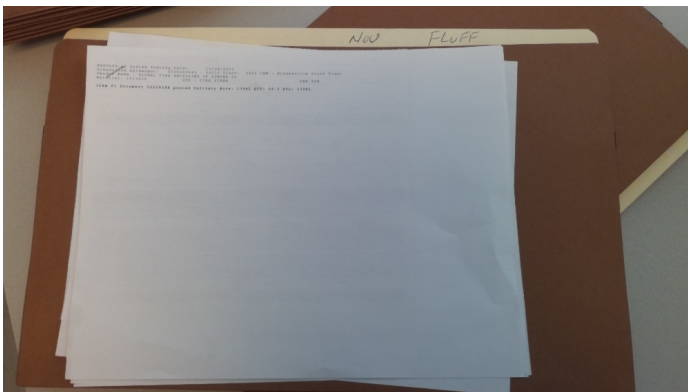
Plant Overview



A-Frame Building



Bill of Lading Records - Nov 2020



Waste Tire Storage Area - Kiln 1



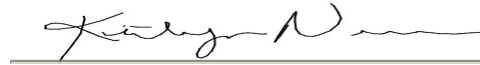
CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

Inspection Date: 11/20/2020

Signed:

Kaitlyn Newsome

Environmental Specialist II

PRINCIPAL INSPECTOR NAME**PRINCIPAL INSPECTOR TITLE**

DEP

12/04/2020

PRINCIPAL INSPECTOR SIGNATURE**ORGANIZATION****DATE**

Tyler Nevins

Environmental Specialist I

INSPECTOR NAME**INSPECTOR TITLE**

NO SIGNATURE REQUIRED

DEP

INSPECTOR SIGNATURE**ORGANIZATION**

Robin Simons

Environmental Manager

REPRESENTATIVE NAME**REPRESENTATIVE TITLE**

NO SIGNATURE REQUIRED

CEMEX

REPRESENTATIVE SIGNATURE**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

David Singer

Environmental Specialist

REPRESENTATIVE NAME**REPRESENTATIVE TITLE**

NO SIGNATURE REQUIRED

CEMEX

REPRESENTATIVE SIGNATURE**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Report Approvers:**Approver:** Steve Tafuni**Inspection Approval Date:** 12/07/2020