KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 ▪ FAX/377-7158

COPY

263-12-16
December 13, 2012

Ms. Aprilia Graves
Used Oil Permit Coordinator
MS4560
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Renewal of Used Oil Permit for CEMEX Miami Cement Plant
CEMEX Construction Materials Florida, LLC
Miami, Miami-Dade County, Florida
I.D. Number FLD 981 758 485
Permit No. 56307-HO-003

Dear Ms. Graves:

On behalf of CEMEX Construction Materials Florida, LLC (CEMEX), Koogler and Associates, Inc. is submitting this permit application package for the renewal of the Miami Cement Plant Used Oil Processing Facility Permit No. 56307-HO-003.

Attached is one original and one copy each of the Application Form 62-710.901(6), attachments, associated supporting information, and a check for $2,000 for the application fee.

If you require additional information, please contact me at 352-377-5822 or treed@kooglerassociates.com.

Best regards,

Tammy L. Reed
Environmental Scientist

/tlr

cc: Charles Walz – CEMEX

Enclosures

CEMEX Materials LLC
1501 Belvedere Road
West Palm Beach, FL 33406

DATE: November 7, 2012
TRACE NUMBER: 2002471103
CHECK NUMBER: 22492345
AMOUNT PAID: $2,000.00

PAYMENT INQUIRIES: (561) 651-7177

00003 CKS 6A 12311 - 0022492345 NNNNNNNNNNN 3115100005011 X338A1 C
FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION
AR DEPT
PO BOX 15425
WEST PALM BEACH FL 33416-5425

3115100004041000501

VENDOR NO: 0000705863

DATE	VENDOR INVOICE NUMBER	PURCHASE ORDER NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
10/31/12	56307-HO-003	4504617735 PERMIT RENEWAL FEE -PERMIT 56307-HO-003	$2,000.00	$0.00	$2,000.00
		TOTALS	**$2,000.00**	**$0.00**	**$2,000.00**

PLEASE DETACH BEFORE DEPOSITING CHECK

CEMEX

CEMEX Materials LLC
1501 Belvedere Road
West Palm Beach, FL 33406

CHECK NUMBER 22492345

70-2322
719

November 7, 2012

*** VOID AFTER 180 DAYS ***

PAY TO THE ORDER OF: **FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

CHECK AMOUNT
$2,000.00

EXACTLY *********2,000 DOLLARS AND 00 CENTS

JPMorgan Chase Bank, N.A.
Chicago, IL

SECURITY FEATURES INCLUDED: SEE DETAILS ON BACK

Robert Caparo

⑈22492345⑈ ⑆071923226⑆ 0972584⑈

APPLICATION FOR USED OIL PROCESSING FACILITY PERMIT

CEMEX Construction Materials Florida, LLC

CEMEX Miami Cement Plant

Miami, Miami-Dade County, Florida

Application Date: December 7, 2012

Consultant:

Maxwell R. Lee, Ph.D., P.E.
Tammy L. Reed
Koogler and Associates, Inc.

KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 ▪ FAX/377-7158

263-12-16

APPLICATION FOR USED OIL PROCESSING FACILITY PERMIT

CEMEX Construction Materials Florida, LLC

CEMEX Miami Cement Plant

Miami, Miami-Dade County, Florida

Application Date: December 7, 2012

Consultant:

Maxwell R. Lee, Ph.D., P.E.
Tammy L. Reed
Koogler and Associates, Inc.
4014 NW 13th Street
Gainesville, FL 32609-1923
(352) 377-5822

263-12-16

Table of Contents

APPLICATION

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

TO BE COMPLETED BY ALL APPLICANTS (*Please type or print*)

A. General Information

1. New____ Renewal X Modification ____ **Date old permit expires** Feb. 12, 2013

2. Revision number ____

3. NOTE: Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:
   - X generators (Subpart C)
   - ____ transporters (Subpart E)
   - X burners of off-spec used oil (Subpart G)
   - ____ marketers (Subpart H)

   or
   - X are disposing of used oil (Subpart I)

4. Date current operation began: Application received by FDEP 6/19/97

5. Facility name: CEMEX Miami Cement Plant

6. EPA identification number: FLD 981 758 485

7. Facility location or street address: 1200 NW 137 Avenue, Miami, FL 33182

8. Facility mailing address:
   1200 NW 137 Avenue — Miami — FL — 33182
   Street or P.O. Box — City — State — Zip Code

9. Contact person: Charles Walz Telephone: (305)229-2950
   Title: Environmental Manager
   Mailing Address:
   1200 NW 137 Avenue — Miami — FL — 33182
   Street or P.O. Box — City — State — Zip Code

10. Operator's name: CEMEX Construction Materials FL, LLC Telephone: (305)229-2950
    Mailing Address:
    1200 NW 137 Avenue — Miami — FL — 33182
    Street or P.O. Box — City — State — Zip Code

11 Facility owner's name: CEMEX Construction Materials FL, LLC Telephone: (___)305-229-2950
    Mailing Address:
    1200 NW 137 Avenue — Miami — FL — 33182
    Street or P.O. Box — City — State — Zip Code

12 Legal structure:
   - X corporation (indicate state of incorporation) Florida
   - ____ individual (list name and address of each owner in spaces provided below)
   - ____ partnership (list name and address of each owner in spaces provided below)
   - ____ other, e.g. government (please specify) ____

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County N/A State _____

Name: N/A
Mailing Address:

Street or P.O. Box City State Zip Code

Name: N/A
Mailing Address:

Street or P.O. Box City State Zip Code

Name: N/A
Mailing Address:

Street or P.O. Box City State Zip Code

Name: N/A
Mailing Address:

Street or P.O. Box City State Zip Code

13 Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased ____ years
☐ presently leased; the expiration date of the lease is: _____

If leased, indicate:
Land owner's name: N/A
Mailing Address:

Street or P.O. Box City State Zip Code

14 Name of professional engineer Maxwell R. Lee, Ph.D. Registration No. 58091
Mailing Address:
4014 NW 13th Street; Gainesville FL 32609
Street or P.O. Box City State Zip Code
Associated with: Koogler and Associates, Inc.

B. SITE INFORMATION

1. Facility location:
   County: Miami-Dade
   Nearest community: Miami
   Latitude: 25/47/17 Longitude: 80/25/26
   Section: 34 Township: 53S Range: 39E
   UTM # 17 /557800 /2852200 /

2. Facility size (area in acres): 353.471

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) SQG

2. List applicable EPA hazardous waste codes:
   D001

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

   A brief description of the facility operation is labeled as Attachment 2

4. Attach a detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4).

   The facility's detailed process description is labeled as Attachment 3

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):
   a. An analysis plan which must include:
      (i) a sampling plan, including methods and frequency of sampling and analyses;
      (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
      (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

   The analysis plan is labeled as Attachment 4

   b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

   Sludge, residue and byproduct management description is labeled as Attachment 4

   c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

   The tracking plan is included as Attachment 4

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. (See item 6, page 5).

   The preparedness and prevention plan is labeled as Attachment 5

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifiying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment 5

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment 6

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment 8

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. (See item 10, page 7).

A description of employee training is labeled as Attachment 7

DEP Form#	62-710.901(6)(a)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: CEMEX Miami Cement Plant EPA ID# FLD 981 758 485

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

Luis G. Lopez

Luis G. Lopez, Plant Manager

Name and Title (Please type or print)

Date: 12/05/12 Telephone: (305) 229-2950

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(b)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: CEMEX Miami Cement Plant EPA ID# FLD 981 758 485

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C. and all rules and regulations of the Department of Environmental Protection.

Luis G. Lopez

Signature of the Facility Owner or Authorized Representative*

Luis G. Lopez, Plant Manager

Name and Title (Please type or print)

Date: 12/05/12 Telephone: (305) 229-2950

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(c)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: CEMEX Miami Cement Plant EPA ID# FLD 981 758 485

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described.

Luis G. Lopez

Signature of the Land Owner or Authorized Representative*

Luis G. Lopez, Plant Manager

Name and Title (Please type or print)

Date: 12/05/12 Telephone: (305) 229-2950

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: FLD 981 758 485
2. Tank Numbers: See Table 1 - Attached

3. Facility Name: CEMEX Miami Cement Plant

4. Facility Address: 1200 NW 137th Avenue; Miami, FL 33182

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature

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

Florida Registration Number: 58091

Mailing Address: 4014 NW 13th Street
Street or P. O. Box

Gainesville FL 32609
City State Zip

Date: 12/13/2012 Telephone ( ) 352-377-5822

[PLEASE AFFIX SEAL]

Table 1. CEMEX Miami Cement Plant
Raw Materials and Fuel Storage

Area Name [a]	Tank ID No. [b]	Legend ID [a]	Size/Capacity	Type of Material Stored	Status	Year Installed
Drainage Area "A"	--	12	2,000 Gallon Tank	Oily Water	Inactive	1987
Drainage Area "A" - BA	5	15	633,000 Gallon Tank	Waste Oils	Active	1958
Drainage Area "A" - C	6	15	633,000 Gallon Tank	Waste Oils	Active	1958
Drainage Area "A" - D1	9	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - D2	10	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - D3	11	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - D4	12	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - E1	13	14	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - E2	15	14	20,000 Gallon Tank	Diesel Fuel	Inactive	2005
Drainage Area "A"- Railcar Unloading	--	16	Storage Area	Fuel Oil	Active	--
Drainage Area "B"-Emergency Generator	--	1	500 Gallon Tank	Diesel Fuel	Active	2000
Drainage Area "B"-Kiln Day Tank - F	4	2	30,000 Gallon Tank	Fuel Oil	Inactive	1958
Fuel Oil Tank	14		30,000 Gallon Tank	Fuel Oil	Active	1990
Drainage Area "D"-Pressure Cleaning Facility	--	3	1,000 Gallon Tank	Waste Oils	Active	1984
Drainage Area "D"-Emergency Generator	--	4	110 Gallon Tank	Diesel Fuel	Active	
Drainage Area "D"-Fueling Station	1	5	20,000 Gallon Tank	Diesel Fuel	Active	1958
Drainage Area "D"-Oil & Lubricant Storage	--	6	60' x 8" Storage Area	Oil and Lubricant	Active	--
Drainage Area "D"-Emergency Generator	7	7	560 Gallon Tank	Diesel Fuel	Active	1958
Drainage Area "D"-Oil & Lubricant Receiving & Stg.	--	8	20' x 40' Storage Area	Oil and Lubricant	Active	--

[a] Refer to Facility Diagram (Attachment 1, Figure 2).

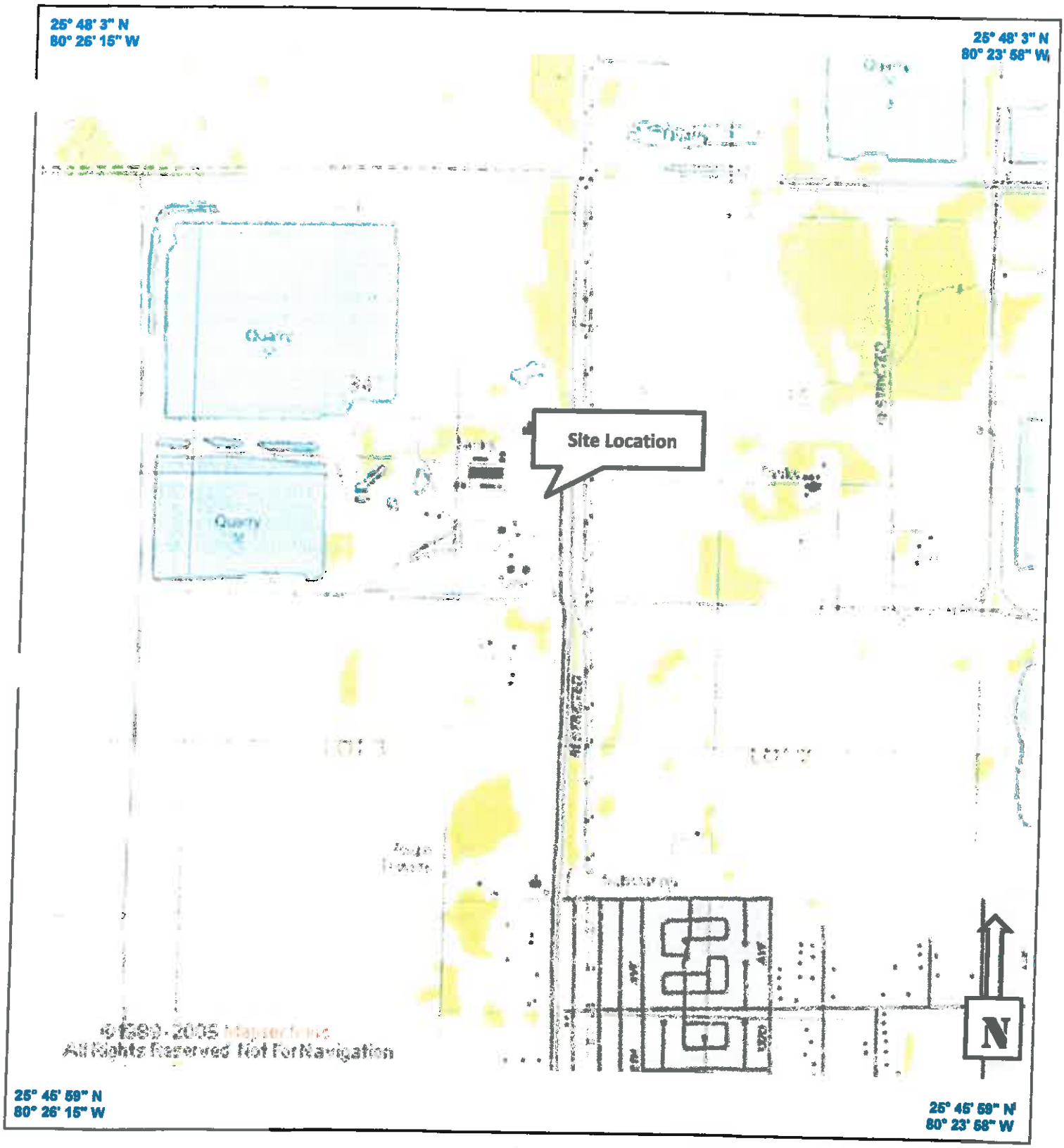
[b] Tank ID from the FDEP tank registrations. Some tanks are not required to be registered and therefore, do not have a tank ID.

ATTACHMENT 1

FIGURE 1 - USGS TOPOGRAPHIC MAP

FIGURE 2 – SITE PLAN

FIGURE 3 - FEMA FLOOD ZONE MAP



Scale 1:24,000
Drawing No. 263-12-16

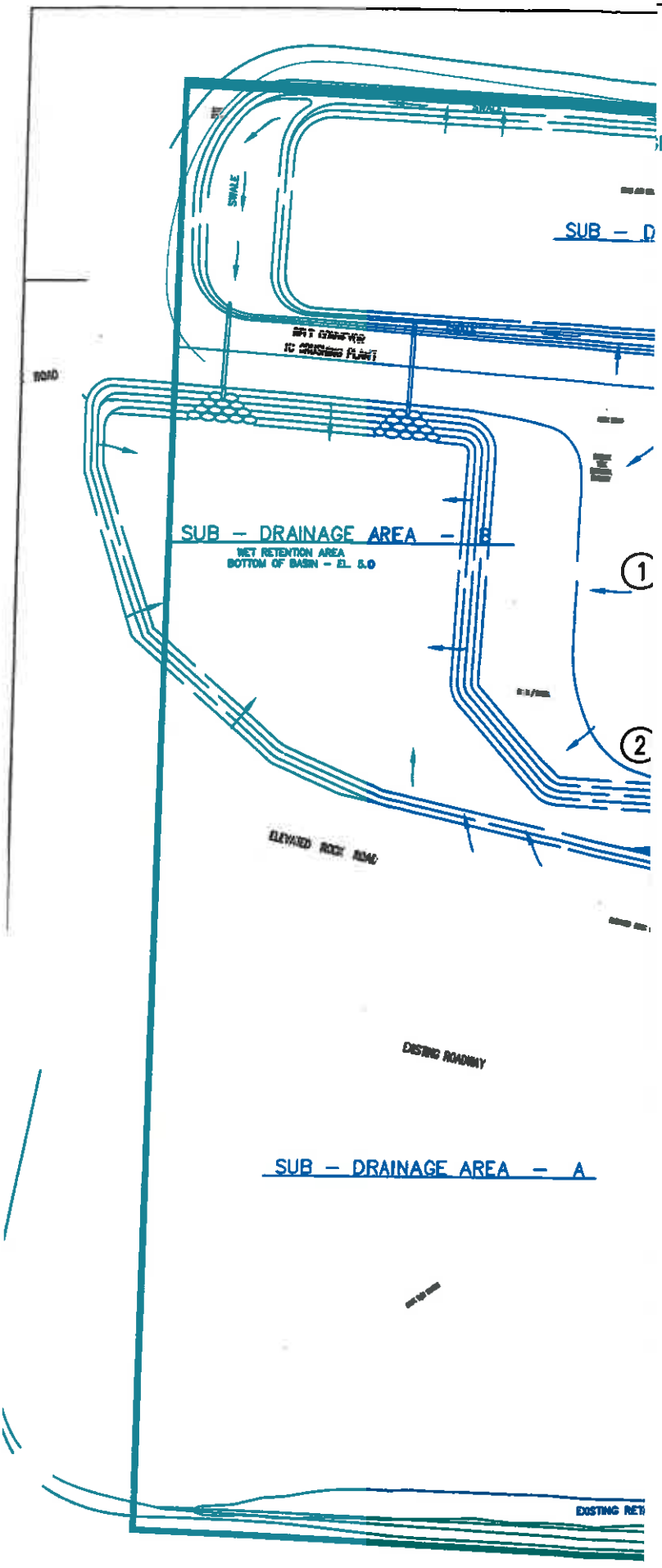
Professional Engineer Certification

12/12/12

Maxwell R. Lee, Ph.D., P.E. Date
P.E. No. 58091

Attachment 1 - Figure 1
USGS Topographic Map
Miami Cement Plant
Miami-Dade County, Florida
CEMEX Construction Materials Florida, LLC
Used Oil Permit Renewal

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES



0 100 200

SCALE: 1" ~ 237.2'

N

LEGEND

OIL STORAGE LOCATIONS/ VOLUME, TYPE

1	EMERGENCY GENERATOR/500–GAL, DIESEL
2	KILN DAY TANK/30,000–GAL, FUEL OIL
3	PRESSURE CLEANING FACILITY/1,000–GAL, WASTE OIL
4	EMERGENCY GENERATOR/110–GAL, DIESEL
5	FUELING STATION/20,000–GAL, DIESEL
6	OIL & LUBRICANT STORAGE
7	EMERENGENCY GENERATOR/560–GAL DIESEL
8	OIL & LUBRICANT RECEIVING & STORAGE
12	2,000 GAL, INACTIVE
13	OILY WATER, 25,000–GAL (4), INACTIVE
14	OILY WATER, 25,000–GAL (2), INACTIVE
15	BULK STORAGE – 633,000 GAL (2), FUEL OIL
16	RAILCAR UNLOADING, FUEL OIL

(#) OIL STORAGE LOCATION

OIL STORAGE CONTAINMENT AREA

PROPERTY LINE

FLOW

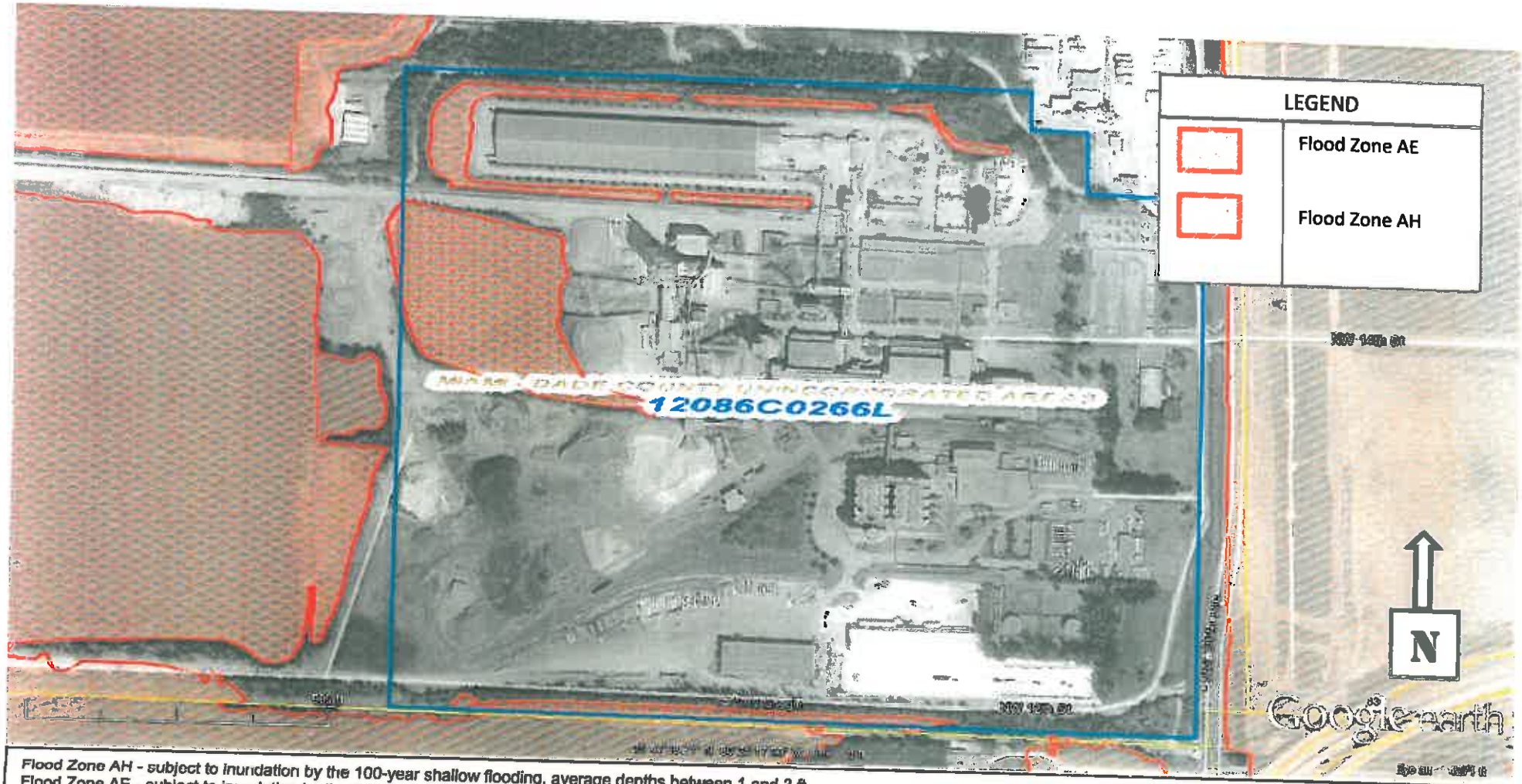
FUEL OIL PIPE LINE

CEMEX Construction Materials Florida, LLC
Miami Cement Plant
Miami–Dade County, Florida, U.S.A.

Attachment 1, Figure 2 - Facility Diagram

DRAWN BY Koogler & Associates - SCC
DATE REV -11/19/2012 - KU
FILENAME 263-12-16

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW 13TH STREET
GAINESVILLE, FLORIDA 32609
(352) 377-5822
FAX (352) 377-7153
TREED@KOOGLERASSOCIATES.COM



Flood Zone AH - subject to inundation by the 100-year shallow flooding, average depths between 1 and 3 ft.
Flood Zone AE - subject to inundation by the 100-year flood

Professional Engineer Certification Maxwell R. Lee, Ph.D., P.E. Date P.E. No. 58091	*Not to Scale* *Aerial from Google earth* *Image date 03/26/2011* *Drawing No. 263-12-16*	**Attachment 1 - Figure 3** **FEMA Flood Zone Map** **Miami Cement Plant** **Miami Dade County, Florida** **CEMEX Construction Materials Florida, LLC** **Used Oil Permit Renewal**	KOOGLER & ASSOCIATES ENVIRONMENTAL SERVICES

ATTACHMENT 2

FACILITY OPERATION DESCRIPTION

ATTACHMENT 2: FACILITY OPERATION

General Description of the Facility and Operation

The cement manufacturing facility current known as the CEMEX Miami Cement Plant (Facility) was built by the Lehigh Corporation and placed into operation on July 1, 1958. In 1976, Rinker Materials Corporation purchased the facility from Lehigh to augment Rinker's rapidly expanding construction materials business. Rinker was established following the demerger of CSR Limited in March 2003. In 2007, Rinker Materials was acquired by CEMEX, which is now CEMEX Construction Materials Florida, LLC. The cement production and materials substitution activities are situated on approximately 300 acres. Another contiguous 3,000 acres are designed for limestone quarrying and environment buffers.

The Facility is a mining, manufacturing, storage and distribution complex. The facility is designed to transform various raw materials into Portland Cement. The principal raw material is limestone which is mined on-site. This and other raw materials proceed through diversified phases such as crushing, screening, grinding, slurring mixing, kiln firing, finish grinding, packing and shipment. The fuel sources include, but are not limited to, coal, pet coke, tires, waste oil, and alternative fuel materials. Thus, large quantities of petroleum products are received, stored, transferred, and consumed in the process functions.

The facility is permitted to operate 24 hours a day, seven days a week. Since the facility is manned, operated, and monitored perpetually, there is increased probability of detection in the eventuality of an oil spill. The probability of a severely detrimental oil spill is lessened by the nature of the industrial facility and its operation.

The Nature of the Business and Activities Conducted

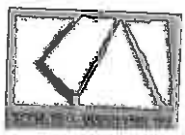
The nature of the business is the production of construction material, specifically, cement and crushed stone. Production activities include:

- Cement production (7 basic operations)
  (1) limestone quarry
  (2) rock crushing
  (3) material receiving and storage (rail and truck)
  (4) raw material and clinker storage
  (5) raw mill/kiln/clinker cooler system
  (6) finish mill
  (7) cement packhouses, storage silos, and loadout
- Crushed stone production
- Thermal treatment of petroleum-contaminated soil and non-hazardous coal tar contaminated soil
- Processing of used oil - oil filters, and waste tires as fuel for the cement kilns and soil thermal treatment facility

Number and Type of Employees

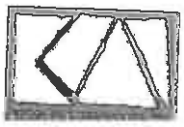
The number of employees is approximately 130 and include:

- General laborers
- Equipment operators
- Supervisors
- Managers



ATTACHMENT 3

DETAILED PROCESS DESCRIPTION



ATTACHMENT 3: DETAILED PROCESS DESCRIPTION

Used Oil Process Description

The facility accepts used oil for processing in its cement kilns. Used oil is used as fuel for the kilns and for the soil thermal treatment facility.

Materials are analyzed by the generator for the following parameters:

Used Oil:
- Total Btu's
- Total Halogens
  - PCB scan if halogens present
  - EPA Method 601 if total halogens > 1,000 ppm
- Metals—arsenic, cadmium, chromium, lead, and mercury

The facility reviews the data on each material as to its acceptability. Upon approval, the material is assigned a control number. Once the materials are approved for receipt, notification is given to the generator/transporter and delivery is scheduled.

Each transport vehicle is escorted to the assigned storage area, off-loaded, and returned to the scalehouse. Samples of the material are obtained, and the material is segregated until Quality Control confirms that the material is as previously approved. Quality Control performs the following analyses:

Used Oil:
- Btu's
- % Water
- Dexsil Kit PCB's
- Total Halogens
- Total Metals—arsenic, cadmium, chromium, and lead

After Quality Control confirms the acceptability of the materials, the materials are processed as described above. Used oil is off-loaded via the pump house located at the major tank farm, and is directed either straight to oil storage or to separation tanks. Upon the accumulation of sufficient volume, used oil is transferred to the fuel feed day tank for combustion in the kilns.

40 CFR 279 Subpart G Compliance

Subpart G (40 CFR 279.60 – 40 CFR 279.69) is applicable because the facility is permitted to burn off-specification used oil, per 40 CFR 279.11, in their cement kiln.

40 CFR 279.60 *Applicability:*

Facility is defined as a "used oil burner"

40 CFR 279.61 *Restrictions on Burning:*

Cement kilns are defined as "industrial furnaces" per 40 CFR 260.10

40 CFR 279.62 *Notification:*

CEMEX has an EPA identification number

40 CFR 279.63 *Rebuttable Presumption for Used Oil*

Compliance is achieved by testing the used oil

40 CFR 279.64 *Used Oil Storage*

Compliance is demonstrated by compliance with Rule 62-762, F.A.C.

40 CFR 279.65 *Tracking*

Compliance is achieved by the Facility Operation Plan (Attachment 4)

40 CFR 279.66 *Notices*

All appropriate notices are performed

40 CFR 279.67 *Management of Residues*

Not applicable—no residues are generated specifically from the storage or burning of used oil

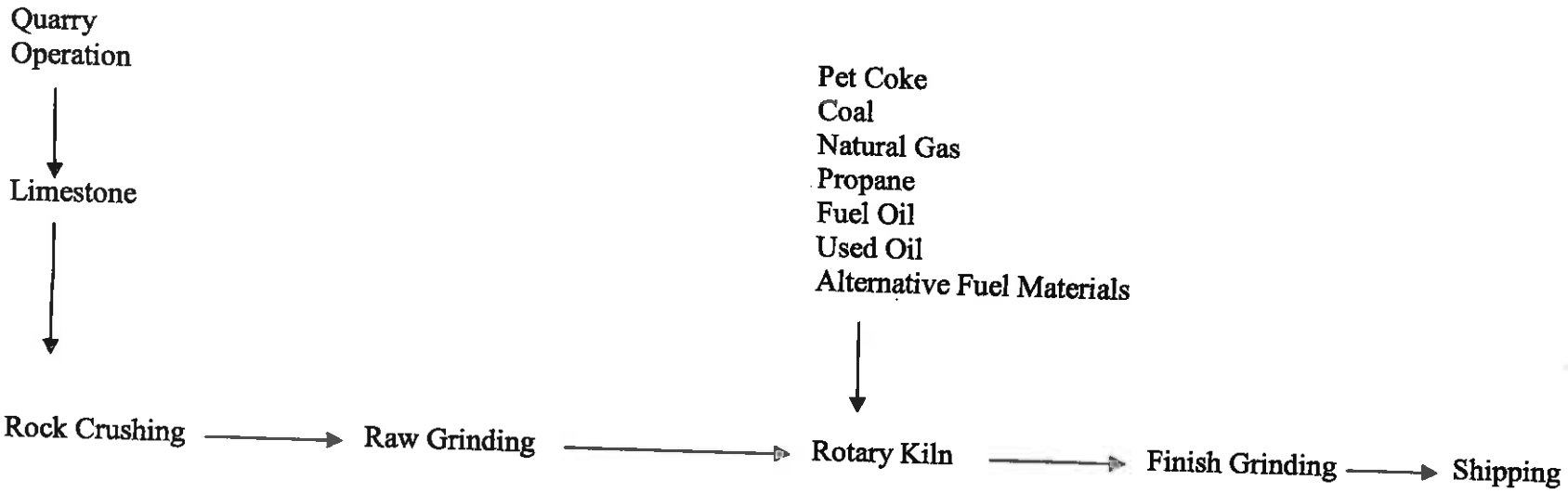
Cement Manufacturing Process

The process that is used at the facility to manufacture cement is called a "dry process". The primary raw material - limestone, is mined in the Miami (SCL) quarry. The limestone is processed through series of crushing, screening/sizing, and transfer operations. Next the kiln feed is prepared in the Raw Material Handling System and is fed to the Preheater/Kiln (maximum dry preheater feed rate of 267 tons per hour (TPH)). The kiln transforms the raw mix into clinker by a series of processes at extremely high temperatures: evaporation, dehydration, calcinations, and reaction. The raw mix enters the kiln at the elevated end, and combustion fuels are introduced into the lower end of the kiln.

The fuels used to fire the kilns are coal, petroleum coke, natural gas, propane, No. 2 fuel oil, residual oil, on- and off-spec used oil, and a variety of alternative fuel materials. These fuels can be used alone or in combinations with the other fuel sources. Waste oil has been utilized as fuel since 1974. Coal has been used since 1979. Alternative fuels have been used since 2012.

The resulting clinker (approx. 162 TPH) is cooled and ground in the Finish Mills with gypsum and other admixtures to produce the product known as Portland Cement. A raw material process flow diagram is presented on the next page.

RAW MATERIAL FLOW DIAGRAM



Tank Inventory

A list of the size and location of tanks is provided in Table 1 on the following page. The tank numbers correspond to the Florida Department of Environmental Protection Tank numbers for those tanks that are required to be registered. The legend number corresponds to the locations depicted on Figure 2 in Attachment 1.

Table 1. CEMEX Miami Cement Plant
Raw Materials and Fuel Storage

Area Name [a]	Tank ID No. [b]	Legend ID [a]	Size/Capacity	Type of Material Stored	Status	Year Installed
Drainage Area "A"	--	12	2,000 Gallon Tank	Oily Water	Inactive	1987
Drainage Area "A" - BA	5	15	633,000 Gallon Tank	Waste Oils	Active	1958
Drainage Area "A" - C	6	15	633,000 Gallon Tank	Waste Oils	Active	1958
Drainage Area "A" - D1	9	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - D2	10	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - D3	11	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - D4	12	13	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - E1	13	14	25,000 Gallon Tank	Oily Water	Inactive	1990
Drainage Area "A" - E2	15	14	20,000 Gallon Tank	Diesel Fuel	Inactive	2005
Drainage Area "A"- Railcar Unloading	--	16	Storage Area	Fuel Oil	Active	--
Drainage Area "B"-Emergency Generator	--	1	500 Gallon Tank	Diesel Fuel	Active	2000
Drainage Area "B"-Kiln Day Tank - F	4	2	30,000 Gallon Tank	Fuel Oil	Inactive	1958
Fuel Oil Tank	14		30,000 Gallon Tank	Fuel Oil	Active	1990
Drainage Area "D"-Pressure Cleaning Facility	--	3	1,000 Gallon Tank	Waste Oils	Active	1984
Drainage Area "D"-Emergency Generator	--	4	110 Gallon Tank	Diesel Fuel	Active	
Drainage Area "D"-Fueling Station	1	5	20,000 Gallon Tank	Diesel Fuel	Active	1958
Drainage Area "D"-Oil & Lubricant Storage	--	6	60' x 8" Storage Area	Oil and Lubricant	Active	--
Drainage Area "D"-Emergency Generator	7	7	560 Gallon Tank	Diesel Fuel	Active	1958
Drainage Area "D"-Oil & Lubricant Receiving & Stg.	--	8	20' x 40' Storage Area	Oil and Lubricant	Active	--

[a] Refer to Facility Diagram (Attachment 1, Figure 2).

[b] Tank ID from the FDEP tank registrations. Some tanks are not required to be registered and therefore, do not have a tank ID.

ATTACHMENT 4

FACILITY OPERATION PLAN

Includes Used Oil Analysis and Tracking Plan

ATTACHMENT 4: DETAILED PROCESS DESCRIPTION

This section addresses the facility's operating plan which includes the following information:

a) An analysis plan which must include at a minimum (40 CFR, Parts 279.53 and 279.55):

(i) Sampling plan, including methods and frequency of sampling and analyses;
Refer to attached Used Oil Analysis Plan

(ii) Fingerprint analysis on incoming shipments, as appropriate; and
Refer to attached Used Oil Analysis Plan

(iii) Representative analyses on outgoing shipments (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.
Not applicable—no outgoing shipments

b) A description of the management of sludges, residues and byproducts. This should include the characterization analysis as well as the frequency of the removal of the sludge. (40 CFR, Parts 279.10(e) and 279.59)
Not applicable—all materials are utilized in cement-making process

c) An explanation or copies of the forms used for the purposes of tracking and recording shipments of used oil into and out of the facility. Note: These records must be retained for at least three years and must include (40 CFR, Part 279.56):

(i) For incoming shipments: the name, address and EPA ID number of the delivering transporter, the name, address and EPA ID number (if applicable) of the origin of the used oil, the quantity of used oil accepted, and the date of acceptance; and
Refer to attached Used Oil Analysis Plan

(ii) For outgoing shipments: The name, address and EPA ID number of the transporter and end user of the outgoing shipment, the quantity of used oil shipped, and the date of shipment.
Not applicable—no outgoing shipments

USED OIL ANALYSIS PLAN

Parameters for Analysis

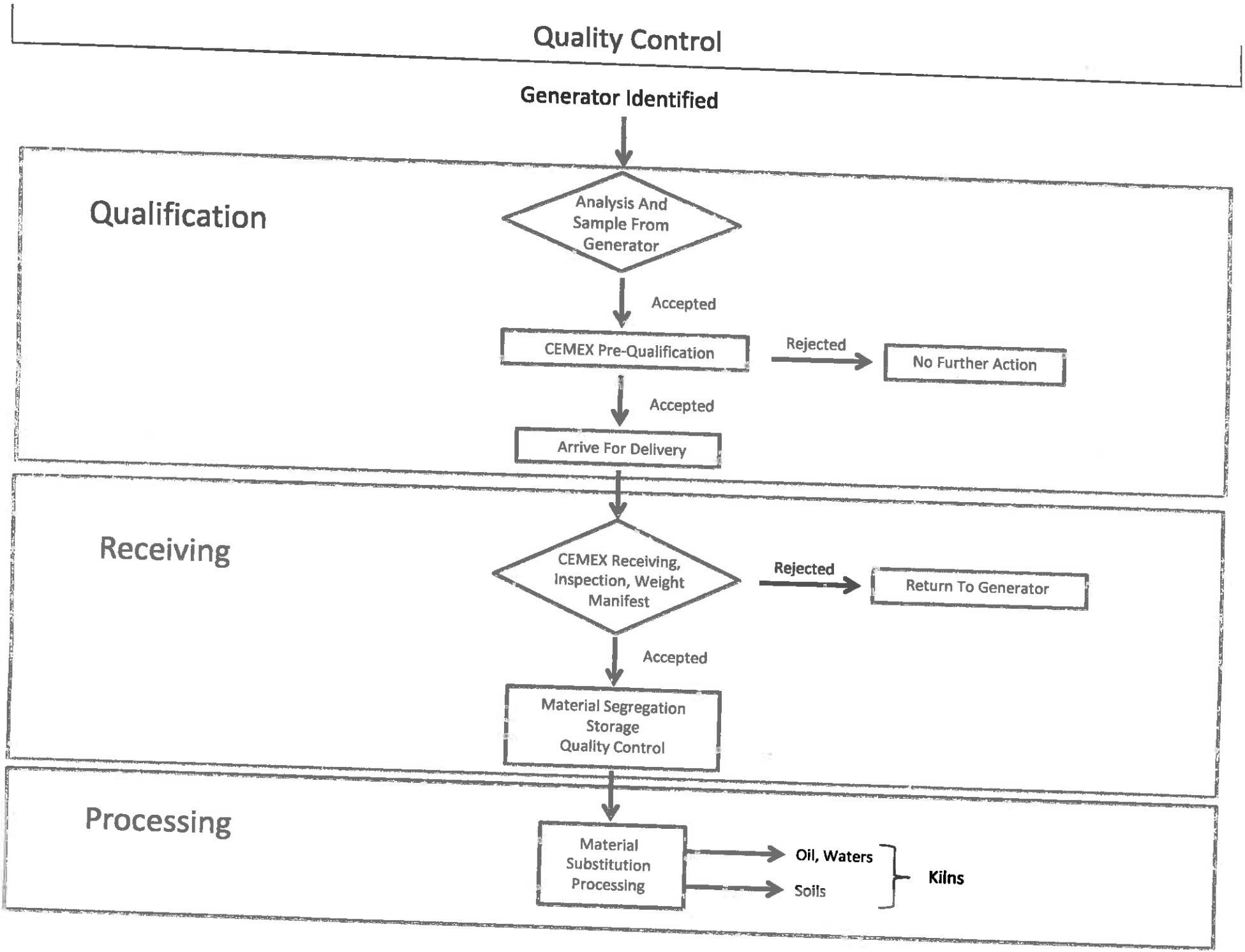
1. 601 (EPA method 8260B)
2. 602 (EPA method 8260)
3. Total metals (Arsenic, Cadmium, Chromium, Lead)
4. Total Halogens
5. Flash Point (reported in degrees Fahrenheit)

The Following Limits Will Apply as Acceptance Criteria:

1. Arsenic	5.0 ppm
2. Cadmium	2.0 ppm
3. Chromium	10 ppm
4. Lead	100 ppm
5. Total Halogens	1000 ppm
6. Flash Point	100 degrees Fahrenheit minimum

Notes:

1. All petroleum contaminated materials must not be classified as hazardous waste based upon prevailing federal and state regulations
2. Sampling procedures must follow accepted quality assurance practices.
3. CEMEX reserves the right to require additional analysis performed by the Generator, or a designated independent laboratory, prior to acceptance.
4. Once the required information is received from the Generator, CEMEX reviews the data as to its acceptability into the Materials Substitution Program. Upon approval, the oil load is assigned a specific CEMEX control number. This specific number is used to record and track the material through final disposition and generator notifications. See Quality Control Process Flow Diagram, Daily Receiving Report, and example of a contractor Bill of Lading on the following pages.


Quality Control
Generator Identified
Qualification
Analysis And Sample From Generator
Accepted
CEMEX Pre-Qualification
Rejected
No Further Action
Accepted
Arrive For Delivery
Receiving
CEMEX Receiving, Inspection, Weight Manifest
Rejected
Return To Generator
Accepted
Material Segregation Storage Quality Control
Processing
Material Substitution Processing
Oil, Waters
Soils
Kilns

CEMEX Miami Cement Plant - Material Substitution Program

Daily Receiving Report

Generator	M.S. No.	Material	Transporter	Quantity (tons/gallons)	Destination (Storage)	Comments

Cliff Berry, Inc
Environmental Services

Emergency Contact Telephone Number
1-800-899-7745

242383-1

BILL OF LADING

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Truck Number
FLD058560699	242383 -1		

3. Name and Mailing Address: Cliff Berry, Inc
PO Box 13079
Ft Lauderdale, FL 33316

4. Phone 954-763-3390

PO 20

5. Transporter 1 Company Name	6. USA EPA ID Number	A. Transporter's Phone
CLIFF BERRY, INC.(DANIA)	FLR000083071	954-763-3390
7. Transporter 2 Company Name	8. USA EPA ID Number	B. Transporter's Phone

9. Designated Facility Name and Site Address	10. USA EPA ID Number	C. Facility's Phone
CEMEX CONSTRUCTION LLC. 1200 MIAMI, FL 33182		305-225-1423

	11. Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a.	Petroleum oil(Contains Fuel Oil, #5), 3, NA1270, PG-III	1			G
b.					
c.					
d.					

D. Additional Descriptions for Materials Listed Above
11a: SALE ON-SPEC FUEL OIL

E. Pickup Location
CLIFF BERRY INC. MIAMI
3033 NW NORTH RIVER DRIVE
MIAMI, FL 33142

15. Special Handling Instructions and Additional Information
SH

16. CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. I certify the materials decribed above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

SHIPPER/GENERATOR

TRANSPORTER

FACILITY

WHITE - ACCOUNTING / GREEN - TRANSPORTER 1 / YELLOW - TRANSPORTER 2 / PINK - FACILITY / GOLD - CUSTOMER

The Receipt of Fuel Oil Deliveries

1. The fuel oil truck driver must weigh-in in the scale house before delivering the load of oil to the dryer.
2. Every field in the Used Oil Delivery Record Form will be filled out legibly and the last field signed by the truck driver.
3. An oil sample must be taken from the truck either by CEMEX personnel or by the fuel oil truck driver. Accepted sampling criteria and procedures must be strictly followed.
4. The oil sample will be taken to the CEMEX Quality Control Laboratory for analysis.
5. The fuel truck driver must weigh-out in the scale house before exiting the plant and will leave all his paperwork with the scale house attendant.

Tracking Plan for Used Oil Deliveries

1. The following information will be recorded in the Used Oil Delivery Record Form: name, address, EPA number of the delivering transporter, origin, destination, quantity, and acceptance date for every shipment of oil.
2. The information described in step 1 above, along with the beginning and ending weights of each oil truck, is transferred to a computerized data base.
3. A calculation is performed, using the oil density and the weight of the fuel, to verify the accuracy of the amount of gallons of oil delivered to CEMEX.
4. The computerized database is backed up daily and its records stored in (a) the designated storage partition on the data server; and (b) optical media, such as RW-CD.

Used Oil Analysis Procedure

CEMEX analyzes used oil (in-house environmental lab) for the following parameters:

- Btu's
- % Water
- Dexsil Kit PCB's
- Total Halogens
- 8 RCRA metals – arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver
- Density
- Viscosity
- Flashpoint

Sampling Methods

Metals are analyzed using a Varian FS220 Atomic Absorption Spectrophotometer. The methods are as follows:

Arsenic – EPA method 7061
Barium – EPA method 7081
Cadmium – EPA method 7131
Chromium – EPA method 7191
Mercury – EPA method 7471 (cold vapor)
Lead – EPA method 7421
Selenium – EPA method 7741
Silver – EPA method 7761

Procedures

When the transport vehicle is escorted to the assigned storage area, the CEMEX representative will secure a sample from the transporter's tanker truck using a sampling syringe. The sample is immediately discharged inside an appropriate plastic container and taken to the CEMEX laboratory for quality control analysis.

The frequency of the initial analysis on the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date. The initial analysis is repeated by the CEMEX laboratory within the next 24 hours of the initial analysis to ensure accuracy and adherence to the existing quality control protocols. The resulting set of data is then reviewed by the Quality Control Manager as soon as the analysis results are available.

Calibration Methods

The laboratory equipment is calibrated every single day and prior to each oil analysis. The calibration procedure consists of testing a blank sample followed by five different standards at different concentrations to obtain a curve of best fit. A correlation coefficient of at least 0.995 is required before proceeding with the analysis itself. The entire set of data is then reviewed by the Quality Control Manager according to the specified laboratory standard operating procedures.

Attachment 6: Unit Management Plan

This plan describes:

- Documentation demonstrating that all aboveground used oil process and storage tanks and containers as well as fill pipes for underground storage tanks are properly labeled with the words "Used Oil." **Refer to Attachment 5—ICP/SPCC Plan**
- The management plan description must include documentation which shows that all used oil storage and process tanks and containers meet the following requirements:

a) For containers:

(i) Adequate aisle space;
Not applicable—tank storage
(ii) Adequate secondary containment, including design, capacity and specifications; and
Not applicable—tank storage
(iii) Inspections and corrective actions.
Not applicable—tank storage

b) For tanks:

(i) All aboveground storage and process tanks must meet the requirements of Rules 62-762.500 (Performance Standards for New Storage Tank Systems), 62-762.510 (Performance Standards for Existing Shop-Fabricated storage Tank Systems), 62-762.520 (Performance Standards for Existing Field-Erected Storage Tank Systems), 62-762.600 (General Release Detection Standards), and 62-762.700 (Repairs to Storage Tank Systems). All underground storage and process tanks must meet the requirements of Rules 62-761.500 (Performance Standards for New Storage Tank Systems), 62-761.520 (Performance Standards for Other Existing Petroleum and Petroleum Product storage Systems Non-Vehicular Fuels), 62-761.600 (General Release Detection standards), 62-761.620 (Release Detection Standards for Other Regulated Substance Storage Tanks), 62-761.630 (Release Detection Standards for Integral Piping), and 62-761.700 (Repairs to Storage Tank Systems).
All above-ground storage and process tanks meet the applicable requirements of Chapters 62-761, F.A.C. and 62-762, F.A.C.
(ii) All storage and process tanks must have a closure plan that meets the requirements of Rules 62-761.800 (Underground Storage Tank Systems: Out of Service and Closure Requirements) and 62-762.800 (Aboveground Storage Tank Systems: Out of Service and Closure Requirements).
Refer to Attachment 8—Facility Closure Plan
(iii) All storage and process tanks must have an inspection or monitoring plan that meets the requirements of Rules 62-761.600 (Underground Storage Tank Systems: General Release Detection Standards) and 62-762.600 (Aboveground Storage Tank Systems: General Release Detection Standards).
Refer to Attachment 5—ICP/SPCC Plan
(iv) A plan for the removal of released material and accumulated precipitation from secondary containment
Not applicable—all released material and accumulated precipitation from secondary containment is incorporated into the cement-making process.

ATTACHMENT 7 – EMPLOYEE TRAINING PROGRAM

Attachment 7: Employee Training Program

a. The methods and/or materials used to familiarize employees with all state and federal rules and regulations.

Refer to the ICP/SPCC Plan (Attachment 5) and the attached Used Oil Regulatory Training Manual

b. The method of documenting that employees have been trained to use emergency equipment.

All employees that are required to undergo the training must sign a training sign-in sheet that is tracked by the General Manager of Environmental Services.

c. How the employee education program is updated to address changes in applicable regulations or facility operations.

The training manual and program is updated annually or as necessary to address changes to rules and facility operations.

CEMEX

MIAMI CEMENT PLANT

USED OIL REGULATORY TRAINING MANUAL

Manual Date: 12/5/2012

KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th Street
Gainesville, Florida 32615
352-377-5822

263-12-16

1.0 PURPOSE

The purpose of this manual is to ensure that all CEMEX Miami Cement Plant (Facility) employees have an understanding of the Used Oil Management regulations required by the federal government and the State of Florida as per Chapter 40 Part 279 C.F.R., Chapter 403 F.S., Chapter 62-701 and 62-710 F.A.C., (Attachment 1) and in accordance with the used oil permit for the Facility, I.D. No. FLD 981 758 485. This manual (along with the Facility's SPCC Plan) will provide Facility employee's with the knowledge of the regulations as it applies to used oil and other petroleum products.

2.0 DEFINITIONS

"Oily Waste" – means those materials, which are mixed with used oil and have become separated from that used oil. Oily wastes also mean materials, including wastewaters, centrifuge solids, filter residues or sludges, bottom sediments, tank bottoms, and sorbents which have come into contact with, and have been contaminated by, used oil.

"Processing" – means chemical or physical operations designed to produce from used oil, or to make used oil more amenable for production of, fuel oils, lubricants, or other used oil-derived products. Processing includes, but not limited to: blending used oil with virgin petroleum products, blending used oils to meet the fuel specification, filtration, simple distillation, chemical or physical separation and re-refining.

"Processor" - means any person processing used oil. The term also includes any transfer facility that stores used oil for longer than 35 days at a time, any used oil marketer who receives used oil from transporters or who has at least 25,000 gallons of used oil storage capacity, and any person who blends used oil with on-specification used oil fuel or with virgin petroleum products for the purpose of producing on-specification used oil fuel.

"Used Oil" – means any which has been refined from crude oil or synthetic oil

and, as a result of use, storage, or handling, has become contaminated and unsuitable for its original purpose due to the presence of physical or chemical impurities or loss of original properties.

"Used Oil Fuel Marketer" – means any person who conducts either of the following activities: (1) Directs a shipment of off-specification used oil from their facility to a used oil burner; or (2) First claims that used oil that is to be burned for energy recovery meets the used oil fuel specifications.

"Used Oil Transporter" – means any person who transports for hire used oil over public highways in shipments greater than 55 gallons at one time.

3.0 APPLICABILITY (279.40) (62-710.300)

Anyone who handles used oil is subject to Federal and State law on the management of used oil. Listed below are entities that are regulated by their handling of used oil:

- Generators of used oil
- Private and public used oil collection centers ad aggregation points
- Used oil transporters and transfer facilities
- Burners who burn off-specification used oil for energy recovery
- Marketers

4.0 PROHIBITIONS (62-710.401)

Handlers of used oil must comply with federal and state laws when managing used oil. Used oil must be handled properly to ensure proper management and to minimize the risk to the environment.

State and federal environmental regulations prohibit the unauthorized discharge or management of used oil in a way that could harm the environment.

<u>No used oil or oil waste can be discharged into:</u>

- Soils

- Sewers
- Drainage systems
- Septic tanks
- Surface or ground waters
- Watercourses
- Marine waters

Except as outlined below, used oil shall not be mixed or comingled with solid waste that is to be disposed of in landfills and shall not directly be disposed of in landfills.

- Oily wastes, sorbents or other materials used for maintenance or to clean up or contain spills or releases of used oil, and soils contaminated with used oil as a result of spills or releases are not subject to this prohibition. In some cases, other Florida Department of Environmental Protection (FDEP) rules, local ordinances, or landfill policies may prohibit the disposal of such materials.
- To dispose of solid waste mixed with used oil in a landfill which is otherwise prohibited, contact the FDEP to discuss the proposed action and to determine what procedures may be necessary.
- Any person who unknowingly disposes into a landfill any used oil, including used oil filters which have not been properly segregated or separated from other solid wastes by the generator, is not guilty of a violation under Chapter 62-710 F.A.C. This provision is applicable to landfill operators who unknowingly accept such wastes for disposal.

Used oil cannot be used for:

- Dust suppressant
- Weed abatement
- Any other use that has the potential for release into the environment

Storage of Used Oil:

- Tanks or containers must be clearly labeled with the words "used oil" and must be in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage.
- If tanks or containers are not stored inside a structure, the contents shall be

closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area.

5.0 REGISTRATION AND NOTIFICATION (62-710.500)

The Facility shall register their used oil handling activities annually with the FDEP using Form 62-730.900(1)(b), "8700-12FL – Florida Notification of Regulated Waste Activity," effective date January 4, 2009. This Form can be obtained on-line at **http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-730.htm** or by contacting the Hazardous Waste Regulation Section, MS 4560, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

The registration shall be valid from July 1 of the year of registration or renewal until June 30 of the following year. The Facility shall display the validated registration form and identification number in a prominent place.

6.0 RECORD KEEPING AND REPORTING (62-710.510)

CEMEX has an internal material identification and handling process to track in-coming and out-going petroleum products. Along with material identification, CEMEX utilizes a bill of lading/manifest system to track used oil transactions. The Facility must maintain records on FDEP Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the FDEP form. These records shall include the following information:

- Name, business address, telephone number, EPA identification number of the transporter;
- Source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one;
- The total number of gallons of used oil received from each source, including any oily wastes which may be an integral part of the used oil shipment;

- The type of used oil received, using the type code designation found in the form instructions;
- The date of receipt;
- The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and
- Documentation of halogen screening.

The records must be maintained for a minimum of three years at the Facility and be available for inspection by federal or state regulators during normal business hours. No later than March 1 of each year, the Facility shall submit an annual report of the used oil handling activities for the preceding calendar year to the FDEP on Form 62-710.901(3).

7.0 USED OIL PROCESSORS (62-710.800)

This Rule shall apply to any owner or operator of a facility that processes used oil. An owner or operator of a used oil processing facility shall operate, modify, or close such a facility only pursuant to a permit issued by the FDEP in accordance with Chapter 62-710 F.A.C. The CEMEX Miami Cement Plant is required to maintain a permit as a Used Oil Processing Facility. Under this permit, the Facility is authorized to process used oil, oily wastewater and petroleum contact water. Refer to the permit for general, standard, and specific conditions. At the time this employee training manual was updated, the existing permit (56307-HO-003) was in the process of being renewed.

Before operating, closing or making any substantial modification to a used oil processing facility, the owner or operator shall submit to the FDEP the Used Oil Processing Facility Permit Application, DEP Form 62-710.901(6). The engineering aspects of the application shall be certified by a Professional Engineer.

Processing does not include the removal of used oil from wastewater solely for the purpose of making the wastewater or stormwater acceptable to meet discharge limits in other permits. However, the used oil generated from such activity is regulated. Sediment material removed from an oil/water separator for disposal is subject to the requirements

of Chapter 62-730, F.A.C.

8.0 MANAGEMENT OF USED OIL FILTERS

Used oil filters shall not be disposed of or commingled with other solid waste for disposal in a landfill in Florida. It is the responsibility of the Facility to make reasonable efforts to assure that such filters are not disposed of in a landfill. The Facility shall ensure that its filters are transported by a registered used oil filter transporter and processed by a registered used oil filter processor or end user.

Used oil filters shall be stored in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface. Upon detection of a release of oil from any used oil filter container the facility owner or operator shall:

1. Stop the release;
2. Contain the released oil;
3. Clean up and manage properly the released oil and any subsequent oily waste in accordance with the provisions of Chapter 770, F.A.C., if applicable; and
4. Repair or replace any leaking used oil filter storage containers prior to returning them to service.

9.0 SPILL PREVENTION CONTROLS AND COUNTERMEASURES

The Facility maintains a separate SPCC Plan, which is incorporated into the Integrated Contingency Plan (ICP). Please refer to that document for spill prevention, control, response and employee training details and procedures.

10.0 EMPLOYEE TRAINING (62-710.600)

Facility employees will be trained on an annual basis to ensure that personnel, as applicable to their position, have a clear understanding of both the federal and state regulations on the management of used oil. Employee training shall also include spill prevention, control and response procedures and use of emergency equipment as

applicable. The employee training program is evaluated and updated periodically to address changes in applicable regulations and/or changes to Facility operations and procedures.

Employee Training documents regarding the handling of petroleum products include the Facility's SPCC Plan, an overview of the Facility's SPCC Plan as a Power Point Presentation, FDEP Used Oil Fact Sheets (Attachment 2), and this manual.

The Facility maintains a record of training in the company's files and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. The records shall be retained for a minimum of three years and available for review by FDEP personnel during inspections.

CEMEX

MIAMI CEMENT PLANT

ATTACHMENT 1

USED OIL MANAGEMENT

Manual Date: 12/5/2012

KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th Street
Gainesville, Florida 32615
352-377-5822

263-12-16

CHAPTER 62-710
USED OIL MANAGEMENT
TABLE OF CONTENTS

62-710.100 Intent. (Repealed)
Specific Authority 403.061, 403.704 FS. Law Implemented 403.75 through 403.769 FS. History - New 2-25-85, Formerly 17-7.60, 17-7.600, Amended 1-17-90, Formerly 17-710.100, Amended 6-8-95, 12-23-96, Repealed 3-25-97.

62-710.200 Definitions. (Repealed)
Specific Authority 403.061, 403.704 FS. Law Implemented 403.703, 403.75, 403.760 FS. History - New 2-25-85, Amended 5-21-85, Formerly 17-7.61, 17-7.610, Amended 1-17-90, Formerly 17-710.200, Amended 6-8-95, 12-23-96, Repealed 3-25-97.

62-710.201 Definitions.
In addition to applicable definitions in Rule 62-701.200, F.A.C., the following words, phrases, or terms as used in this rule, unless the context indicates otherwise, shall have the following meaning:

(1) "Oily wastes" means those materials which are mixed with used oil and have become separated from that used oil. Oily wastes also means materials, including wastewaters, centrifuge solids, filter residues or sludges, bottom sediments, tank bottoms, and sorbents which have come into contact with, and have been contaminated by, used oil.

(2) "Processing" means chemical or physical operations designed to produce from used oil, or to make used oil more amenable for production of, fuel oils, lubricants, or other used oil-derived products. Processing includes blending used oil with virgin petroleum products, blending used oils to meet the fuel specification found in 40 C.F.R. Part 279.11, filtration, simple distillation, chemical or physical separation and rerefining.

(3) "Processor" means any person processing used oil. The term also includes any transfer facility that stores used oil for longer than 35 days at a time, any used oil marketer who receives used oil from transporters or who has at least 25,000 gallons of used oil storage capacity, and any person who blends used oil with on-specification used oil fuel or with virgin petroleum products for the purpose of producing on-specification used oil fuel.

(4) "Public used oil collection center" means:

(a) An automotive service facility or government-sponsored collection facility which accepts for disposal small quantities of used oil from households; or

(b) A facility which stores used oil and which accepts small quantities of used oil from households.

(5) "Used oil" means any oil which has been refined from crude oil or synthetic oil and, as a result of use, storage, or handling, has become contaminated and unsuitable for its original purpose due to the presence of physical or chemical impurities or loss of original properties.

(6) "Used oil transporter" means any person who transports used oil over public highways in shipments of greater than 55 gallons at one time.

(7) "Used oil filter" means any device which is an integral part of an oil flow system, the primary purpose of which is to remove contaminants from the flowing oil contained within the system and which, as a result of use, has become contaminated and unsuitable for its original purpose, is removed from service, and contains entrapped used oil.

(8) "Used oil filter processor" means a person who removes oil from used oil filters to prepare them for recycling. Generators of used oil filters who consolidate, drain or crush used oil filters for off-site recycling are not used oil filter processors providing the generator complies with the requirements of subsection 62-710.850(2), F.A.C.

(9) "Used oil filter transporter" means any person who transports for hire used oil filters to a used oil filter transfer or processing facility.

(10) "Used oil filter transfer facility" means any facility which is used to store, for more than 10 days, used oil filters which were not generated at that facility. A person who stores its own used oil filters generated at its own non-contiguous operations on its own property is not considered a used oil filter transfer facility provided the used oil filters are processed by a registered used oil filter processor.
Specific Authority 403.061, 403.704 FS. Law Implemented 403.703, 403.75, 403.760, 403.767, 403.769 FS. History – New 6-9-05.

62-710.210 Documents Incorporated by Reference.

(1) General provisions relating to solid waste management may be found in Chapter 62-701, F.A.C., including statements of intent, definitions, prohibitions, general permitting requirements, alternate procedures, and forms. Except where the context indicates otherwise, these general provisions apply to this chapter.

(2) The Department adopts by reference 40 C.F.R. Part 279 revised as of July 1, 2004, which contains the federal standards for the management of used oil. It is the intent of the Department to interpret these standards in a manner consistent with interpretations promulgated by the United States Environmental Protection Agency, except when such interpretations conflict with Florida law.

(3) "On-specification used oil fuel" means any used oil which meets the requirements of 40 C.F.R. Part 279.11. Used oil fuel containing PCBs at a concentration equal to or greater than 2 ppm, but less than 50 ppm, shall be managed in accordance with 40 C.F.R. Part 761.20(e) and burned only in boilers or industrial furnaces as defined in 40 C.F.R. Part 260.10 and identified in 40 C.F.R. Part 279.61. Used oil containing PCBs at a concentration equal to or greater than 50 ppm is fully subject to the requirements of the Toxic Substances Control Act found in 40 C.F.R. Part 761. Blending used oil for the purpose of reducing the concentration of PCBs to below 50 ppm is prohibited in accordance with the provisions of 40 C.F.R. 279.10(i) and 761.20(e).

(4) References in 40 C.F.R. Part 279 to 40 C.F.R. Part 262 shall mean rules adopted by the Department regarding generators of hazardous wastes; reference to 40 C.F.R. Part 263 shall mean rules adopted by the Department regarding transporters of hazardous waste; reference to 40 C.F.R. Parts 264 and 265 shall mean rules adopted by the Department regarding treaters, storers and disposers of hazardous wastes; references to 40 C.F.R. Part 266 shall mean rules adopted by the Department regarding standards for the management of specific hazardous waste; and references to Section 3010 of RCRA shall mean notification requirements of Florida Law. The above-mentioned Department rules are found in Chapter 62-730, F.A.C.

(5) When the same word, phrase, or term is defined in Rule 62-710.201, F.A.C., and 40 C.F.R. Part 279 and the definitions are not identical, the definitions as given in Rule 62-710.201, F.A.C., shall apply.

(6) Unless specifically indicated otherwise, when used in any such provisions as adopted from 40 C.F.R. Part 279, United States shall mean the State of Florida, EPA shall mean the Department, and Administrator or Regional Administrator shall mean the Secretary of the Department or the Secretary's designee, where appropriate.

(7) Any reference to 40 C.F.R. Parts 124 or 270 as adopted by reference in 40 C.F.R. Part 279 shall mean the permitting provisions in Chapter 62-4 or 62-730, F.A.C., or Section 403.722, F.S.

(8) Any reference to the Resource Conservation and Recovery Act of 1976 (RCRA) as adopted by reference in 40 C.F.R. Part 279 shall be construed to refer to comparable provisions of the Florida Resource Recovery and Management Act as established in Part IV of Chapter 403, F.S.

Specific Authority 403.061, 403.704, 403.7545, 403.8055 FS. Law Implemented 403.704, 403.7545 FS. History–New 6-8-95, Amended 12-23-96, 3-25-97, 6-9-05, 1-4-09.

62-710.300 Applicability. (Repealed)

Rulemaking Authority 403.061, 403.704, 403.767 FS. Law Implemented 403.703, 403.75, 403.754, 403.760, 403.767, 403.769 FS. History – New 6-9-05, Repealed 2-16-12.

62-710.400 Prohibitions. (Repealed)

Specific Authority 403.061, 403.704 FS. Law Implemented 403.751 FS. History - New 2-25-85; Formerly 17-7.62, 17-7.620, Amended 1-17-90, Formerly 17-710.400, Amended 6-8-95, Repealed 3-25-97.

62-710.401 Prohibitions.

(1) No person may collect, transport, store, recycle, use, or dispose of used oil, used oil filters or oily wastes except as authorized in this chapter or in Chapter 403, F.S.

(2) No person may discharge used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters.

(3) Except as provided herein, no person may mix or commingle used oil with solid waste that is to be disposed of in landfills or directly dispose of used oil in landfills.

(a) Oily wastes, sorbents or other materials used for maintenance or to clean up or contain spills or releases of used oil, and soils contaminated with used oil as a result of spills or releases are not subject to this prohibition. In some cases, other Department rules, local ordinances, or landfill policies may prohibit the disposal of such materials.

(b) Any person wishing to dispose of solid waste mixed with used oil in a landfill which is otherwise prohibited by this subsection may apply to the Department for approval of alternate procedures in accordance with Rule 62-710.310, F.A.C. If the basis for the request is that it is impractical to separate the used oil from the solid waste, the request may be submitted without a fee.

(c) Any person who unknowingly disposes into a landfill any used oil, including used oil filters which have not been properly segregated or separated from other solid wastes by the generator, is not guilty of a violation under this subsection. This provision is applicable to landfill operators who unknowingly accept such wastes for disposal.

(4) Notwithstanding the provisions found in 40 C.F.R. 279.10(b)(3), no person may mix or commingle used oil with hazardous substances that make it unsuitable for recycling or beneficial use.

(5) Used oil shall not be used for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment.

(6) No person may store used oil in tanks or containers unless they are clearly labeled with the words "used oil" and are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area.

Specific Authority 403.061, 403.704 FS. Law Implemented 403.751 FS. History – New 6-9-05.

62-710.500 Registration and Notification.

(1) The following persons shall annually register their used oil handling activities with the Department using Form 62-730.900(1)(b), "8700-12FL – Florida Notification of Regulated Waste Activity," effective date January 4, 2009, which is hereby adopted and incorporated by reference. This Form can be obtained on the

internet at http://www.dep.state.fl.us/waste/quick_topics /forms/pages/62-730.htm or by contacting the Hazardous Waste Regulation Section, MS 4560, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

(a) Used oil transporters and transfer facilities;

(b) Used oil processors;

(c) Used oil fuel marketers who sell used oil fuel; and

(d) Used oil burners of off-specification used oil.

(2) The registration form shall be accompanied by a registration fee of $100 per facility. It is not necessary to submit more than one form or fee if registering more than one activity, or if the registration is for an entire transportation fleet operating out of one facility site. The registration form and fee shall be due by March 1 of each year. The registration fee is waived for used oil processing facilities for which a permit fee was paid under Rule 62-710.800, F.A.C.

(3) Upon receipt of the completed form and fee, the Department shall issue to each registered person a validated registration form which shall be valid for one year. For used oil transporters, acknowledgment of registration shall be included in the certification process of Rule 62-710.600, F.A.C. The registration shall be valid from July 1 of the year of registration or renewal until June 30 of the following year.

(4) Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

(5) Each public used oil collection center shall notify the Department no later than 30 days after first accepting used oil from the public on DEP Form 62-710.901(5). The Department shall acknowledge filing of the notification within 30 days of receipt.
Specific Authority 403.061, 403.704 FS. Law Implemented 403.704, 403.754, 403.760 FS. History–New 2-25-85, Formerly 17-7.63, 17-7.630, Amended 1-17-90, Formerly 17-710.500, Amended 6-8-95, 12-23-96, 3-25-97, 6-9-05, 1-4-09.

62-710.510 Record Keeping and Reporting.

(1) Each registered person shall maintain records on DEP Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the Department form. These records shall include the following information:

(a) The name, business address, telephone number and EPA identification number of the transporter;

(b) The source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one;

(c) The total number of gallons of used oil received from each source, including any oily wastes which may be an integral part of the used oil shipment;

(d) The type of used oil received, using the type code designation found in the form instructions;

(e) The date of receipt;

(f) The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and

(g) Documentation of halogen screening in accordance with the requirements of Rule 62-710.600, F.A.C.

(2) Transporters shall maintain documentation of all shipments of used oil, including those accepted for transport as well as those refused due to suspected mixing with hazardous waste. A copy of this record shall be left with the generator.

(3) A generator of used oil that transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter is not subject to the record keeping and reporting requirements of this section.

(4) The records required by this section shall be retained for a period of three years. The records shall be kept at the street address of the registered person and shall be available for inspection by the Department during normal business hours, unless another location and inspection schedule is specified in the registration package submitted to the Department.

(5) No later than March 1 of each year, each person required to register in accordance with Rule 62-710.500, F.A.C., shall submit an annual report for the preceding calendar year to the Department on DEP Form 62-710.901(3). The report shall summarize the records kept pursuant to this section.

(6) No later than July 1 of each year, each public used oil collection center shall submit to the Department an estimate of the quantity of used oil accepted from the public during the previous calendar year. The Department shall advise each public used oil collection center of this requirement by June 1 of each year.

Specific Authority 403.061, 403.704 FS. Law Implemented 403.754, 403.760 FS. History - New 2-25-85, Formerly 17-7.64, 17-7.640, Amended 1-17-90, Formerly 17-710.510, Amended 6-8-95, 12-23-96, 3-25-97, 6-9-05.

62-710.520 Reporting. (Repealed)

Specific Authority 403.061, 403.704 FS. Law Implemented 403.754, 403.760 FS. History - New 2-25-85, Formerly 17-7.65, 17-7.650, Amended 1-17-90, Formerly 17-710.520, Amended 6-8-95, Repealed 3-25-97.

62-710.530 Exemptions. (Repealed)

Specific Authority 403.061, 403.704 FS. Law Implemented 403.754 FS. History - New 2-25-85, Formerly 17-7.66, 17-7.660, Amended 1-17-90, Formerly 17-710.530, Amended 6-8-95, Repealed 3-25-97.

62-710.600 Certification Program for Used Oil Transporters.

(1) Any used oil transporter that transports over public highways more than 500 gallons of used oil annually, not including oily waste, shall become certified pursuant to this section. This section shall not apply to:

(a) Any local governments or private solid waste hauler under contract to a local government that transports used oil collected from households to a public used oil collection center; or

(b) Any used oil transporter that transports its own used oil, which is generated at its own noncontiguous facilities, to its own central collection facility for storage, processing, or energy recovery. However, such used oil transporter shall provide the proof of financial responsibility required in paragraph (2)(e) of this section.

(2) To become certified and to maintain certification, used oil transporters shall:

(a) Register annually with the Department and comply with the annual reporting and record keeping requirements pursuant to Rules 62-710.500 and 62-710.510, F.A.C.;

(b) Show evidence of familiarity with applicable state laws and rules governing used oil transportation by submitting a training program for approval to the Department which includes provisions for at least the following:

1. Compliance with state and federal rules governing used oil;

2. Proper used oil management practices, including appropriate response actions to any release or spill;

3. A detailed description of the company's standard operating procedure for halogen screening at each pick up location. This description shall include instrument specifications and capabilities, calibration methods and frequency, procedures addressing the handling of loads which indicate halogen levels in excess of 1,000 ppm, and record keeping procedures for all loads accepted or refused.

4. An introduction of each new employee to the applicable laws and rules before unsupervised driving of a used oil transportation vehicle; and

5. Documentation that all company personnel handling or transporting used oil have successfully completed the training program. New employees shall complete the training program as soon as possible, but no later than 90 days after beginning employment;

(c) Maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. These records shall be retained for a minimum of three years and available for review by Department personnel during inspections;

(d) Submit to the Department and annual statement in conjunction with the annual registration required under Rule 62-710.500, F.A.C., which states that the training program is still operating and is being adhered to and has been annually

reviewed and updated to address changes in regulations which apply to the operation, and which provides an explanation of any modifications to the training program; and

(e) Have, verify, and maintain vehicle insurance with a combined single limit of no less than $1,000,000. Such insurance, or additional policy, must in no way exclude pollution coverage for sudden and accidental alleged or threatened discharge, dispersal, seepage, migration, release or escape of used oil, and must include any cost or expense relating to pollution damage for which the transporter is legally liable. Such insurance must be maintained at all times and be exclusive of legal defense costs.

1. The insurance required in this paragraph may be established by:

a. Evidence of liability insurance, either on a claim made or an occurrence basis, with or without a deductible (with the deductible, if any, to be on a per occurrence or per accident basis and not to exceed ten percent of the equity of the business), using DEP Form 62-710.901(4). The insurance policy shall be issued by an agent or company authorized or licensed to transact business in the State of Florida. An ACORD form will only be accepted for renewal of a policy with the same carrier; or

b. For business entities registered in Florida, evidence of self-insurance provided by the chief financial officer of the business entity.

2. States and the federal government are exempt from the requirements of this paragraph.

(3) The Department shall issue a certification to each transporter that provides reasonable assurance of compliance with the requirements of this section, which shall be valid for the current registration period.

(4) The revocation provisions of Section 403.087(7), F.S., apply to certified used oil transporters. That statute authorizes revocations in accordance with the procedural requirements of Section 120.60, F.S., upon a finding by the Department that such transporter:

(a) Has submitted false or inaccurate information in its application;

(b) Has violated statutes which the Department is authorized to enforce, Department orders, rules, or certification conditions;

(c) Has failed to submit reports or other information required by Department rule or permit condition; or

(d) Has refused to allow inspection of its records or equipment by Department personnel or other persons when such inspection is authorized by Department rule or permit condition.

Specific Authority 403.061, 403.704, 403.767 FS. Law Implemented 403.767 FS. History - New 1-17-90, Formerly 17-710.600, Amended 6-8-95, 12-23-96, 3-25-97, 6-9-05.

62-710.800 Permits for Used Oil Processing Facilities.

(1) This rule shall apply to any owner or operator of a facility that processes used oil. The owner or operator shall comply with the requirements of this chapter including the requirements of 40 C.F.R. Part 279 Subpart F.

(a) Processing does not include the removal of used oil from wastewater solely for the purpose of making the wastewater or stormwater acceptable to meet discharge limits in other permits. However, the used oil generated from such activity is subject to this chapter. Sediment material removed from an oil/water separator for disposal is subject to the requirements of Chapter 62-730, F.A.C.

(b) Permits shall not be required under this section for generators who aggregate their own used oil with virgin oil or on-specification used oil for purposes of burning on-specification used oil fuel at the aggregation site, provided a valid air permit authorizing such burning is in effect for the facility.

(c) Permits shall not be required under this section for facilities that conduct processing operations incidental to burning the used oil fuel on-site, provided a valid air permit authorizing such burning is in effect for the facility and all of the used oil fuel is burned on-site.

(2) An owner or operator of a used oil processing facility shall operate, modify, or close such a facility only pursuant to a permit issued by the Department in accordance with this chapter.

(3) Before operating, closing or making any substantial modification to a used oil processing facility, the owner or operator shall submit to the Department the Used Oil Processing Facility Permit Application, DEP Form 62-710.901(6). The engineering aspects of the application shall be certified by a Professional Engineer.

(a) Pursuant to subsections 62-4.050(6) and (7), F.A.C., a substantial modification means a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review. For purposes of this subsection, an increase in storage capacity of the facility by 25% or 25,000 gallons, whichever is less, is considered a substantial modification.

(b) Pursuant to paragraph 62-4.050(4)(s), F.A.C., a minor modification means a modification that does not require substantial technical evaluation by the Department, does not require a new site inspection by the Department, and will not lead to substantially different environmental impacts or will lessen the impacts of the original permit. For purposes of this subsection, replacement of existing tanks with new tanks is considered a minor modification.

(c) Changes at a facility which involve routine maintenance, such as repair of equipment, replacement of equipment with similar equipment, aesthetic changes, or minor operational changes are not considered modifications, do not have to be reported to the Department, and require no permit fee. Facility operators are advised to contact the Department if they have questions as to whether a change would be considered routine maintenance.

(4) Notwithstanding the provisions of Rule 62-4.050, F.A.C., the fee for a used oil processor permit application, including a permit renewal application, is $2,000. The fee for a substantial modification to the permit is $500. No permit fee is required for minor modifications. Applications for renewal of permits shall be submitted to the Department at least 60 days prior to the expiration date of the existing permit in accordance with Rule 62-4.090, F.A.C.

(5)(a) The owner or operator of a used oil processing facility shall have and submit to the Department as part of its permit application a written closure plan to show how the facility will be closed to meet the following requirements:

1. There will be no need for further facility maintenance;
2. Used oil will not contaminate surface or ground water; and
3. All tanks, piping, secondary containment and ancillary equipment will be emptied, cleaned and decontaminated, and all materials removed and managed.

(b) The closure plan shall be updated whenever significant operational changes occur or design changes are made.

(c) The closure plan shall be maintained with records required under Rule 62-710.510, F.A.C.

(d) The owner or operator shall submit a detailed closure plan to the Department at least 60 days prior to the scheduled date of closing the facility.

(e) Within 30 days after closing the facility, the owner or operator shall submit a certification of closure completion to the Department which demonstrates that the facility was closed in substantial compliance with the detailed closure plan. Within 30 days of determining that the facility was closed in accordance with its closure plan, the Department shall release the facility from its financial assurance obligations.

(6) Financial assurance.

(a) The owner or operator of a used oil processing facility shall provide the Department with proof of financial assurance issued in favor of the State of Florida in the amount of the closing cost estimate for the facility. This proof, along with the closing cost estimate, shall be submitted to the Department as part of the permit application process for the facility. Proof of financial assurance shall consist of either a surety bond guaranteeing payment or a surety bond guaranteeing performance, which complies with the requirements of Rule 62-701.630, F.A.C. An owner or operator may request an alternate proof of financial assurance in lieu of, or in combination with, the requirement for a surety bond, consisting of one or more of the following financial instruments which comply with the requirements of Rule 62-701.630, F.A.C.: trust fund; irrevocable letter of credit; insurance; or financial test and corporate guarantee. Financial documents shall be submitted on Form 62-701.900(5)(a), (b), (c), (d), (e), (f), (g) or (h), as appropriate.

(b) For the purpose of determining the closing cost estimate, the owner or operator shall estimate the total cost of closing the facility using Form 62-710.901(7) and in accordance with the closure plan pursuant to subsection (5) of this section, for

the time period in the facility operation when the extent and manner of its operation make closing most expensive. The owner or operator shall submit the estimate, together with all necessary justification, to the Department along with the proof of financial assurance. The costs shall be estimated and certified by a professional engineer for a third party to perform the work, on a per unit basis, with the source of estimates indicated. The owner or operator shall keep the latest closing cost estimate at the facility. When this estimate has been adjusted in accordance with paragraph (c) of this subsection, the latest adjusted closing cost estimate shall also be kept at the facility.

(c) The owner or operator shall annually adjust the closing cost estimate for inflation and changes in the closure plan, and shall submit updated information to the Department between January 1 and March 1 of each year. Such adjustments shall be made either by:

1. Recalculating the maximum cost of closing, in current dollars; or
2. Using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its Survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year.

(d) If the value of the funding mechanism is less than the total amount of the current closing cost estimate, the owner or operator shall revise the funding mechanism to reflect the new estimate.

(e) The initial Used Oil Facility Closing Cost Estimate Form shall be submitted to the Department no more than six months after the effective date of the rule and the owner/operator shall demonstrate funding of this closing estimate within 60 days of receiving approval of the cost estimate from the Department.

Specific Authority 403.061, 403.704 FS. Law Implemented 403.704, 403.707, 403.769 FS. History - New 1-17-90, Formerly 17-710.800, Amended 6-8-95, 12-23-96, 6-9-05.

62-710.850 Management of Used Oil Filters.

(1) Prohibition. No person who removes or manages used oil filters shall dispose of such filters, or commingle such filters with other solid waste for disposal, in a landfill in Florida. It is the responsibility of the generator to make reasonable efforts to assure that such filters are not disposed of in a landfill. This prohibition shall not apply to used oil filters generated by individual households.

(2) Generators. Each generator of used oil filters whose solid waste is typically disposed of in a landfill shall either register as a used oil filter processor or shall ensure that its filters are transported by a registered used oil filter transporter and processed by a registered used oil filter processor or end user. This does not include persons who recycle engine blocks on which used oil filters remain. Generators of used oil filters are exempt from the registration and reporting requirements of this rule

provided that they transport their own used oil filters in sealed containers of 55 gallons or less which are secured to a vehicle owned by the generator.

(3) Registration. The following persons shall register with the Department in accordance with the requirements of subsections 62-710.500(2) and (4), F.A.C.:

(a) Used oil filter transporters;

(b) Used oil filter transfer facilities;

(c) Used oil filter processors; and

(d) End users of used oil filters, including scrap metal dealers, metal foundries and thermal processing units such as cement kilns, who accept used oil filters from a person who is not a registered used oil filter processor. An end user shall not be required to comply with the provisions of this section with respect to used oil filters that have been obtained from a registered used oil filter processor.

(4) Used oil filter processors.

(a) Each registered used oil filter processor shall maintain records on Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the Department form. These records shall include the destination or end use of the processed used oil filters, including the name and street address of each destination or end user.

(b) The records required by this subsection shall be retained for a period of three years. The records shall be kept at the street address of the registered person and shall be available for inspection by the Department during normal business hours.

(c) No later than March 1 of each year, each registered used oil filter processor shall submit an annual report for the preceding calendar year to the Department on Form 62-710.901(2). This report shall summarize the records kept pursuant to paragraph (a) of this subsection.

(5) General requirements for the storage of used oil filters.

(a) All persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface.

(b) Upon detection of a release of oil from any used oil filter container the facility owner or operator shall:

1. Stop the release;

2. Contain the released oil;

3. Clean up and manage properly the released oil and any subsequent oily waste in accordance with the provisions of Chapter 770, F.A.C., if applicable; and

4. Repair or replace any leaking used oil filter storage containers prior to returning them to service.

Specific Authority 403.061, 403.704 FS. Law Implemented 403.751, 403.754, 403.769 FS. History – New 6-8-95, Amended 12-23-96, 6-9-05, 1-4-09.

62-710.900 Forms. (Repealed)

Specific Authority 120.53(1), 403.061 FS. Law Implemented 403.754, 403.760, 403.767, 403.814 FS. History - New 1-17-90, Formerly 17-710.900, Amended 6-8-95, 12-23-96, Repealed 3-25-97.

62-710.901 Forms.

The forms used by the Department in the used oil management program are adopted and incorporated by reference in this section. The form is listed by rule number, which is also the form number, and with the subject, title and effective date. The forms can be obtained on the internet at http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-710.htm or by contacting the Hazardous Waste Regulation Section, MS 4560, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

(1) [reserved].

(2) Used Oil and Used Oil Filter Record Keeping Form, effective June 9, 2005.

(3) Annual Report by Used Oil and Used Oil Filter Handlers, effective June 9, 2005.

(4) Certificate of Liability Insurance Used Oil Handlers, effective June 9, 2005.

(5) Public Used Oil Collection Center Notification and Annual Report, effective June 9, 2005.

(6) Used Oil Processing Facility Permit Application, effective June 9, 2005.

(7) Used Oil Processing Facility Closing Cost Estimate Form, effective June 9, 2005.

Specific Authority 120.53(1), 403.061, FS. Law Implemented 403.754, 403.769 FS. History – New 12-23-96, Amended 6-9-05, 1-4-09.

CEMEX

MIAMI CEMENT PLANT

ATTACHMENT 2

FDEP USED OIL FACT SHEETS

Manual Date: 12/5/2012

KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th Street
Gainesville, Florida 32615
352-377-5822

263-12-16

Used Oil Generator
[40 CFR, Part 279.1]

Any person , by site, whose act or process produces used oil or whose act first causes used oil to become subject to regulation.

The following persons are exempted from the management standards for used oil generators:

- households
- vessels at sea or at port, and;
- farmers who generate a yearly average of 25 gallons or less per month of used oil.

Used Oil, defined:
[62-710.201(5), F.A.C]

Any oil which has been refined from crude oil or synthetic oil and, as a result of use, storage, or handling, has become contaminated and unsuitable for its original purpose due to the presence of physical or chemical impurities or loss of original properties.

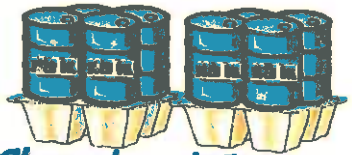
Any material which meets this description must be managed as used oil. Used oil includes synthetic oils, transmission and brake fluids, lubricating greases, etc. Used oil does not include products derived from vegetable or animal fats.

Used oil destined for recycling is presumed **not** to be hazardous.

The information contained in this brochure was compiled from F.A.C Rule 62-710 (effective January 4, 2009) and Department enforcement guidance dated December 9, 2005 and is not intended to be a substitution for the Department Rules. For copies of the Used Oil Management Rule please contact the Florida Department of Environmental Protection or visit our website at www.dep.state.fl.us

rev: 5/25/2006 7:02 AM

Stay CLEAN



C: Closed and Contained

L: Labeled "Used Oil" & "Used Oil Filters"

E: Ensure Proper Disposal Encourage Recycling

A: Abate & Clean Up Discharges

and keep it

N: Neat!

Used Oil Management Fact Sheet

What you need to know and do to maintain a CLEAN operation when dealing with Used Oil and Used Oil Filters

Think GREEN
Stay CLEAN

Remember it's the Generators Responsibility to Ensure Environmental Compliance

C Closed and in Containment

L Label all containers "Used Oil" & "Used Oil Filters"

E Ensure proper disposal and Encourage Recycling

A Abate and clean up any discharges

N Neat and tidy

Oily Wastes, Sorbent Clays ("kitty litter"), Oily Rags, Organic Sorbent Material:

[Rule 62-710.201(1), F.A.C.]

"Oily wastes" means those materials which are mixed with used oil and have become separated from that used oil.

These materials may be landfilled provided that:

- it is not prohibited in other Department rules or local ordinances
- the amount generated is "de minimus" (a small amount)
- it is the result of minor leaks or spills resulting from normal process operations*
- all free-flowing oil has been removed to the practical extent possible

*leaks and spills should be repaired immediately

Storage of used oil filters

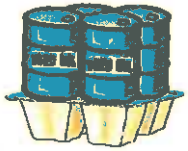
[Rule 62-710.850, F.A.C.]

Used oil filters must be stored in above ground containers which are **clearly labeled "Used Oil Filters,"** and which are in good condition. The storage **containers must be sealed or otherwise protected from weather** and **stored on an oil impermeable surface such as sealed concrete or asphalt**. Any leak or spill must be stopped, contained, cleaned up and managed and the container repaired or replaced.

No person who removes or manages used oil filters shall dispose of such filters, or commingle such filters with other solid waste for disposal, in a landfill in Florida.

Guidance for Used Oil Management Secondary Containment Requirements

Rule 62-710.401(6) sets out several requirements that apply to the storage of used oil in tanks or containers. These terms are not defined but should be interpreted broadly to include all types of containers that store used oil, including drip pans, portable collection containers and satellite accumulation containers. This means, for example, that **all used oil storage tanks and containers must be labeled with the words "Used Oil"** in order to minimize the risk of cross contamination. It also means that **all tanks and containers must have secondary containment (unless they are double-walled) that has the capacity to hold 110% of the volume of the largest tank or container within the containment area.**



The Department recognizes that it is not always practical to have specially constructed secondary containment for small containers, drip pans, portable collection containers, or satellite accumulation containers, and that the environmental risks of a spill of used oil from small containers is minimal. **The Department will therefore assume that portable collection containers, satellite accumulation containers, and other small containers (those with a total capacity of equal to or less than 55 gallons) which are stored on an oil impermeable surface inside a structure will meet the secondary requirement****. In addition, any portable collection containers regardless of size which have wheels, which are typically emptied within 24 hours, and which are stored on an oil impermeable surface inside a structure will meet the secondary containment requirement.**

****Like any assumption, *this one may be overcome if site-specific conditions create a likelihood that any spill from the containers would not be adequately contained.***

All tanks and containers, stored outside of a structure, <u>regardless of their size</u>, shall be closed, or otherwise protected from the weather, and must either be double-walled or must be stored on an oil impermeable surface with engineered secondary containment.

Rule 62-710.401(6) also refers to a "structure" without defining that term. In context, it is clear that this term must refer to those structures which will protect the used oil storage tank or container from the weather in much the same way as would a covering and/or proper use of lids. Any structure other than a building with four walls and a roof must be evaluated on a case-by-case basis to determine whether it is expected to adequately protect the used oil from the weather (e.g. blowing rain).

Contact your local Florida Department of Environmental Protection for additional information or if you have specific questions on this material.

FDEP Offices:

- Northwest: Pensacola (850) 595-8300
- Northeast: Jacksonville (904) 807-3300
- Central: Orlando (407) 894-7555
- Southwest: Tampa (813) 632-7600
- Southeast: West Palm Beach (561) 681-6600
- South: Fort Myers (239) 332-6975

FLORIDA FACT SHEET ON USED OIL IN THE ENVIRONMENT
8/15/95

- Because of the many special additives used in the production of motor oil for today's high performance engines, as well as the contaminants picked up in use through the engine, used oil can be more environmentally damaging than crude oil pollution.

- When released on land, used oil tends to migrate through the soil, stressing soil microbes and other small organisms. Loss of these organisms reduces nutrient cycles and can stress the plant foundation of the food chain.

- On water, oil spreads across the surface and eventually settles (as a tar-like substance) on the bottom. In both cases, plants, microbes, invertebrates and other organisms become stressed as the oil clogs breathing mechanisms, interferes with temperature regulation and may accumulate in some tissues, such as muscle.

- Oil contaminants in tissues make the organism unfit for human consumption. If not consumed by humans, the contaminants may be passed along (and concentrated through) the food chain, contributing to environmental degradation.

- 90% of all economically important seafood spend at least part of their life in estuarine systems (coastal areas where sea salt water mixes with run-off fresh water), which are very susceptible to polluiton caused by oil spills.

- One pint of oil in a body of water can produce an oil slick that will cover one acre (approximately the area of a football field).

- Oil on water interferes with photosynthesis and gas exchange at the surface, reducing oxygen levels.

- It may take up to twenty years for an aquatic system to recover from an oil spill.

- One part of oil per million parts of water (1 ppm - about one drop of oil in a bathtub full of water) can produce odors and tastes noticeable to humans.

- 35 parts per million (ppm) of oil can cause an oil slick visible to the human eye.

- One gallon of oil can render one million gallons of fresh water (one year's supply for 50 people) undrinkable.

Management of Gasoline Fuel Filters

July 26, 1995

If the gasoline entrapped within a used fuel filter is to be disposed of, it is then solid waste and could (probably would) test out as hazardous for, at least, ignitability and benzene. If the gasoline entrapped within a used fuel filter is destined for recycling as a commercial chemical fuel (e.g. mixed with used oil) by burning for energy recovery, it is not discarded and is not, therefore, a hazardous waste, according to Federal Register, Vol. 50, No. 230, November 29, 1985, p. 49179.

The metal and paper portions of the fuel filter casing could qualify for the scrap metal recycling exemption found in Chapter 40, Part 261.6 (a) (3) (iii).

Used fuel filters destined for recycling would be exempted from the manifesting and permitting requirements of the hazardous waste management regulations.

Generators of used fuel filters should drain them of all free flowing liquid prior to shipping. Due to the low flash point of gasoline, the generator should store them safely, allowing for the venting of any pressure build-up, and protecting the storage area from the possibility of sparks.

Management of Sorbent Materials

April 27, 1998

Used Oil is regulated under Chapter 62-710 of the Florida Administrative Code (F.A.C.), Used Oil Management.

Any oil sorbent material is defined, under the definitions in Rule 62-701.200 (76), F.A.C., as an oily waste which may be tested and discarded in a manner which is in compliance with other state and local requirements. Rule 62-701.300(8) and (11), F.A.C., allows for the landfill disposal of oily wastes unless prohibited in other department rules. In short, oily wastes can be sent to landfills for disposal unless they contain free liquids, are hazardous wastes, or are prohibited by local government regulations.

The Department recommends that as little of this material be generated as possible. *As a point of reference only, as it is not found in any used oil regulations, the concept of de minimus may be helpful.* A de minimus quantity of hazardous waste is defined in Chapter 40, Part 261.3(a)(IV)(D) of the Code of Federal Regulations (CFR) as " losses ... from normal material handling operations (e.g. spills from the unloading or transfer of materials from bins or other containers, leaks from pipes, valves or other devices used to transfer materials); minor leaks of process equipment, storage tanks or containers; leaks from well-maintained pump packages and seals ..."

Using this reference, quantities of used oil contaminated sorbent generated in lieu of normal maintenance (e.g. using sorbent to control used oil from a leaking valve, rather than fixing the valve) would generate a large quantity of contaminated sorbent material which would not be considered to be de minimus.

Accumulating large quantities of oily waste may require additional TCLP testing which is expensive and not considered a Best Management Practice. If the oily waste does test hazardous, the material must be managed as a hazardous waste.

If a waste is determined to be hazardous, and is destined for burning for energy recovery, it is regulated under 40 CFR Subpart H, Hazardous Waste Burned in Boilers and Industrial Furnaces.

Waste-to-Energy Facilities are prohibited from burning any hazardous waste. A Waste-to-Energy facility must manage its process within the limits of its Air Permit. To accomplish this, the facility has the right to refuse acceptance of a particular waste, regardless of the hazardous determination. This includes any type of sorbent material.

ATTACHMENT 8

FACILITY CLOSURE PLAN

ENVIRONMENTAL SERVICES

ATTACHMENT 8: FACILITY CLOSURE PLAN

This plan describes the facility's closure plan for used oil facilities.

a) A closure schedule;
The facility will notify FDEP and Miami-Dade Department of Regulatory and Economic Resources of the closure within 72 hours of the cessation of the acceptance of these materials. The FDEP will also be notified of the proposed method of closure and when completed.

The cessation of used oil will be completed as expeditiously as practical considering the volume on site, normal usage and any tank or pipeline cleanup required. The total process should take less than three (3) months depending on tank cleanup/scheduling requirements. All of the materials involved will be utilized in the cement/manufacturing process.

b) A listing of tanks, piping and other equipment that will be cleaned/closed;
Refer to Attachment 5—ICP.

c) Procedures for decontamination of tanks, containers, pipes, equipment and other process areas;
Upon closure of tanks, containers, pipes, etc., an outside company specializing in closure procedures will be contracted to perform this work in accordance with 40 CFR Part 279.54(h)(1).

d) A listing and justification of sampling methods (including number of samples), sampling parameters, and analytical methods. All sampling and analysis must be in accordance with SW-846 or equivalent methods;
Upon closure of tanks, containers, pipes, etc., an outside company specializing in closure procedures will be contracted to perform this work in accordance with 40 CFR Part 279.54(h)(1).

e) A description of the characterization and disposal of rinsewaters and residues generated from clean-up and closure activities;
All such materials are incorporated into the cement-making process.

f) A description of the characterization and disposal of solid wastes generated from clean-up and closure activities;
All such materials are incorporated into the cement-making process.

g) A description of soil sampling near secondary containment. Also describe how the following will be addressed at time of closure, in accordance with 40 CFR Part 279.54(h)(ii):

(i) A description of how, if soil is contaminated, the groundwater will be sampled; and
Upon closure of facility an outside company specializing in closure procedures will be contracted to perform this work in accordance with 40 CFR Part 279.54(h)(1).

(ii) A description of how, if groundwater is contaminated, the facility will meet the closure requirements of 40 CFR, Part 265.310, Closure and Post-Closure Permit.
Upon closure of facility an outside company specializing in closure procedures will be contracted to perform this work in accordance with 40 CFR Part 265.310.

ATTACHMENT 5

INTEGRATED CONTINGENCY PLAN WITH SPCC PLAN

INTEGRATED CONTINGENCY PLAN (ICP)

WITH

SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) PLAN

CEMEX CONSTRUCTION MATERIALS FLORIDA, LLC
Miami Cement Plant and SCL Quarry
1200 NW 137th Avenue
Miami, Florida 33182
(305) 221-7645

MOST RECENT PLAN REVISION: December 7, 2012

263-12-16

EMERGENCY CONTACT LISTS AND SUMMARY OF RESPONSE PROCEDURES

For Complete Details, See Section IV – Spill Prevention, Control, and Countermeasure Plan, Section 21.0

INTERNAL NOTIFICATION EMERGENCY AND CONTACT LIST

Person Making Notification:_____

Date:_____

Reason for Notification:_____

In case of emergency, complete checklist to serve as a record of notification action.

Personnel	Department or Title	Office No.	Cell No.	Time
Charles E. Walz Home Address: 1149 NW 122 Terr. Pembroke Pines, FL 33026	**Facility Emergency Response Coordinator:** Environmental Manager/Plan Coordinator	305-229-2955	305-586-8379	
Robert McClanahan Home Address: 18253 NW 15th Lane Pembroke Pines, FL 33029	**Asst. Facility Emergency Response Coordinator:** Health/Safety Manager – Asst. Plan Coordination	305-228-4383	305-798-6930	
Luis G. Lopez	Plant Manager	305-229-2962	786-449-5351	
Jim Sujansky	Production Manager	305-228-4372	954-680-4475	
Joel Eite	RES Manager	305-229-2942	305-773-0122	
Jeff Passerello	Quality Control Manager	305-229-2925	305-216-5098	
Paul Shaffer, Vernon Clark, Joe Kronick, Earl Haines, Tom Sadowski or JR Solanes.	On-Scene Process Foreman	305-229-2920	305-229-3981	
Devon Coppock	**Environmental Manager – SCL Quarry**	305-818-4955	813-476-1185	

Update this list as applicable.
Copy and complete this list after each notification event.

EXTERNAL EMERGENCY CONTACT AND NOTIFICATION LIST

In the event that a material is spilled/released in a quantity above a reportable threshold quantity, the Facility Emergency Response Coordinator or his designee is responsible for notifying the applicable agencies as listed below (also provided in the SPCC Plan, Section IV.21.0). **Call 911 first for emergency situations.**

When In Doubt Call: **FLORIDA WARNING POINT**	**State**	**800-320-0519**
National Response Center (NRC)	**Federal**	**800-424-8802 (24 hr.) or online http://www.nrc.us.uscg.mil/nrchp.html**
U.S. Coast Guard National Response Center	**Federal**	**800-424-8802 (24 hr)**
US EPA Region 4 Emergencies	**Federal**	**800-241-1754 or 404-562-9900**
FEMA Region IV	**Federal**	**303-646-2500 (Washington) 770-220-5200 (Atlanta, GA)**
FDEP Southeast District	**State**	**813-332-6975 Phone 813-332-6969 FAX**
Bureau of Emergency Response (BER)	**State**	**850-245-2010**
FL Division of Emergency Mgmt.	**State**	**850-413-9969**
Miami-Dade Dept. of Emergency Management and Homeland Security	**Local**	**305-468-5400**
Miami-Dade County DRER (Emergencies)	**Local**	**305-372-6955 (24 hr)**
Florida Marine Patrol, Miami	**Local**	**305-795-2145**
Local Emergency Planning Council	**Local/Regional**	**305-468-5421** Niel Batista, Bureau Manager Miami-Dade DEM&HS **niel.batista@miamidade.gov**

OTHER CONTACTS

LOCAL

Miami Dade Police
9105 NW 25 Street
Doral, FL 33172
305-471-1780
911 for Emergencies

Miami Dade Fire Department
Station 58 Tamiami
12700 SW 6th Street
Miami, FL 33184
786-331-5000
911 for Emergencies

Miami Dade County Officials:

Chairman:
Joe A. Martinez
Office: 305-375-5511 Fax: 305-375-5883

Administrator:
Alina T. Hudak, County Manager
Office: 305-375-2300 Fax: 305-375-1271

Sheriff: Robert Parker, Police Chief
Office: 305-476-5423 Fax: 305-471-2163

American Red Cross: Mona Adams, Chair
Office: 305-644-1200 Fax: 305-644-1038
www.miamiredcross.org

Medical Facilities

Kendall Regional Med Center
11750 Bird Road
Miami, FL 33175-3530
(305) 223-3000

Westchester General Hospital
2500 SW 75th Avenue
Miami, FL 33155-9947
(305) 264-5252

South Miami Hospital
6200 SW 73rd Street
Miami, FL 33143-9990
(786) 662-4000

Baptist Hospital of Miami
8900 North Kendall Drive
Miami, FL 33176-2197
(786) 596-1960

STATE

- HRS Radiological Office: (407) 297-2095
- Explosive Ordinance Disposal (extensive details needed): (407) 853-9951

HOTLINES

- Center for Disease Control: (404) 639-2888
- Southern Waste Exchange: (800) 441-SWIX
- Poison Control Center: (800) 282-3171
- EPCRA/CERCLA Hotline: (800) 535-0202
- Toxic Substances Control Act Hotline: (202) 554-1404
- Association of American Railroads, Bureau of Explosives: (202) 639-2222
- DOT Hotline: (202) 366-4488
- Mercury Hotline: (800) 833-3505
- National Animal Poison Control Center: (800) 548-2423
- ATSDR (Agency for Toxic Substances and Disease Registry): (404) 639-0615
- RCRA/Superfund Hotline: (800) 424-9346
- Pesticide Hotline: (800) 858-7378

WEATHER

- National Weather Service (S. Florida Weather Forecast Office): 305-229-4522

SPILL RESPONSE SUMMARY

Reportable thresholds are the following:

Petroleum based spills

- Involving waterways in any amount
- Greater than 25 gallons (or the potential to release greater than 25 gallons)

Chemical based spills

- SARA/EHS/CERCLA Releases
- Threatening population or the environment
- Requiring evacuation

MINOR SPILL RESPONSE

A "minor spill" poses no significant harm to human health or the environment. The spill is generally less than 25 gallons and can usually be cleaned up by Facility personnel. In addition, a minor spill:

- is easily stopped or controlled at the time of the spill
- is localized
- is not likely to reach surface water or ground water
- poses little danger to human health
- will usually not result in a fire or explosion

IN THE EVENT OF A MINOR SPILL:

1. ***Immediately notify the Quarry Manager or Facility Emergency Response Coordinator (FERC).***
2. ***Under the direction of the Quarry Manager or FERC, contain the spill with spill response materials and equipment.***
3. ***Place spill debris in properly labeled waste containers.***
4. ***After making the appropriate phone calls and the spill is contained, complete the Internal Spill Notification/Discharge Reporting Form in Appendix D and send to the FERC.***

MAJOR SPILL RESPONSE (SPILL EMERGENCY)

A "spill emergency" involves a spill that cannot be safely controlled or cleaned up. Characteristics of a major spill include:

- The spill is large enough to spread beyond the immediate spill area
- The spilled material enters surface water or ground water (regardless of amount spilled)
- The spill requires special training and equipment to cleanup
- The spilled material is dangerous to human health, and
- There is a danger of a fire or explosion

IN THE EVENT OF A SPILL EMERGENCY:

1. ***All workers are to evacuate the spill site and move to a safe distance***
2. ***Notify the FERC immediately. The FERC will call for medical assistance if workers are injured. No worker will engage in rescue operations unless they have been properly trained and equipped.***
3. ***The FERC will immediately contact the following as applicable:***
   - **Fire Department - 911**
   - **Miami-Dade County DRER at 305-372-6955**
   - **State Warning Point at 1-800-320-0519**
   - **National Response Center at 1-800-424-8802**
4. ***The FERC will coordinate cleanup and seek assistance from a cleanup contractor as necessary.***
5. ***The FERC will submit required reports as applicable.***

Local Reporting

The Miami-Dade County Department of Regulatory and Economic Resources (DRER) should be called directly in the event of a chemical or petroleum spill, a hazardous waste materials incident, or other environmental emergency after dialing 9-1-1.

The LEPC is to be contacted in the event of a release of an Extremely Hazardous Substance or CERCLA Hazardous Substance.

State Reporting

The Florida Department of Environmental Protection (FDEP) Division of Law Enforcement's Bureau of Emergency Response (BER) is the designated State Warning Point in the event of a hazardous materials incident.

The BER responds to environmental pollution threats in every form. The BER provides technical and on-site assistance to ensure threats to the environment and human safety are quickly and effectively addressed.

The BER also works with local public safety officials and emergency response contractors to minimize threats to the environment. BER offices are located throughout the state, with headquarters in Tallahassee.

The incidents listed below are reportable to the BER through the State Warning Point as soon as possible, but no later than 24 hours of the release.

- Petroleum Based Spills
  - Spills into or involving state waterways (any amount)
  - Spills greater than 25 gallons (or potential > 25 gallons)
  - Spills requiring any state/federal notifications or assistance
- Chemical Spills
  - All SARA/EHS/CERCLA Releases
  - All spills threatening population or the environment
  - All spills requiring evacuation

Within 7 days, a Discharge Notification Report (DNR) Form must be submitted to the BER. A DNR form is provided in Appendix E. For a petroleum spill, follow the specific FDEP guidelines provided in Appendix F.

Federal Reporting

The National Response Center (NRC) must be contacted within 1 hour if the discharge threatens or enters waters of the state. A discharge must also be reported to the EPA Regional Administrator when there is discharge of:

- More than 1,000 US gallons of oil in a single discharge to navigable waters of adjoining shorelines; or
- More than 42 U.S. gallons of oil in each of two discharges to navigable waters or adjoining shorelines occurring within any twelve month period.

Be prepared to report the following information:

- *Your name, location, organization, and telephone number*
- *Name and address of the party responsible for the incident*
- *Date and time of the incident*
- *Location of the incident*
- *Source and cause of the release or spill*
- *Types of material(s) released or spilled*
- *Quantity of materials released or spilled*
- *Medium (e.g. land, water) affected by release or spill*
- *Danger or threat posed by the release or spill*
- *Number and types of injuries or fatalities (if any)*
- *Weather conditions at the incident location*
- *Name of the carrier or vessel, the truck number, or other identifying information*
- *Whether an evacuation has occurred*
- *Other agencies notified or about to be notified*
- Any other information that may help emergency personnel respond to the incident

A written report shall be submitted to the EPA Administrator – Region IV and the FDEP within 60 days of a discharge of more than 1,000 gallons of oil into or upon the navigable waters of

the United States or adjoining shorelines in a single discharge event or discharges of 42 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in two discharge events occurring within any twelve month period. The following information should be included in the follow–up report:

- *Name and location of facility*
- *Owner/operator name*
- *Maximum storage/handling capacity of the facility and normal daily throughput*
- *Corrective actions and countermeasures taken, including descriptions of equipment repairs and replacements*
- *Adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary*
- *Cause of the discharge to navigable waters, including a failure analysis*
- *Failure analysis of the system where the discharge occurred*
- *Additional preventive measures taken or planned to take to minimize discharge reoccurrence*
- *Other information EPA Region IV may reasonable require*

TABLE OF CONTENTS

Appendices

CEMEX MIAMI CEMENT PLANT MANAGEMENT APPROVAL

This Integrated Contingency Plan (ICP) has the full approval of management at a level of authority to commit the necessary resources for its implementation. The provisions of this ICP will be carried out whenever a situation arises which might potentially endanger public health and safety and/or the environment.

Facility management is familiar with this Facility and the information contained in this ICP. This ICP will be implemented as herein described. The ICP was prepared in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information contained in this plan is true, accurate, and complete.

Name/Title:_____

Signature: _____

Date: _____

SPCC CROSS REFERENCE TABLE

SPCC Rule	Description of Section	Page(s)
§ 112.7	General requirements for SPCC Plans for all facilities and all oil types.	55
§ 112.7(a)	General requirements; discussion of facility's conformance with rule requirements; deviations from Plan requirements; facility characteristics that must be described in the Plan; spill reporting information in the Plan; emergency procedures.	57
§ 112.7(b)	Fault analysis.	83
§ 112.7(c)	Secondary containment.	86
§ 112.7(d)	Contingency planning.	87
§ 112.7(e)	Inspections, tests, and records.	89
§ 112.7(f)	Employee training and discharge prevention procedures.	92
§ 112.7(g)	Security (excluding oil production facilities).	93
§ 112.7(h)	Loading/unloading (excluding offshore facilities).	95
§ 112.7(i)	Brittle fracture evaluation requirements.	97
§ 112.7(j)	Conformance with State requirements.	98
§ 112.8	Requirements for onshore facilities (excluding production facilities).	100
§ 112.8(a)	General and specific requirements.	100
§ 112.8(b)	Facility drainage.	100
§ 112.8(c)	Bulk storage containers.	101
§ 112.8(d)	Facility transfer operations, pumping, and facility process.	106

SECTION I – PLAN INTRODUCTION ELEMENTS

1.0 PURPOSE AND SCOPE OF INTEGRATED CONTINGENCY PLAN COVERAGE

The CEMEX Miami Cement Plant (Facility) is a mining, manufacturing, storage and distribution complex located at 1200 NW 137th Avenue in Miami, Miami-Dade County, Florida. Limestone is the principal raw material that is mined on-site. The facility is designed to efficiently transform various raw materials into Portland cement. Limestone and other raw materials are processed on-site through diversified phases including crushing, screening, grinding, kiln firing, finish grinding, packing and shipment. Facility location and site plans are provided in Appendix A.

This Integrated Contingency Plan (ICP) is provided for the Facility and SCL Quarry to address federal, state and local contingency planning regulations. Additional regulations which may apply are listed in Appendix B. It is specifically constructed to address a wide range of risks at the Facility. Risks include both physical and chemical hazards associated with events such as chemical releases, oil spills, fires, explosions, and natural disasters. The Facility maintains a stand-alone Fire Plan in a separate document.

This ICP establishes procedures and identifies methods and equipment to:

1. Prevent and to respond to the discharge of petroleum products from the Facility;
2. Document used oil and waste management practices; and
3. Minimize hazards to human health or the environment from fire, explosions, hurricanes and tornadoes, or any unplanned release of hazardous waste to the air, soil, groundwater or surface water.

Due to the Facility's location, the potential exists for oil products to be accidentally discharged to waters of the United States. The Facility has above-ground oil storage capacity greater than 1,320 gallons. Therefore, this ICP includes a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with Rule 40 CFR 112. Applicable storage tanks have been registered in accordance with the Florida Department of Environmental Protection (FDEP) requirements.

The Facility is a generator and burner of used oil and is required to comply with applicable sections of the Florida Hazardous Waste and Used Oil Management regulations (Rule 62-730 FAC). In addition, the Facility may also be subject to state emergency response planning requirements. CEMEX coordinated development of earlier versions of their contingency plan with relevant state and local agencies to ensure compliance with additional regulatory requirements.

This ICP is designed to be a functional document for use in varied emergency situations while providing a mechanism for complying with multiple agency requirements. The Plan includes instructions and response procedures specific to the Facility for a variety of emergencies. Appendices provide additional supporting information including Facility location and site plan figures, and inspection, training and reporting forms.

2.0 CURRENT REVISION DATE

This ICP was revised on December 7, 2012. Detailed information on update history (i.e., a record of amendments) is provided and maintained in Section 10.0.

3.0 CEMEX MIAMI CEMENT PLANT FACILITY INFORMATION

Facility name: CEMEX Miami Cement Plant and SCL Quarry

Owner/operator: CEMEX Construction Materials Florida, LLC

Parent company: CEMEX
1501 Belvedere Road
West Palm Beach, FL 33406
Telephone 561-820-8344
Fax 561-820-8388

Physical address: 1200 NW 137th Avenue
Miami, Dade County, Florida
Latitude: 25°46'48" Longitude: 80°25'10"

Mailing address:
Plant: Charles E. Walz, Environmental Manager
1200 NW 137th Avenue
Miami, Florida 33182
Office 305-229-2955; Fax 305-229-8015

Quarry: Devon Coppock, Environmental Manager
13292 NW 118th Avenue
Miami, FL 33178
Office 305-818-4955; Mobile 813-476-1185

Other identifying information:

ID numbers: Title V Air Program ID No. 0250014
Solid Waste ID No: 5013P05691

SIC Codes: 1422 - Limestone mining and processing
3241 - Portland cement manufacturing

Key contacts for plan development and maintenance:

Maxwell R. Lee, Ph.D., P.E. or
Tammy Reed for Plan development and updates
Koogler and Associates, Inc.
4014 NW 13th Street, Gainesville, Florida 32609
Phone 352-377-5822 Fax 352-377-7158

Charles E. Walz, Environmental Manager – Plan maintenance
CEMEX Construction Materials Florida, LLC
1200 NW 137th Avenue, Miami, Florida 33182
Phone 305-229-2955 Fax 305-229-8015

SECTION II – CORE PLAN ELEMENTS

4.0 RESPONSE MANAGEMENT SYSTEM

This section contains a general description of the Facility's response management system as well as specific information necessary to guide or support the actions of each response management function (i.e., command, operations, planning, logistics, and finance) during a response.

4.1 Hazard Assessment

This section presents an assessment of potential hazards present at the Facility, an analysis of vulnerable receptors (e.g., human populations, both workers and the general public, environmentally sensitive areas, and other Facility-specific concerns) and a discussion of which risks deserve primary consideration during an incident.

An emergency is any unplanned event that can cause death or significant injury to employees, customers or the public; or that can shut down the Facility, disrupt operations, cause physical or environmental damage, or threaten the Facility's financial standing or public image.

Numerous events can be considered emergencies, including:

- Fires
- Hazardous materials incident
- Severe weather
  - Flood
  - Hurricane
  - Tornado

- Communications failure
- Civil disturbance
- Loss of key supplier or customer
- Explosion
- Transportation accidents
- Terrorism

The Facility's energy requirements are supplied by various fuels including, but not limited to, coal, petroleum coke, tires, waste oil, etc. Thus, large quantities of fuels are received, stored, transferred, and consumed in the process functions. Oil for the purposes of this ICP generally encompass fuel oil, used oil, gasoline, lubricating oil, and other petroleum-derived products. The primary purpose of the SPCC Plan incorporated in this ICP is to prevent any oil that may be spilled from reaching navigable water. Specific details on this topic are provided in the SPCC Plan in Section IV.

4.2 Command – CEMEX Miami Cement Plant Facility

This section addresses the Facility's organization and describes in detail the structure of the Facility's response management system with specific job descriptions for each position. A unified incident management system and command structure will be used. Under a unified command structure in the command post, the implementation of the action plan will be done under the direction of a single individual. For Level I or Level II incidents, the implementation of the plan will be directed by the designated Facility Emergency Response Coordinator (FERC). For Level III and Level IV incidents, the implementation of the plan will be directed by the Incident Commander. See Section 5.1 for definitions of Level I-IV incidents.

When an emergency occurs, the effects of which are strictly confined to the premises, governmental response agency assistance should be on a cooperative basis only. When there is any possible off-site threat to the general public or the environment, the local government, through its emergency response organizations, will assert its authority and take charge.

Facility Emergency Response Coordinator (FERC)
(Contact information is provided in the front of the ICP)

- ☐ Conduct a preliminary assessment of the situation, including an identification of incident type, hazards involved, magnitude of the problem, and resources threatened
- ☐ Account for all employees
- ☐ Establish objectives and priorities for response to the specific incident, including:
  - ☐ Immediate goals/tactical planning (e.g., protection of workers and public as priorities)
  - ☐ Mitigating actions (e.g., discharge/release control, containment, and recovery, as appropriate)
  - ☐ Identification of resources required for response
- ☐ Implement tactical plan
- ☐ Mobilize resources
- ☐ Determine the type and nature of the hazardous material involved and coordinate the issuance of personal protection equipment (PPE) as needed
- ☐ Determine the necessity for an evacuation, issue evacuation orders when appropriate, and identify the vulnerable zone to be evacuated
- ☐ Notify the Florida Department of Environmental Protection through the Florida Warning Point when necessary, and notify other state and federal agencies as required by federal and state laws
- ☐ Appoint a Public Information Officer to coordinate the press and electronic media
- ☐ Provide post-emergency information to facilitate recovery operations and for the continuous safety, health, and well-being of the population. Provide instructions designed to preclude the hindrance of cleanup operations, instructions on avoidance of hazards to health and safety, instructions on where and how to receive assistance, and notification when reentry into the evacuated area will be permitted

Incident Commander

In the event of an emergency, the first responding unit at the site may establish an On-Scene Command Post. The Incident Commander at the On-Scene Command Post will be the highest ranking officer in the jurisdiction of the incident and (s)he shall coordinate and control on-scene emergency operations and coordinate the efforts of all agencies involved in on-site emergency-operations related to the incident. (S)He will act through respective agency representatives who will maintain control over their respective forces. The FERC or Incident Commander will serve as a liaison between the responding agencies.

Public Information Officer

Public Information Officers are those persons authorized to release news and background information to the media, monitor events and summarize information for distribution to responders and the media, coordinate and verify information from and within all entities, assure support with regard to timely notification to the public, and assist public information spokespersons to maintain records of news releases and public information as well as a log of events. Specific duties to be performed include the following:

- Collect, edit, and release information and instructions to the media
- Establish contact with wire services
- Assist news media personnel in the performance of their functions, including accreditation and identification
- Coordinate the release of information with facility representative and county information officer
- Brief the news media as conditions warrant
- Keep personnel informed through in-house bulletins
- Do not speculate about the incident
- Do not permit unauthorized personnel to release information
- Do not cover up facts or mislead the media
- Do not place blame for the incident

Emergency information efforts should focus on specific, event-related information. A special effort should be made to report positive information about emergency response efforts to reassure citizens that the situation is under control. Rumor control should be emphasized. The spokesperson shall gather information from the various agencies with expertise on the scene and condense it to a single public announcement.

4.3 Communications

This section addresses how the Facility will disseminate information internally (i.e., to Facility/response employees), externally (i.e., to the public) and interact with local officials to assist with public evacuation and other needs.

Internal Communications

Activation of the notification system will be accomplished within 15 minutes after the decision is made to activate. Available communications equipment includes:

1. Land Line - telephone lines available
2. FAX unit
3. Cellular telephones
4. Two-way radios (walkie-talkies)
5. CB radio system
6. Public-address system for warning personnel of an emergency. The system should:
   - Be audible or within view by all people in the facility
   - Have an auxiliary power supply
   - Have a distinct and recognizable signal

Media Relations

Any inquiries from the news media are routed to and only addressed by the FERC or the Public Information Officer. The FERC may conduct news conferences and issue news bulletins or other public information statements.

Upon the determination of an emergency or full emergency incident, the FERC will activate procedures to provide public protective recommendations to the public. In addition, rumor control may be established to address public requests for information. A press room will be established to accommodate representatives of the news media. The press briefing area will be in a safe location in the cold zone, and will be in such a location that it will not interfere with field operations. Copies of news releases will be distributed in the press room. The Public Information Officer will arrange for periodic situation briefings in the press room and will participate in these briefings. All other staff shall not, unless authorized by the FERC or Plant Manager, respond directly to inquiries from the broadcast media/press; and should refer all inquiries to the Public Information Officer.

- Give all media equal access to information.
- Give local and national media equal time.
- Try to observe media deadlines.
- Escort media representatives to ensure safety.
- Keep records of information released.

4.4 Access Control

All personnel and equipment responding to the incident will report to the FERC or Incident Commander, where they will check in. Command personnel will report to the FERC or Incident Commander after their equipment is positioned in the staging area. When their mission is completed, they will check out through the FERC or Incident Commander.

The FERC or Incident Commander will maintain a log of all personnel reporting to the scene. The log will contain the following information:

- Name of individual
- Purpose

- Agency name
- Phone number of agency
- Entry time
- Exit time

The only exception to the above procedure will be fire responders. They will be able to enter the scene from any area after they receive clearance from the FERC or Incident Commander.

Law enforcement personnel on the security perimeter will direct any personnel or equipment trying to enter the scene to the FERC or Incident Commander.

All agencies required for the mitigation and cleanup will report to the FERC or Incident Commander, proceed to the staging area and position their vehicles. Each agency or contractor will keep one person at the command center. This person will provide the communications link between the agency or contractor and the FERC or Incident Commander. This will improve the FERC or Incident Commander's ability to rapidly withdraw personnel if the situation deteriorates.

Should there be a need to enter the scene from a point other than the designated access point, notify the law enforcement representative at the command center. The law enforcement representative will contact his/her personnel at the selected point of entry on the security perimeter. They will give them the agency's name, the number of people entering the area, and their estimated time of arrival. When the agency arrives at the selected point, they will check in with the officer at that point. The entry time will be communicated to the command center for logging. When the personnel leave the area, their exit will be logged at the point of exit and/or the command center.

4.5 Safety

This section includes a process for ensuring the safety of Facility personnel and responders.

- All personnel shall wear required protective clothing and equipment to safely handle the material. The FERC or Incident Commander will determine what level of protection is called for.
- Safe operation at an incident must begin with a positive attitude that is created at the supervisory level, understood at the company level, and practiced by everyone at the incident.
- Control the scene and its perimeter.

4.6 Medical Facilities

Personnel or responders who are injured in the affected area of a hazardous material emergency will be treated as possible contamination victims until a positive determination can be made. Emergency medical personnel will take precautions to prevent the spread of contamination on an injured person, to medical support personnel, and to medical equipment until the injured person can be transported to a medical facility with injury decontamination capabilities. Medical facility contact information is provided in the Emergency Contacts Lists in front of the ICP and in Appendix E.

4.7 Equipment

This section addresses how the Facility will provide for the operational needs of response operations. Fire control is provided by multiple hydrants and fire stations located in strategic areas throughout the facility.

The Miami-Dade County Department of Regulatory and Economic Resources (DRER) is the local contact for response to any major emergency. All Miami-Dade County and municipal hazardous materials teams maintain equipment that will be used in response to emergencies

involving the release or spill of hazardous materials. Their contact information is provided at the front of this ICP and in Appendix E.

The FDEP Bureau of Emergency Response is the state contact in the event of an environmental pollution threat. The FDEP has arranged with private response contractors located throughout Florida to provide response personnel and equipment, including mobile analytical laboratories for major chemical releases that occur in inland areas of the state. FDEP has similar arrangements with private response contractors located throughout Florida, to provide response personnel and equipment, including mobile laboratories for major chemical releases that occur in coastal and navigable waters. Their contact information is provided at the front of this ICP and in Appendix E.

Initial response equipment available on-site includes:

- Basic firefighting equipment, including properly rated extinguishers where appropriate or required.
- Containment equipment, such as frontend loaders
- Decontamination equipment and supplies
- Sponges and soft brushes
- First aid equipment
- Scissors for clothing removal
- Mild detergent
- Tarps or 6-mil construction plastic
- Water supply
- Towels and blankets
- Five-gallon buckets
- Duct and masking tape

- Plastic trash bags
- Plastic sheeting
- Flashlights
- Spare bulbs
- Rope
- Rain suits
- Drinking cups
- Hand soap
- Toilet paper
- Cots
- Paper towels
- Gas cans
- Drinking water
- Heat lamps

4.8 Containment of Spills

A spill from any of the bulk storage tanks would be contained within the secondary containment structures and reintroduced into material substitution and consumed in the cement manufacturing process. For specific information on spill response see the SPCC Plan in Section IV.21.0.

4.9 Decontamination Procedures

- Decontaminate from the head down.
- Take care not to introduce contaminants into open wounds.
- Decontaminate exposed wounds and eyes before intact skin areas.

- For external contamination, begin with the least aggressive methods.
- Limit mechanical or chemical irritation of the skin.
- Wash contaminated area gently under a stream of water, and scrub with a soft brush or surgical sponge.
- Use warm, never hot, water.
- Remove contaminants to the level that they are no longer a threat to patient or response personnel.
- All equipment and clothing from a contaminated area should be stored in a controlled area near the incident site until decontamination or proper disposal.
- Contaminated equipment, such as buckets, brushes, tools, etc., should be placed in containers and labeled.
- Partially decontaminated clothing should be placed in plastic bags pending further decontamination or disposal.
- Respirators should be dismantled, washed, and disinfected after each use.
- Water used for tool and vehicle decontamination will be allowed to run into suitable collection ditches, holding ponds, and other secure areas.
- Areas used for decontamination will be monitored for residual contamination.

4.10 Waste Management

This section addresses procedures for the disposal of contaminated materials in accordance with federal, state, and local requirements.

All equipment and clothing from a contaminated area should be stored in a controlled area near the incident site until decontamination or proper disposal. All runoff from decontamination operations will be contained and disposed of in accordance with accepted federal, state, and local practices and regulations.

4.11 Incident Documentation

This section describes the procedures for conducting a follow-up investigation of the cause of the accident. During all phases of response, documentation should be collected and maintained to support all actions taken under this plan, and to form the basis for cost recovery. All employees involved must provide details for the completion of an accident investigation report. In general, documentation should be sufficient to provide the source and circumstances of the condition, the identity of responsible parties, accurate accounting of local or private party costs incurred, and impacts and potential impacts to the public health, welfare and the environment. A final report of the incident should be prepared which includes, at a minimum, the following information:

- Time and date of incident
- Description of incident
- Summary of actions taken by emergency response agencies and organizations
- Summary of actions taken to protect public health/safety, the environment and other property
- Summary of injuries and property damage
- Documentation of costs
- Need for additional actions

5.0 RESPONSE PROCEDURES

This section describes emergency response levels and the essential steps necessary to initiate, conduct, and terminate an emergency response action. Specific response plans have been developed and are included in this ICP for hurricanes/tornadoes (Section III.11.0), medical emergencies (Section III.12.0) and for spill/discharge events (Section IV.21.0). Fire response instructions are listed in a separate document, see CEMEX Fire Plan.

A system of response levels is used in emergency planning for classifying emergencies according to seriousness and assigning an appropriate standard response or series of response actions to each level. This process allows response personnel to match the emergency and its potential impacts with appropriate resources and personnel.

CEMEX determined appropriate response levels based on the need to initiate time-urgent response actions to minimize or prevent unacceptable consequences to the health and safety of workers, the public, or the environment; and the need to communicate critical information concerning the emergency to offsite authorities.

5.1 Emergency Levels

Level I - Minor: An incident or threat of a release that can be controlled by the first responders and does not require evacuation of anything other than the involved structure or the immediate outdoor area. The incident is confined to a small area and does not pose an immediate threat to life or property. Level 1 emergencies involve nominal or no detrimental effects upon operating personnel, the public or the environment.

Level II - Limited: An incident involving a spill, release, or potential release of a known hazardous material with minor injuries, if any; and no fatalities. It involves a limited area of involvement and has a product quantity of less than 55 gallons. Evacuations will be limited to the immediate area for a limited duration (less than 4 hours). Local resources can be used to handle the incident. Level II emergencies involve moderate contamination and no immediate detrimental effects upon operating personnel, the public, or the environment.

Level III - Emergency: An incident involving a hazard or area which poses a potential threat to life and/or property and which may require a limited evacuation of the surrounding area. Level III emergencies involve an imminent major incident with possible fire, explosion or contamination.

Level IV - Full Emergency: A spill or release of a hazardous material that has resulted in a serious fire, explosion or environmental contamination over an extended area. The product may be highly toxic, very reactive, unstable or flammable. In addition, it may be extremely pathogenic. Evacuation will affect a large area for a long duration. Mutual aid will be required. Level IV emergencies involve a major incident with contamination, fire, and/or explosion with severe effects on operating personnel, the public or the environment.

5.2 Notification

The Facility Emergency Response Coordinator (FERC) is responsible for ensuring that notifications are carried out in a timely manner but is not necessarily responsible for making the notifications.

5.2.1 Internal Notification

See Internal Notification and Contact List provided in the front of this ICP and in Appendix E.

5.2.2 Emergency Response Contractors

A list of Emergency Response Contractors is included in the External Emergency Contact and Notification List provided in the front of this ICP and in Appendix E.

5.2.3 Community Notification

Most incidents will be reported through the 9-1-1 Public Service Answering Point (PSAP). The notification message will specify that the agency stand-by or activate emergency response personnel.

5.2.4 Agency Notification

In the event of a spill or discharge of petroleum or other hazardous substance, notification and reporting to local, state, and federal officials may be necessary. For specific details on how to respond to a spill/release event refer to the SPCC Plan in Section IV.21.0. Other emergency contacts, including hospitals, are provided in the Emergency Contacts Lists in front of this ICP and in Appendix E.

5.3 General Procedures

Employees are reminded that the Facility is not equipped nor trained to conduct emergency rescues of injured personnel in certain situations. These include, but are not limited to, Confined Space Rescue and Hazardous Materials Releases. You subject yourself and other employees to potential serious injuries or death if you attempt a specialized rescue without the proper training or equipment. Arrangements for these operations have been made with other specially trained units who will respond as needed. These responders include the Fire Department (confined space, chemical spills, leaks and fires).

5.3.1 Discovery of Incident or Emergency

- Call for help or seek assistance from a co-worker.
- Notify your supervisor as soon as practical.
- Rescue any injured or trapped persons in only those situations where you are properly certified.

- Take care of any injured personnel.
- Attempt to contain the occurrence to the smallest area possible.

5.3.2 Initial Response

- Take appropriate action to mitigate the hazards.
- Stabilize the situation.
- Protect plant property to the extent possible without taking personal risk.

5.3.3 Sustained Actions

- Evacuate the area only as directed by the FERC.
- Leave belts full of material.
- Turn off oil and gas valves.
- Cover all motors.
- Turn off all switches at main switch gear.
- Turn off computers.

The Facility Emergency Response Coordinator will:

- Ensure that all employees, visitors, vendors and contractors are accounted for.
- Establish a command post, staging area, agency response area, security perimeter, restricted area, access control coordination point, hot zone, and a decontamination area, as needed. This information shall be relayed to responding agencies.
- Develop traffic patterns for the area.
- Establish a perimeter around the incident, allowing no unauthorized persons into the area.
- In coordination with the Incident Commander, establish an access coordination point for all to enter and exit; maintain a record of those who enter and exit.
- In coordination with the Incident Commander or as necessary conduct evacuations of the area at risk.
- Isolate and establish command over the area where evacuation, traffic control and protection of property are of concern.
- Provide traffic control along evacuation routes.
- Secure evacuated areas until personnel are allowed to return to their workstations.

- Conduct decontamination and/or containment operation, as required.

5.3.4 Termination and Follow-Up Actions

Re-entry operations will be coordinated by the FERC or on-scene Incident Commander. Re-entry will be considered when chemical concentrations in the air, the water and the ground are below established levels of concern in the affected areas (downwind portions of the vulnerable zone). Upon the determination that the environmental conditions in the affected areas are safe for public access, protective actions will be relaxed and re-entry will be authorized. Cleared areas will be opened when clearly definable boundaries are available (i.e., highways, streets, canals). Limited re-entry by the general public will not be allowed.

- Conduct an employee briefing.
- Keep detailed records. Consider audio recording of all decisions.
- Take photographs of or videotape the damage.
- Account for all damage-related costs. Establish special job order numbers and charge codes for purchases and repair work.
- Follow notification procedures.
- Notify employees' families about the status of personnel on the property.
- Notify off-duty personnel about work status.
- Notify insurance carriers and appropriate government agencies.
- Protect undamaged property.
- Remove smoke, water and debris.
- Protect equipment against moisture.
- Restore sprinkler systems.
- Physically secure the property.
- Restore power.
- Conduct an investigation.
- Conduct salvage operations.

- ☐ Segregate damaged from undamaged property.
- ☐ Keep damaged goods on hand until an insurance adjuster has visited the premises.
- ☐ Take an inventory of damaged goods. If you release goods, obtain a signed inventory stating the quantity and type of goods being removed.
- ☐ Restore equipment and property.
- ☐ For major repair work, review restoration plans with the insurance adjuster and appropriate government agencies.
- ☐ Assess the value of damaged property. Assess the impact of business interruption.
- ☐ Maintain or reestablish contact with customers and suppliers.

6.0 EVACUATION PROCEDURES

These evacuation procedures are applicable for plant personnel when directed by the FERC. Evacuation of off-site residents is beyond the scope of this plan. All employees shall be aware of the emergency evacuation procedures from the area of the Facility in which they work. The evacuation procedures and routes apply to all types of emergencies. During an emergency, an immediate evacuation to a predetermined area away from the Facility may be necessary. In a hurricane, evacuation could involve the entire community and take place over a period of days.

- Identify personnel with the authority to order an evacuation.
- Conduct evacuation drills.
- Post maps of evacuation routes in prominent places.
- Keep evacuation routes including stairways and doorways clear of debris.
- Designate "evacuation wardens" to assist others in an evacuation and to account for personnel.
- Designate personnel to continue or shut down critical operations while an evacuation is underway. They must be capable of recognizing when to abandon the operation and evacuate themselves.
- Evacuate personnel away from lightweight modular offices or mobile home-size buildings.
- Designate primary and secondary evacuation routes and exits.
- Designate assembly areas where personnel should gather after evacuating.
- Take a head count after the evacuation. The names and last known locations of personnel not accounted for should be determined and given to the FERC.
- Account for non-employees such as suppliers and customers.
- Establish procedures for further evacuation in case the incident expands. This may consist of sending employees home by normal means or providing them with transportation to an off-site location.
- Each employee will ensure that all his/her office equipment, i.e., personal computer, is turned off and that he/she has his/her personal belongings.
- Administrative personnel are responsible to turn off the copier, coffee pot, FAX machine, the mail metering machine, and other equipment as applicable.
- Designated administrative personnel will ensure safe shutdown of the computer systems.

7.0 SHELTERING PROCEDURES

In some emergencies, the best means of protection is to take shelter either within the Facility or away from the Facility in a public building.

- Consider the conditions for taking shelter, e.g., tornado warning.
- Identify shelter space in the Facility and in the community.
- Establish procedures for sending personnel to a shelter.
- Determine needs for emergency supplies such as water, food and medical supplies.
- Designate shelter managers, if appropriate.
- Adults require about six square feet of space. Suitable shelter space includes:
  - Small interior rooms on the lowest floor and without windows
  - Hallways on the lowest floor away from doors and windows
  - Rooms constructed with reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.
- Once in the shelter, personnel should protect their heads with their arms and crouch down.

Internal Shelter-In-Place SAMPLE Notification

CEMEX has declared an emergency situation. This is a warning to all personnel. There has been (a fire/a release of hazardous materials). To avoid exposure, you are advised to seek shelter immediately; go indoors, close windows and doors, turn off air conditioners and fans. Stay inside until you receive further instructions. Evacuation has not been recommended at this time.

8.0 TRAINING AND EXERCISES/DRILLS

This section contains a description of the training and exercise program conducted at the Facility. The Facility should hold at least one realistic scenario exercise per year to test its plan. The Facility may notify the Miami Dade County Department of Emergency Management (DEM) and Local Emergency Planning Council (LEPC) at least one month in advance of the exercise. The contact number for the DEM and LEPC is provided in the front of this ICP. The DEM may participate in drills as applicable. The LEPC shall, if notified, publish a monthly exercise schedule to all agencies and response agencies may observe any Facility exercise. In addition, each FERC should observe one full-scale exercise within 18 months of obtaining the FERC position and one every 4 years thereafter.

Everyone who works at or visits the Facility requires some form of training. This includes periodic discussion sessions with employees to review procedures, technical training in equipment use for emergency responders, evacuation drills and full-scale exercises. Employees are trained to recognize and report hazardous material spills and releases. Employees are trained in proper handling and storage of hazardous materials. All personnel must attend a mandatory fire training class held annually for instruction in fighting different types of fires. All plant personnel must receive training in the prevention and control of any oil spill.

An exercise is an event that tests the integrated response capability and major elements within emergency preparedness plans. The emergency preparedness exercise will simulate an emergency and response by local authorities. Scenarios will be varied from year to year such that all major elements of the plan and preparedness organizations are tested within a five-year period.

8.1 Tabletop Exercise

A tabletop exercise is a simulation in which response activities are discussed. There is no mobilization of emergency personnel and resources in such an exercise.

8.2 Functional Exercise

A functional exercise is designed to demonstrate one or more functions or capabilities specified in the emergency plan. Mobilization of local personnel and resources are limited in such an exercise.

8.3 Full Scale Exercise

A full-scale exercise is designed to demonstrate the emergency preparedness and response capabilities of appropriate county and city agencies and organizations. Mobilization of local emergency personnel and resources are demonstrated in such an exercise as if the emergency actually occurred.

The functional exercise is the basic goal of an emergency management exercise program. These exercises are fully simulated, using messages that can be either written, or transmitted by telephone or radio, or both. The functional exercise creates stress by increasing the frequency of messages, intensity of activity, complexity of decisions and/or the requirements for coordination.

A drill is a supervised instruction period aimed at developing, testing and monitoring technical skills necessary to perform emergency response operations. A drill may be a component of an exercise. Each drill will be evaluated by the coordinator for that particular drill. In addition to the required exercise, drills will be conducted at the frequencies listed below.

8.4 Communications Drills

Test the warning system at least monthly. Communications with state and local emergency operations centers and on-scene personnel will be tested annually. The test of communications with on-scene teams will be part of the exercises.

8.5 Medical Drills

Medical emergency drills involving a simulated injury and participation by appropriate local emergency medical services will be conducted as part of the annual exercise.

The exercises and drills will be documented and evaluated. Documentation will include:

- Objectives of the exercise and appropriate evaluation criteria
- Dates, time period, places, and participating organizations
- The simulated events
- Time schedule of real and simulated events
- A narrative summary describing the conduct of the exercise

9.0 PREVENTION PROCEDURES

This section includes prevention-based procedures (e.g., maintenance, testing, in-house inspections, release detection, site security, containment, fail safe engineering) that are required in contingency planning regulations or that have the potential to impact response activities covered in a contingency plan.

9.1 Access Control and Site Security

The security of the Facility is the responsibility of all personnel. All jobs at the Facility are dependent upon producing cement. Basic security procedures are detailed below. It is the responsibility of the appropriate department manager or supervisor to ensure that there is strict adherence to this policy.

- Keys are not to be left in any equipment.
- No company equipment is to be left outside the Facility fence overnight.
- The only vehicles allowed within the plant area are those furnished by CEMEX.
- Vehicles not allowed in the mill area include:
  - Personal vehicles
  - Vendors – unless they are delivering parts
  - Outside contractors – except their maintenance trucks.
- Vehicles not allowed in the plant are to be parked in the parking lot located adjacent to the plant main office.
- Parking is not allowed in front of the laboratory/process area.
- All vendors/outside contractors are to sign in and have entrance approval at the front office prior to entering the mill.
- No vendor or outside contractor vehicles are to be within the plant without prior notice.

A security guard is present at the guard shack at the entrance to the facility 24 hours a day, seven days a week. Locked gates are present near N.W. 14th Street, but there is no facility access from those points.

On weekdays, the "B" shift Packhouse is to lock the gate at the Packhouse after the last truck has been loaded. This gate should stay closed the remainder of "B" shift and all of "C" shift and all shifts weekends and holidays (except as needed to be open for loadout).

On weekdays, the "B" and "C" shift Process Foreman is to make a security round of the Quarry, Packhouse and Silos, Front Office, Plant, Environmental Services, and Batch Plant each day. On weekends and holidays, each Shift Process Foreman is to make a security round of the Quarry, Packhouse, and Silos, Front Office, Plant, Environmental Services, and Batch Plant each day.

Access to oil tanks during off-hours is gained by unlocking the necessary valves. Closed and locked hours will generally be from 6 PM to 7 AM daily and all day on weekends and holidays. After transfers, all tank valves must be secured with valves closed and locked. The date and time of transfer should be noted on the security log. Security checks should confirm that all valves are closed and locked appropriately and the power is turned off. All critical tank farm valves plus the kiln day tan valve will be closed and locked at the end of each operational day.

9.2 Preventive Maintenance

Preventive maintenance involves the routine inspection and testing of equipment, structural control devices, storage containers and/or systems that are used at the Facility. A preventive

maintenance program is also implemented to minimize or prevent equipment breakdowns and maximize the efficiency of the Facility.

Regular visual inspections are performed to evaluate the effectiveness of good housekeeping practices and to ensure that equipment, structural control devices, and storage containers are working properly. Visual inspections also identify any new potential pollutant sources so procedures can be initiated that will reduce or eliminate the potential source of pollution before it becomes a problem. Routine inspections of tanks, containment systems, piping and related equipment are incorporated into the existing daily and routine operational, maintenance, and security inspection system. Visible oil leaks from tank seams, gaskets, and bolts are promptly reported. Routine inspection for such leaks is incorporated into the routine security, safety, operation and maintenance programs/inspections. Any evidence of leaks, oil accumulation, corrosion, other deterioration, tampering with valve locks, or other irregularities will be noted and programmed for expeditious maintenance and/or other management corrective action.

All storage tanks, piping, joints, valve glands and bodies, pipeline supports, metal surfaces and other aboveground equipment and facilities for holding oil and oily water will be visually checked by each employee as he conducts his daily work. Any and all discrepancies will be reported immediately to the supervisor. Additionally, an entry will be made in the record about the discrepancy and any correction action taken.

A detailed and specific visual check of the entire facility, including monitoring wells, will be made on the first working day of each week. Records of these inspections will be maintained at the premises.

The materials and design of the bulk storage tanks are compatible with the products they hold. All aboveground tanks, their foundations and supports will be visually inspected daily during routine operations. Each aboveground storage tank has visual gauges and its contents are measured daily, and records of contents are kept. Also, gaskets, pumps, lines, etc. are inspected daily by personnel and any leakage is reported. Additional inspection details for tanks and containers are discussed in the SPCC Plan in Section IV.25.0 and a monthly inspection form is provided in Appendix H.

9.3 *Fire Plan and Prevention*

CEMEX maintains a separate Fire Plan document. Please refer to that document for detailed fire response procedures.

9.3.1 Fire Fighting Plan

Employee positions listed below serve as the firefighting crew to answer fire alarms and extinguish fires as they are reported. These employees are required to fight fires and answer fire alarms:

Fire Chief - Process Foreman on Shifts

Fire Truck Operator- Burner Helper on Shifts

Start Fire Pump - Mill Area Operator on Shifts

When a fire is discovered by anyone, he/she must call the Burner on the phone (Extension 3981) or by radio and report the location of the fire. The burner will then sound alarm. (Fire alarm will be intermittent blasts on the air whistle.) When alarm is sounded, employees on firefighting crew will call the Burner to find out the fire location and proceed to that area.

Water at adequate volume and pressure for all fire control equipment is available at the Facility at the dedicated fire control well, in production wells, and in the slurry water in tanks.

9.3.2 Fire Prevention

Fire is always a major and serious threat to the company's production capability. Fires do not just happen. They are caused by carelessness in operating equipment, handling hazardous materials, and personal habits, such as smoking. Even though these actions are not usually deliberate, this still does not lessen the results. Only you can protect yourself against these hazards by learning how to prevent fires.

The two main ingredients of fire prevention are:

1. Be on the alert for signs of trouble before a fire starts.
2. Eliminate all unsafe habits that lead to fires.

Three things are needed for fires to start: heat, fuel, and air combined in the correct proportion to cause combustion. Therefore, to prevent fires:

1. Find the hazard.
2. Correct the hazard.
3. Do not allow the hazard to recur.
4. Make certain that you are not the cause of a hazard.

Become familiar with the three (3) classes of fire, their burning characteristics and the proper extinguishing agents for each.

Class "A" fires involve normal combustibles such as wood and paper. Water is the proper extinguisher.

Class "B" fires involve oils and flammable liquids. CO_2 and dry chemicals are the proper extinguishers.

Class "C" fires involve electrical equipment. CO_2 and dry chemicals are the proper extinguishers.

Fire Prevention Procedures/Guidelines

- Fire protection equipment must be correctly located, maintained, and be readily accessible at all times.
- Employees must never tamper with or move this equipment except for actual use.
- Report any equipment defects immediately to your supervisor.
- Employees must know the location and proper operation of all protective fire equipment in the vicinity of their work areas.
- Materials and supplies must be stored carefully to prevent falling, spilling, and etc.
- All chemicals and solvents must be kept in properly labeled and approved containers.
- Clean and used rags must be kept in metal lined containers with metal covers.
- Never use flammable liquids for cleaning purposes.
- Before using solvents, discuss needed precautions with your supervisor.
- If you must work with open flames, you must explicitly follow the Hot Work Permit procedure.
- To extinguish clothing fire on yourself or another person, drop to the ground and roll to cause smothering effect and use a fire blanket or other means if available.
- Know and strictly follow the smoking rules in the plant and on company property.
- Know primary and secondary exit routes from your area.
- When an alarm sounds, evacuate immediately.

10.0 RESPONSE CRITIQUE AND PLAN REVIEW AND MODIFICATION PROCESS

Initial Preparation: September 12, 2000

Revision Date: February 11, 2008

Revision Date 2: December 7, 2012

Revised in coordination with CEMEX by:
Koogler and Associates, Inc.
4014 NW 13th Street
Gainesvillle, FL 32609
352-377-5822

Revisions conducted:
1) Updated and reformatted entire ICP Plan (drafted 10/2011)
2) Added a SPCC Plan (drafted 10/2011)

10.1 Response Critique and Plan Review

This ICP will be reviewed and annually. This ICP will be modified as a result of the annual review or lessons learned through an exercise or a response to an actual incident. Plan modifications are viewed as a part of the Facility's continuous improvement process.

A critique will be conducted after each incident to evaluate the capability of participating emergency agencies and organizations to implement emergency plans and procedures. Participating agencies will be requested to submit critique written comments as input for an after-action report on the incident. The Facility will keep sufficient records of emergency response actions to submit an after-action report for study and critique.

10.2 Modification Process

This ICP will be amended as necessary when:

- Applicable regulations are revised or promulgated.
- The plan fails in an emergency.

- ☐ The Facility changes its design, construction, operation, maintenance, or other circumstances in a manner that materially or significantly affect the potential for fires, explosions, discharge of toxic or hazardous constituents, or the discharge of pollutants to the waters of the United States; or which changes the response necessary in an emergency.

- ☐ The List of Emergency Response Coordinators changes.

- ☐ The List of Emergency Equipment changes.

- ☐ Otherwise required by regulatory agencies.

SECTION III – SPECIFIC RESPONSE PLANS

11.0 HURRICANE & EXTREME WEATHER EMERGENCIES

Listen for tornado, hurricane, and other severe weather warnings issued by the National Weather Service.

Hurricane Watch — A hurricane is possible within 24 to 36 hours. Stay tuned for additional advisories. Tune to local radio and television stations for additional information. An evacuation may be necessary.

Hurricane Warning — A hurricane will hit land within 24 hours. Take precautions at once. If advised, evacuate immediately.

Tornado Watch — Tornadoes are likely. Be ready to take shelter. Stay tuned to radio and television stations for additional information.

Tornado Warning — A tornado has been sighted in the area or is indicated by radar. Take shelter immediately.

11.1 Hurricane Safety Plan

11.1.1 Hurricane Instructions

When advised of the approach of a hurricane the following general steps shall be taken:

General Planning

Lab - Check supply of plastic sheeting and rags.

Yard - Check supply of plywood for boarding up windows.

Storeroom - Check supply of plastic sheeting to cover motors, etc.

Storeroom - Check supply of flashlights, flashlight batteries and bulbs.

Storeroom - Check to see that diesel tank is full.

Storeroom - Check on supply of gasoline cans (OSHA approved).

Storeroom - Check on supply of paper cups for drinking water.

Storeroom - Check on supply of rope.

Each Dept. - Check two-way radios (walkie-talkies).

Storeroom - Check on supply of drinking water.

Hurricane Supplies

Hurricane supplies and equipment are to be stored in the coal sorting room

Items and Quantities Required:

- Plastic sheeting
- Flashlights
- Batteries
- Spare bulbs
- Rope
- Rain suits
- Drinking cups
- Hand soap
- Toilet paper
- Cots
- Paper towels
- Gas cans
- Masking tape
- Drinking water

- Heat lamps
- Get gasoline tanker on-site full
- Ice machine full

11.1.2 Personnel Responsibilities

Supervisors will be responsible for all hurricane protection within their department.

Process Foremen will have the responsibility to see that Mills, Kiln Pre-blending, Additive buildings, and Overhead Cranes have carried out protection measures.

Yard Foreman has the responsibility to see that all yard equipment has been properly secured. In addition, (s)he must see that all loose material throughout the Facility is secured or removed.

Packhouse Foreman is responsible for carrying out procedure in Packing and Shipping department and also Track Scale House.

Maintenance Foremen are responsible for Machine Shop, Truck Garage, Fuller Compressor Room, Raw Water Supply, and assist in covering motors, lashing down bridge cranes.

Electric Foreman is responsible to ensure all electric rooms are secured and bermed as needed, and all sump pumps operate.

Lab Supervisor provides a supply of water in containers to office and in storeroom. Secure Gammametrics buildings.

Materials Foreman has the responsibility for carrying out hurricane procedures in the Crushing Dept, Car Unloading Station, and Coal Loading System, and the Flyash System.

Resource Recovery Foreman handles dryer, material storage building, and tires/trailers.

Office and Safety Managers check on first aid supplies. Also have sufficient film on hand to take pictures of storm damage. Remove flags and secure rope on flag pole.

Department Manager/Supervisors poll department personnel to stay at plant in the event of hurricane should threaten.

11.2 When Hurricane Is Imminent

11.2.1 Protection for Overhead Cranes, Mills, Preblending, Kiln, and Dryer

Shift Foremen will have the responsibility of carrying out protection for Overhead Cranes, Mills, Preblending, Kiln, and Dryer.

Bridge Cranes

1. Move cranes to the center of the building.
2. Lower buckets to floor.
3. Park cranes in center of building.
4. Lash together and chock wheels.
5. Be sure all main switches are pulled and doors and windows closed and latched.

PreBlend Hall

1. Ensure piles are as full as possible as hurricane approaches.
2. Move stacker and reclaimer to center of building.
3. Boom stacker down on reclaimer and lash together.
4. Lock brakes, and chock and block to prevent movement.
5. Load conveyor belts with material and lock down covers.
6. Tie down take-up pulleys.
7. Where belts cannot be loaded with material, lash belts every 20 feet.
8. Load belts for preblend system and ensure covers are locked down.
9. Cover motor.
10. Ensure doors and hatches on system are secured shut.
11. Ensure Gammametrics building is locked shut and electronics protected/covered.

Finish Mill 4/5 Building

1. Close doors and block with drums of balls.
2. Set lights for emergency operations.

3. Cover all Mill motors.
4. Cover motors in finish slurry pit.
5. Close top door by #4 separator and hatch.
6. Close door by #4 air compressor and berm.
7. Open bottom of elevators and clean out cement.
8. Cover Fuller compressor motors.
9. Cover Fuller-Kinyon pump motors.
10. Cover separator motors.

Vertical Raw Mill

1. Close doors and block with drums of balls.
2. Load belts with material and secure covers.
3. Tie down take up pulleys.
4. Ensure doors and hatches in raw material bins to VRM are secured.
5. Laboratory personnel will ensure Gammametrics electronics protected and building is sealed.
6. Ensure air slides are sealed.

Homogenization Silo

1. Ensure all covers are secured.
2. Cover motors.
3. Close and berm doors for air systems.
4. Ensure bucket elevator doors are sealed and ground floor doors bermed as needed.

Coal Mill Building

1. Close all doors and block with drums.
2. Load belts with material and lock down covers.
3. Tie down take up pulleys.

4. If hurricane looks imminent, run system so that the coal bin can be run to empty if shutdown is required.
5. Fill CO_2 system daily if required.

Clinker Silo

1. Ensure doors and hatches are secured at the top.
2. Protect motors for transfer system.
3. Protect bucket elevator motor.
4. Secure passenger elevator at the ground.

Finish Mill Buildings

1. Close doors and block with drums of balls.
2. Open bottom of elevators and clean out cement.
3. Set lights for emergency operation.
4. Berm doors.
5. Cover all finish mill motors.
6. Cover Fuller-Kinyon pump motors.
7. Cover Fuller compressor motors.
8. Cover separator motors.

Preheater Tower

1. Ensure all doors and hatches on vessels are secured.
2. Ensure all loose materials are taken down and stored in storage rooms below tower.
3. Secure all doors in electric and equipment rooms.
4. Ensure all bucket elevators doors are sealed and secured.
5. Ensure all air slides are sealed and hatches or ports are secured closed.
6. Cover all exposed motors.

Kiln

1. After normal shutdown procedure has been followed, empty clinker conveyors.
2. Cover Kiln drive motor.
3. Ensure all hatches on cooler and drag conveyors are secured.
4. Check emergency starting engines and fill with fuel.
5. Park kiln inlet elevator at ground floor level.
6. Clean conveyor tunnel.
7. Set lights for emergency operation.
8. Ensure emergency generator is fueled.
9. Secure and berm, as required, doors on kiln piers.
10. Provide protection to central control panel room windows to prevent breakage.
11. Cover induced draft fan motors.
12. Cover shell cooling fan motors.
13. Ensure cooler hatches and covers are sealed and protected.
14. Remove new shell scanner heads and cover rest of unit with plastic.
15. Cover cooler fan motors.
16. Berm, as needed, to prevent water flow into pan conveyor pit.
17. Ensure sump pump operates.

Baghouse

1. Ensure all screw conveyors are sealed.
2. Cover motors.
3. Ensure all doors are secured.
4. Ensure all air slides are sealed and protected.

Dryer

1. After normal shutdown, leave the feed belt full of material.
2. Turn off the gas valve to the burner.

3. Turn off the gas valve to the oxidizer.

4. Turn off the gas valve at the burner floor.

5. Cover the following motors:

   Feed belt
   Dryer
   Primary collected screw
   Cross screw
   Return screw
   Intermediate return screw
   Transverse screw
   2 cooler motors
   Auxiliary collected screw
   Auxiliary intermediate screw
   Slat conveyor
   Discharge elevator
   Primary air fan
   Secondary air fan
   Auxiliary Baghouse fan
   Primary Baghouse fan
   Oxidizer fan
   Oil pump
   Air compressor

6. Cover the oxidizer fire eye.

7. Turn off all switches at main switchgear.

8. Turn off the co-monitor and tape the door and windows, cover with plastic.

9. Cover air conditioner unit.

10. Remove the pads on top of the primary baghouse.

11. Secure all conveyor tops.

12. Turn off the main computer.

13. Shut "all" oil valves - all tanks 1/2 full or more.

14. Close, lock and seal Control Room.

15. Close and berm doorways.

16. Berm electric switchgear / pit.

17. Berm main entry door (north).

Tank Farm and Pumphouse Area (including oil water separator)

1. Ensure all valves are closed in and out of system.
2. Bolt all tank hatch covers down tight.
3. Cover all electric motors with plastic.
4. Cover electric controls with plastic.
5. Shut all power off in switchgear room.
6. Tie off truck hose in containment area.
7. Place 55 gallon trash cans inside pumphouse.
8. Make sure all tanks are ½ full or more.
9. Open all valves in rail car containment area.
10. Cover windows in pump room.
11. Close, lock, and berm doors.
12. Secure rail cars (chock wheels).
13. Fill rail cars ½ full, disconnect all hoses and secure hatch lids.

Soils Building

1. Shut off all power on switchgear unit.
2. Cover motors with plastic.
3. Tie switchgear doors and seal in place.
4. Lower conveyor and screen to lower position, tie down all conveyor belt. Berm with soil.
5. Pick all loose equipment, trash cans, tools and etc, put in steel lock up container. Berm container in place.
6. Fill water tank on east side of building.
7. Position loader inside building in front of screen, in back of building.
8. Have roll-offs removed from facility. If removal is not possible cover any materials with loader as needed to prevent overflowing around and berm to prevent movement.

9. Get rental equipment removed from facility and parked safely side by side for protection on SW side of building.

10. All rolling stock (trucks, trailer, forklift, bobcat) and etc., should be parked inside soil building-south wall.

Drum Process Building

1. Shut off power at switch gear unit.

2. Fill water tank at pressure cleaner.

3. Pickup and secure all loose items and equipment.

4. Secure oil /water cleaner and cover.

5. Crush cleaned drums or fill with dirt.

6. Trucks and trailer - park together, berm around wheels and landing gear.

Kiln Waste Water Tanks

1. Bolt down hatches.

2. Tanks to be ½ or more full.

3. System off.

4. Cover pump motors with plastic and secure with rope.

5. Close all valves in the system.

6. Leave northeast containment drain open to allow water drain out after ensuring there is no oil in area.

7. Park trailers next to pile - west side.

8. Bag landing gear.

11.2.2 Protection for the Crusher, Car Unloading, and Coal Handling Equipment

When hurricane is imminent the following procedure must be carried out immediately:

Materials Handling Foreman will have the responsibility of carrying out protection for the Crusher, Car Unloading, and Coal Handling Equipment.

Crusher

1. Secure Electric Rooms.

2. Secure all windows and doors.
3. Set brakes on rock tripper.
4. Set lights for emergency operation.
5. Cover Jaw Crusher motor.
6. Cover impactor drive motor.
7. Protect screen motors.
8. Load belts and tie down take-ups.

Car Unloader

1. Secure car shaker on ground.
2. Berm raw materials hopper and door to downstairs tunnel.
3. Check sump and make sure pump is working.
4. Cover motors of car shaker.
5. Consider auxiliary power /pump for flooding.
6. Cover motors.

Coal

1. Tie down belt conveyors and cover motors.
2. Tie down incoming coal conveyor.
3. Secure cover on top of coal silo.
4. Secure all belt covers.
5. Load transfer belt.

Flyash

1. Cover control panels in compressor room.
2. Cover compressor motors.
3. Close and latch doors.
4. Tie down air and discharge hoses.

5. Close and latch doors at blow tank room.

11.2.3 Responsibilities of Packing & Shipping Department

The **Packing /Shipping Manager & Asst. Manager** are responsible for the (may call upon Maintenance and Electrical Departments for assistance).

Packing and Shipping Cement Storage

1. Loading & dust collection spouts in silos must be secured from swinging. All baskets must come down and be secured.
2. Secure all silo hatches on silo roof.
3. Cover all silo vents on silo roof.
4. Empty and seal all floor screws in Packhouse so water cannot get into screws and harden cement.
5. Empty all supply bins in Packhouse #1 through #7.
6. Open cement bucket elevators and empty bottoms out.
7. Turn off air to silos.
8. Set all lights for emergency operation.
9. Cover the control panels in the silos and the Packhouse.
10. Cover the MCC's in the silos and the Packhouse.
11. Move empty pallets into Packhouse. If not possible store in silos or tightly corral with loaded tankers.
12. Move all elevators to the top floor and cut power off.
13. Remove all scrap pallets and other debris from all terminal areas.
14. Cover FK pump motors in silos.
15. Cover FK compressor motors in silos.
16. Cover Sullair compressor motors on both the Packhouse and the silos.
17. Cover silo dust collector motors and controls.
18. Cover electronic track scale controls.
19. Park locomotive in flyash unloading building- secure brake, chock wheels.

20. Board Packhouse office windows.

21. Board terminal office windows.

22. Seal with tape all cracks in pit scales.

23. Make sure sump pump in scale pit is working and that sump is drained as low as possible.

24. Remove and store all garbage containers and other outside items.

25. Stack 2 full pallets securely against each rollup door in the Packhouse to protect door against the wind.

26. Move all empty bags as deeply as possible in the silos and cover outside stacks with pallet covers.

27. Elevate all bags onto 2 extra pallets to keep bags out of standing water.

28. Use sand to run a berm along all silo openings.

29. Back up all essential computer data on to floppies.

30. Dismantle all computer equipment and store in the front office.

31. Store all essential paperwork in lock file cabinets and move away from windows.

32. Clean out all drainage points so water will flow.

33. Secure shaker with hurricane tie down cables

Transport

1. Load all tanks and leave connected to the tractors with the landing gear rolled down.

2. Corral all empty flatbeds tightly with loaded tanks.

3. Any loaded flatbeds should be double tarped and fully strapped.

4. Strap all unused tarps to the flatbeds or store in the transport shop.

5. Secure all dunnage on the flatbeds with straps or remove and store in the transport shop.

6. Secure all spare hoses on tanks.

7. Board all windows.

8. Store pressure washer guns and hoses.

9. Secure trash cans and other outside items that can fly.

10. Set up fuel tanker to deliver gasoline and store tanker in the silos with the tractor connected.

11. Move company tractors, nose to nose, into transport shop.

12. Move yard tractor into silos.

13. Secure sideboards on drum trailer so they won't fly.

11.2.4 Responsibilities of Yard Department

The **Yard Department** will be responsible for carrying out the following procedures:

1. Check Yard completely and see that Yard equipment is secured, that all loose material throughout the Plant is secured or removed.

2. Park all mobile equipment in truck garage and machine shop.

3. Secure all doors in fuel pumphouse and control room.

4. Secure doors of Butler Building with drums of balls.

5. Assist in securing other Departments as requested.

11.2.5 Responsibility of Laboratory

The **Laboratory** will be responsible for carrying out the following procedures:

1. Check out of storeroom - adequate supply of flashlights, first aid supplies, drinking water containers, and food if personnel are to be in the area during storm.

2. Check out boots and raincoats.

11.2.6 Responsibility of Electrical Department

The **Electrical Department** will be responsible for carrying out the following procedures:

1. Check operation of all sump pumps.

2. Check all motor heaters.

3. Check emergency generator for proper operation, ensure diesel fuel tank is full

4. Ensure electric rooms are sealed and bermed, particularly ER 6.

5. Assist other Departments in covering electrical equipment.

6. Secure all windows in main switchgear room.

7. AFTER STORM check all motors with megohm meter before starting.

11.2.7 Responsibility of Maintenance Department

The **Maintenance Department** will be responsible for carrying out the following procedures:

1. Close all doors to machine shop, truck shop and truck storage (block with drums of balls).

2. Secure all windows in machine shop, truck shop, paint shop and Butler Building.

3. Secure all windows in compressor room.

4. Close all doors in compressor room.

5. Assist other Departments as needed.

11.2.8 Responsibility of Resource Recovery

Resource Recovery will be responsible for carrying out the following procedures:

Kiln Waste Water Tanks

1. Bolt down hatches.

2. Tanks to be ½ or more full.

3. System off.

4. Cover pump motors with plastic and secure with rope.

5. Remove truck unloading line and tie securely to piping inside diked area.

6. Close ALL valves in the system.

7. Leave Southwest dike drain open after insuring there is no oil in the area to drain out of the system.

Horizontal Oil/Water Tanks

1. Ensure all valves are closed in or out of the system.

2. Bolt all hatch covers down tight.

3. Ensure tanks are ½ full.

11.3 Termination and Follow-Up Actions

After storm, check all motors with megohm meter before starting.

12.0 MEDICAL EMERGENCIES

A list of medical facilities and other emergency hotline numbers is provided in the front of this ICP and in Appendix E.

12.1 Discovery

CONTACT 9-1-1 FOR ALL SERIOUS INJURIES

Information that will aid in initiating appropriate actions includes:

- Type and time of incident
- Number of patients
- Signs/symptoms being experienced by the patients
- Nature of injuries
- Name of chemical(s) involved
- Information available at the site concerning the chemical(s)
- Extent of patient decontamination in the field

12.2 Initial Response

- CONTACT 9-1-1 FOR ALL SERIOUS INJURIES
- Advanced medical care should be provided by trained EMS personnel at the scene.
- The patient should be transported to a facility having the most appropriate personnel and technical resources to manage his or her care.
- Do not remove non-ambulatory patients from the Exclusion Zone unless properly trained personnel with the appropriate personal protective equipment (PPE) are available and decontamination has been accomplished.
- Observe factors specific to the patient, such as size of the skin surface area exposed, presence of open wounds or breaks in the skin, and rate and depth of respiration.

12.3 Sustained Actions

- CONTACT 9-1-1 FOR ALL SERIOUS INJURIES
- Remove the patient from danger by removing the patient from the injury area and removing contaminants from the patient.
- The potential for additional or increased danger to patient and responder prohibits any treatment inside the Exclusion Zone other than basic life support.
- Gross management of Airway, Breathing, and Circulation (ABC) is all that should be undertaken while there is potential for further injury to patient or response personnel.
- Wash wounds areas gently under a gentle spray of water, and wash with a soft sponge using a mild soap such as dishwashing liquid. Use warm, never hot, water.
- Once wounds have been cleaned, cover the wounds with a waterproof dressing.
- For some chemical exposure injuries, such as strong alkali, it may be necessary to flush exposed eyes with water or normal saline for several hours.
- Care for and have the injured transported to appropriate hospitals.
- Inform the receiving hospitals of the types of materials the injured have been exposed to, if they are contaminated, and if any field decontamination has been done.


SPCC
Plan

SECTION IV – SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

13.0 PURPOSE AND RULE APPLICABILITY

The CEMEX Miami Cement Plant is required to amend and implement their Spill Prevention, Control, and Countermeasure Plan (SPCC) by November 10, 2011 in accordance with the following federal regulation:

> *§ 112.3 Requirement to prepare and implement a Spill Prevention, Control, and Countermeasure Plan.*
>
> *The owner or operator or an onshore or offshore facility subject to this section must prepare in writing and implement a Spill Prevention Control and Countermeasure Plan (hereafter "SPCC Plan" or "Plan")," in accordance with §112.7 and any other applicable section of this part.*
>
> *(a)(1) Except as otherwise provided in this section, if your facility, or mobile or portable facility, was in operation on or before August 16, 2002, you must maintain your Plan, but must amend it, if necessary to ensure compliance with this part, and implement the amended Plan no later than November 10, 2011. If such a facility becomes operational after August 16, 2002, through November 10, 2011, and could reasonably be expected to have a discharge as described in §112.1(b), you must prepare and implement a Plan on or before November 10, 2011. If such a facility (excluding oil production facilities) becomes operational after November 10, 2011, and could reasonably be expected to have a discharge as described in §112.1(b), you must prepare and implement a Plan before you begin operations. You are not required to prepare a new Plan each time you move a mobile or portable facility to a new site; the Plan may be general. When you move the mobile or portable facility, you must locate and install it using the discharge prevention practices outlined in the Plan for the facility. The Plan is applicable only while the mobile or portable facility is in a fixed (non-transportation) operating mode.*

14.0 PROFESSIONAL ENGINEER'S REVIEW AND CERTIFICATION (112.3(d)(1) AND 112.5(c))

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices. I attest that: (1) I am familiar with the requirements of the current SPCC Rule; (2) I or my agent has visited and examined the facility; (3) the Plan was prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule; (4) procedures for required inspections and testing have been established; and, (5) the Plan is adequate for the Cemex Miami Cement Plant.

This certification shall in no way relieve the owner or operator of a facility of his duty to prepare and fully implement such Plan in accordance with the requirements of 40 CFR 112.

I am not certifying that all required testing has been completed; such responsibility belongs to the owner or operator of the facility. Testing may be ongoing after this plan is certified. The operator is responsible for completion of testing. I have not and will not oversee all testing, which is the sole responsibility of the owner or operator.

A Professional Engineer must certify any technical amendments to the Plan in accordance with §112.3(d).

Description of Technical Amendment (if applicable, attach details as needed)	**Affected Pages**	**P.E. Certification Required (Y/N)**

Engineer: Maxwell R. Lee Ph.D., P.E.
Koogler and Associates, Inc., 4014 NW 13th Street, Gainesville, Florida 32609
352-377-5822
mlee@kooglerassociates.com

Signature _____ Date: _____

SEAL:
Registration Number: 58091
State: Florida

15.0 PLAN AMENDMENTS AND MANAGEMENT REVIEW AND APPROVAL (112.5 & 112.7(d)(2)

A review and evaluation of this SPCC is to be conducted at least once every five (5) years. Amendments are required within six (6) months of the review to include more effective prevention and control technology if the technology will significantly reduce the likelihood of a spill and if such technology has been field proven at the time of the review. The applicable federal regulation with review and amendment details is as follows:

> *§ 112.5 Amendment of Spill Prevention, Control, and Countermeasure Plan by owners or operators.*
>
> *If you are the owner or operator of a facility subject to this part, you must:*
>
> *(a) Amend the SPCC Plan for your facility in accordance with the general requirements in §112.7, and with any specific section of this part applicable to your facility, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in §112.1(b). Examples of changes that may require amendment of the Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility. An amendment made under this section must be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment.*
>
> *(b) Notwithstanding compliance with paragraph (a) of this section, complete a review and evaluation of the SPCC Plan at least once every five years from the date your facility becomes subject to this part; or, if your facility was in operation on or before August 16, 2002, five years from the date your last review was required under this part. As a result of this review and evaluation, you must amend your SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge as described in §112.1(b) from the facility. You must implement any amendment as soon as possible, but not later than six months following preparation of any amendment. You must document your completion of the review and evaluation, and must sign a statement as to whether you will amend the Plan, either at the beginning or end of the Plan or in a log or an appendix to the Plan. The following words will suffice, "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (will not) amend the Plan as a result."*
>
> *(c) Except as provided in §112.6, have a Professional Engineer certify any technical amendments to your Plan in accordance with §112.3(d).*

MANAGEMENT APPROVAL:

I have completed review and evaluation of the SPCC Plan for the CEMEX Miami Cement Plant and SCL Quarry on _____, and will (will not) amend the Plan as a result.

Description of Review Amendment (if applicable)	Affected Pages	P.E. Certification Required (Y/N)

Authorized Facility Representative:_____

Signature:_____

Title:_____

Copy and complete this form as necessary for each SPCC Review.

16.0 CONFORMANCE WITH SPCC REQUIREMENTS [112.7(a)]

16.1 Discussion of Conformance

This section of the SPCC Plan includes a discussion of conformance with the SPCC requirements. This facility is subject to the general requirements of 40 CFR 112.7 and the specific requirements of 40 CFR 112.8, because the facility has an aggregate aboveground storage capacity of greater than 1,320 gallons of oil and due to its location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon the navigable waters of the United States or adjoining shorelines, or into or upon: the waters of the contiguous zone; in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974; or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States (including resources under the Magnuson Fishery Conservation and Management Act).

Navigable water is any river, stream, brook, or any other type of water which will eventually run or drain into a navigable river or lake. For purposes related to the Miami Cement Plant and SCL Quarry, the following are considered to be navigable waters:

- Mud Creek which flows adjacent to the plant entrance and egress road (137th Avenue) to the Tamiami Canal.
- Any of the lakes from quarry operations. These are considered navigable and are located in an environmentally sensitive area.

Since the plant site was filled to conform with the flood control district criteria at the time of construction, the topography of the area is generally constant. However, due to the proximity of the fuel farm tanks to Mud Creek, this is considered the foremost danger point.

The facility is not subject to the requirements of 40 CFR 112.9, because it is not an onshore oil production facility. The facility is not subject to the requirements of 40 CFR 112.10 or 40 CFR 112.11 because it is not an oil drilling, production, or workover facility.

The facility is subject to the requirements of 40 CFR 112.12 through 112.19 because the oils handled and stored at the facility are petroleum oils and non-petroleum oils, except animal fats and oils and greases, and fish and marine mammal oils; and vegetable oils (including oils from seeds, nuts, fruits, and kernels).

The requirements of 40 CFR 112.20 and 40 CFR 112.21 are not applicable based on the substantial harm criteria, included as Appendix C.

A SPCC cross-reference table is provided in this Plan after the Table of Contents which lists the SPCC rule by section, a description of the section, and the page number in this Plan where a detailed discussion of conformance with the SPCC requirement can be found.

16.2 Discussion of Nonconformance

This Plan may deviate from certain requirements if it provides equivalent environmental protection. Where the Plan does not conform, the reasons for nonconformance are provided and alternate methods achieving equivalent environmental protection are described in detail in this section.

Deviation from requirements? ☐ Yes ☒ No

16.3 Items not yet Operational

If this Plan calls for additional facilities or procedures, methods, or equipment not yet fully

operational, any such items are discussed in separate paragraphs in this section. The discussion explains separately the details of installation and operational start-up. This section also describes testing or inspections recommended by the Professional Engineer P.E.), but not completed at time of Plan printing.

Items not yet operational? ☐ Yes ☒ No
If yes, describe: N/A

P.E. recommended testing/inspections? ☒ Yes ☐ No
If yes, describe: N/A

Integrity testing should be conducted on the tanks with a capacity of 5,001 gallons or greater in accordance with the schedule in Appendix J.

17.0 PHYSICAL LAYOUT, FACILITY DIAGRAM, AND CONTAINER INVENTORY [112.7(a)(3)]

17.1 Physical Layout

See Figures 1, 2 and 3 in Appendix A for the physical layout of the Facility.

17.2 Facility Diagram

This Plan includes facility diagrams, which mark the location and content of each container. The facility diagrams include above ground tanks, transfer stations and connecting pipes, if present. The facility diagrams are presented in Appendix A as Figures 1, 2 and 3.

17.3 Waterways and Site Drainage

Mud Creek flows adjacent to the plant entrance and egress road (137th Avenue) to the Tamiami Canal. The plant layout and tanks and drum storage areas are shown on Figure 1.

The on-site mine pits and tank and drum storage areas at the quarry are shown on Figures 2 and 3. Storm water from the quarry discharges to the mine pits. The tank and drum storage areas generally drain northerly toward the on-site mine pits.

17.4 Bulk Storage Container Inventory

The Facility includes two general areas of tank storage: the cement plant and the quarry. The cement plant includes (12) aboveground double walled stationary tanks and two (2) drum storage areas. The quarry includes (7) tanks. Each storage area/tank has a unique identifier. The products are used for fueling vehicles and mobile equipment, and for maintenance of vehicles and equipment.

A Container Inventory is presented in Table 1 below. Storage area identification numbers correspond to those presented in Figures 1, 2 and 3 in Appendix A.

Table 1 - Container Inventory (Aboveground Storage Tanks and Drums)

Storage Area/ Tank ID(s)	Description	Product	Capacity (gallons)	Containment and Spill Control Features
Cement plant (see Legend on Figure 1 for location)				
1	Emergency Generator	Diesel	500	Concrete floor-under roof
2	Kiln Day Tank	Waste Oil	30,000	Concrete containment under roof
3	Mobile Shop	Lubricating/Motor Oil	4, 350 gal	Concrete containment under roof
4	Lubrication/ Distribution Center (Drum Storage)	Clean Oil of various weights	~24, 55 gal	Concrete containment under roof
5	Fueling Station	Diesel	20,000	Concrete containment under roof
6	Oil/Lubricant Warehouse Storage (Drum Storage)	Oil (waste and hydraulic), Lubricant	~150, 55 gal drums ~10, 320 gal polyurethane totes	Concrete containment under roof Totes within metal frame
7	Emergency Generator	Diesel	560	Concrete pad-under roof
8	Fire Pump & Well Building	Diesel	150	Concrete block containment under roof
13 (Inactive)	Waste Water	Oily Water	4 - 25,000	Concrete containment
15	Bulk Storage	Fuel Oil	2 - 633,000	*For kiln and Soil remediation* surrounded by earthen dike, double bottom, on concrete
		Total	**~1,331,380 gal (active)**	

Inventory as of 11/2012

Storage Area/ Tank ID(s)	Description	Product	Capacity (gallons)	Containment and Spill Control Features
Quarry (see Figures 1, 2 and 3 for location)				
1	Oil	Transmission Oil	500	Concrete tank double walled above ground
2	Oil	Hydraulic Oil	500	Concrete curb – under roof
3	Oil	Hydraulic Oil	500	Concrete curb – under roof
4	Oil	Motor Oil	500	Concrete curb – under roof
5	Oil	Used Oil	540	Concrete curb – under roof
6	Fuel	Vehicular Diesel	20,000	Concrete curb – under roof
7	Fuel	Gasoline	275	Concrete curb – under roof
		Total	**~22,815 gal**	

Inventory as of 11/2011

18.0 DISCHARGE PREVENTION PROCEDURES [112.7(a)(3)(ll)]

The FERC has the direct responsibility for implementing the provisions of the SPCC Plan. The FERC is also directly responsible for providing training in the standard operating procedures in the case of a spill/release incident. See internal and external contact information in the front of the ICP.

Prevention of discharge is the ultimate goal of this plan. Proper procedures for loading, unloading and transferring petroleum products are the first phases of discharge prevention procedures. Discharges or leaks can occur from tank overflow, leaks, ruptures, pipe failure and spills during transfer. Locations of loading, unloading, transferring and dispensing of petroleum products are depicted on Figures 1, 2 and 3 in Appendix A.

The following practices are recommended to prevent a spill or release:

- ✓ Ensure container lids are securely fastened at all times
- ✓ Do not leave portable sources outside unattended
- ✓ Return portable sources to their designated storage location
- ✓ Use absorbent material, drip pans, and funnels during transfer of petroleum products from a portable container
- ✓ Protect oil sources from damage by moving equipment
- ✓ Do not store oil sources near catch basins, floor drains, etc.
- ✓ Monitor loading and unloading of petroleum products
- ✓ Monitor fueling area(s) especially during transfer and dispensing

18.1 Procedures for Loading, Unloading, and Transfer

Proper procedures for loading, unloading and transferring petroleum products are the first phases of discharge prevention procedures. Discharges or leaks can occur form tank overflow,

leaks, ruptures, pipe failure and spills during transfer. A summary of te petroleum products, hazardous material or oil loading, unloading transfer operations are as follows:

- Truck will be placed in designated loading/unloading location
- Trailer wheels will be air locked and wheel-chocked
- Proper spillage container will be placed under trailer outlet
- Transfer line will be connected from truck to tank
- The transfer will be monitored by the appropriate Facility personnel or the delivery truck driver via direct visual observation. Deliveries from new suppliers and periodically from existing approved suppliers will be observed as follows:
    - Inspect vehicles prior to delivery and departure
    - Confirm the truck contains the correct product for the tank
    - Assure that the tank can hold what the supplier intends to deliver
    - Ensure vehicle is equipped with adequate spill response supplies
- Lines, hoses and valves will be routinely checked during transfer
- Tank and truck valves will be confirmed to be closed before disconnecting hose
- Material collected (oily rags, diapers, oil dry, etc.) will be placed in appropriate spill containers.

18.1.1 Loading

Loading of petroleum products occurs within various areas throughout the Facility where empty drums and spent oil are collected and transported to the drum storage and pressure cleaning area, and then the containers are drained and crushed. Private contractors properly remove the waste oil and crushed drums off-site for disposal. Alternatively waste oil can be burned in the kiln as fuel. Loading of petroleum occurs within the spill containment located within that area.

18.1.2 Unloading

Unloading of petroleum products occurs within containment areas. Unloading of oil and lubricants occurs at two locations, the receiving and storage dock and the lubrication/distribution center. A handcart, pallet jack, or a forklift unloads the delivery vehicle and stores the load in the receiving and storage containment area. A forklift unloads delivery vehicles at the lubrication/distribution center. Unloading of petroleum products occurs within the spill containment located on the receiving and storage dock and the storage building. Various sizes of containers are then stored and distributed to areas throughout the Facility as applicable.

The two emergency generator diesel fuel tanks are filled within the containment structure. The emergency generator diesel fuel tank under the pre-heater tower is a double walled tank and is filled from the top. The double walled tank does not require an external containment structure.

18.1.3 Transfers/Dispensing

The Facility utilizes a forklift to transport petroleum products to various points within the Facility. Petroleum products are transported from containment areas to areas within the Facility where an appropriate catch basin is located. The Facility transfers fuel oil by pipeline from the bulk storage tanks to the kiln day tank. At the quarry, all the tanks are refilled from a dispenser truck that carries the various types of oils and diesel fuel.

Filling operations of vehicles and equipment will be performed and monitored by trained Facility personnel. Facility personnel will ensure safe and proper fueling operations and will take immediate action or correct any deficiencies. The Facility manager or designee will supervise all deliveries from new suppliers and will periodically observe deliveries from existing, approved suppliers. Delivery observations should include:

- Vehicle inspection prior to delivery and departure

- Inquiry to confirm the truck contains the correct product for the tank
- Assurance that the tank can hold what the supplier intends to deliver
- Ensure vehicle is equipped with adequate spill response supplies

18.2 Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment. Facility personnel are required to maintain good housekeeping practices within their designated work areas.

18.3 Preventive Maintenance

Preventive maintenance involves the routine inspection of equipment, structural control devised, storage containers and/or systems that are used at the Facility. Preventive maintenance is implemented to minimize or prevent incidents. If identified during an inspection, the preventive maintenance needs are noted on the inspection forms in order of priority to be completed.

18.4 Visual Inspections

Regular visual inspections are performed to evaluate the effectiveness of good housekeeping practices and to verify that equipment, structural control devices, storage containers, etc., are working properly.

19.0 DISCHARGE OR DRAINAGE CONTROLS [112.7(a)(3)(iii)]

Detailed discharge response, control, and reporting procedures are listed in Section 21.0.

19.1 Secondary Containment

All bulk storage container installations at the Facility provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation to meet the requirements of 40 CFR 112.8(c)(2). A spill from any of the bulk storage tanks would be contained within the secondary containment structures and reintroduced into material substitution and consumed in the cement manufacturing process.

Visible discharges within a secondary containment area that result in a loss of oil from the container will be promptly corrected. These include but not limited to seams, gaskets, piping, pumps, valves, etc. Accumulations of oil and excessive rainfall in diked or uncovered areas will be promptly removed.

The Facility utilizes earthen dikes for secondary control of petroleum discharge from the two bulk storage tanks. Pumps that are utilized to transfer petroleum products provide containment in case of leakage from seams, gaskets, piping, pumps, valves, etc.

Industry standards that may assist an owner or operator with secondary containment include:

- NFPA 30;
- BOCA, National Fire Prevention Code; and,
- API Standard 2610, "Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities."

19.2 Control of Discharge

In the case of any oil spill or leakage, individual initiative in observing, reporting, and then immediately commencing restraint measures is imperative to control a discharge. In the case of a spill at the Facility, the FRC has the direct responsibility for implementing the provisions of the SPCC Plan. The FRC is also directly responsible for providing training in the standard operating procedures in the case of a spill. The FRC will report any spill occurrence as applicable to other company officials. After direct inspection of the scene, the FRC will notify the appropriate local, state and federal agencies.

A variety of best management practices, structural controls, and spill prevention and response countermeasures will be in place at the Facility when this Plan is implemented. The combination of these controls will limit the possibility of spilled materials being discharged from the site and entering waters of the State/United States.

20.0 COUNTERMEASURES FOR DISCHARGE DISCOVERY, RESPONSE AND CLEAN-UP (112.7(a)(3)(IV) AND METHODS OF DISPOSAL [112.7(a)(3)(V)]

In the case of an oil spill or leakage, individual initiative in observing, reporting, and then immediately commencing restraint measures is paramount. Also, timely notification to the FERC and other appropriate management officials is of the utmost importance. Containment will be accomplished by any of the following techniques:

- Protective booming.
- Dispersant use.
- In-situ burning.
- Bioremediation.
- Natural remediation.
- Vapor suppression.
- Drainage controls where precipitation or runoff from other sources may enter the release area.
- Stabilization of berms, dikes or impoundments where needed to maintain the integrity of the structures.
- Capping of contaminated soils or sludge where needed to reduce the spread of hazardous substances into soil, groundwater or air.
- Removal of contaminated soils from drainage or other areas where removal will reduce the spread of contamination.
- Removal of bulk containers that hold hazardous substances where it will reduce the likelihood of spillage, leakage, exposure to humans, animals or food chain, or fire or explosion.

Detailed response procedures and measures are discussed in Section IV.21.0.

20.1 Facility Countermeasure Capability for Discharge Discovery and Response

The Facility will clean up minor spills using on-site personnel and equipment. The Facility is equipped to initiate the response to all minor spills or accidental released that could occur on

the site. Emergency equipment is located in designated areas at the Facility. The equipment is available for use by personnel that have appropriate training for the equipment's use. Spill kits are located in the main warehouse, in the mobile equipment room, near the kiln day tanks, and at the rail car /truck unloading area. Front end loaders and other construction equipment are on-site as needed for response.

A cleanup contractor will be utilized to remediate major spills that are beyond the capabilities of the Facility. Letters of understanding attesting to the ability of the emergency response contractor to immediately respond to a spill emergency should be obtained and kept on file.

20.2 Contractor Countermeasure Capability for Discharge Discovery and Response

In the case of any discharge discovery of an oil spill or leakage that the contractor observes, that contractor will commence with measures to restrain the spill or leak as appropriate and immediately contact the FERC.

20.3 Facility Countermeasure Capability for Discharge Cleanup

In the case of any spill, the FERC is the on-scene supervisor with the direct responsibility for implementing the necessary steps to clean up the spill utilizing the resources and equipment at the Facility necessary for spill remediation. He also has the responsibility to keep the Plant Manager and Environmental Manager informed on the remediation situation. These individuals will take necessary steps, once they are assured by direct inspection of the scene that the situation is cleaned up, to get additional outside help if necessary and to notify other company responsible individuals and local, state and federal agencies as necessary.

20.4 Contractor Countermeasure Capability for Discharge Cleanup

In the case of any discharge cleanup of an oil spill or leakage involving a cleanup contractor, that contractor will commence with measures to clean up the spill or leak as appropriate and immediately contact the FERC.

20.5 Methods of Disposal of Recovered Materials

Oil contaminated materials recovered during cleanup of an oil spill or leakage will be disposed of on-site at the Facility soil storage and treatment facility.

21.0 DISCHARGE RESPONSE, CONTROL, AND REPORTING PROCEDURES [40 CFR 112.7(A)(5)]

This section of the SPCC Plan describes the specific procedures to be used when a discharge occurs. Internal and external contact notification information is provided in the front of this ICP. When there is any doubt about the identity of a product it shall be considered hazardous until it has been identified and proven to be otherwise. **When in doubt call the Florida Warning Point at 800-320-0519.**

In the event of a spill or discharge of petroleum product or other hazardous chemical, notification and reporting to local, state, and federal agencies may be required.

In the case of any spill or release, the FERC is the on-scene supervisor with the direct responsibility for implementing the necessary steps to stop, contain, and control the spill/release utilizing the resources and equipment at the plant necessary to control and contain the situation. The FERC and other responsible company personnel will take the necessary steps, once they are assured by direct inspection of the scene that the situation is under control, to get additional outside help and to notify other company responsible individuals and local, state and federal agencies as applicable.

21.1 Spill Reporting Summary

Note: The following information is repeated in the front the ICP Plan under "Spill Response".

In the event that a material is spilled/released in a quantity above a reportable threshold, the FERC or his designee is responsible for notification and reporting to the appropriate agencies. Reportable thresholds are the following:

Petroleum based spills

- Involving waterways in any amount
- Greater than 25 gallons (or the potential to release greater than 25 gallons)

Chemical based spills

- SARA/EHS/CERCLA Releases
- Threatening population or the environment
- Requiring evacuation

21.2 Minor Spill Response

A "minor spill" poses no significant harm to human health or the environment. The spill is generally less than 25 gallons and can usually be cleaned up by Facility personnel. In addition, a minor spill:

- is easily stopped or controlled at the time of the spill
- is localized
- is not likely to reach surface water or ground water
- poses little danger to human health
- will usually not result in a fire or explosion

IN THE EVENT OF A MINOR SPILL:

1. ***Immediately notify the Quarry Manager or FERC***
2. ***Under the direction of the Quarry Manager or FERC, contain the spill with spill response materials and equipment***
3. ***Place spill debris in properly labeled waste containers***
4. ***After making the appropriate phone calls and the spill is contained, complete the Internal Spill Notification/Discharge Reporting Form in Appendix D and send to the FERC.***

21.3 Major Spill Response (Spill Emergency)

A "spill emergency" involves a spill that cannot be safely controlled or cleaned up. Characteristics of a major spill include:

- The spill is large enough to spread beyond the immediate spill area
- The spilled material enters surface water or ground water (regardless of amount spilled)
- The spill requires special training and equipment to cleanup
- The spilled material is dangerous to human health, and
- There is a danger of a fire or explosion

IN THE EVENT OF A SPILL EMERGENCY:

1. ***All workers are to evacuate the spill site and move to a safe distance***
2. ***Notify the FERC immediately. The FERC will call for medical assistance if workers are injured. No worker will engage in rescue operations unless they have been properly trained and equipped.***
3. ***The FERC will immediately contact the following as applicable:***
   - **Fire Department - 911**
   - **Miami-Dade County DRER 305-372-6955**
   - **State Warning Point at 1-800-320-0519**
   - **National Response Center at 1-800-424-8802**
4. ***The FERC will coordinate cleanup and seek assistance from a cleanup contractor as necessary.***
   - ***The FERC will submit required reports as applicable.***

21.4 Emergency Contacts and Reporting

This section provides emergency contacts and reporting instructions as well as a Release Reporting Flowchart to be used as a guideline.

Emergency Contact List and Spill Reporting Hotlines are shown on the following pages (See the contact information sheets in the front of this ICP or Appendix E for a complete list).

NAME	AGENCY	TELEPHONE
Charles E. Walz	**Facility Emergency Response Coordinator:** Environmental Manager/Plan Coordinator	**305-229-2955** **305-586-8379 (cell)**
Robert McClanahan	**Asst. Facility Emergency Response Coordinator:** Health/Safety Manager – Asst. Plan Coordination	**305-228-4383** **305-798-6930 (cell)**
Devon Coppock	**SCL Quarry Environmental Mgr.**	**305-818-4955** **813-476-1185 Cell**
National Response Center (NRC)	**Federal**	**800-424-8802 (24 hr.)** or online http://www.nrc.us.uscg.mil/nrchp.html
U.S. Coast Guard National Response Center	**Federal**	**800-424-8802 (24 hr)**
US EPA Region 4 Emergencies	**Federal**	**800-241-1754 or 404-562-8700**
When In Doubt Call: **FLORIDA WARNING POINT**	**State**	**800-320-0519**
FDEP Southeast District	**State**	**813-332-6975 Phone** **813-332-6969 FAX**
Bureau of Emergency Response (BER)	**State**	**850-245-2010**
FL Division of Emergency Mgmt.	**State**	**850-413-9969**
Florida Marine Patrol, Miami	**Local**	**305-795-2145**
Miami-Dade Dept. of Emergency Management and Homeland Security	**Local**	**305-468-5400**
Miami-Dade County DRER (Spill/Release Emergencies)	**Local**	**305-372-6955 (24 hr)**

Local Emergency Planning Committee	**Local/Regional**	**305-468-5421** Niel Batista Bureau Manager Miami-Dade DEM&HS niel.batista@miamidade.gov
CHEMTREC	**Chemical Information**	**800-424-9300**
Spill Response Contractors	**SWS Emergency Response**	**954-957-7271**
	Cliff Berry	**954-763-3391**
	American Compliance Technologies	**800-256-9900**
	Atlantic Industrial Services, Inc.	**800-256-9900 or 954-610-6172**

Local

The Miami-Dade County Department of Regulatory and Economic Resources (DRER) should be called directly in the event of a chemical or petroleum spill, a hazardous waste materials incident, or other environmental emergency after dialing 9-1-1.

The LEPC is to be contacted in the event of a release of an Extremely Hazardous Substance or CERCLA Hazardous Substance.

State

The Florida Department of Environmental Protection (FDEP) Division of Law Enforcement's Bureau of Emergency Response (BER) is the designated State Warning Point in the event of a hazardous materials incident.

The BER responds to environmental pollution threats in every form. The BER provides technical and on-site assistance to ensure threats to the environment and human safety are quickly and effectively addressed.

The BER also works with local public safety officials and emergency response contractors to minimize threats to the environment. BER offices are located throughout the state, with headquarters in Tallahassee.

The incidents listed below are reportable to the BER through the State Warning Point as soon as possible, but no later than 24 hours of the release.

- Petroleum Based Spills
  - Spills into or involving state waterways (any amount)
  - Spills greater than 25 gallons (or potential > 25 gallons)
  - Spills requiring any state/federal notifications or assistance
- Chemical Spills
  - All SARA/EHS/CERCLA Releases
  - All spills threatening population or the environment
  - All spills requiring evacuation

Within 7 days, a Discharge Notification Report Form must be submitted to the BER. A DNR form is provided in Appendix F. For a petroleum spill, follow the specific FDEP guidelines provided in Appendix G.

Federal

The National Response Center (NRC) must be contacted within 1 hour if the discharge threatens or enters waters of the state.

A discharge must also be reported to the EPA Regional Administrator when there is discharge of:

- More than 1,000 US gallons of oil in a single discharge to navigable waters of adjoining shorelines; or

- More than 42 U.S. gallons of oil in each of two discharges to navigable waters or adjoining shorelines occurring within any twelve month period.

Be prepared to report the following information:

- *Your name, location, organization, and telephone number*
- *Name and address of the party responsible for the incident*
- *Date and time of the incident*
- *Location of the incident*
- *Source and cause of the release or spill*
- *Types of material(s) released or spilled*
- *Quantity of materials released or spilled*
- *Medium (e.g. land, water) affected by release or spill*
- *Danger or threat posed by the release or spill*
- *Number and types of injuries or fatalities (if any)*
- *Weather conditions at the incident location*
- *Name of the carrier or vessel, the truck number, or other identifying information*
- *Whether an evacuation has occurred*
- *Other agencies notified or about to be notified*
- *Any other information that may help emergency personnel respond to the incident*

A written report shall be submitted to the EPA Administrator – Region IV and the FDEP within 60 days of a discharge of more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single discharge event or discharges of 42 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in two discharge events occurring within any twelve month period.

The following information should be included in the follow–up report:

- *Name and location of facility*
- *Owner/operator name*
- *Maximum storage/handling capacity of the facility and normal daily throughput*

- *Corrective actions and countermeasures taken, including descriptions of equipment repairs and replacements.*
- *Adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary*
- *Cause of the discharge to navigable waters, including a failure analysis*
- *Failure analysis of the system where the discharge occurred*
- *Additional preventive measures taken or planned to take to minimize discharge reoccurrence*
- *Other information EPA Region IV may reasonable require.*

21.5 General Response Actions in the Event of a Spill

- For first responders, the first priority is scene isolation – keep others away.
- Determine or verify the type of material involved and, if possible, the nature of the hazard.
- Take action to safely stop the spill or release.
- Identify and downgrade fire, explosion and vapor hazards.
- Ensure that there is "No Smoking" in the spill area.
- In the event of a fire or explosion hazard, notify the fire department, evacuate all personnel to a safe location and secure the area.
- Notify your supervisor or the Plant Manager.
- Immediately establish an Exclusion (Hot) Zone, but do not become exposed in doing so. The Exclusion Zone should encompass all contaminated areas, and no one should be allowed to cross into that zone. Assume that anyone leaving the Exclusion Zone is contaminated, and should be assessed and decontaminated if necessary.
- Limit entry into contaminated areas to the maximum extent possible.
- Limit the amount of time spent in petroleum contaminated areas.
- Keep upwind, upgrade (higher than the elevation of the incident location) and maintain a safe distance from the incident.
- Do not enter areas where the atmosphere is contaminated. You do not have the protective clothing and equipment to operate safely in these areas.
- Full protective equipment and clothing should be the minimum protection for all personnel who are at the incident. This rule should be strictly enforced, especially when harmful

effects are obvious (for example, there are victims down or there is discoloration of surroundings).

- ❑ Keep unnecessary equipment from becoming contaminated.
- ❑ Visually inspect all spills and exposed areas and prevent further migration of the spill. Contain spill as close to the source as possible with dike of absorbent materials. Construct additional dikes as necessary.
- ❑ Initiate cleanup and removal operations in accordance with state and federal guidelines.
- ❑ If on-site personnel cannot manage the spill/release, the emergency response agencies/contractors will be mobilized.
- ❑ Alert neighbors if personal danger is possible or if any part of the discharge is going to leave the property or premises.
- ❑ Determine if the spill is reportable to outside agencies.
- ❑ Take photographs of the spill/affected area; pre- and post clean-up conditions if possible.
- ❑ As soon as practical, record all information on the Internal Spill Notification/Discharge Reporting Form in Appendix D.

Follow these specific procedures to control a petroleum discharge:

- Contain the spread of the spill.
- If an oil spill overtops the containment structure surrounding that storage area, any readily available sorbent material will be utilized to form cascading barriers between the spill and water resources.
- Divert the spill from any drainage structures, ditches, swales, and discharge points to the mining pits.
- If the spill occurs on paved or impermeable surfaces, clean up using "dry" methods (i.e., absorbent materials, cat litter, and/or rags).
- If the spill occurs in dirt areas, immediately contain the spill by constructing an earthen dike. Dig up and properly dispose of contaminated soil.
- If the spill occurs during a storm event, cover the impacted area to avoid runoff.

Sustained Actions

- ❑ All required Facility resources will be used to ensure that a spill does not reach any waterways.
- ❑ Berms can be established both up and downstream to contain the spill and limit the cleanup required.

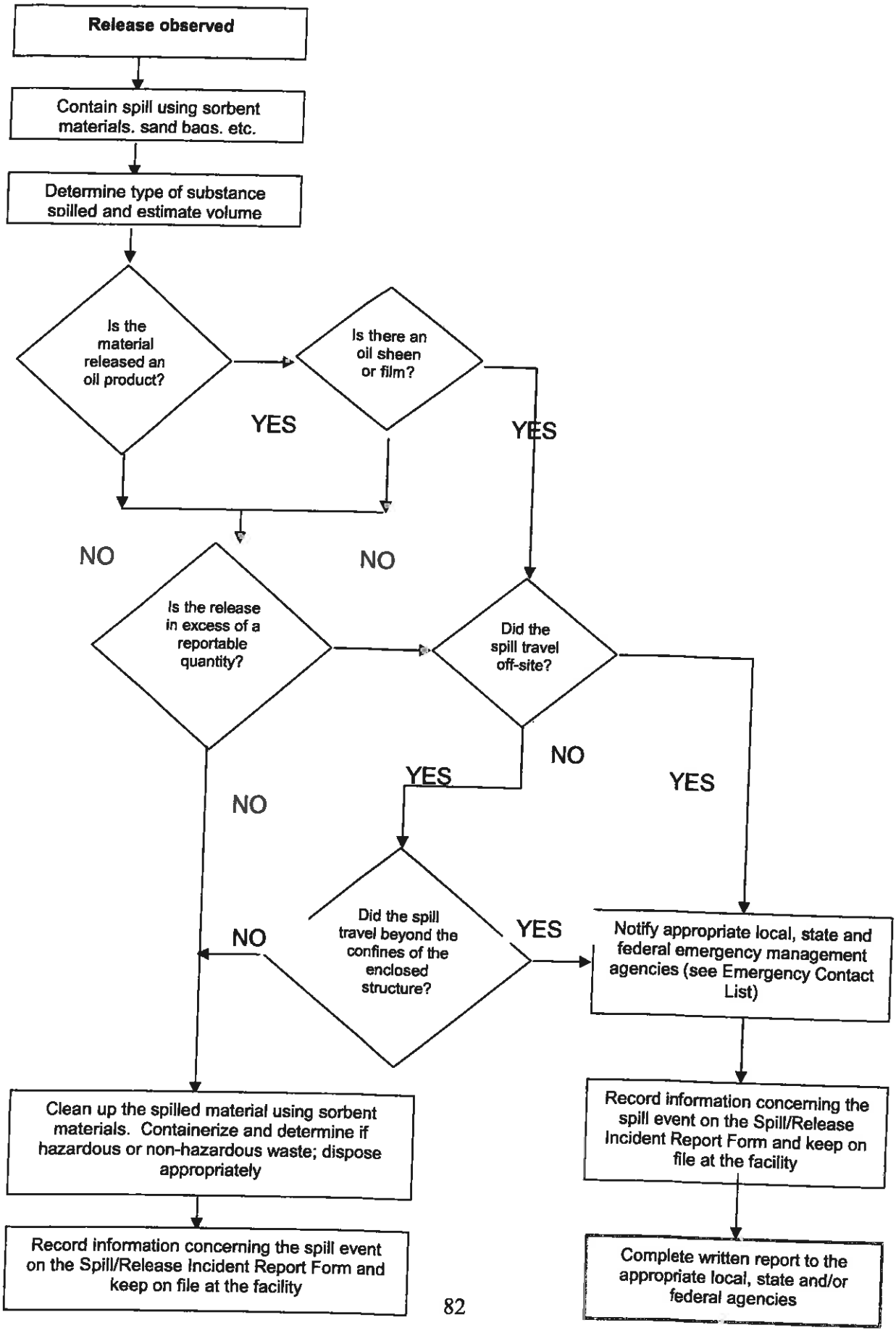
- Isolate the hazard area and keep non-essential personnel away from the scene.
- When necessary, or so instructed, initiate and conduct evacuation of surrounding areas, particularly downwind or downstream.
- Attempt to detain persons believed to be contaminated. If this is not possible, obtain their names and addresses.
- Establish an access control coordination point to the incident area. Maintain control of personnel entering the area.

Termination and Follow-Up Actions

- Vehicles, equipment and personnel will be decontaminated prior to being returned to normal service. If necessary, notify the owner, shipper, or other appropriate custodian of the material involved in the incident.
- Prevent unnecessary handling of incident debris.
- Assess damage to wildlife populations and habitat resulting from a hazardous materials incident.
- Determine the nature and threat presented by the release and then evaluate proposed remedies.
- This may involve assessing whether the threat can be prevented or minimized by controlling the source of the contamination at or near the area where the hazardous substances were originally located (source control measures) and/or whether additional actions will be necessary because the hazardous substances have spread to other areas (management or mitigation).
- Prior to allowing public access to potentially contaminated areas, evaluate the environmental conditions in the affected areas. Environmental assessment will proceed from the perimeter of affected areas to the interior.

See the following Spill Reporting Determination Flowchart as a guide.

RELEASE REPORTING FLOWCHART



22.0 EQUIPMENT FAILURE [112.7(b)]

Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge including secondary containment total failure), this Plan includes a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure. Where there are multiple equipment locations, discharge predictions are provided for each (See Section 17.4, Table 1 – Container Inventory for Area Identification).

22.1 Discharge Prediction from Loading Equipment Failure

Equipment Area ID: *Area No. 4* – **Lubrication/Distribution Center**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **55** gallons/minute
Prediction of total quantity of oil: **55** gallons (estimate failure would be for single drum loading)

Loading Equipment Area ID: *Area No. 6* - **Waste Oil & Lubricant Storage**
Prediction of the direction of oil flow: **N**
Prediction of rate of flow: **55** gallons/minute
Prediction of total quantity of oil: **55** gallons (estimate failure would be for single drum loading)

22.2 Discharge Prediction from Unloading Equipment Failure

Equipment Area ID: *Area No. 4* – **Lubrication/Distribution Center**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **55** gallons/minute
Prediction of total quantity of oil: **55** gallons (estimate failure would be for single drum loading)

Unloading Equipment Area ID: *Area No. 5* - **Diesel Fueling Station Piping**
Prediction of the direction of oil flow: **N**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **800** gallons (presume 10% release of tanker volume)

Unloading Equipment Area ID: *Area No. 6* – **Waste Oil & Lubricant Storage**
Prediction of the direction of oil flow: **N**
Prediction of rate of flow: **55** gallons/minute
Prediction of total quantity of oil: **55** gallons (estimate failure would be for single drum loading)

22.3 Discharge Prediction from Tank Overflow, Rupture or Leakage

Plant:

Equipment Area ID: *Area No. 1* - **Emergency Generator**
Prediction of the direction of oil flow: **NE**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **500** gallons (estimate total release)

Equipment Area ID: *Area No. 2* - **Kiln Day Tank**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **2,000** gallons/minute
Prediction of total quantity of oil: **30,000** gallons

Equipment Area ID: *Area No. 3* – **Mobile Shop, Lubricating/Motor Oil Tanks**
Prediction of the direction of oil flow: **N**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **1,400** gallons (total volume of 4 tanks)

Equipment Area ID: *Area No. 4* – **Lubrication/Distribution Center**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **55** gallons/minute
Prediction of total quantity of oil: **55** gallons (estimate failure would be for single drum loading)

Equipment Area ID: *Area No. 5* - **Diesel Fueling Station Tank**
Prediction of the direction of oil flow: **N**
Prediction of rate of flow: **1,000** gallons/minute
Prediction of total quantity of oil: **20,000** gallons (total tank volume)

Equipment Area ID: *Area No. 6* - **Waste Oil & Lubricant Storage**
Prediction of the direction of oil flow: **N**
Prediction of rate of flow: **55** gallons/minute
Prediction of total quantity of oil: **55** gallons (estimate failure would be for single drum loading)

Equipment Area ID: *Area No. 7* - **Emergency Generator**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **560** gallons (total tank volume)

Equipment Area ID: *Area No. 8* – **Fire Pump and Well Building – Diesel Tank**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **150** gallons (total tank volume)

Equipment Area ID: *Area No. 12* - **Bulk Fuel Storage (Inactive)**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **1,000** gallons/minute
Prediction of total quantity of oil: **1,266,000** gallons tanks (total volume two tanks)

Equipment Area ID: *Area No. 13* - **Waste Oil Water Storage (Inactive)**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **1,000** gallons/minute
Prediction of total quantity of oil: **100,000** gallons (total tank volume)

Quarry:

Tank ID: 1
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **500** gallons (total tank volume)

Tank ID: 2
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **500** gallons (total tank volume)

Tank ID: 3
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **500** gallons (total tank volume)

Tank ID: 4
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **500** gallons (total tank volume)

Tank ID: 5
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **540** gallons (total tank volume)

Tank ID: 6
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **1,000** gallons/minute
Prediction of total quantity of oil: **20,000** gallons (total tank volume)

Tank ID: 7
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **50** gallons/minute
Prediction of total quantity of oil: **275** gallons (total tank volume)

22.4 Discharge Prediction from Other Equipment Failure

Other Equipment Area ID: **ALL**
Other Equipment Description: **Various Earthmovers**
Prediction of the direction of oil flow (Location of mobile equipment): **Any direction**
Prediction of rate of flow: **100** gallons/minute
Prediction of total quantity of oil: **100** gallons (estimate of largest mobile source tank)

23.0 CONTAINMENT AND DIVERSIONARY STRUCTURES AND EQUIPMENT [40 CFR 112.7(c)]

This Plan provides appropriate containment and/or diversionary structures or equipment to prevent a discharge. The facility uses the following prevention systems or its equivalent:

- Containment systems (other than dikes, berms, or retaining walls) - each containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. The containment systems at the facility are constructed of concrete block to ensure that any discharge will not escape before cleanup occurs.
- Dikes, berms, or retaining walls - dikes, berms, or retaining walls are constructed of compacted limerock to ensure that they are sufficiently impervious to contain oil.
- Curbing
- Culverts, gutters or other drainage systems - culverting, gutters, or other drainage systems are used to prevent a discharge offsite by diverting oil spills to on-site retention ponds. Culverts are used to assure that any oil discharge is forced to run under driveway and roads to prevent the spread of contamination to earthmoving equipment and emergency vehicles that are used to contain spills.
- Retention ponds – the facility is a closed drainage basin. There are five sub-basins that drain into onsite retention ponds. These basins are used to prevent a discharge offsite.
- Sorbent materials - if an oil spill overtops the containment structure surrounding an oil storage area, any readily available sorbent material, such as the raw materials used in the cement making process will be utilized to form cascading barriers between the spill and retention ponds.

During annual training, employees will be made aware of the location of these materials and monitoring will be performed to make sure that ample supplies of oil absorbent, mats and/or pads are available.

24.0 CONTINGENCY PLANNING [112.7(d)]

If the installation of any of the structures or pieces of equipment listed in 40 CFR 112.7(c), 40 CFR 112.7(h)(1), 40 CFR 112.8(c)(2), and 112.8(c)(11) to prevent a discharge is not practicable, this section explains why such measures are not practicable. If this is the case, this Plan provides the following additional requirements:

- For bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping;
- Provide an oil spill contingency plan following the provisions of 40 CFR 109; and,
- Provide a written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful to personnel and the environment.

The structures or pieces of equipment include:

40 CFR 112.7(c)	Dikes, berms, or retaining walls
	Curbing
	Culverting, gutters, or other drainage systems
	Weirs, booms, or other barriers
	Spill diversion ponds
	Retention ponds
	Sorbent materials
40 CFR 112.7(h)(1)	Catchment basins
	Treatment facilities
	Quick drainage systems
	Containment systems
40 CFR 112.8(c)(2)	Manual, open-and-closed design valves, for drainage of diked areas
40 CFR 112.8(c)(11)	Positioning of mobile or portable oil storage containers to prevent a discharge
	Secondary containment for mobile or portable oil storage containers, such as dikes or catchment basins

Facility management has determined that use of secondary containment, site topography, diversionary structures and readily available on-site mobile equipment is practical and effective to prevent a discharge of petroleum products from reaching navigable waters at this Facility.

Industry Standards

Industry standards that may assist an owner or operator with the integrity testing of containers, and the integrity and leak testing of piping and valves include:

- API Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction";
  API Recommended Practice 575, "Inspection of Atmospheric and Low-Pressure Tanks";

- API Standard 570, "Piping Inspection Code (Inspection, Repair, Alteration, and Rerating of In-Service Piping Systems)";
- American Society of Mechanical Engineers (ASME) B31.3, "Process Piping";
- ASME 31.4, "Liquid Transportation Systems for Hydrocarbons, Liquid Petroleum Gas, Anhydrous Ammonia, and Alcohols";
- Steel Tank Institute Standard SP001–00, "Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids"; and,
- Underwriters Laboratory (UL) Standard 142, "Steel Aboveground Tanks for Flammable and Combustible Liquids."

25.0 INSPECTIONS, TESTS, AND RECORDS [112.7(e)]

When the Facility is in operation, daily visual inspections consist of a complete walkthrough to check aboveground storage tank, drum, and mobile fueling equipment areas for tank damage or leakage, stained or discolored soils, excessive accumulation of precipitation within diked areas, and to ensure the containment drain valve(s) are securely closed. All electrical items containing dielectric fluid shall be periodically checked for leaks. Appropriate labels identifying the fluid contained in the item shall be affixed to the outside of the item in clear view.

The Plant Manager or his representative will conduct and document formal visual inspections on at least a monthly basis and when repairs are completed. The personnel performing these inspections shall be knowledgeable of storage facility operations, the type of AST and its associated components, and the contents. The results will be recorded on the Monthly Inspection Report forms provided in Appendix H. The monthly inspections shall include a visual inspection of the following elements: tank exterior and base; tank vents and ports; piping, pumps, and flexible hoses and nozzles; condition and cleanliness of containment and transfer areas; spill response equipment; site and tank security equipment and procedures. The inspection reports are to be signed by the appropriate supervisor or inspector and kept with the SPCC Plan for a period of three years. There is a tab provided in Appendix H to file completed reports.

In addition to monthly inspections, integrity testing needs to be conducted on tanks as per the schedule in Appendix J. If the tank inventory changes, a new assessment of inspection and testing requirements will be necessary.

Industry Standards

Industry standards that may assist include:

- o STI-SP001-00
- o STI-SP001-03
- o API 653

25.1 Inspection and Maintenance of Above Ground Storage Tanks

Inspections will include observations of the exterior of the tank for signs of deterioration or spills/leaks; tank foundation and supports for signs of instability; and, the vent, fill and discharge pipes for signs of poor connection. Visual inspection will be conducted on a monthly basis. It may be necessary to conduct testing more frequently based on the monthly inspection results. Integrity testing will be conducted as applicable. Integrity testing schedule and procedures are provided in Appendix J.

All petroleum tank and piping problems will be immediately reported to the Plant Manager. Visible spills/leaks that result in a loss of oil from tank walls, piping, or other components will be repaired or replaced as soon as possible to prevent the possibility of a major spill and discharge to the environment.

25.2 Inspection and Maintenance of Drums

Inspections will include observations of the exterior of the drums for signs of deterioration or spills/leaks, and of the drum integrity for signs of instability that could result in a spill. Visual inspection will be conducted monthly on all drums and portable containers containing petroleum products. In accordance with the STI SP001 Standard, these drums and containers only require periodic inspection providing spill control is in place.

All problems noted with any drum will be immediately reported to the Plant Manager. Visible signs of poor integrity including rust, cracks, damage, or leaks that could cause a loss of product will be repaired or replaced as soon as possible to prevent the possibility of a major spill and discharge to the environment.

25.3 Inspection and Maintenance of Mobile Fueling Equipment

Inspections will include observations of: the exterior of the tank for signs of deterioration or spills/leaks; tank foundation and supports for signs of instability; and, the vent, fill and discharge pipes for signs of poor connection. All mobile fueling equipment problems will be immediately reported to the Plant Manager. Visible spills/leaks that result in a loss of oil from tank walls, piping, or other components will be repaired or replaced as soon as possible to prevent the possibility of a major spill from the source.

26.0 PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCEDURES [112.7(f)]

26.1 Training Topics

CEMEX will provide SPCC spill training for personnel involved with handling of petroleum products. The Environmental Manager is responsible for training which will include the following topics:

- Contents of this SPCC Plan and introduction to pollution control laws
- Rules and regulations pertaining to the use and storage of petroleum products
- Inspection, operation, and maintenance of spill equipment and petroleum storage and dispensing equipment
- Spill response and cleanup
- Spill notification and record keeping
- Spill prevention practices.

26.2 Documentation of Training

The annual SPCC training will be documented to include the instructor's name, date, topics covered during training, attendees' names and signatures, and a corrective action list for areas in need of improvement, if any. This information will be filed and maintained for at least three (3) years in the office of the Environmental Manager.

An employee training worksheet is provided in Appendix I which may be used as a guide for annual SPCC employee training and documentation. There is a tab provided in Appendix I where completed employee training documents may be filed.

27.0 SECURITY [112.7(g)]

27.1 Fencing

The Facility entrance is secured with a gate and guard seven (7) days per week, 24-hours per day. The majority of the facility is fenced; however, fencing does not enclose the entire property. The areas utilized for handling, processing, or storing oil are fully fenced or alternate methods achieving equivalent security and environmental protection are provided.

27.2 Valves

Master flow and drain valves and any other valves permitting direct outward flow of the oil container's contents to the surface have adequate security measures (pad locks etc.) so that they remain in the closed position when in non-operating or non-standby status.

Access to the keys to the security measures is restricted to plant operations personnel and other authorized personnel.

27.3 Pumps

The starter control on each oil pump is locked in the "off" position and the starter controls are located at sites accessible only to authorized personnel when the pump is in a non-operating or non-standby status.

27.4 Piping

The Facility will securely cap or blank-flange the loading/unloading connections of oil pipelines or Facility piping when not in service or when in standby service for an extended time. This security practice also applies to piping that is emptied of liquid content either by draining or by inert gas pressure.

The Facility formerly used underground piping for transferring oil. All underground pipes have been drained, cleaned, and filled with concrete so that they are no longer usable and pose no environmental concern.

27.5 Lighting

Facility lighting is commensurate with the type and location of the facility. The existing lighting will assist in the following:

- Discovery of discharges occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.); and
- Prevention of discharges occurring through acts of vandalism.

Industry Standards

Industry standards that may assist an owner or operator with security purposes include:

- API Standard 2610, Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities; and,
- NFPA 30A, Automotive and Marine Service Station Code, Flammable and Combustible Liquids Code.

28.0 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK [112.7(h)]

28.1 Drainage and Containment

The nearest surface water bodies to the tanks in the quarry are the on-site mining pits (See Figure 2 in Appendix A). Storm water from the quarry discharges to the mine pits, and therefore off-site water bodies are not impacted by spills occurring at the quarry. The tanks at the quarry are under a roof within steel, secondary containment structures.

At the plant, where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, the Facility uses a quick drainage system for tank truck loading and unloading areas. Any containment system for loading/unloading areas is designed to hold at least the maximum capacity of any single compartment of a tank truck loaded or unloaded at the facility.

28.2 Vehicle Departure Control

The facility provides vehicle departure control in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines through warning signs and wheel chocks.

28.3 Vehicle Drain Inspection

Facility or hauling vendor personnel will closely inspect for discharges from the lowermost drain and all outlets of tank cars or tank trucks, prior to filling and departure of any tank truck. If necessary, the personnel will ensure that drains and outlets are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

Industry Standards

Industry standards that may assist an owner or operator with loading and unloading areas include:

- NFPA 30, "Flammable and Combustible Liquids Code"; and,
- API Standard 2610, "Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities."

29.0 FIELD-CONSTRUCTED ABOVEGROUND CONTAINERS [112.7(i)]

Field-constructed aboveground containers are present at the Facility. If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, the facility will evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

Industry Standards

Industry standards that may assist an owner or operator with brittle fracture evaluation include:

- API Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction"; and,
- API Recommended Practice 920, "Prevention of Brittle Fracture of Pressure Vessels."

30.0 CONFORMANCE WITH OTHER REQUIREMENTS [112.7(j)]

In addition to the general prevention standards listed in 40 CFR 112.7, this section includes a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.

40 CFR 112.8 provides specific standards applicable to this facility. This Plan includes discussions of conformance with the specific standards.

30.1 Conformance with State Requirements

This discussion of conformance with State requirements only addresses discharge prevention and containment procedures listed in any applicable more stringent State rules, regulations, and guidelines. The discussion is limited to Chapter 62-761, Florida Administrative Code, Storage Tank Systems. The following sections of the regulation address discharge prevention and containment procedures and are potentially applicable to the facility:

62-761.100	Intent
62-761.300	Applicability
62-761.500	Performance Standards for Category-C Storage Tank Systems.
62-761.510	Performance Standards for Category-A and Category-B Storage Tank Systems
62-761.600	Release Detection Standards
62-761.610	Release Detection Methods
62-761.640	Performance Standards for Release Detection Methods
62-761.700	Repairs, Operation and Maintenance of Storage Tank Systems
62-761.710	Recordkeeping
62-761.820	Incident and Discharge Response

If any of these standards are applicable and more stringent than the applicable standards from 40 CFR 112, conformance with the State standards is discussed in detail in the corresponding section of this Plan.

30.2 Conformance with Local Requirements

If any local requirements are applicable and more stringent than the applicable standards from 40 CFR 112, conformance with the local standards is discussed in detail in the corresponding section of this Plan.

31.0 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN REQUIREMENTS FOR ONSHORE FACILITIES (112.8)

This Plan meets the general requirements listed under 40 CFR 112.7, and the specific discharge prevention and containment procedures listed in 40 CFR 112.8.

31.1 Facility drainage [112.8(b)]

31.1.1 Diked Areas

Valves to prevent a discharge into the drainage system or facility effluent treatment system restrain drainage from diked storage areas. Pumps or ejectors may be utilized to empty certain diked areas. If so, facility personnel will manually activate these pumps or ejectors and will inspect the condition of the accumulation before starting, to ensure no oil will be discharged.

Valves of manual, open-and-closed design are used for the drainage of diked areas. Flapper-type drain valves are not used to drain diked areas. Uncontaminated retained stormwater is drained after inspection. The drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system is done under the following circumstances:

- Normally keep the bypass valve sealed closed,
- Inspect the retained rainwater to ensure that its presence will not cause a discharge,
- Open the bypass valve and reseal it following drainage under responsible supervision; and
- Keep adequate records of such events.

31.1.2 Undiked Areas

Facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) is designed to flow into ponds, lagoons, or catchment basins designed to

retain oil within the facility property boundary lines. Catchment basins are not located in areas subject to periodic flooding.

31.1.3 Diversion System

For those areas where facility drainage is not engineered to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility, the final discharge of all ditches inside the facility are equipped with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.

31.1.4 Pump Controls

Starter controls on all oil pumps are locked in the "Off" position and starter controls are located secure areas accessible only to authorized personnel when the pump is in a no-operation or non-standby status.

31.1.5 Pump Transfer for Multiple Treatment Units

Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is used, two "lift" pumps are provided and at least one of the pumps is permanently installed.

31.1.6 Facility Drainage Inspections

Effluent treatment facilities are inspected frequently enough to detect possible system upsets that could cause a discharge.

Industry Standards

Industry standards that may assist an owner or operator with facility drainage include:

- NFPA 30, "Flammable and Combustible Liquids Code"; and
- API Standard 2610, "Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities."

31.2 Bulk Storage Containers [112.8(c)]

All bulk storage containers (tanks and drums) are to be compatible with the contents. Secondary containment for each bulk storage container has the capability to contain the capacity of the largest container plus normal rainfall. All 55-gallon containers are located within

secondary containment on a drum rack with all sides visible.

31.2.1 Container Material and Construction

Containers for the storage of oil are not used unless their material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.

Industry Standards

Industry standards that may assist an owner or operator with the material and construction of containers include:

- API Standard 620, "Design and Construction of Large Welded Low-Pressure Storage Tanks";
- API Standard 650, "Welded Steel Tanks for Oil Storage";
- Steel Tank Institute (STI) F911, "Standard for Diked Aboveground Steel Tanks";
- STI Publication R931, "Double Wall Aboveground Storage Tank Installation and Testing Instruction";
- UL Standard 58, "Standard for Steel Underground Tanks for Flammable and Combustible Liquids";
- UL Standard 142, "Steel Aboveground Tanks for Flammable and Combustible Liquids";
- UL Standard 1316, "Standard for Glass-Fiber-Reinforced Plastic Underground Storage Tanks for Petroleum Products"; and,
- Petroleum Equipment Institute (PEI) Recommended Practice 200, "Recommended Practices for Installation of Aboveground Storage Systems for Motor Vehicle Fueling."

31.2.2 Secondary Containment

All bulk storage container installations provide a secondary means of containment for the entire capacity of the largest single container and have sufficient freeboard to contain precipitation at uncovered tank locations. Diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. An alternative system consisting of a drainage trench enclosure must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.

EPA believes that the proper standard of "sufficient freeboard" to contain precipitation is that

amount necessary to contain precipitation from a 25-year, 24-hour storm event. That standard allows flexibility for varying climatic conditions. The 25-year, 24-hour storm event standard is appropriate for most facilities and protective of the environment.[1] The 25-year 24-hour storm event for this facility results in 10.5 inches of rainfall.[2]

Industry Standards

Industry standards that may assist an owner or operator with secondary containment for bulk storage containers include:

- NFPA 30, "Flammable and Combustible Liquids Code";
- BOCA, National Fire Prevention Code;
- API Standard 2610, "Design Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities"; and,
- Petroleum Equipment Institute Recommended Practice 200, "Recommended Practices for Installation of Aboveground Storage Systems for Motor Vehicle Fueling."

31.2.3 Mobile or Portable Containers

Mobile or portable oil storage containers that are at various locations throughout the Facility are positioned or located to prevent a discharge. A secondary means of containment is provided, such as a dike or catchment pan or basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

Industry Standards

Industry standards that may assist an owner or operator with secondary containment for mobile containers include:

- NFPA 30, "Flammable and Combustible Liquids Code'; and,
- BOCA, "National Fire Prevention Code."

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[1] Preamble to Final Rule, 67 FR 47116, July 17, 2002.
[2] Soil Conservation Service, Technical Release 55, "25-Year 24-Hour Rainfall (Inches) in Alabama

31.2.4 Overfill Protection

Each container installation is engineered or updated in accordance with good engineering practice to avoid discharges. At least one of the following devices is provided:

- High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice.
- High liquid level pump cutoff devices set to stop flow at a predetermined container content level.
- Direct audible or code signal communication between the container gauge and the pumping station.

A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If this alternative is used, a person is present to monitor gauges and the overall filling of bulk storage containers.

Industry Standards

Industry standards that may assist an owner or operator with alarm systems, discharge prevention systems, and inventory control include:

- NFPA 30, "Flammable and Combustible Liquids Code";
- API Recommended Practice 2350, "Overfill Protection for Storage Tanks in Petroleum Facilities"; and,
- API, "Manual of Petroleum Measurement Standards."

31.2.5 Completely Buried Metallic Storage Tanks

Any completely buried metallic storage tanks installed on or after January 10, 1974 are protected from corrosion by coatings or cathodic protection compatible with local soil conditions. Such completely buried metallic storage tanks are regularly leak tested.

Completely buried metallic storage tanks at facility? ☐ Yes ☒ No

31.2.6 Partially Buried or Bunkered Metallic Tanks

Partially buried or bunkered metallic tanks are not used for the storage of oil, unless the buried section of the tank is protected from corrosion by coatings or cathodic protection compatible with local soil conditions.

Partially buried or bunkered metallic tanks at facility? ☐ Yes ☒ No

31.2.7 Integrity Testing

Each aboveground container is tested for integrity on a regular schedule, and whenever material repairs are made. The frequency and type of testing takes into account container size and design (such as floating roof, skid-mounted, elevated, or partially buried).

Visual inspection is combined with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. Test results reports are kept on file at the Facility.

Integrity testing required at the Facility? ☒ Yes ☐ No

See Appendix J for an integrity testing schedule and requirements. Records should be maintained for the life of the tank.

Industry Standards

Industry standards that may assist an owner or operator with integrity testing include:

- API Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction";
- API Recommended Practice 575, "Inspection of Atmospheric and Low-Pressure Tanks;" and,
- Steel Tank Institute Standard SP001–00, "Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids."

31.2.8 Procedures for Inspections

The outsides of containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. Container supports and foundations are also inspected.

31.2.9 Procedures for Tests

Liquid level sensing devices are regularly tested to ensure proper operation.

Liquid level sensing devices at facility? ☐ Yes ☒ No

Completely buried metallic storage tanks are regularly leak tested.
Completely buried metallic storage tanks at facility? ☐ Yes ☒ No

31.2.10 Internal Heating Coils

Leakage through defective internal heating coils is controlled by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open

watercourse, or by passing the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

Internal heating coils at facility? ☐ Yes ☒ No

31.3 Facility Transfer Operations, Pumping, and Facility Process [112.8(d)]

31.3.1 Aboveground Valves and Piping – Inspection

All aboveground valves, piping, and appurtenances are regularly inspected. The inspection assesses the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.

Industry Standards

Industry standards that may assist an owner or operator with inspection and testing of valves, piping, and appurtenances include:

- API Standard 570, "Piping Inspection Code (Inspection, Repair, Alteration, and Rerating of In-Service Piping Systems";
- API Recommended Practice 574, "Inspection Practices for Piping System Components";
- American Society of Mechanical Engineers (ASME) B31.3, "Process Piping"; and,
- ASME B31.4, "Liquid Transportation Systems for Hydrocarbons, Liquid Petroleum Gas, Anhydrous Ammonia, and Alcohols."

31.3.2 Aboveground Valves and Piping - Protection

All vehicles entering the Facility are warned to be sure that no vehicle will endanger aboveground piping or other oil transfer operations. Signs and "catch cables" are posted at all overhead piping locations throughout the facility. The "catch cables" are designed to catch on the vehicle and fall over, warning the vehicles driver of the prohibited height of the vehicle and the danger it poses to overhead piping.

31.3.3 Buried Piping – Corrosion Protection, Inspection and Testing

If a section of buried line is exposed for any reason, it will be carefully inspected for deterioration. If corrosion damage is found, additional examination and corrective action will be undertaken as indicated by the magnitude of the damage. Integrity and leak testing of buried

piping will be conducted at the time of installation, modification, construction, relocation, or replacement.

Buried piping at facility? ☐ Yes ☒ No

Industry Standards

Industry standards that may assist an owner or operator with corrosion protection for buried piping installations include:

- National Association of Corrosion Engineers (NACE) Recommended Practice-0169, "Control of External Corrosion on Underground or Submerged Metallic Piping Systems"; and,
- STI Recommended Practice 892, "Recommended Practice for Corrosion Protection of Underground Piping Networks Associated with Liquid Storage and Dispensing Systems."

A - Figures

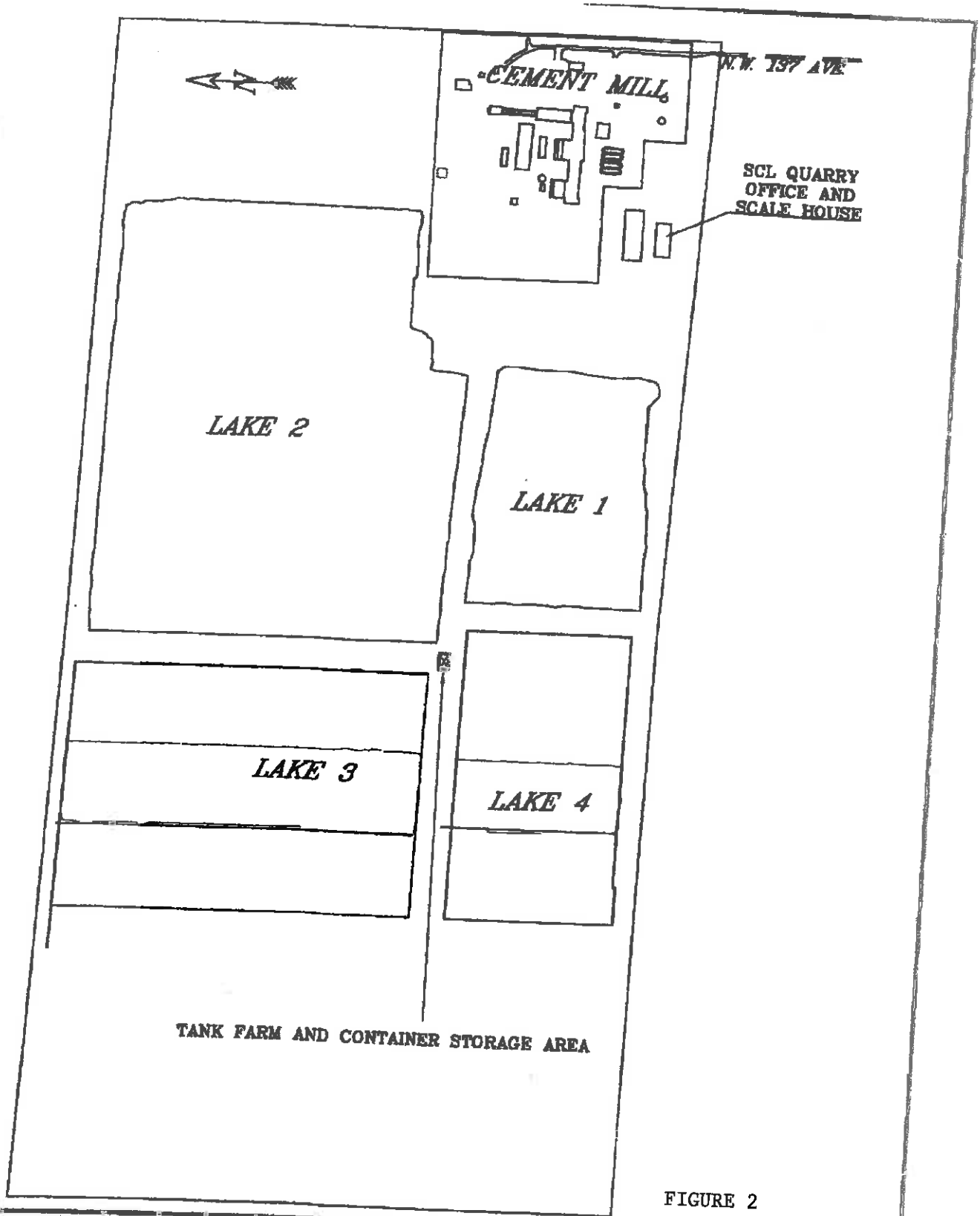


FIGURE 2

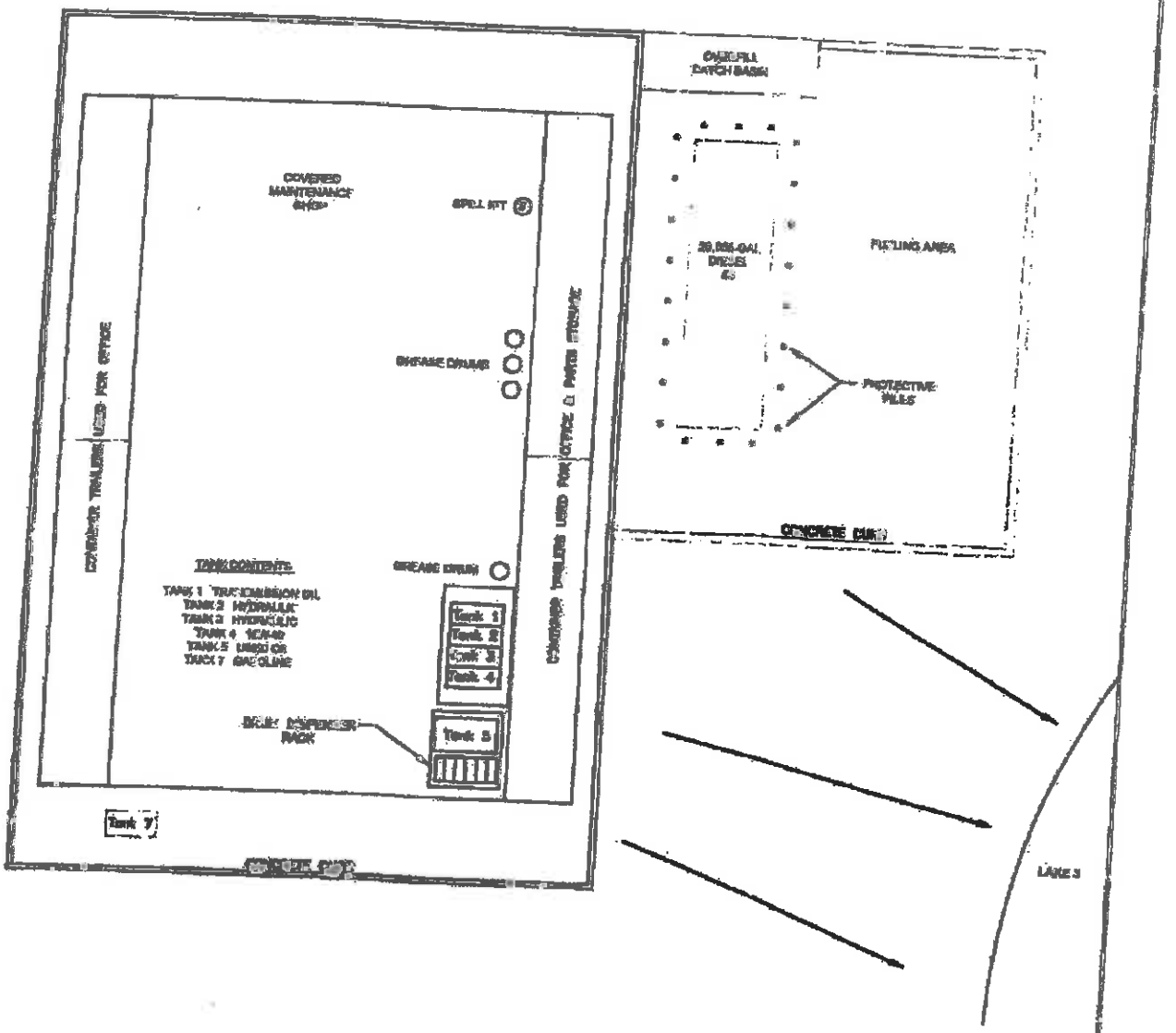
CEMEX CONSTRUCTION MATERIALS FLORIDA, L.L.C.

DATE	JOB NO.	PLATE NO.
09/27/06	S-262-F22	1

THE COLINAS GROUP, INC.
ENGINEERING AND ENVIRONMENTAL CONSULTANTS
2051 E. EDGEWOOD DRIVE – #5, LAKELAND, FLORIDA 33803
863-668-9141 – Fax 863-668-1742
LAKELAND . SARASOTA . WINTER PARK

LOCATION MAP

SCL QUARRY
MIAMI, FLORIDA



LEGEND

——→ DIRECTION OF SURFACE DRAINAGE

NOTE: DISPENSERS ARE LOCATED ON TANKS

FIGURE 3

0 20'

CEMEX CONSTRUCTION MATERIALS FLORIDA, L.L.C.	DATE 11/06/08	JOB NO. S-262-F22	PLATE NO. 2
THE COLINAS GROUP, INC. ENGINEERING AND ENVIRONMENTAL CONSULTANTS 2031 E. EDGEWOOD DRIVE - #5, LAKELAND, FLORIDA 33803 863-669-9141 - Fax 863-668-1742 LAKELAND . SARASOTA . WINTER PARK	TANK FARM AND MAINTENANCE SHOP		
	SCL QUARRY BRAIL FLORIDA		

B - Federal Regulations

Additional Federal Regulations which may be applicable to

CEMEX Miami Cement Plant:

- EPA's Oil Pollution Prevention Regulation (SPCC and CEMEX facility Response Plan Requirements) - 40 CFR Part 112.7(d) and 112.20-.21;
- US Coast Guard's (USCG's) Facility Response Plan Regulation - 33 CFR Part 154, Subpart F;
- Occupational Health and Safety Administration's (OSHA's) Emergency Action Plan Regulation - 29 CFR 1910.38(a);
- OSHA's Process Safety Standard - 29 CFR 1910.119;
- OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) Regulation - 29 CFR 1910.120; and
- EPA's Resource Conservation and Recovery Act (RCRA) Contingency Planning Requirements - 40 CFR Part 264, Subpart D, 40 CFR Part 265, Subpart D, and 40 CFR 279.52.

C - [illegible]
Harm Criteria

SUBSTANTIAL HARM CRITERIA CHECKLIST [40 CFR 112.20(e)]
CERTIFICATION OF THE APPLICABILITY

FACILITY NAME: CEMEX Miami Cement Plant and SCL Quarry
FACILITY ADDRESS: 1200 NW 137th Avenue, Miami, FL 33165

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes ☐ No ☒

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes ☐ No ☒

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" and the applicable Area Contingency Plan.
Yes ☒ No ☐

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2].
Yes ☐ No ☒

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes ☐ No ☒

[1] If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.
[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Name:_____ Signature:_____
Title: _____ Date:_____

Internal Spill Notification/Discharge Reporting Form

Name of person filling out report:_____Date:_____

Facility address & phone no.	1200 NW 137 Ave., Miami, FL 33182 800-226-7647
Discharge date and time	
Discovery date and time	
Location of discharge/spill	
Material discharged	
Total quantity discharged (est.)	
Quantity discharged offsite (est.)	
Discharge source	
Cause of discharge	
Describe all affected media (air, water, soil, well, sewer, etc.) and estimate area affected.	
Discharge damage/injuries	
Action taken to stop/remove/mitigate discharge	
Evacuation required (Y/N)	

Notification Checklist

SpillType	Notification Date/Time	Name of Person that Received Call
Greater than 25 gallons of petroleum product on ground or chemical spills: Miami-Dade DRER 305-372-6955		
FL Warning Point 800-320-0519		
Discharge threatens or enters waters of the state. National Response Center 800-424-8802		

Copy this form as necessary


E - Contact
Lists

INTERNAL NOTIFICATION EMERGENCY AND CONTACT LIST

Person Making Notification:_____

Date:_____

Reason for Notification:_____

In case of emergency, complete checklist to serve as a record of notification action.

Personnel	Department or Title	Office No.	Cell No.	Time
Charles E. Walz Home Address: 1149 NW 122 Terr. Pembroke Pines, Florida 33026	**Facility Emergency Response Coordinator:** Environmental Manager/Plan Coordinator	305-229-2955	305-586-8379	
Robert McClanahan Home Address: 18253 NW 15th Lane Pembroke Pines, FL 33029	**Asst. Facility Emergency Response Coordinator:** Health/Safety Manager – Asst. Plan Coordination	305-228-4383	305-798-6930	
Luis G. Lopez	Plant Manager	305-229-2962	786-449-5351	
Jim Sujansky	Production Manager	305-228-4372	954-680-4475	
Joel Eite	RES Manager	305-229-2942	305-773-0122	
Jeff Passerello	Quality Control Manager	305-229-2925	305-216-5098	
Paul Shaffer, Vernon Clark, Joe Kronick, Earl Haines, Tom Sadowski or JR Solanes.	On-Scene Process Foreman	305-229-2920	305-229-3981	
Devon Coppock	**Environmental Manager – SCL Quarry**	305-818-4955	813-476-1185	

Update this list as applicable.
Copy and complete this list after each notification event.

In the event that a material is spilled/released in a quantity above a reportable threshold quantity, the Facility Emergency Response Coordinator or his designee is responsible for notifying the applicable agencies as listed in the SPCC Plan, Section IV.21.0.

EXTERNAL EMERGENCY CONTACT AND NOTIFICATION LIST

When In Doubt Call: **FLORIDA WARNING POINT**	**State**	**800-320-0519**
National Response Center (NRC)	**Federal**	**800-424-8802 (24 hr.) or online http://www.nrc.us.uscg.mil/nrchp.html**
U.S. Coast Guard National Response Center	**Federal**	**800-424-8802 (24 hr)**
US EPA Region 4 Emergencies	**Federal**	**800-241-1754 or 404-562-9900**
FEMA Region IV	**Federal**	**303-646-2500 (Washington) 770-220-5200 (Atlanta, GA)**
FDEP Southeast District	**State**	**813-332-6975 Phone 813-332-6969 FAX**
FL Division of Emergency Management	**State**	**850-413-9969**
Miami-Dade Dept. of Emergency Management and Homeland Security	**Local**	**305-468-5400**
Miami-Dade County DRER (Emergencies)	**Local**	**305-372-6955 (24 hr)**
Florida Marine Patrol, Miami	**Local**	**305-795-2145**
Local Emergency Planning Council	**Local/Regional**	**305-468-5421** Niel Batista Bureau Manager Miami-Dade DEM&HS niel.batista@miamidade.gov
CHEMTREC	***Chemical Information***	**800-424-9300**

OTHER CONTACTS

LOCAL

Miami Dade Police
9105 NW 25 Street
Doral, FL 33172
305-471-1780
911 for Emergencies

Miami Dade Fire Department
Station 58 Tamiami
12700 SW 6th Street
Miami, FL 33184
786-331-5000
911 for Emergencies

Miami Dade County Officials:

Chairman:
Joe A. Martinez
Office: 305-375-5511 Fax: 305-375-5883

Administrator:
Alina T. Hudak, County Manager
Office: 305-375-2300 Fax: 305-375-1271

Sheriff: Robert Parker, Police Chief
Office: 305-476-5423 Fax: 305-471-2163

American Red Cross: Mona Adams, Chair
Office: 305-644-1200 Fax: 305-644-1038
www.miamiredcross.org

Medical Facilities

Kendall Regional Med Center
11750 Bird Road
Miami, FL 33175-3530
(305) 223-3000

Westchester General Hospital
2500 SW 75th Avenue
Miami, FL 33155-9947
(305) 264-5252

South Miami Hospital
6200 SW 73rd Street
Miami, FL 33143-9990
(786) 662-4000

Baptist Hospital of Miami
8900 North Kendall Drive
Miami, FL 33176-2197
(786) 596-1960

OTHER STATE CONTACTS

- HRS Radiological Office: (407) 297-2095
- Explosive Ordinance Disposal (extensive details needed): (407) 853-9951

HOTLINES

- Center for Disease Control: (404) 639-2888
- Southern Waste Exchange: (800) 441-SWIX
- Poison Control Center: (800) 282-3171
- EPCRA/CERCLA Hotline: (800) 535-0202
- Toxic Substances Control Act Hotline: (202) 554-1404
- Association of American Railroads, Bureau of Explosives: (202) 639-2222
- DOT Hotline: (202) 366-4488
- Mercury Hotline: (800) 833-3505
- National Animal Poison Control Center: (800) 548-2423
- ATSDR (Agency for Toxic Substances and Disease Registry): (404) 639-0615
- RCRA/Superfund Hotline: (800) 424-9346
- Pesticide Hotline: (800) 858-7378

WEATHER

- National Weather Service (S. Florida Weather Forecast Office): 305-229-4522
- Weather Forecast-Miami: 305-229-455

F - FDEP
Discharge

FDEP Discharge Notification Form

If the spill/release is reportable, the form on the following page must filled out and submitted within 24 hours to:

Florida Department of Environmental Protection
Division of Law Enforcement - Bureau of Emergency Response
3900 Commonwealth Boulevard M.S. 600
Tallahassee, Florida 32399

Copy and fill out form as necessary. The form is also available for download at:
http://www.dep.state.fl.us/law/ber/resources_links.htm

Discharge Reporting Form

PLEASE PRINT OR TYPE

DEP Form # 62-761.900(1)
Form Title Discharge Reporting Form
Effective Date _____

Instructions are on the reverse side. Please complete all applicable blanks

1. **Facility ID Number** (if registered):_____ 2. **Date of form completion**:_____

3. **General information**
Facility name:_____
Facility Owner or Operator: _____
Facility Contact Person_____Telephone number: ( )_____County: _____
Facility Mailing address: _____
Location of discharge (facility street address):_____
Latitude and Longitude of discharge (If known.)_____

4. **Date of receipt of test results or discovery of confirmed discharge:** _____month/day/year

5. **Estimated number of gallons discharged:**_____

6. **Discharge affected:** [ ] Air [ ] Soil [ ] Ground water [ ] Drinking water well(s) [ ] Shoreline [ ] Surface water (water body name) _____

7. **Method of discovery** (check all that apply)
[ ] Liquid detector (automatic or manual)
[ ] Vapor detector (automatic or manual)
[ ] Tightness test
[ ] Pressure test
[ ] Statistical Inventory Reconciliation
[ ] Internal inspection
[ ] Inventory control
[ ] Monitoring wells
[ ] Automatic tank gauging
[ ] Manual tank gauging
[ ] Closure/Closure Assessment
[ ] Groundwater analytical samples
[ ] Soil analytical tests or samples
[ ] Visual observation
[ ] Other _____

8. **Type of regulated substance discharged:** (check one)
[ ] Unknown [ ] Used/waste oil [ ] Jet fuel [ ] Heating oil [ ] New/lube oil
[ ] Gasoline [ ] Aviation gas [ ] Diesel [ ] Kerosine [ ] Mineral acid
[ ] Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives
(write in name or Chemical Abstract Service (CAS) number)_____
[ ] Other_____

9. **Discharge originated from a:** (check all that apply)
[ ] Dispensing system [ ] Pipe [ ] Barge [ ] Pipeline [ ] Vehicle
[ ] Tank [ ] Fitting [ ] Tanker ship [ ] Railroad tankcar [ ] Airplane
[ ] Unknown [ ] Valve failure [ ] Other Vessel [ ] Tank truck [ ] Drum
[ ] Other_____

10. **Cause of the discharge:** (check all that apply)
[ ] Loose connection [ ] Puncture [ ] Spill [ ] Collision [ ] Corrosion
[ ] Fire/explosion [ ] Overfill [ ] Human error [ ] Vehicle Accident [ ] Installation failure
[ ] Other_____

11. **Actions taken in response to the discharge:** _____

12. **Comments:** _____

13. **Agencies notified (as applicable):**
[ ] State Warning Point *(904) 488-1320* [ ] National Response Center *1-800-424-8802* [ ] Fire Department. _____ [ ] County Tanks Program _____ [ ] DEP (district/person) _____

To the best of my knowledge and belief all information submitted on this form is true, accurate, and complete.

_____
Printed Name of Owner, Operator or Authorized Representative

_____
Signature of Owner, Operator or Authorized Representative.

G - EPA Oil Discharge

APPENDIX G – EPA OIL DISCHARGE REPORTING REQUIREMENTS

For Specific Implementation Guidance for Immediate Responses to Petroleum product Releases see http://www.dep.state.fl.us/oer/files/implem_guidance.pdf

United States Environmental Protection Agency

Office of Emergency Management (5104A)

EPA-550-F-06-006
December 2006
www.epa.gov/emergencies

Oil Discharge Reporting Requirements

How to Report Oil Discharges to the National Response Center and EPA

If a facility or vessel discharges oil to navigable waters or adjoining shorelines, waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act of 1974, or which may affect natural resources under exclusive U.S. authority, the owner/operator is required to follow certain federal reporting requirements. These requirements are found in two EPA regulations – 40 CFR part 110, Discharge of Oil regulation, and 40 CFR part 112, Oil Pollution Prevention regulation. The Discharge of Oil regulation provides the framework for determining whether an oil discharge to inland and coastal waters or adjoining shorelines should be reported to the National Response Center. The Oil Pollution Prevention regulation, part of which is commonly referred to as the "SPCC rule," identifies certain types of discharges from regulated facilities that also need to be reported to EPA. Although these reporting requirements were not changed by EPA's recent modifications of the SPCC rule, this Fact Sheet will help facilities with the Reportable Discharge History criterion associated with the qualified facility option and the oil-filled operational equipment option offered in the recent SPCC modifications.

Who is subject to the Discharge of Oil regulation?

Any person in charge of a vessel or of an onshore or offshore facility is subject to the reporting requirements of the Discharge of Oil regulation if it discharges a harmful quantity of oil to U.S. navigable waters, adjoining shorelines, or the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act of 1974, or which may affect natural resources under exclusive U.S. authority.

What is a "harmful quantity" of discharged oil?

A harmful quantity is any quantity of discharged oil that violates state water quality standards, causes a film or sheen on the water's surface, or leaves sludge or emulsion beneath the surface. For this reason, the Discharge of Oil regulation is commonly known as the "sheen" rule. Note that a floating sheen alone is not the only quantity that triggers the reporting requirements (e.g., sludge or emulsion deposited below the surface of the water may also be reportable).

Under this regulation, reporting oil discharges does not depend on the specific amount of oil discharged, but instead can be triggered by the presence of a visible sheen created by the discharged oil or the other criteria described above.

To whom do I report an oil discharge?

A facility should report discharges to the National Response Center (NRC) at 1-800-424-8802 or 1-202-426-2675. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

If reporting directly to NRC is not practicable, reports also can be made to the EPA regional office or the U.S. Coast Guard Marine Safety Office (MSO) in the area where the incident occurred.

When must I report to NRC?

Any person in charge of a vessel or an onshore or offshore facility must notify NRC immediately after he or she has knowledge of the discharge.

What information do I need to report?

NRC will ask a caller to provide as much information about the incident as possible including:

- Name, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the discharge
- Types of material(s) discharged
- Quantity of materials discharged
- Danger or threat posed by the discharge

- Number and types of injuries (if any)
- Weather conditions at the incident location
- Other information to help emergency personnel respond to the incident

How are reports to NRC handled?

NRC relays information to an EPA or U.S. Coast Guard On Scene Coordinator (OSC), depending on the location of the incident. After receiving a report, the OSC evaluates the situation and decides if federal emergency response action is necessary.

If I report a discharge to NRC, do I also report to EPA?

If a facility is regulated under the SPCC rule and has a reportable discharge according to EPA regulations (see below), it must be reported to both NRC and EPA.

What are the oil discharge reporting requirements in the SPCC rule?

Any facility owner/operator who is subject to the SPCC rule must comply with the reporting requirements found in §112.4.

A discharge must be reported to the EPA Regional Administrator (RA) when there is a discharge of:

- More than 1,000 U.S. gallons of oil in a single discharge to navigable waters or adjoining shorelines
- More than 42 U.S. gallons of oil in each of two discharges to navigable waters or adjoining shorelines occurring within any twelve-month period

When determining the applicability of this SPCC reporting requirement, the gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines, not the total amount of oil spilled.

What do I need to submit to EPA?

The owner/operator must provide the following:

- Name and location of the facility
- Owner/operator name
- Maximum storage/handling capacity of the facility and normal daily throughput
- Corrective actions and countermeasures taken, including descriptions of equipment repairs and replacements
- Adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary
- Cause of the discharge to navigable waters, including a failure analysis
- Failure analysis of the system where the discharge occurred
- Additional preventive measures taken or planned to take to minimize discharge reoccurrence
- Other information the RA may reasonably require

An owner/operator must also send a copy of this information to the agency or agencies in charge of oil pollution control activities in the state in which the facility is located.

What happens after a facility submits this information to EPA?

The EPA Regional Administrator will review the information submitted by the facility and may require a facility to submit and amend its SPCC Plan. Facilities and equipment that qualified for the new streamlined requirements may lose eligibility for those options as determined by the Regional Administrator. A state agency may also make recommendations to EPA for a facility to amend its Plan to prevent or control oil discharges.

For More Information

Review the Discharge of Oil regulation (40 CFR part 110)
http://www.gpoaccess.gov/cfr/

Review the Oil Pollution Prevention regulation (40 CFR part 112)
http://www.gpoaccess.gov/cfr/

Visit the EPA Office of Emergency Management Web site
www.epa.gov/emergencies

Call the Superfund, TRI, EPCRA, RMP, and Oil Information Center
(800) 424-9346 or (703) 412-9810
TDD (800) 553-7672 or (703) 412-3323
www.epa.gov/superfund/resources/infocenter

To Report an Oil or Chemical Discharge

Contact the National Response Center
(800) 424-8802 or (202) 267-2675
TDD (202) 267-4477
http://www.nrc.uscg.mil/index.html

H - Monthly
Visual

MONTHLY VISUAL ABOVE GROUND STORAGE TANK INSPECTION
CEMEX MIAMI CEMENT PLANT AND/OR SCL QUARRY

All inspections must be conducted within 35 days of last inspection.
All "yes" answers must have an explanation in the action required/comments section.
All standing liquids within the containment must be removed immediately and properly disposed of.
All spilled materials must be cleaned up immediately and properly disposed of.

Inspection Date:_____

Inspector Name and Title (Print):_____

Inspector's Signature _____

Tanks at Plant/Quarry *(circle as applicable)* **inspected:**

Tank ID	Contents	Size (gallons)

Inspection conducted:

Storage Tank Condition	Yes	No	N/A	Action Required/Comments
Are any tanks cracked?				
Are any tanks corroded?				
Are any tanks leaking?				
Are all tanks clearly labeled to indicate their content and hazards?				

Storage Tank Condition (cont.)	Yes	No	N/A	Action Required/Comments
Is there any water or fluid in interstitial spaces? (double walled tanks)				
Piping Condition				
Are there any leaking fittings, valves, or pumps?				
Are their any corroded, cracked or damaged piping, fittings, valves or pumps?				
Are dispenser hoses stored when not in use to eliminate spillage? (holstered in an upright position)				
Is there any water or fluid in Interstitial spaces? (double walled underground piping?				
Is there any water or fluid in dispenser liners?				
Containment Area Condition				
Is the containment coating or sealant cracked or peeling?				
Are the containment walls cracked?				
Is there any standing water, fuel or oil inside the containment areas?				
Are containment walls free of oil or grease residue				
Are there any spills or stained soils around the storage tank containment?				
Spill Prevention and Control				
Is there a spill cleanup kit readily available?				

MONTHLY VISUAL ABOVE DRUM/CONTAINER INSPECTION
CEMEX MIAMI CEMENT PLANT AND/OR SCL QUARRY

All inspections must be conducted within 35 days of last inspection.
All "yes" answers must have an explanation in the action required/comments section.
All standing liquids within the containment must be removed immediately and properly disposed of.
All spilled materials must be cleaned up immediately and properly disposed of.

Inspection Date:_____

Inspector Name and Title (Print):_____

Inspector's Signature _____

Tanks inspected at Plant/Quarry *(circle as applicable):*

Container/Drum Description or ID	Contents	Size (gallons)	Location

Inspection conducted:

Container Condition	Yes	No	N/A	Action Required/Comments
Are any containers leaking?				
Are any pipes, hoses, valves, or pumps leaking?				
Are there any indications of corrosion of the containers?				

Container Condition (cont.)	Yes	No	N/A	Action Required/Comments
Are there any indications of damage to the containers (dents, raised spots, rust, damaged opening)?				
Are any containers open that are not in use?				
Secondary Containment				
Are there any cracks in the secondary containment walls or floor?				
Is the containment coating or sealant cracked or peeling?				
Is there any standing water, fuel or oil inside the containment area?				
Are containment walls free of oil or grease residue?				
Are there any spills or stained soils outside the containment?				
Spill Prevention and Control				
Is there a spill cleanup kit readily available?				


I - Employee
Training

ANNUAL EMPLOYEE SPCC TRAINING (Attach additional forms as necessary)

ANNUAL SPCC EMPLOYEE TRAINING

Instructors Name: _____

Date: _____

Duration of Training: _____

Instructions: Describe the course outline and topics below. Record the employees who attend the training sessions and obtain signatures on following page.

Training Course Outline	Specific Topics	Notes/Corrective Actions for Areas in Need of Improvement	Brief Description of Training Program Materials (if used)

ANNUAL EMPLOYEE SPCC TRAINING RECORD
CEMEX MIAMI CEMENT PLANT AND/OR SCL QUARRY

(Keep with SPCC Plan)

Date and Time of Training Session: _____

Instructor's Name, Title: _____

Instructor's Signature: _____

SPCC Topics Covered: _____

Attendee (Print Name)	Attendee Signature

These forms may be copied and completed for each annual training session


Testing

APPENDIX J – EPA BULK STORAGE CONTAINER INSPECTION FACT SHEET AND FACILITY INTEGRITY TESTING PLAN AND PROCEDURES

At the time this SPCC Plan was prepared all of the tanks required periodic visual inspection as per the STI SP001 Standard*. The tanks with a capacity of 5,001 gallons and greater also require a formal external inspection by a certified inspector. Additionally, the two 633,000 gallons tanks require a formal internal inspection by a certified inspector. See the table on the following page for the testing details and schedule.

EPA recommends that the formal test records or reports be retained for the life of the container. If the tank inventory or containment configuration or construction changes, it will be necessary to review the inspection and testing requirements.

A Facility specific integrity testing plan includes the following for applicable tanks:

- *Type of testing (visual plus one other method)*
  - *visual inspection*
  - *hydrostatic testing*
  - *radiographic testing*
  - *ultrasonic testing*
  - *acoustic emissions testing*
  - *other systems of non-destructive testing*
- *Frequency of testing*
- *Inspection procedure for each container*
- *Appropriate qualifications of personnel performing tests and inspections*
- *Record keeping for life of tank is recommended.*

**STI SP001 Standard refers to the Steel Tank Institute: Standard for Inspection of Aboveground Storage Tanks (Fifth Edition, September 2011).*

NOTE:
THIS PLAN IS CREATED FROM A COMPILATION OF OLDER PLANS. IT REFLECTS CHANGES TO THOSE PLANS BASED ON HISTORICAL INFORMATION OBTAINED FROM THE OWNER.

PLANT ENTRANCE
GUARD SHACK
SWEETWATER BATCH PLANT
EXIST. ELEVATED ROCK ROAD
TANK 6
TANK 5
TANK 3
TANK 1
TANK 4
TANK 8
TANK 9
TANK
LUBRICATION DISTRIBUTION CENTER
NO ACCESS
LOCKED GATE
LINE TO KILN
TANK 2
TANK 13
FUEL PUMP HOUSE
FUEL OIL TANK
TANKS 12 (2)
BERM
METAL STORAGE WAREHOUSE
(NO SERVICES)

LEGEND:

- ASPHALT OR CONC. PAVEMENT
- 3"ID W.S. DOMESTIC WATER SERVICE LINE - POTABLE - CURRENTLY SERVED BY DOMESTIC WATER WELL
- 1" @ P.W. SERVICE/PROCESS WATER NOT POTABLE - FROM FIRE WELL AND PUMP LINES
- 6"ID FIRE FIRE LINE SERVED BY FIRE WELLS AND PUMPS
- 4"ID SAN GRAVITY SEWER SERVICE LINES
- CC SEWER CLEANOUT
- HB HOSE BIBB
- SPILL KITS / CLEAN-UP SUPPLIES

TANKS DESCRIPTION
SEE SECTION 17.4
OF SPCC PLAN

NO.	DATE	REVISIONS	BY
2	1/24/13	ADD SPILL KIT LOCATIONS	KA
1	1/10/13	ADD TIER TWO UNIT	KA

320 PALERMO AVENUE, CORAL GABLES, FLORIDA 33134 - 305-446-1969 - LB #112

PROJ.: 263-12-16
DES.-DWER.: SVZ
DRAF.: TE
CHECKED: SVZ
SCALE: AS NOTED
DATE: 12-6-12 - 1/13
SHEET: 1 OF 1 SHEET

AST - Integrity Testing Schedule and Requirements

CEMEX Miami Cement Plant & SCL Quarry

Active Tanks >5,001 with secondary containment and continuous release detection

Tank/Area ID	Description	Content	Capacity/gal	Containment	Integrity Testing Method Req'd	Formal Test Schedule	Last Conducted	Next Due
2	Kiln Day Tank	Waste Oil	30,000	Concrete	Monthly Visual Inspection and Formal External Inspection by Certified Inspector	Every 20 years	N/A (tank installed 2000)	2020
5	Fueling Station	Diesel	20,000	Dbl wall/concrete	Monthly Visual Inspection and Formal External Inspection by Certified Inspector	Every 20 years	(tank installed 1958)	ASAP
12	Bulk Storage	Fuel Oil	2 - 633,000 (<50 ft ht. and < 30 ft dia.)	Earthen Berm/false bottom/concrete base/leak detection system	Monthly Visual Inspection and Formal External Inspection by Certified Inspector, and Formal Internal Inspection by Certified Inspector	Formal External Inspection - Every 5 years; Formal Internal Inspection - Every 10 years	External ~2007	External - ASAP Internal - ASAP
6/14	Fuel (Quarry)	Vehicular Diesel	20,000	Concrete Curb/dbl wall	Monthly Visual Inspection and Formal External Inspection by Certified Inspector	Every 20 years	N/A (tank installed 2008)	2028

Notes:

1. These testing requirements are based on the installation date and that all of the above tanks having secondary containment AND a continuous release detection method (i.e., double walled, double bottomed, elevated tanks not in contact with earthern materials and visible on all sides, or release prevention barriers installed under tanks such as concrete or steel liners).

2. This Schedule will need to be reveiwed and updated if there are any changes at the facility.

3. Refer to latest STI SPOO1 and API 653 for regulations

4. Maintain testing records for life of container

5. This Schedule is based on tank installation dates as per the FDEP registration data, and an assumption that the tanks were new at the time of installation.

United States Environmental Protection Agency

Office of Emergency Management

July 2012
www.epa.gov/emergencies

Spill Prevention, Control and Countermeasure Plan (SPCC) Program

Bulk Storage Container Inspection Fact Sheet

The inspection requirements of the SPCC rule are designed to detect oil leaks, spills, or other potential integrity or structural issues before they can result in a discharge of oil to navigable waters of the U.S. or adjoining shorelines. Regularly scheduled inspections, evaluations, and testing of bulk oil storage containers by qualified personnel are critical parts of discharge prevention. A container integrity inspection and/or testing program may involve one or more of the following: an external visual **inspection** of containers, foundations, and supports; non-destructive **testing** (examination) to evaluate integrity of certain containers; and additional **evaluations**, as needed, to assess the containers' fitness for continued service. The type of inspection program and its scope will depend on site specific condition and the application of good engineering practices and this can be accomplished by following applicable industry standards.

What oil storage containers do I have to inspect at my facility?

Conduct integrity testing and routinely inspect the following aboveground bulk storage containers with a capacity of 55 gallons or more:

- Large (field-constructed or field-erected) and small (shop-built) bulk storage containers;
- Containers located on, partially in (partially buried, bunkered, or vaulted tanks), and off the ground wherever located; and
- Double-walled containers.

Oil filled equipment is not a bulk storage container and, therefore, not subject to the integrity testing requirements of the SPCC rule.

§§112.8(c)(6), 112.12(c)(6)(i)
Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations.

In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph.

Note: The above text is an excerpt of the SPCC rule. Refer to the full text of 40 CFR part 112

How do I inspect aboveground bulk storage containers?

The SPCC rule requires that you:

- Test or inspect **each** container for integrity on a regular schedule and whenever you make material repairs; and
- Frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. This visual inspection is intended to be a routine walk-around and include the container's supports and foundations.
- Identify in your SPCC Plan the type and frequency of testing and inspection for each container and the appropriate qualifications of personnel performing the tests and inspections. You must retain testing and inspection records for 3 years. EPA recommends that formal test records or reports be retained for the life of the container.

Integrity testing is required for all aboveground bulk storage containers located at onshore facilities (except oil production facilities). Integrity testing is necessary to determine if the container (e.g. a tank) is suitable for continued use until the next formal inspection.

Depending on the type of container, integrity testing may be as simple as an external visual inspection or may involve more complicated methods of non-destructive testing such as Magnetic Flux Leakage (MFL) or ultrasonic thickness (UT) measurements, vacuum box testing, and weld inspection in order to adequately assess the container condition.

While frequent external visual inspections can often be completed by trained facility personnel, the requirement to conduct regular integrity tests or inspections may involve hiring specialized personnel (as specified by the applicable industry standard). For example, integrity testing of field-erected aboveground storage tanks in accordance with API 653 involves formal in-service external inspections and formal out-of-service internal inspections to be conducted by an API 653 certified inspector. A formal in-service external inspection involves visual inspection and UT measurements of the shell. A formal out-of-service internal inspection determines the condition of the tank's floor, walls and structure, but should also include the shell, roof, nozzles, and tank appurtenances. The out-of-service inspection typically includes non-destructive testing such as MFL scanning of the floor, vacuum box testing floor welds, helium leak testing, UT measurements, and tank bottom settlement measurements.

How do I develop a program for inspecting and/or testing my containers?

First, you, or a registered Professional Engineer (PE), determine which industry standards are applicable. Then, in accordance with the industry standards determine:

- The appropriate qualifications for personnel performing tests and inspections; and
- The frequency and type of testing and inspections. This must take into account the aboveground container size, configuration, and design (i.e., shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried).

Industry standards describe procedures to identify the condition of the container through formal internal and external inspections conducted by certified personnel. For internal inspections, the container must typically be taken out of service, cleaned, and made ready for personnel to enter the container. Examples of these integrity tests include, but are not limited to: visual inspection, radiographic examination, UT, MFL scanning, helium leak testing, magnetic particle examination, liquid penetrant examination, acoustic emissions testing, hydrostatic testing, inert gas leak testing or other methods of non-destructive examination. Acoustic emission testing and UT robotic measurement are non-destructive examination methods that can be used while the tank is in-service. Acoustic emission testing is used to determine if there is a leak but does not determine if there is corrosion or metal loss. Hydrostatic testing is typically performed on new tanks and on existing tanks that have had major repairs or alterations. Industry standards may use one, or a combination, of these non-destructive examination methods or tests as part of an integrity testing program.

What are industry standards?
Industry standards are technical guidelines created by experts in a particular industry for use throughout that industry. Standards-developing organizations use a consensus process to establish the minimum accepted industry practice. The SPCC rule requires that the Plan be prepared in accordance with good engineering practice. Standards play a role in determining good engineering practice when developing spill prevention procedures and an inspection program for an SPCC-regulated facility.

The use of a particular standard is up to the owner/operator. When an owner/operator indicates in the SPCC Plan that he intends to use a standard to comply with a particular rule requirement (e.g. integrity testing), then it is mandatory to implement the relevant portions of the standard (i.e. those that address integrity testing of the container).

The American Petroleum Institute (API) Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction" and the Steel Tank Institute (STI) "SP001 Standard for the Inspection of Aboveground Storage Tanks" (STI SP001) are two commonly used inspection standards for aboveground bulk storage containers.

If you have containers that have never been inspected for integrity then, depending on their size and configuration, industry standards may require that you assess baseline conditions for these containers.

The industry standard you or your PE identifies in your SPCC Plan outlines the specific inspection and integrity testing protocol for the containers at your facility. These protocols may vary depending on the size and configuration of your containers. For example, portable containers (e.g. a drum) have fewer inspection requirements than shop-built and field-erected containers.

Who can help me establish an integrity inspection and/or testing program for my bulk storage containers?

If your SPCC Plan will be certified by a Professional Engineer (PE) then the PE will work with you to establish an inspection and/or testing program that is appropriate for the types of containers at your facility. The PE may consider industry standards and consult with tank inspectors to determine the frequency, type of testing and inspections and the appropriate qualifications for personnel performing the tests and inspections.

If you have a qualified facility and are planning to self-certify your SPCC Plan, then you can develop your inspection and/or testing program by following the protocols identified in the industry standards applicable for your oil storage containers or by contacting tank inspection professionals. Industry standards, such as API 653 and STI SP001 contain requirements to inspect aboveground containers.

More information on industry standards:

API Standard 653
API-653 covers steel storage tanks built to design specifications in the API 650 standard and its predecessor API12. It provides minimum requirements for maintaining the integrity of tanks after they have been placed in service and addresses inspection, repair, alteration, relocation, and reconstruction. This standard is typically used to establish an integrity testing program for field-erected tanks.

Go to the API website for more information on their standards: http://www.api.org/

STI Standard SP001
This standard focuses primarily on inspection of welded, metal, shop-fabricated and small field-erected tanks. Also included is the inspection of smaller, portable containers such as 55-gallon drums, intermediate bulk containers (IBCs) and other such containers that may be of metal or plastic construction.

Go to the STI website for more information on the SP001 standard: http://www.steeltank.com/

If you deviate from the requirements of the standards, then you can do so in accordance with the environmental equivalence provision in §112.7(a)(2) and have a PE certify that portion of your SPCC Plan.

How often do I have to perform inspections or tests?

Testing on a 'regular schedule' means testing per industry standards or at a frequency sufficient to prevent discharges. Industry standards establish the scope and frequency for inspections that considers the particular conditions of the aboveground container. These conditions may include the age, service history, original construction specifications (e.g., shop-built vs. field-erected, welded steel vs. riveted steel), prior inspection results, and the existing condition of the container. It may also consider the degree of risk of a discharge to navigable waters or adjoining shorelines, e.g. containers that are located near saltwater where an accelerated corrosion rate would be expected. The frequency of inspections is based on changing conditions of the container (e.g., corrosion rates, settling, etc.) and the interval between inspections may vary over the lifetime of the container.

Once you determine an inspection schedule for your aboveground containers (based on applicable industry standards), document the schedule in your Plan and conduct inspections according to that schedule. You should also include a description of the conditions of the container that led to the specific inspection schedule identified in the Plan.

How do I establish a baseline condition for my aboveground container?

Industry standards, such as API 653 and STI SP001, contain minimum requirements to inspect aboveground containers and criteria to assess each container's suitability for continued service. The baseline and suitability evaluation provides information on the container's existing condition relative to the design metal thickness and the rate of metal loss from corrosion as well as the anticipated remaining service. In some cases, where baseline information is not known, the testing program may include two data collection periods, one to establish a baseline of the container's existing shell and bottom plate thicknesses, and a second inspection to establish corrosion rates in order to develop the next inspection interval. These inspection intervals establish the frequency of the 'regular schedule' required for testing under the SPCC rule.

When no or only partial baseline information is available for a container(s) at the facility, then the owner/operator needs to schedule integrity testing as soon as possible. One time frame you may consider is that the SPCC Plan be reviewed at the facility every five years. As an example, when no or only partial baseline information is available for a container, the Plan preparer should schedule integrity testing within the first five-year review cycle of the SPCC Plan to establish a regular testing schedule based on current container conditions and the applicable industry standard. For this example, the review cycle would begin on the revised rule implementation compliance date of November 10, 2011 and the first (baseline) container inspection or integrity test would be completed by November 10, 2016.

The implementation of the testing program should be in accordance with industry standards and establish appropriate inspection priorities among multiple containers at a facility. For instance, special consideration may be discussed in the Plan for containers for which the age and existing condition is not known (no baseline or only partial information exists); older containers; or those in more demanding service. These higher priority containers may be targeted for inspection in the schedule before other aboveground containers where the baseline information is known.

Section 112.7 of the rule states that if the Plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, you must discuss these items in separate paragraphs, and must explain separately the details of installation and operational start-up. Therefore, if an owner or operator has yet to implement the integrity testing program, the SPCC Plan should establish and document a schedule (in accordance with good engineering practice and the introductory paragraph of 112.7) that describes the projected implementation of the integrity testing program for the aboveground bulk storage containers at the facility. The owner or operator must then implement the inspection program in accordance with the SPCC Plan.

Do I need to establish a baseline when the standard requires only visual inspections?

No, if the industry standard only requires visual inspections for the container (e.g., certain shop-built containers) then a baseline is not necessary. The standard establishes a frequency for visual inspections rather than basing the interval on the container's corrosion rate. On the other hand, a baseline is necessary for most non-destructive testing protocols, because the container's corrosion rate impacts the frequency/interval of future formal integrity testing inspections.

Owners and operators need to refer to the particular industry standard identified in the SPCC Plan to determine the scope of inspection and testing requirements. For example under the STI SP001 standard, visual inspection is allowed for portable containers such as drums and totes. A baseline determination of metal thickness of a portable container is not required prior to implementing the visual only integrity testing inspection protocol.

How do I demonstrate in my SPCC Plan that I have an inspection and/or testing program for containers that I have not yet inspected?

The introductory paragraph of §112.7 of the SPCC rule allows for the owner or operator to describe procedures, methods, or equipment that are not yet operational in the SPCC Plan and in this event, requires the owner or operator to include a discussion of the details.

The Plan preparer must provide details in the Plan including a timeline to gather the necessary baseline data to establish a regular schedule of integrity testing in accordance with §§112.8(c)(6) and 112.12(c)(6). The Plan preparer may need to consult with a tank professional and/or PE to determine the scope of the integrity testing program for the containers. Include in your Plan a description of the inspection program including:

- The type of integrity inspection that will be conducted (i.e., visual or another non-destructive method),
- The applicable industry standard that the serves as the basis for program
- The implementation schedule for inspecting containers, and
- Any other considerations that went into the development of the inspection program.

Ensure that your containers fall within the scope of the industry inspection standard that you elect to follow and include a description of the inspection procedures in the SPCC Plan. Finally, include information on recordkeeping procedures in the Plan.

What are my recordkeeping requirements?

The facility integrity testing and inspection program must be documented in the Plan, including the schedule for conducting inspections and tests. The SPCC rule requires that you keep a record of the inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years. However, industry standards often advise that records for formal inspections and tests be maintained for the life of the container.

EPA strongly recommends that you keep comparison records of integrity inspections and tests as directed in the standard, but no less than three years in accordance with the SPCC record retention requirement, in order to identify changing conditions of the oil storage container. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements.

Can I visually inspect large shop-built oil storage containers to satisfy the integrity inspection and testing requirements of the SPCC rule?

Yes, under certain circumstances visual inspection alone may suffice. However, the SPCC rule requires that inspections be in accordance with industry standards. For tanks larger than 5,000 gallons, most industry standards require more than a visual inspection by the owner or operator.

The SPCC Guidance for Regional Inspectors[1] published in 2005 describes an example that may be environmentally equivalent to the integrity testing requirements of the SPCC rule at that time. The example indicates that visual inspection plus certain additional actions to ensure the containment and detection of leaks may be appropriate for bulk oil storage containers with a capacity up to 30,000 gallons. This example is based on a policy that described the environmental equivalence flexibility available to a PE with respect to integrity testing in a letter to the Petroleum Marketers Association of America (PMAA).[2] This policy was established at a time when the rule specifically required that integrity testing include more than just a visual inspection. While the policy and approach for the use of environmental equivalence described in this letter is still valid, EPA revised the integrity testing provision in 2008 to allow inspection requirements outlined in industry standards to be used without the need for environmental equivalence determinations certified by a PE. A major industry standard for integrity testing (STI SP001) was modified since the letter to PMAA was written to outline "good engineering practice" for integrity testing of shop-built containers. This may affect a PE's decision whether to certify an environmentally equivalent approach as described in the PMAA letter, or to follow an industry standard.[3]

If an owner or operator wants to deviate from applicable industry standards to develop an integrity testing program, then a PE must certify an environmentally equivalent alternative in the SPCC Plan.

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1 *SPCC Guidance for Regional Inspectors*, December 2, 2005 (http://www.epa.gov/osweroe1/content/spcc/spcc_guidance.htm)

2 Letter to Daniel Gilligan, President, Petroleum Marketers Association of America, from Marianne Lamont Horinko, Assistant Administrator, Office of Solid Waste and Emergency Response, EPA, May 25, 2004.

3 Further details can be found in the Federal Register; 73 FR 74265 (December 5, 2008).

Furthermore, the Plan must provide the reason for the deviation, describe the alternative approach, and explain how it achieves environmental protection equivalent to the applicable industry standard.

How do I inspect mobile or portable bulk storage containers?

Industry standards (such as STI SP001) refer to specific conditions for which visual inspection alone is an appropriate method for verifying the integrity of certain smaller shop-built containers (e.g., portable containers such as drums and totes). These conditions include container type, size, and configuration (such as whether the container is in contact with the ground or has appropriate secondary containment). For example, according to STI SP001, when portable containers have adequate secondary containment then visual inspection of these containers is acceptable and will satisfy the integrity testing requirements of the rule.

Do I have to use an industry standard?

No. Although the rule requires that you consider industry standards when developing an inspection program, you can incorporate an environmentally equivalent inspection protocol when you and the certifying PE decide that another approach would be more appropriate or cost effective, based on site-specific factors. You can use an environmentally equivalent alternative when you include in your SPCC Plan the reason for deviating from the rule requirements and describe the alternative method in detail, including how it is environmentally equivalent.

An environmentally equivalent approach to following the applicable industry standard may be a site-specific inspection program that is based on elements designed to minimize the risk of container failure and allow detection of leaks before they impact navigable waters or adjoining shorelines. These elements may be based on a combination of various industry standards and good engineering practice.

Can I deviate from portions of an industry standard?

Yes, under certain circumstances it may be appropriate to deviate from portions of an industry standard. As you develop your inspection and/or testing program, you must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration and design. However, you and the certifying PE can decide to deviate from a portion of a standard when another approach would be more appropriate or cost effective, based on site-specific factors.

You must document your environmentally equivalent alternative, the reason for deviating from the rule requirement, and describe the alternative method in detail, including how it is environmentally equivalent in your SPCC Plan.[4] An environmentally equivalent approach to following the applicable industry standard may be a site-specific inspection program based on a combination of elements from various industry standards and good engineering practice, or other measures that effectively minimize the risk of container failure and that allow for the detection of leaks before they impact navigable waters or adjoining shorelines.

What if no industry standard applies to my container?

If no industry standard applies to a particular container (e.g. Animal Fats and Vegetable Oils (AFVOs) containers, containers storing oils that have a specific gravity greater than 1.0, or oil containers operated at elevated temperatures), then the Plan preparer should consider the manufacturer's specifications and instructions for the proper use and maintenance of the equipment, appurtenance, or container. If no industry standards or manufacturer's instructions apply, the Plan preparer may also call upon his/her professional experience and/or consult with tank inspection professionals to develop site-specific inspection and testing requirements for the facility or equipment that are in accordance with good engineering practice and document them in the Plan.

A customized, site-specific inspection program based on relevant industry standards (in whole or in part) and other good engineering principles is often referred to as a 'hybrid' program. A PE does not need to provide and certify an environmental equivalence justification for implementing a hybrid

[4] See 73 FR 74264 (December 5, 2008)

inspection program when industry standards do not apply to a container or the container is outside the scope of the standard. However, you must describe the procedures for this inspection program in your SPCC Plan and keep a record of inspections and tests for three years. EPA recommends that formal test records or reports be retained for the life of the container.

What are some recommended elements for a site-specific integrity inspection and/or testing program (hybrid testing program)?

The components of a hybrid inspection program would likely include frequent visual inspections by the owner, as well as periodic inspections (plus testing as appropriate) by a certified inspector. Any hybrid inspection program should include an evaluation of the principal elements that would cause a tank to fail, and how the inspection program addresses finding such conditions, or prevents such conditions from continuing to the point of failure. For example, internal and external corrosion conditions must be considered, and a testing method developed to assure that the condition is identified and measured. Conditions that may lead to a structural failure should be identified, for example a failing foundation, and evaluation methods developed to identify the condition.

In all cases, careful consideration should be given to discovering such conditions that may not be identifiable from visual examination, such as the bottom of floor plates. Hybrid programs should also include evaluation of container modifications made since last examination that may degrade integrity or lead to failure.

Recommended Elements for a Hybrid Inspection Program

Here is a partial list of items to consider regarding the elements of a hybrid inspection program.

For shop-built tanks:

- Visually inspect exterior of tank;
- Evaluate external pitting;
- Evaluate "hoop stress and longitudinal stress risks" where corrosion of the shell is present,
- Evaluate condition and operation of appurtenances,
- Evaluate welds,
- Establish corrosion rates and determine the inspection interval and suitability for continued service,
- Evaluate tank bottom where it is in contact with ground and no cathodic protection is provided;
- Evaluate the structural integrity of the foundation,
- Evaluate anchor bolts in areas where required, and
- Evaluate the tank to determine it is hydraulically sound and not leaking

For field-erected tanks:

- Evaluate foundation,
- Evaluate settlement,
- Determine safe product fill height;
- Determine shell corrosion rate and remaining life;
- Determine bottom corrosion rate and remaining life,
- Determine the inspection interval and suitability for continued service,
- Evaluate welds;
- Evaluate coatings and linings,
- Evaluate repairs for risk of brittle fracture, and
- Evaluate the tank to determine it is hydraulically sound and not leaking

How do I inspect and/or test containers that store animal fats or vegetable oils (AFVO)?

The inspection and/or testing requirements for AFVO at §112.12(c)(6)(i), are identical to those described above at §112.8(c)(6). The SPCC rule also provides differentiated, more flexible, alternative requirements at §112.12(c)(6)(ii) for AFVO containers that meet certain criteria to address differences in the way certain AFVOs may be stored and handled at a facility.

Facility owners with AFVO containers that meet the following criteria can conduct visual inspections of their containers when the following criteria are met:

- Are subject to the Food and Drug Administration (FDA) regulations in 21 CFR part 110, *Current Good Manufacturing Practice in Manufacturing, Packing or Holding Human Food*;
- Are elevated;
- Are made from austenitic stainless steel;
- Have no external insulation; and
- Are shop-built.

The owner or operator is required to document the procedures for inspections and testing in their SPCC Plan, including those for AFVO bulk storage containers that are eligible for these differentiated requirements.

§§112.12(c)(6)(ii)
For bulk storage containers that are subject to 21 CFR part 110, are elevated, constructed of austenitic stainless steel, have no external insulation, and are shop-fabricated, conduct formal visual inspection on a regular schedule. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph (c)(6).

Note: The above text is an excerpt of the SPCC rule. Refer to the full text of 40 CFR part 112.

In addition, when an AFVO bulk storage container falls outside the scope of an industry standard then the owner or operator may develop a site-specific inspection and testing program for the equipment that is in accordance with good engineering practice and documented in the Plan. A PE does not need to provide and certify an environmental equivalence justification for implementing a hybrid inspection program when industry standards do not apply to a container or the container is outside the scope of the standard. However, the hybrid inspection program must be in accordance with good engineering practice.

What are the requirements to test completely buried tanks?

You must regularly leak test completely buried metallic storage tanks installed on or after January 10, 1974. "Regular testing" means testing in accordance with industry standards or at a frequency sufficient to prevent leaks. Appropriate methods of testing should be selected based on good engineering practice and tests conducted in accordance with 40 CFR part 280 or a State program approved under 40 CFR part 281 are acceptable. Describe the method and schedule for testing your completely buried tanks in the SPCC Plan. For more information on preventing and detecting underground storage tank system leaks see http://epa.gov/oust/prevleak.htm.

§§112.8(c)(4), 112.12(c)(4)
Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.

Note: The above text is an excerpt of the SPCC rule. Refer to the full text of 40 CFR part 112.

What are the requirements to inspect bulk storage containers at an onshore oil production facility?

You must periodically and upon a regular schedule visually inspect each bulk storage container (e.g. oil stock tanks[5], flow-through process vessels, and produced water containers) for deterioration and maintenance needs in accordance with §112.9(c)(3),

§112.9(c)(3)
. periodically and upon a regular schedule visually inspect each container of oil for deterioration and maintenance needs, including the foundation and support of each container that is on or above the surface of the ground.

Note: The above text is an excerpt of the SPCC rule. Refer to the full text of 40 CFR part 112.

[5] A stock tank is storage tank for oil production after the oil has been treated (Schlumberger Oil Field Glossary http://www.glossary.oilfield.slb.com/default.cfm)

including the foundation and support of each container that is on or above the surface of the ground. This inspection is intended to be a routine walk-around where you look at the container and supports and foundations for any evidence of damage, corrosion, or leaks. Document the inspection procedures and schedule in the Plan and conduct inspections in accordance with the Plan.

EPA recommends that the inspection occur on an ongoing routine basis and be conducted by qualified personnel. Before the PE certifies the SPCC Plan in accordance with §112.3(d), he must consider applicable industry standards when developing the Plan and establishing procedures for inspections and tests. API has developed Recommended Practice 12R1 "Recommended Practice for Setting, Maintenance, Inspection, Operation and Repair of Tanks in Production Service" that includes inspection procedures for tanks employed in onshore oil production service.

More information on industry standards:

API RP 12R1
API RP 12R1 (R2008) Recommended Practice for Setting, Maintenance, Inspection, Operation and Repair of Tanks in Production Service contains recommendations for good practices in:

- The collection of well or lease production,
- Gauging,
- Delivery to pipeline carriers for transportation, and
- Other production storage and treatment operations.

This recommended practice is intended primarily for applications to tanks fabricated to API Specs 12B, 12D, 12F, and 12P when employed in on-land production service; but its basic principles are applicable to atmospheric tanks of other dimensions and specifications when they are employed in similar oil and gas production, treating, and processing services. API 12R1 is available for purchase at:

Additionally, the owner or operator of an onshore oil production facility must conduct *integrity testing* for any bulk storage containers for which he determines secondary containment is impracticable. The Plan must follow the provision of §112.7(d) and clearly explain why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under §112.20, provide the following in the Plan:

- An oil spill contingency plan following the provisions of part 109 of this chapter, and
- A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

For More Information

Review the Oil Pollution Prevention regulation (40 CFR part 112):
http://www.gpoaccess.gov/cfr/

Call the Superfund, TRI, EPCRA, RMP, and Oil Information Center:
(800) 424-9346 or (703) 412-9810
TDD (800) 553-7672 or (703) 412-3323
http://www.epa.gov/superfund/resources/infocenter

To Report an Oil or Chemical Spill Call the National Response Center:
(800) 424-8802 or (202) 267-2675
TDD (202) 267-4477

ATTACHMENT 6 – UNIT MANAGEMENT PLAN

ENVIRONMENTAL SERVICES