From: Kothur, Bheem
To: Mayberry, Eric
Subject: FW: CEMEX Miami Used Oil Permit No. 56307-HO-005
Date: Wednesday, November 13, 2013 11:24:56 AM

Hi Eric,
Please insert into OCULUS below e-mails under permit application related activities.
The facility I.D.: FLD 981 758 485
Subject: Sampling and Analysis for off-spec oil.

If you have any questions, please let me know.
Bheem

From: Kothur, Bheem
Sent: Wednesday, November 13, 2013 11:18 AM
To: Winston, Kathy
Cc: Kothur, Bheem
Subject: RE: CEMEX Miami Used Oil Permit No. 56307-HO-005

Kathy,
Tony and I had a conference call with Tammy Reed (Koogler and Associates).
Tony explained to Tammy that the facility need not to do any sampling analysis for off-spec oil.
However, the Supplier and the Permittee must maintain the records of sampling and analysis all the time.
As per the permit is concerned, no changes at this time because of their other activities at the facility.

Bheem

From: Winston, Kathy
Sent: Wednesday, November 13, 2013 9:43 AM
To: Kothur, Bheem
Subject: RE: CEMEX Miami Used Oil Permit No. 56307-HO-005

That's what I thought. So what are they saying here. That they want approval to accept off spec results, if that is the case, what standard do we compare it to.

From: Kothur, Bheem
Sent: Wednesday, November 13, 2013 9:35 AM
To: Winston, Kathy
Subject: RE: CEMEX Miami Used Oil Permit No. 56307-HO-005

It is for off–spec oil.

From: Winston, Kathy

Sent: Wednesday, November 13, 2013 9:28 AM
To: Kothur, Bheem
Subject: RE: CEMEX Miami Used Oil Permit No. 56307-HO-005

I will try to take a look at that part of the permit this afternoon and let you know what I think. Is it actually on spec or is it on spec for energy burning?

From: Kothur, Bheem
Sent: Wednesday, November 13, 2013 8:58 AM
To: Winston, Kathy
Subject: FW: CEMEX Miami Used Oil Permit No. 56307-HO-005

Hi Kathy,
Please review below e-mail from CEMEX Consultants and let me know you have any comments on their request.
Thanks.
Bheem

From: Tammy Reed [mailto:treed@kooglerassociates.com]
Sent: Tuesday, November 12, 2013 3:40 PM
To: Kothur, Bheem
Subject: CEMEX Miami Used Oil Permit No. 56307-HO-005

Mr. Kothur:

As discussed by telephone today, our client, CEMEX Construction Materials requested that Koogler determine what tasks would need to be completed to eliminate the need to perform the oil analysis required by their current permit. They will no longer be using off-spec oil and will only be using on-spec oil and want to use the supplier certification to meet the rule requirements.

In review of the permit, Page 13, Part II Used /Oil Processing Conditions, Item 2a refers to the analysis required by rule and the permit application. The RAI submitted February 14, 2013 contains Attachments 3 and 4 which provide the facility's current process description and used oil analysis plan.

Please advise if documenting their in-coming shipments of on-spec oil through supplier certification is sufficient, and if a modification to the permit is needed and if so, what would be required.

Please contact me if you have questions or require more information.

Thank you,
Tammy

Tammy Reed
Environmental Scientist

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