

Inspection at Cemex Miami Cement Plant on 02/23/2015

Winston, Kathy
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The purpose of this email is to acknowledge return to compliance from the Department's inspection on February 23, 2015 at the above mentioned facility. Attached please find the final report for that inspection. Please feel free to contact me if you have any questions concerning this inspection or any other compliance issue. Thank you for your cooperation in this matter.



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: CEMEX Miami Cement Plant

On-Site Inspection Start Date: 02/24/2015

On-Site Inspection End Date: 02/24/2015

ME ID#: 27064

EPA ID#: FLD981758485

Facility Street Address: 1200 NW 137th Ave, Miami, Florida 33182-1803

Contact Mailing Address: 1200 NW 137th Ave, Miami, Florida 33182-1803

County Name: Miami-Dade

Contact Phone: (305) 229-2955

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Maddie Gierczak, Environmental Specialist; Charles Walz, Environmental Manager

LATITUDE / LONGITUDE: Lat 25° 47' 9.4648" / Long 80° 25' 20.5412"

SIC CODE: 3241 - Manufacturing - cement, hydraulic

TYPE OF OWNERSHIP: Private

Introduction:

Cemex Miami Cement Mill & SCL Quarry (Cemex) is a permitted used oil processor operating under permit number 56307-H0-005, which will expire on February 12, 2018. Used oil is the main fuel used for firing the cement kiln but the facility is also using wood and tire fluff, as fuel alternatives. The facility already has natural gas lines hooked up at the plant but they haven't been connected to kiln due to initial installation cost. Cemex is also a registered used oil filter transporter and used oil filter processor; however, this activity is not taking place at this time. The permitted activities are situated on 300 acres of land and there is additional contiguous 3000 acres designated for limestone quarrying. Cemex employs approximately 100 people and is connected to county water and septic tanks.

Compliance History

This visit was a routine compliance evaluation inspection; the district is obligated to inspect each of their used oil processors at least every other year. Cemex is permitted because of the amount of used oil that is stored onsite. The last two inspections were conducted on December 19, 2011 and March 20, 2013, respectively. Each of these inspections revealed only minor violations and in each case, the facility return to compliance without enforcement.

Process Description:

The facility tour only revealed two small compliance issues. Out at the facility's maintenance shop, that is associated with the quarry, there was a pallet of batteries that was sitting out in the open and unprotected from the elements. The other issue was related to the laboratory waste that is

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created onsite. It is stored in a three sided concrete enclosure with a roof which has an entrance consisting of a locked chain link fence. Since the facility representative didn't have a key to the enclosure with him, the drum was observed through the fence. From that vantage point, it appeared that the drum was not properly closed and a funnel had been left in the bung hole.

Record Review

There was only one recordkeeping issue noted. The facility had recently purchased an aerosol can puncturer and was combining the waste paints and solvents from their aerosols cans to be shipped offsite as hazardous waste. They were also collecting the empty cans for metal recycling. However; the facility couldn't produce any documents from the last three years to account for the shipment of "non-RCRA empty" aerosol cans as hazardous waste prior to the purchase of the puncturer. All other records appeared to be in order: training records, the remaining manifests, used oil delivery logs, the general facility inspection log, and the Contingency Plan.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-730.030(3)
Question Number:	7.50
Question:	Can the facility document proper disposal through written receipts or records?
Explanation:	The facility could not provided any disposal receipts from the last three years for the shipment of aerosol cans with hazardous waste residues inside.
Corrective Action:	Please provide the Department with any disposal receipts from the last three years demonstrating the disposal of aerosol cans with hazardous waste residues inside.

Conclusion:

The facility was not in compliance at the time of the inspection and was given 14 days to return to compliance. On March 10, 2015, the Department received a compliance submittal from CEMEX that provided documentation demonstrating the facility had returned to compliance from the issues that were noted during the February 24, 2015 inspection.

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kathy R. Winston

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

2/25/2015

DATE**Supervisor:** Karen Kantor

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