



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

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**FACILITY INFORMATION:**

**Facility Name:** CEMEX Miami Cement Plant & SCL Quarry

**On-Site Inspection Start Date:** 11/08/2017

**On-Site Inspection End Date:** 11/08/2017

**ME ID#:** 27064

**EPA ID#:** FLD981758485

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

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

**County Name:** Miami-Dade

**NOTIFIED AS:**

CESQG (<100 kg/month)

Used Oil

**INSPECTION TYPE:**

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

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Norva Blandin, Inspector

Other Participants: Kayla Acosta, ES I; Daniel Lopez, ES I; Maria Rodriguez, Assistant Manager

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

**SIC CODE:** 3241 - Manufacturing - cement, hydraulic

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On November 8, 2017 a representative of the Florida Department of Environmental Protection (FDEP) conducted an used oil compliance inspection at Cemex Miami Cement Mill & SCL Quarry (Cemex). 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. The facility has been in operation at this site since 1958, employs approximately 100 people and is connected to county water and septic tanks.

During the inspection, CEMEX was represented by Mrs. Maria Rodriguez, Assistant Site Manager of the facility. The DEP was represented by Norva Blandin, Kayla Acosta and Daniel Lopez, Environmental Specialists.

**Notification History**

2/9/2017- notified as used oil burner, used oil processor, a CESQG and Small Quantity Handler of Universal Waste. This registration will expire on 6/30/2018.

**Inspection History**

2/24/2015 - FDEP Inspection. Minor OC- One violation was cited and returned to compliance without enforcement (CWOE).

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PPE was required by the facility (hard hats, gloves, safety vest, safety glasses, safety boots and ear protection) and also a brief safety training was conducted by Mrs. Rodriguez prior to entry the facility.

### **Process Description:**

Cemex primarily receives on-specification used oil, but occasionally receives some off-specification used oil. The off-spec used oil has a flashpoint less than 100 degrees F due to mixing with diesel fuel at off-site suppliers. Used oil is burned during kiln startups to preheat the kiln to 1900 degrees F and may also be burned as supplemental fuel, such as during coal mill problems.

The inspectors toured the facility with CEMEX representative through the following areas: Aggregates Plant-SCL Quarry Shop, Used Oil Storage Tank Farm and Unloading Station, Mechanic Shop/Maintenance Warehouse, New Oil Drum Storage/Equipment Wash Area, QC Laboratory and Hazardous waste storage area (CESQG amounts).

#### **SCL Quarry Shop**

The SQL Quarry provides crushed limestone to Cemex and is covered under Cemex's EPA Identification Number FLD981758485. This Quarry Shop had a canopy covered work area; the used oil storage area has been provided with a metal roof. The inspectors observed the some oily rain water had accumulated in the secondary containment area of the 500-gallon used oil tank. Containers of used oil filters and oily rags were protected from the elements, properly labeled and stored on containment pallets. No hazardous waste is generated at this shop. Spill kits and fire extinguishers were observed during the inspection.

#### **Used Oil Storage Tank Farm and Unloading Station**

This area consists of two 600,000-gallon aboveground used oil storage tanks, a tanker truck unloading station, and six 25,000-gallon aboveground oily water storage tanks that are inactive. All tanks were labeled "Used Oil". Used oil is unloaded from trucks and transferred via pumps to the tanks. Used oil pump filter residue is mixed with the contaminated soil for processing. Oily water from the truck unloading containment area is removed by Cliff Berry, Inc. (CBI). Near to this area, the facility has spill kits and fire extinguishers up to date.

The inspectors observed a System One parts washer which is in use.

#### **Small Engine Repair Shop**

Lead-acid batteries were being stored in this area on a pallet. The batteries are managed under the Universal Waste regulation and were marked as universal waste batteries. Also, the inspectors observed nine (9) boxes of universal wastes- spent mercury lamps- properly closed, labeled and dated.

#### **New Oil Drum Storage and Equipment Wash Area**

This area had one closed, labeled 55-gallon drum of used oil filters, two (2) closed 55-gallon drum of empty aerosol cans, one closed/labeled ( 1) 55-gallon drum of hazardous waste (Aerosolv puncture system), eleven (11)- 55 gallon drum of oily rags; four of them were open but were closed during the inspection. This area also has an equipment wash bay. Oily water from this bay is removed by CBI. A used oil filter crusher is also located in this area.

#### **QC Laboratory**

At this area, CEMEX conducts quality control sampling for their materials and generates hazardous wastes at this point. Acidified sample waste from the atomic absorption (AA) analyzer is collected in small containers. The AA waste is primarily nitric acid and mercuric chloride. One 2-gallon collection container was observed connected to the AA analyzer via tubing. One, full, 5-gallon container of AA waste acid was also observed in the lab. The containers are transferred from the lab to the hazardous waste storage area and placed in a metal cabinet. A glycerol, ethanol, and barium chloride waste is also generated by the lab and managed as a hazardous waste. The amount generated is about one 55-gallon drum every 12 to 18 months based on the volume of cement production. This waste is also transferred to the hazardous waste storage area and placed in 55-gallon drums. A record of the hazardous waste transferred to this area is kept in the metal storage cabinet. All containers observed in the lab were being properly managed.

The inspectors observed three (3) closed- 2 gallon containers of waste glycerol designated as satellite accumulation area (SAA's). All containers were labeled.

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#### Hazardous waste storage area

Located near to the New Oil Drum Storage and Equipment Wash Area, the inspectors observed one closed and labeled (1)- 55 gallon drum of waste glycerol, ethanol and barium chloride.

Also, the inspector observed the following non hazardous waste: one open (1)- 55 gallon drum of oily water and three open (3)- 55 gallon drum of grease. These four (4) containers were closed during the inspection and the facility provided documentation of proper disposal on 11/22/2017.

For the records, the Used Oil Tank for Soil Thermal Treatment Facility is no longer in used and was closed in September 15, 2015. A final report was provided for review during the inspection. In the past, this tank supplied used oil fuel to the contaminated soil treatment kiln. The tank was closed in 2015. The contaminated soil thermal treatment system is not longer in operation. CEMEX ceased to operated conduct this process in their facility.

#### Emergency and Safety Equipment

All emergency and safety equipment observed during the inspection, such as eye wash stations, fire extinguishers, etc., appeared satisfactory.

#### Record Review:

> Disposal Records: pick-up and acceptance records were provided at the time of inspection. At least of three years were available for review. This facility only accepts used oil (on-spec or off spec) from Cliff Berry (CBI) EPA ID FLR00003071.

> For Hazardous waste - CEMEX use the services of CBI as transporter and as designated facility uses PSC/Allworth (EPA ID #ALD094476793); last disposal 9/15/17

> For Universal waste - CEMEX use the services of Veolia; last bill of lading 7/12/17.

> Contingency Plan/Notification to Local Authorities -the facility has a hard copy of their current Contingency Plan available during the inspection. It was noted that information of their emergency coordinator job description information was not updated; as a result, the emergency response arrangements and distribution of the plan to local authorities must be redistributed. the other elements required by rule were included in the Contingency Plan, including Closure Plan, Waste Analysis Plan (WAP), Emergency Response Procedures, SPCC ,among others. Last update 4/5/13.

> Employee Training - All employees receive initial and annual hazardous waste and used oil training, including training concerning the facility's proper hazardous waste and used oil handling, storage, and spill cleanup procedures. The facility maintained and have records for Used Oil Transporter certification for their employees and also for the hazardous waste training (RCRA 101). Last training was conducted on 11/6/17.

> All DEP permits, forms, liability insurances policies and inspection reports displayed on-site appeared to be complete and in-order. In addition, the facility prominently displayed all permits and licenses issued by Broward County for its used oil handling activities in accessible locations on-site. The inspector observed that these county permits/licenses appeared to be complete and in-order.

> The facility's Used Oil and Used Oil Filter Annual Reports from the last three years were also available to the inspector for review. The most recent Annual Report appeared to be complete and in-order. Last report was dated February 9, 2017. Also, Closure Estimates from the last three years were available.

#### PHOTO ATTACHMENTS:

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SCL Quarry Shop



1 - 55 gallon drum of hazardous waste



Universal wastes



Aersolv recycling system



Used oil tanks



Eye wash station





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SAA - QC Laboratory



**Conclusion:**

Based on the inspection, the facility appeared to be in compliance with the used oil processing and burning regulations and hazardous and universal waste rules.

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**1.0 - Pre-Inspection Checklist**

## Requirements:

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

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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**2.0 - CESQG Checklist****Requirements:**

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

Item No.	Standards for Conditionally Exempt Small Quantity Generators	Yes	No	N/A
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✓		

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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.

Norva Blandin

**Principal Inspector Name**

Inspector

**Principal Inspector Title****Principal Inspector Signature**

DEP

**Organization**

12/20/2017

**Date**

Kayla Acosta

**Inspector Name**

ES I

**Inspector Title**

DEP

**Organization**

Daniel Lopez

**Inspector Name**

ES I

**Inspector Title**

DEP

**Organization**

Maria Rodriguez

**Representative Name**

Assistant Manager

**Representative Title**

CEMEX

**Organization**

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

**Report Approvers:****Approver:**

Norva Blandin

**Inspection Approval Date:**

12/20/2017