



263-17-17
February 14, 2018

ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
www.kooglerassociates.com
352/377-5822 ■ FAX 352/377-5822

Sent via Email to: HWPP@dep.state.fl.us

Florida Department of Environmental Protection
Attn: Bradley Buselli
2600 Blair Stone Road
Tallahassee, FL 32329-2400

RE: Request for Additional Information
Used Oil Processing Permit Renewal for CEMEX Miami Cement Plant
DEP Application Number 56307-006-HO

Dear Mr. Buselli:

On behalf of CEMEX Construction Materials, LLC (CEMEX), Koogler and Associates, Inc. (Koogler) is responding to the Department's request for additional information (RAI) dated January 11, 2018. The RAI items (abbreviated in some items) and our responses are as follows:

1. Application, DEP Form 62-710.901(6) Part I:

- a. Item #A.2: "The revision number should be 0, not 5... Please confirm.":

RESPONSE: Correct the revision number is 0. The corrected application form, Page 1 of 8, is enclosed.

- b. Item #A.9: "The email address of the Contact Person is omitted. Please provide the email address.

RESPONSE: The email address for the contact person is on the revised application form, Page 1 of 8, enclosed.

- c. Item #B.1: "The County should be Miami-Dade, not "N/A", Please revise.

RESPONSE: The County name, Miami-Dade, has been added to the application. The corrected application form, page 2 of 8 is enclosed.

2. Application, DEP Form 62-710.901(6) Part II:

a. Pages 5, 6 & 7 of 8 – Operator, Facility Owner, and Land Owner Certifications: “It is the Department’s understanding that CEMEX Construction Materials Florida, LLC is listed as the current operator, facility and land owner. If Luis Lopez is an authorized representative, please attach a letter of authorization...”

RESPONSE: Luis Lopez has been the authorized representative of this facility for many years. A new letter of authorization is enclosed.

b. Page 8 of 8 – P.E. Certification. “The facility ID number provided is incorrect...”

RESPONSE: Noted. The facility ID number is FLD 981 758 485.

3. Attachment 3, Detailed Process Description:

a. “As noted during the recent site inspection, the facility is no longer conducting soil thermal treatment. Please state this in the facility description section of the permit application and attach a copy of the closure report for reference.”

RESPONSE: The facility description section of the permit application has been revised as requested (see Attachment 2-Facility Operation Description-page 2 and Attachment 3-Detailed Process Description-page 2, additions underlined). The updated Attachments 2 and 3 are enclosed along with a copy of the approval letter from Miami Dade County for the closure certification report (behind Attachment 2).

b. Tables 1 & 2 – Tank and Product Inventory. “The product / content descriptions for some of the tanks listed in these tables do not match the descriptions listed in the Facility Diagram (Attachment 1, Figure 2)...Please clarify as revise as necessary”.

RESPONSE: Tables 1 & 2 and the Facility Diagram (Attachment 1, Figure 2) have been updated as applicable. The terms waste oil, fuel oil, and used oil have been evaluated for the applicable tanks and defined as applicable. The facility does not have or use waste oil. The anticipated tank removal dates for Tank IDs 7-12 is 2022. The revised Tables are provided in the updated Attachment 3 enclosed, and the revised Figure 2 is enclosed.

4. Attachment 4, Facility Operation Plan:

“The first page of this attachment lists the title as “Attachment 4: Detailed Process Description”. The table of contents lists this attachment as the “Facility Operation Plan.” Please review and revised as needed.

RESPONSE: The first page of Attachment 4 has been revised to read "Facility Operation Plan". Attachment 4 has also been revised as the facility no longer uses their lab for analysis, but receives a fuel oil certification with each shipment. The revised Attachment 4 is enclosed.

5. Attachment 5, ICP and SPCC Plan:

a. Contact Lists (pages ii-iii, viii, xi, 12, 75-78 & Attachment E):

- (1) "The contingency plan must list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators in accordance with 40 CFR 279.52(b)(iv)".

RESPONSE for Items a(1)(a-d): The requested information has been added to the ICP/SPCC Plan or corrected as applicable. The revised ICP/SPCC Plan is enclosed.

Note: According to the Chief of the Air Division of Miami Dade County, the official name is: Miami Dade County - Department of Regulatory and Economic Resources (RER). The Division of Environmental Resources Management (DERM) is under RER. The Pollution Regulation Division is under DERM. The correct name for reference is RER. For the purposes of this application, it is referred to as Miami Dade County – RER.

The updated ICP/SPCC Plan was not provided to the local authorities as we were waiting for this application to be deemed complete. The updated ICP/SPCC Plan has now been provided to: Local Emergency Planning Committee District 11, with a copy to the Miami Dade Fire Department. Please note that the LEPC, Miami-Dade Fire Department, and Miami-Dade County Office of Emergency Management all have the same mailing address, therefore a separate copy was not sent to the attention of the Miami-Dade County Office of Emergency Management (see enclosed transmittal letter).

b. Table of Contents (page xvii): "Sections IV-25 (Inspections, Tests, and Records) and IV-27 (Security) are omitted in the Table of Contents. Please revise the Table of Contents and resubmit this page."

RESPONSE: The Table of Contents has been revised as stated. Since other changes have been made to the ICP/SPCC in response to this RAI, the entire ICP/SPCC as updated is enclosed.

c. Management Approval (page xvii): "Please sign, date, and resubmit this page."

RESPONSE: This page has been signed and dated and the updated ICP/SPCC is enclosed.

d. Section II-4.7, Equipment (page 12):

(1) "There appear to be inconsistencies between the equipment listed on pages 13-14 and the list on page 38. Please clarify and revise and necessary."

RESPONSE: The equipment list has been reviewed and updated. However, due to their location, CEMEX has specific Hurricane Plan including supplies and procedures in the event of a hurricane and the two lists are not intended to be inclusive of each other. The updated ICP/SPCC is enclosed.

(2) "The location, physical description, and brief outline of the capabilities of each listed emergency equipment item at the facility must be included as part of the contingency plan in accordance with 40 CFR 279.52(b)(v). Please revise and resubmit an updated list of the emergency equipment locations, a schedule or description of how the equipment is maintained, and include a map showing the locations of each item."

RESPONSE: The equipment list has been reviewed and updated and the locations added to Figure 2 in Attachment 1. Maintenance of equipment is already addressed in the ICP/SPCC (see Sections 9.2, 10.2, 11.2.7 and 25.0). The updated ICP/SPCC is enclosed.

e. Section IV-14.0, Professional Engineer's Review and Certification (page 56): "The Certification form has not been signed, sealed and dated by a Florida Professional Engineer. Please resubmit a properly certified page."

RESPONSE: A signed and sealed PE page is provided in the updated ICP/SPCC, enclosed.

f. Section IV-17.4, Bulk Storage Container Inventory (pages 62-65): "Please refer to comment number 3...."

RESPONSE: The inventory tables have been reviewed and revised and the updated ICS/SPCC is enclosed.

g. Section IV-19.1, Secondary Containment (pages 69-70): "It is stated within this section that "a spill from any of the bulk storage tanks would be contained within the secondary containment structures...". Although the adequacy of secondary containment has been certified by the Project Engineer, the Department requests that you provide the total secondary containment capacity and include any calculations or narrative as to how this capacity was determined within the section of the SPCC Plan."

RESPONSE: The instructions for a used oil permit renewal state that “information submitted to the Department in support of the expiring permit, and which is still valid, does not need to be re-submitted but must be accurately referenced to the effective dates of the existing documents)”. This information has not changed in at least the last 18 years (newest used oil tank was installed/constructed in 2000). The facility maintains a P.E. signed and sealed ICP/SPCC plan (see Attachment 5). Section 19.1 of the ICP/SPCC plan has been updated to further describe the secondary containment systems of the used oil tanks.

h. Section IV-21.4, Emergency Contacts and Reporting (pages 75-81):

(1) and (2) “In addition to the reporting requirements of 40 CFR 112.4(a) stated within this section, the details of any incident requiring the implementation of the contingency plan must be documented and submitted in writing...”

(2) “Please revise this section to reflect the additional reporting requirement.”

RESPONSE (1) (a – f) and (2): This additional reporting requirement has been added and the updated ICP/SPCC is enclosed.

i. Appendix A, Figure 1 – Site Plan: “Please refer to comment number 3...”

RESPONSE: Figure 1 – Site Plan in Appendix A has been revised to correct inconsistencies. The revised Figure is provided in the enclosed updated ICP/SPCC Plan.

k. Appendix J, Integrity Testing Plan and Procedures: “Please refer to comment number 3...”

RESPONSE: The tank tables have been revised to correct inconsistencies. The revised tables are provided in the enclosed updated ICP/SPCC Plan.

6. Attachment 8, Facility Closure Plan: “While it’s difficult to prepare a comprehensive Site Closure Plan prior to actual closure, the included plan requires for detail than provided. Please provide additional details regarding the closure plan...”

RESPONSE: The instructions for a used oil permit renewal state that “*information submitted to the Department in support of the expiring permit, and which is still valid, does not need to be re-submitted but must be accurately referenced to the effective dates of the existing documents)*”. The closure plan was not revised since the last permit renewal and a copy was provided as a courtesy. However, the Closure Plan has been updated to provide more details as requested, and is enclosed. Note that your reference to the unloading of oil that occurs in two locations (Attachment 5 – ICP/SPCC, page 67) is not specific to used oil. Used oil transfer

activities occur at the tanks and via an above ground pipeline to the kiln day tank. Sampling will be conducted as described in the revised Closure Plan, attached, or as determined otherwise (if required) during the closure of the used oil processing facility.

Citation Errors: "Please note that the following citation errors were observed in the permit application. Please review, revise, and resubmit the appropriate pages electrically:

1. **Attachment 6, Unit Management Plan**: Please update each instance of the underlined citations below as indicted.
2. **Attachment 7, Employee Training Program**:

RESPONSE: The corrections to Attachments 6 and 7 have been made and the revised documents are enclosed.

I trust these responses provide the requested information to proceed with issuance of the permit. If you have any further questions or require additional information, please contact me at (352) 377-5822 or treed@kooglerssociates.com.

Best regards,



Tammy L. Reed
Environmental Scientist II
KOOGLER AND ASSOCIATES, INC.

/tlr

Enclosures

cc: Charles Walz – CEMEX Miami (*Email*)
Maxwell R. Lee – Koogler and Associates, Inc. (*Email*)

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

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

A. General Information

1. New _____ Renewal ☒ Modification _____ Date current permit expires 2/12/2018

2. Revision number 0

3. NOTE: Used Oil Processors must also meet all applicable subparts, (**describe compliance in process description for applicable standards**) if they are:

- ☒ Generators (Subpart C of Part 279)
☐ Transporters (Subpart E)
☒ Burners of off-spec used oil (Subpart G)
☐ Marketers (Subpart H)
☒ are disposing of used oil (Subpart I)

4. Date current operation began: 1997

5. Facility name: CEMEX Miami Cement Plant

6. EPA identification number: FLR 981-758-485

8. Facility mailing address:

<u>1200 NW 137th Avenue</u>	<u>Miami</u>	<u>FL</u>	<u>33182</u>
Street or P.O. Box	City	State	Zip Code

9. Contact person: Luis G. Lopez Telephone: (305-229-2950)

Title: Plant Manager Email: luisguillermo.lopez@cemex.com

Mailing Address:

Same as above

Street or P.O. Box	City	State	Zip Code
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10. Operator's name: CEMEX Construction Materials Florida, LLC Telephone: (305-229-2950)

Mailing Address:

Same as Above

Street or P.O. Box	City	State	Zip Code
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11. Facility owner's name: Same as Above Telephone: (305-229-2950)

Mailing Address:

Street or P.O. Box	City	State	Zip Code
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12. Legal structure:

- ☒ 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 _____ State _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Name: _____
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: _____

Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____
Miami FL 33182

14. Name of professional engineer Maxwell R. Lee, Ph.D., P.E. 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" N Longitude: 80° 25' 26" W

Section: 34 Township: 53S Range: 39E

UTM # 17 / 557800 / 2852200 / _____

2. Facility size (area in acres): 122.74 ac - See Attachment 2

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.

The facility's detailed process description is labeled as Attachment 1 (Fig 1 & 2) & Att 3



January 15, 2018

TO WHOM IT MAY CONCERN:

This letter is authorization for Luis G Lopez (an employee of CEMEX Construction Materials Florida, LLC), as my agent, to sign permit applications on behalf of CEMEX Construction Materials Florida, LLC related to the job address of 1200 NW 137th Avenue, Miami, Florida. This authorization is valid through January 15, 2019.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike F. Egan".

Mike F. Egan – Vice President
CEMEX Construction Materials Florida, LLC

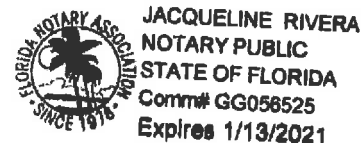
STATE OF FLORIDA
COUNTY OF PALM BEACH

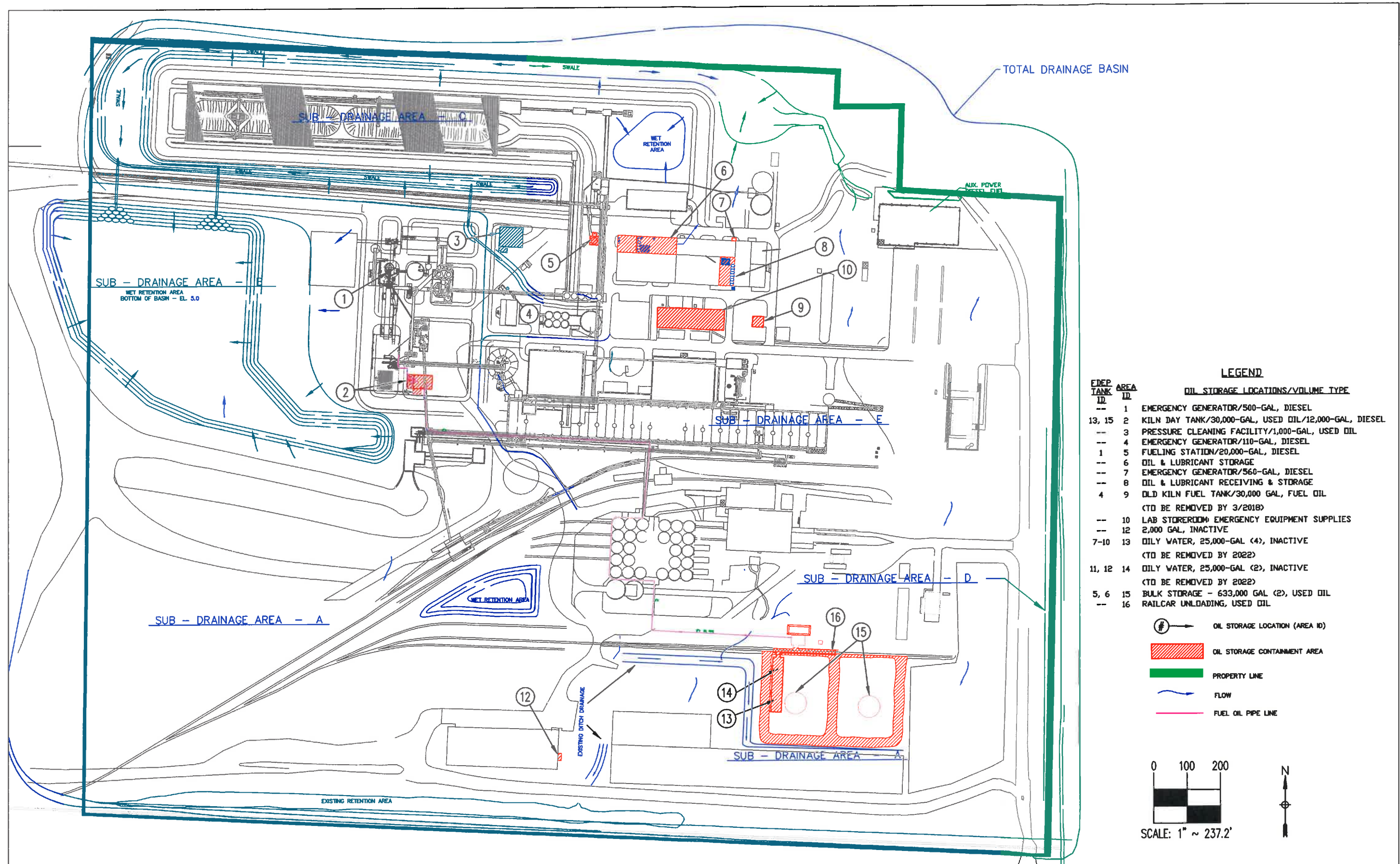
Subscribed and sworn to before me this 15th day of January, 2018 by Mike F. Egan, personally known to me to be a Vice President of CEMEX Construction Materials Florida, LLC.

A handwritten signature in blue ink, appearing to read "Jacqueline Rivera".






Notary Public In and For
Said County and State

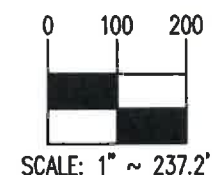
STAMP/SEAL:





		LEGEND	
		OIL STORAGE LOCATIONS/VOLUME TYPE	
EDEP TANK ID	AREA ID		
--	1	EMERGENCY GENERATOR/500-GAL, DIESEL	
13, 15	2	KILN DAY TANK/30,000-GAL, USED OIL/12,000-GAL, DIESEL	
--	3	PRESSURE CLEANING FACILITY/1,000-GAL, USED OIL	
--	4	EMERGENCY GENERATOR/110-GAL, DIESEL	
1	5	FUELING STATION/20,000-GAL, DIESEL	
--	6	OIL & LUBRICANT STORAGE	
--	7	EMERGENCY GENERATOR/560-GAL, DIESEL	
--	8	OIL & LUBRICANT RECEIVING & STORAGE	
4	9	OLD KILN FUEL TANK/30,000 GAL, FUEL OIL	
(TO BE REMOVED BY 3/2018)			
--	10	LAB STOREROOM EMERGENCY EQUIPMENT SUPPLIES	
--	12	2,000 GAL, INACTIVE	
7-10	13	OILY WATER, 25,000-GAL (4), INACTIVE	
(TO BE REMOVED BY 2022)			
11, 12	14	OILY WATER, 25,000-GAL (2), INACTIVE	
(TO BE REMOVED BY 2022)			
5, 6	15	BULK STORAGE - 633,000 GAL (2), USED OIL	
--	16	RAILCAR UNLOADING, USED OIL	

-  OIL STORAGE LOCATION (AREA ID)
-  OIL STORAGE CONTAINMENT AREA
-  PROPERTY LINE
-  FLOW
-  FUEL OIL PIPE LINE



ATTACHMENT 1, FIGURE 2- FACILITY DIAGRAM
CEMEX CONSTRUCTION MATERIALS FLORIDA, LLC
MIAMI CEMENT PLANT
MIAMI-DADE COUNTY, FLORIDA

KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13TH STREET
GAINESVILLE, FLORIDA 32609
DWG BY: KGU (REV 11/19/12)
VJW (REV 2/5/18)
FILENAME: FACILITYDIAGRAMSPCCP_VJW_2018_02_05.DWG
PROJECT: 263_17_17



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 Plant encompasses a parcel of land that is 122.74 acres. Land to the west and northwest, which encompasses the two adjacent quarry mining pits, is a parcel of land totaling 353.74 acres. The remaining land encompassing the SCL quarry, quarry pits, environmental buffers, and land to the northeast of the Cement Plant property is a parcel of land totaling 2,476.14 acres. The used oil activities take place within the Cement Plant property (122.74 acres).

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, used 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
- Processing of used oil - oil filters, and waste tires as fuel for the cement kilns

As of mid-2015, the soil thermal treatment facility was closed. The facility is no longer conducting thermal treatment of soil. The closure of the facility was approved By Miami Dade County in October 2015 (see attached approval letter).

Number and Type of Employees

The number of employees is approximately 130 and include:

- General laborers
- Equipment operators
- Supervisors
- Managers



Regulatory and Economic Resources
Environmental Resources Management
701 NW 1st Court • 7th Floor
Miami, Florida 33136-3912
T 305-372-6600 F 305-372-6893

miamidade.gov

October 13, 2015

Mr. Luis G. Lopez
CEMEX Construction Materials Florida, LLC
1200 NW 137th Ave
Miami, FL 33182

CERTIFIED MAIL NO.7010 1870 0000 2685 9600
RETURN RECEIPT REQUESTED

Re: Closure Certification Report (CCR) dated September 15, 2015 and revised CCR dated October 12, 2015 submitted in response to DERM Request for Additional Information No. 2 letter dated May 21, 2015 pertinent to closure requirements for the Cemex Construction Materials Florida LLC Soil Treatment Facility (FDEP Permit No. 0133892-009-SO / WACS No. 59293 / DERM Permit No. SW-1117) located at, near, or in the vicinity of 1200 NW 137th Ave, Miami, Miami-Dade County, Florida.

Dear Mr. Lopez:

The Environmental Permitting Section (EPS) of the Department of Regulatory and Economic Resources (RER) - Division of Environmental Resources Management (DERM) acknowledges the receipt of the referenced submittals respectively on September 21, 2015 and October 12, 2015. Based on the review of said submittals and on a site inspection conducted by RER personnel on October 08, 2015, the EPS has no objection to the closure of said facility permit. However, be advised of the following:

1. The referenced facility currently has a Financial Assurance established in the amount of \$1,520,380.42 which includes closing and long term care cost. In accordance with the engineer certification dated October 12, 2015, submitted along with the referenced closure report and pursuant to Rule 62-713.600(5), long term care requirements are not applicable to the facility. Therefore, the responsible party shall contact the FDEP SW Financial Coordinator in Tallahassee at (850) 245-8732 or via email (Solid.Waste.Financial.Coordinator@dep.state.fl.us.) regarding any intent to terminate the relevant mechanism(s) as a result of the permit closure. All financial assurance related documents shall be sent to the address below:

Florida Department of Environmental Protection
Financial Coordinator - Solid Waste Section
2600 Blair Stone Road, MS 4548
Tallahassee, Florida, 32399-2400

2. Be advised that sampling requirements in support of the Soil Treatment Facility (STF) operating permit are no longer applicable to the facility. However, prior approval from the Environmental Monitoring and Restoration Division (EMRD) shall be obtained regarding any intent to abandon the on-site monitoring wells previously used in support of STF operations.
3. This approval does not relieve the property owner from obtaining any other permits and/or approvals for compliance with other applicable Local, State, or Federal rules as may be required.

If you have any questions regarding the above, please contact Johnny Vega, P.E. or Francisco Teresa Calleja of the EPS at (305) 372-6600 or via email respectively at vegajo@miamidade.gov and callef@miamidade.gov.

Sincerely,


Rashid Z. Istambouli, P.E., Chief
Pollution Regulation Division

cc: Johnny Vega, P.E., Patti Emad, Francisco Teresa-Calleja, Ryan Briggie – DERM
SW Financial Coordinator - FDEP/TLH (via e-mail: Solid.Waste.Financial.Coordinator@dep.state.fl.us)
Charles Waltz - CEMEX Construction Materials Florida, LLC (via email: charles.waltz@cemex.com)
Tammy Reed – Koogler and Associates, Inc. (treed@kooglerassociates.com)
Maxwell R. Lee, Ph.D., P.E. – Koogler and Associates, Inc. (via email: mlee@kooglerassociates.com)

DERM File No. SW-1117

ATTACHMENT 3

DETAILED PROCESS DESCRIPTION

ATTACHMENT 3: DETAILED PROCESS DESCRIPTION

Used Oil Process Description

The facility only accepts on-specification used oil for processing as a fuel in its cement kilns. The supplier sends an oil analysis with each shipment.

~~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 (or equivalent)
_____ 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 (Area 15, see Attachment 1, Figure 2), 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~~ receiving a fuel oil analysis certificate with each shipment.

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

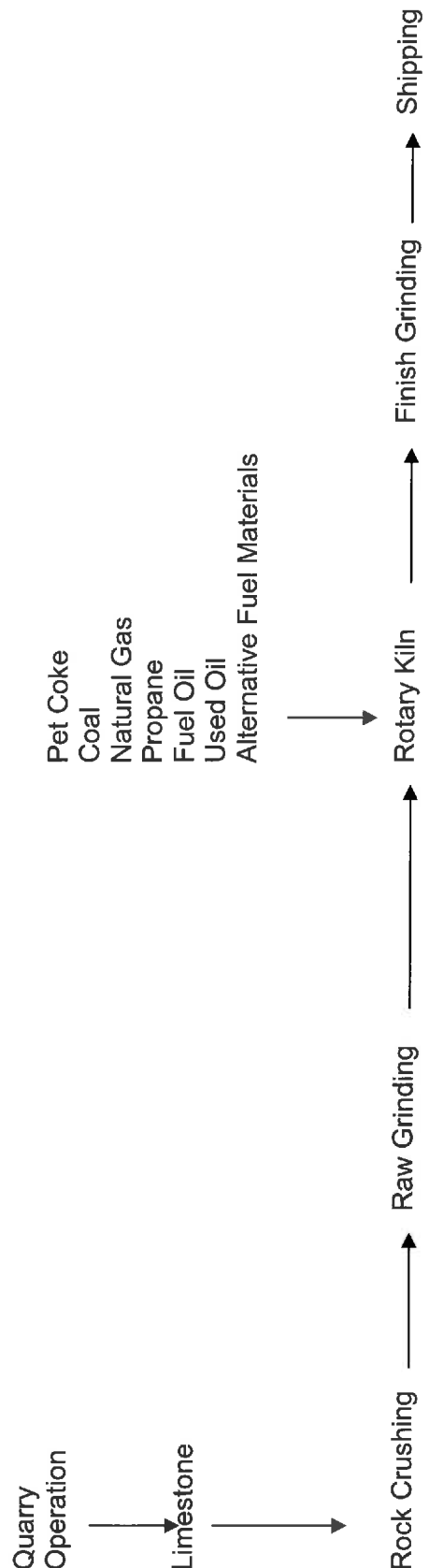
The process that is used at the facility to manufacture cement is called a “dry process”. The primary raw material - limestone, is mined in the Miami (SCL) quarry. The limestone is processed through series of crushing, screening/sizing, and transfer operations. Next the kiln feed is prepared in the Raw Material Handling System and is fed to the Preheater/Kiln (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. Used 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.

As of mid-2015, the soil thermal treatment facility was closed. The facility is no longer conducting thermal treatment of soil. The closure of the facility was approved By Miami Dade County in October 2015.

RAW MATERIAL FLOW DIAGRAM



Tank Inventory

A list of the Used Oil tanks is provided as Table 1 below. A list of the facility tanks and oil products is provided in Attachment 5 – the ICP/SPCC Plan. The tank IDs correspond to the Florida Department of Environmental Protection Tank IDs for those tanks that are required to be registered. The storage area number corresponds to the locations depicted on Figure 2 in Attachment 1.

Table 1 – CEMEX Miami Used Oil Tank Inventory

Tank ID(s)/ Storage Area	Description	Product	Capacity (gallons)	Containment and Spill Control Features
Refer to Permit Application - Facility Diagram, Attachment 1, Figure 2 for locations				
13/ Area 2	Kiln Day Tank	Used oil	30,000	Concrete containment, under roof
5 & 6 Area 15	Bulk Storage	Used oil	2 tanks - 633,000 each*	For kiln surrounded by earthen dike, double bottom, on concrete
No tank ID/Area 3	Oil Storage Bldg. Tank	Used oil	1,000	Concrete barrier, under roof

62-710.201 Definitions. (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.

*Note: One of the 633,000 gal tanks (Tank No. 6) is currently empty but remains in active status.

ATTACHMENT 4

FACILITY OPERATION PLAN

Includes Used Oil Analysis and Tracking Plan

ATTACHMENT 4: FACILITY OPERATION PLAN

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;
All used oil at the facility is on specification used oil. The supplier sends an oil analysis with each shipment. Refer to attached Used Oil Analysis Plan (see page 2 of this attachment).

(ii) Fingerprint analysis on incoming shipments, as appropriate; and
Refer to attached Used Oil Analysis Plan (see page 2 of this attachment).

(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 consumed 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 (see page 2 of this attachment).

(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)

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.~~

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.~~

The Receipt of Fuel Oil Deliveries

- All used oil at the facility is on specification used oil. The supplier sends an oil analysis with each shipment.
- The fuel oil truck driver must weigh-in in the scale house before delivering the load of oil to the dryer.
- Every field in the Used Oil Delivery Record Form will be filled out legibly and the last field signed by the truck driver.
- ~~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.~~
- ~~The oil sample will be taken to the CEMEX Quality Control Laboratory for analysis.~~
- 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

- 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.

- 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.
- 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.
- 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.

CEMEX Miami Cement Plant - Material Substitution Program

Daily Receiving Report

[illegible]

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.

FLD058560699

Manifest
Document No.

242383 -1

2. Page 1

of 1

Truck Number

3. Name and Mailing Address

Cliff Berry, Inc

PO Box 13079

Ft Lauderdale, FL 33316

4. Phone 954-763-3390

5. Transporter 1 Company Name

CLIFF BERRY, INC.(DANIA)

6. USA EPA ID Number

FLR000083071

A. Transporter's Phone

954-763-3390

7. Transporter 2 Company Name

8. USA EPA ID Number

B. Transporter's Phone

9. Designated Facility Name and Site Address

CEMEX CONSTRUCTION LLC.

1200 MIAMI, FL 33182

10. USA EPA ID Number

C. Facility's Phone

305-225-1423

11. Shipping Name and Description

12. Containers

No.

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 described 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

ATTACHMENT 5
INTEGRATED CONTINGENCY PLAN (ICP)
AND SPCC PLAN

Includes: Preparedness and Prevention Plan, Contingency Plan, and Portions of Unit Management Plan (see also Attachment 6) and Employee Training (see also Attachment 7)

SEE
SEPARATE
EMAIL
DUE TO SIZE

COPY

Letter of Transmittal



DATE:	2/5/2018	PROJECT NO:	263-17-17
TO:	Local Emergency Planning Committee District 11; 9300 NW 41 Street; Miami, FL 33178		
ATTENTION:	Niel Batista, Bureau Manager		
REGARDING:			
CEMEX Miami Cement Plant – Integrated Contingency and SPCC Plan			

WE ARE FORWARDING TO YOU THE FOLLOWING:

Copies	Description
1	Copy of ICP/SPCC for CEMEX Miami

THESE ARE TRANSMITTED BY:

<input checked="" type="checkbox"/> REGULAR MAIL	<input type="checkbox"/> DELIVERED
<input type="checkbox"/> OVERNIGHT	<input type="checkbox"/> CLIENT PICK UP
<input type="checkbox"/> 2 DAY	<input type="checkbox"/> OTHER: _____

REMARKS:

As requested by the Florida Department of Environmental Protection (FDEP), the enclosed Integrated Contingency/SPCC Plan for the CEMEX Miami Cement Plant is being sent to you for your files in support of their FDEP used oil permit.

Miami-Dade County Fire Department; 9300 NW 41 St; Miami FL 33178
FDEP- Attn: Bradley Buselli
Charles Walz-CEMEX

File

SIGNED: Tammy Reed, Env. Sci. II

cc: _____

ATTACHMENT 6 – UNIT MANAGEMENT PLAN

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 62-762.501 (Storage Tank System Requirements for Shop Fabricated Storage), 62-762.601 (Release Detection Requirements for Shop Fabricated Storage Tanks), and 62-762.701 (Repairs, Operation and Maintenance of Shop Fabricated Storage Tanks). All underground storage and process tanks must meet the requirements of Rules 62-761.500 (), 62-761.600 (), and 62-761.700 ().

All above-ground storage and process systems meet the applicable requirements of Chapter 62-762, F.A.C.

(ii) All storage and process tanks must have a closure plan that meets the requirements of Rule 62-762.801 (Out of Service and Closure Requirements for Shop Fabricated Storage Tanks).

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 Rule 62-762.600 (Release Detection for Shop Fabricated Storage Tanks).

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, attached.

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.



MIAMI CEMENT PLANT

USED OIL REGULATORY TRAINING MANUAL

Manual Date: 12/5/2012

*Revised January 23, 2018
to correct rule references for the Used Oil Permit Renewal
DEP Application No. 56307-006-HO*



*ENVIRONMENTAL SERVICES
4014 NW 13th Street
Gainesville, Florida 32615
352-377-5822*

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 ICP/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 (279.10, 279.60) (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 and 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.

No used oil or oil waste can be discharged into:

- 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 April 23, 2013. This Form can be obtained on-line at <https://floridadep.gov/waste/permitting-compliance-assistance/content/forms-chapter-62-730-hazardous-waste> or by contacting the Hazardous Waste Regulation Section, MS 4500, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 850-245-8705.

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 (56307-005-HO) 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 62-780, F.A.C. (Contaminated Site Cleanup Criteria), 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 ICP/SPCC Plan and attachments.

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.

ATTACHMENT 8
FACILITY CLOSURE PLAN

ATTACHMENT 8: FACILITY CLOSURE PLAN

This plan describes the facility's closure plan for the used oil processing facility. All tanks, piping and secondary containment and ancillary equipment (as applicable) will be emptied, cleaned and decontaminated, and all materials will be removed and managed. This Facility Closure Plan is to be updated if there is a significant operational or design change affecting the used oil processing facility. This Closure Plan is to be maintained with records in accordance with Rule 62-710.510 F.A.C. Within 30 days after closing the facility, CEMEX will submit a P.E. certified report, signed by the facility's authorized representative or owner that the facility was closed in substantial compliance with the Facility Closure Plan. 62-710.800(5)(a) F.A.C.

a) A closure schedule;

The facility will notify FDEP and Miami-Dade Department of Regulatory and Economic Resources (RER) of the closure within 72 hours of the cessation of the acceptance of these materials. The FDEP and RER will be notified in writing at least 60 days prior to the scheduled date of closing the facility. If more details of the closing of the used oil processing facility is determined to be required, those details will be provided to the FDEP (and RER, as applicable) prior to the scheduled closing.

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 the materials involved will be utilized in the cement/manufacturing process, and there will be no need for further maintenance of the used oil processing facility.

b) A listing of tanks, piping and other equipment that will be cleaned/closed;
Refer to Table 1 in Attachment 3-Detailed Process Description of this document.

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). Used oil residues in tanks and containment systems will be removed or decontaminated and disposed of by incorporating them into the cement-making process, or otherwise disposed of properly.

The used oil tanks are double-walled and within a concrete containment system and. Unloading of petroleum products occurs within containment areas with the exception of filling the two emergency generator diesel fuel tanks. Filling operations of vehicles and equipment will be performed and monitored by trained Facility personnel. Therefore, no contamination of soil or water is anticipated.

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). For sampling and analysis see item g) below.

e) A description of the characterization and disposal of rinse waters 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;
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).

Note: Soil and groundwater contamination is highly unlikely as the four used oil tanks are double walled, within concrete containment systems engineered to hold 110% of contents, and transfer activities occur within containment systems. There is no contact with soil. The transfer pipeline (to kiln day tank) is above ground and exposed (but does cross areas of internal roads and pervious surfaces) which allows for continual visual observation. If a pipeline should leak, it would be quickly discovered, the system would be shut down, and the spill would be cleaned up (in accordance with the SPCC Plan). Furthermore, the two 633,000-gallon tanks had formal inspections (API-653) in 2015/2016 and were determined to be in excellent condition. It is also CEMEXs practice not to fill tanks to maximum capacity.

However, if contamination is discovered during closure of the tanks or pipeline, soil sampling actions will be conducted per the Florida Department of Environmental Protection, Instructions for Conducting Sampling During Above Ground Storage Tank Closure, April 2016, as incorporated in subparagraph 62-762.801(2)(b)5. F.A.C.; as follows:

- **When a used oil tank is being removed, a visual inspection of the excavation, of the tank condition and of the removed soil is to be performed to document the integrity of the tank. If the tank (or pipeline) appears to have discharged or if soil contaminated or saturated with used oil is identified and remains on-site, a sample that represents the location believed to be most likely to have contamination must be analyzed for all parameters specified for used oil in Table D of Chapter 62-780, F.A.C.**
- **If soil visually stained or saturated with used oil is identified and excavated, at least one sample is to be obtained from the bottom of the excavation if the water table was not reached and at least one sample is**

to be obtained from the wall of the excavation at an equivalent depth of the soil visually stained or saturated with used oil that was removed, and analyzed for those contaminants detected in the sample collected from the most visibly stained area or during pre-burn analyses.

- **Soil samples will be discrete grab samples. It is anticipated that if soil sampling is determined to be necessary, a minimum of 2 samples per used oil tank/activity location will be obtained.**
- **Samples will be analyzed using methods listed in Chapter 62-780, F.A.C. or approved as per Chapter 62-160 F.A.C.**

(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. Soil and groundwater contamination is highly unlikely as the four used oil tanks are all double walled, within concrete containment systems, and transfer activities occur within containment systems. There is no contact with soil. However, if soil contamination is discovered during closure, sampling actions for groundwater will be conducted per the Florida Department of Environmental Protection, Instructions for Conducting Sampling During Above Ground Storage Tank Closure, April 2016, as incorporated in subparagraph 62-762.801(2)(b)5. F.A.C.; as follows:**

- **If the depth to the groundwater table is less than 20 feet, a temporary monitoring well is to be installed in the area(s) that represents the location believed to be most likely to have contamination as determined by the visual observations of the soil samples. If the depth to the groundwater table is greater than 20 feet, a groundwater sample is not required if:**
 - **visual observations or laboratory results indicated that contaminated soil was not present; or**
 - **contaminated soil was identified and was left in place requiring the discharge to be reported and a site assessment to be conducted in accordance with Rule 62-780.600, F.A.C.; or**
 - **contaminated soil was identified, excavated and results demonstrated that groundwater should not have been affected based on the degree of contamination, horizontal and vertical extent of contamination in the excavated soil, type of product believed to have been discharged, and site stratigraphy.**

- **Groundwater samples must be analyzed for all parameters specified for used oil in Table D of Chapter 62-780, F.A.C.**

If sampling is conducted, a report will be provided to the FDEP (and RER, as applicable) detailing: the field sampling procedure(s); location, number, extent and depth of samples (with a site map); analysis methods; results; laboratory report; and, if applicable, a recommendation for additional actions.