INTEGRATED CONTINGENCY PLAN (ICP)

WITH

SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) PLAN

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

MOST RECENT PLAN REVISION: February 6, 2018

Consultant:
Maxwell R. Lee, Ph.D., P.E.
Tammy L. Reed
Koogler and Associates, Inc.
PO Box 5127
Gainesville, FL 32623
(352) 377-5822

263-17-17

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
Maurice R. Hogg **9615 SW 152 Ave** **Miami, FL 33196**	**Facility Emergency Response Coordinator:** Environmental Manager/Plan Coordinator	305-229-2949	786-853-1828	
Luis G Lopez **2398 SW 185 Ave** **Miramar, FL 33029**	**Asst. Facility Emergency Response Coordinator**: Environmental Manager/Plan Coordinator	305-229-2950	786-449-5351	
Roberto Guzman 19421 NW 3 Court Pembroke Pines, FL 33029	Production Manager	305-228-4372	954-680-4475	
Jeff Passerello 15034 SW 51 St. Davie, FL 33331	Quality Control Manager	305-229-2925	305-216-5098	
Anthony Debow 18799 SW 293 Terr. Homestead, FL 33030	Production Coordinator/Yard; On-Scene Process Supervisor at Main Control Room	305-229-2917 or cell 305-484-7557	305-229-2920 *Main Control No. Room is manned 24/7*	

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: **STATE WATCH OFFICE/Emergency Mgmt**	**State**	**800-320-0519**
National Response Center (NRC)	**Federal**	**800-424-8802 (24 hr.) or online http://www.nrc.us.uscg.mil**
U.S. Coast Guard National Response Center	**Federal**	**800-424-8802**
US EPA Region 4	**Federal**	**800-241-1754**
FEMA Region IV	**Federal**	**303-646-2500 (Washington) 770-220-5200 (Atlanta, GA)**
FDEP Southeast District – Office of Emergency Response Release Reporting*	**State**	**561-681-6767 3301 Gun Club Rd, MSC7210-1 West Palm Beach, FL 33406**
FDEP –Emergency Support Report storm related environmental hazards	**State**	**850-921-0223**
Miami-Dade Dept. of Emergency Management and Homeland Security	**Local**	**305-468-5400**
Miami-Dade County Dept. of Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM)	**Local**	**305-372-6955 (24 hr)**
Florida Marine Patrol, Miami	**Local**	**305-795-2145**
Local Emergency Planning Committee District 11	**Local/ Regional**	**305-468-5421 Niel Batista, Bureau Manager niel.batista@miamidade.gov**
CHEMTREC	**Chemical Info**	**800-424-9300**
Cleanup Contractors	**SWS Emergency Response**	**954-957-7271**
	Cliff Berry	**954-763-3391**

NOTE:** ***This Plan does not provide specific requirements of the following new Florida Department of Environmental Protection (FDEP) Reporting Statute:

New Public Notice of Pollution Reporting Requirements – June 30, 2017

Section 403.077, Florida Statutes, defines a "reportable release" and requires the reporting of any "release or discharge of a substance from an installation to the air, land, or waters of the state which is discovered by the owner or operator of the installation, which is not authorized by law, and which is reportable to the State Watch Office within the Division of Emergency Management pursuant to any department rule, permit, order, or variance."

- The preferred method for reporting is electronically using the following link: http://dep.state.fl.us/pollutionnotice/.
- Reporting entities may also report via e-mail using the Pollution Notice Form and e-mailing it to pollution.notice@dep.state.fl.us.
- Reporting entities should be aware that, while submission of a notice through the website complies with the requirements of Section 403.077, F.S., it does not relieve them of any obligation to report to the State Watch Office.

Per the statutory requirements, an owner or operator of the installation at which the reportable pollution release occurred must provide to FDEP within 24 hours of discovery a notice containing the information reported to the State Watch Office, which may include:

- The name and address of the installation where the reportable pollution release occurred.
- The name and title of the reporting person and the nature of his or her relationship to the installation.
- The identification numbers for any active department permits, variances, registrations, or orders that are relevant to the reportable pollution release.
- The name and telephone number of a contact person for further information.
- The substance released.
- The estimated quantity of the substance released and, if applicable, the estimated quantity that has since been recovered.
- The cause of the release.
- The source of the release.

- The location of the release.
- The date, time, and duration of the release.
- The medium into which the substance was released, including, but not limited to, the outdoor air, land, groundwater, aquifer, or specified waters or wetlands.
- Whether the released substance has migrated to land or waters of the state outside the property boundaries of the installation and the location of such migration.
- The owner or operator may also include in the notice any other information he or she wishes in order to assist in the protection of the public health, safety, and welfare.

These reports may be amended if new information becomes available. In addition, if after providing notice, an owner or operator determines that a release has migrated outside the property boundaries of the installation, additional notice must be provided to the department within 24 hours after such discovery.

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:

Mayor of Miami Dade County:
Carlos A. Gimenez
Office: 305-375-5071
mayor@miamidade.gov

Chairman:
Jean Monestime
District Office: 305-694-2779
Fax: 305-694-2781

Deputy Mayor Regulatory & Infrastructure/Svc: Economic Res.
Jack Osterholt
Office: 305-375-5695
josterholt@miamidade.gov

Deputy Mayor of Public
Alina T. Hudak, County Manager
Office: 305-375-2531
ATH2@miamidade.gov

Director of Miami Dade Police Dept.
Juan J. Perez
Office: 305-375-5071

Commissioner:
Jose "Pepe" Diaz, District 12
District Office: 305-599-1200

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

Fire Rescue:
David Downey, Fire Chief

Medical Facilities

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

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

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

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

ALL KEY REGULATORY CONTACTS (FEDERAL, STATE AND LOCAL)

EPA Region 4 (Southeast)
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303
404-562-9900
1-800-241-1754; FAX: 404-562-8174

EPA Region IV Contacts
Air - Beverly Banister (Regional Air Toxics Coordinator), 404-562-9077
Stationary Engines – Lee Page, 404-562-9131

EPCRA - Patricia Rubin, 404-562-8986

Water Protection Director – Mary Walker, 404-562-9345

Solid Waste – Florida Compliance Assistance Coordinator, (404) 562-8594

Florida Department of Environmental Protection - Tallahassee, Florida.
2600 Blair Stone Road
Tallahassee, FL 32399-2400; 850-717-9000

FDEP Contacts:
Air – Jeff Koerner Director, 850-717-9091; Jeff.koerner@dep.state.fl.us
David Read, Permitting Section Administrator; 850-717-9075; david.read@dep.state.fl.us
Environmental Compliance Admin - Jessica Dalton, 850-717-9106;
jessica.dalton@dep.state.fl.us

EPCRA - EPCRA/CERCLA Hotline: 800-535-0202

Hazardous Waste Reg. Section – Bryan Baker; 850-245-8787; Bryan.Baker@dep.state.fl.us

Groundwater Mgmt. (watershed) - Rick Hicks, 850-245-8229; richard.w.hicks@dep.state.fl.us
Solid Waste – Joe Ullo, 850-245-8690; Joseph.Ullo@dep.state.fl.us
Bejnar Tor, 850-245-8743; Tor.Bejnar@dep.state.fl.us (South, SE and SW DEP Districts)

Storage Tank Regulation - Bill Burns, 850-245-8842; Bill.Burns@dep.state.fl.us Closure Guidelines / Assessments

Florida Department of Environmental Protection – S.E. District Air Resources Office
Southeast District
3301 Gun Club Road
West Palm Beach, FL 33406

Jennifer Smith, Director

Jason Andreotta, Asst. Director

SE District Air Resource Permitting Environmental Administrator
Rusty Richards, 561-681-6624; Rusty.Richards@dep.state.fl.us

SE District Air Resource Compliance Assurance Program Administrator
Rusty Richards, 561-681-6624; Rusty.Richards@dep.state.fl.us

SE District Water Facilities Permitting Program
Lisa Self, 561-681-6699; lisa.self@dep.state.fl.us

SE District Water Facilities Compliance Assistance Program
Lisa Self, 561-681-6699; lisa.self@dep.state.fl.us

SE District Hazardous Waste Section
Norva Blandin, 561-681-6728.

Industrial Wastewater Section
Lisa Self, 561-681-6699; lisa.self@dep.state.fl.us

SE District Solid Waste Section
Ben Fisch, 561-681-6617; Ben.Fisch@dep.state.fl.us

SE District Storage Tank Section
Judy Dolan, 561-681-6733; Judy.Dolan@dep.state.fl.us

FDEP Bureau of Emergency Response in Southeast Florida
Kenton Brown, 561-681-6767; Kenton.Brown@dep.state.fl.us

Miami-Dade County Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM)
701 NW 1st Court
Miami, FL 33136
305-372-6789

Air Quality Management – Bernardo Bieler PE Chief Air Section, 305-372-6934; bbieler@miamidade.gov

Air Environmental Resource – Rick Garcia, 305-372-6925; Garciam@miamidade.gov

Air Compliance Engineer – Anthony Blaha, 305-372-6925; Antonin.Blaha@miamidade.gov

Air Permitting - Anthony (Tony) Radhay, 305-372-6643; radhaa@miamidade.gov

Solid Waste Inspector - Francisco Teresa-Calleja Inspector, 305-372-6618; CalleF@miamidade.gov

Pollution Regulation Division – Rashid Z. Istambouli P.E., Chief;
Keith McIntosh, Solid Waste Permitting Engineer, 305-372-6600; mcintk@miamidade.gov

Industrial Waste Water Inspector – IWS Inspector, 305-372-6602

Storage Tank – Victor Cabrera, 305-372-6600

Miami-Dade County Office of Emergency Management
Emergency Management Contact:
C. Douglas Bass, Director
9300 NW 41st Street
Miami, FL 33178
Internet Address: http://www.miamidade.gov/fire/emergency-management.asp
eoc@miamidade.gov
Office: 305-468-5400; Fax: 305-468-5401
Answer Center: 3-1-1

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

CHEMTRAC
1-800-424-9300, 24-hour emergency number
(Chemical Transportation Emergency Center)
Connection with manufacturers and/or shippers who will provide advice on handling rescue gear, decontamination considerations, and etc.

ATSDR
1-404-639-0615, 24-hour emergency number
(Agency for Toxic Substances and Disease Registry)
Provides health-related support in hazard materials emergencies including on-site assistance, if necessary.

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 Plant Manager or Facility Emergency Response Coordinator (FERC).***
2. ***Under the direction of the Plant 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 DERM at 305-372-6955**
   - **State Watch Office 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 Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM) 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) Office of Emergency Response (OER) is designated as the State Watch Office in the event of a hazardous materials incident. (Additionally: see release reporting requirements as of June 30, 2017 on pages iii and iv).

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

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

The incidents listed below are reportable to the OER through the State Watch Office 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 24 hours, or before the close of the next business day, a copy of the Discharge Reporting Form (DRF) must be submitted to the District OER Office in West Palm Beach. A DRF form is provided in Appendix F. For a petroleum spill, follow the specific EPA guidelines provided in Appendix G. An Incident Notification Form is provided in Appendix F along with instructions on reportable incidents.

Federal Reporting

The National Response Center (NRC) must be contacted within one hour if the discharge threatens or enters waters of the state. A discharge must also be formally reported within 60 days 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.

The following information must be reported to the NRC immediately following identification of a discharge to navigable waters or adjoining shorelines (a copy of the **DRF in Appendix F** must be sent to the NRC and see the **EPA Oil Discharge Reporting Fact Sheet in Appendix G)**:

- *Discharge/Discovery Date*
- *Time of Discharge*
- *Facility Name*
- *Facility Location (Address/Lat-Long/Section Township Range)*
- *Name of Reporting Individual*
- *Telephone Number*
- *Type of Material Discharged*
- *Estimated Total Quantity Discharged*
- *Source of the Discharge*
- *Media Affected (Soil, Water, Other)*
- *Actions Taken*
- *Damage or Injuries*
- *Evacuation Needed (if applicable)*
- *Organizations and Individuals Contacted (NRC, Cleanup Contractor, etc.)*

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 of the Facility*
- *Your name*

- *Location of the Facility*
- *Maximum storage or handling capacity of the Facility and normal daily throughput*
- *Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements*
- *An adequate description of the Facility, including maps, flow diagrams, and topographical maps, as necessary*
- *The cause of such discharge as described in 40 CFR 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred*
- *Additional preventative measures you have taken or contemplated to minimize the possibility of recurrence*

Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Additionally, in accordance with 40 CFR 279.52(b)(6)(ix), the details of any incident requiring the implementation of this contingency plan must be documented and submitted in writing to the Regional Administrator within 15 days after an incident. The information required to be reported is as follows:

- *Name, address, and telephone number of owner/operator and the Facility;*
- *Date, time and type of incident;*
- *Name and quantity of materials involved;*
- *The extent of injuries, if any;*
- *An assessment of actual or potential hazards to human health or the environment, where applicable; and,*
- *The estimated quantity and disposition of recovered material that resulted from the incident.*

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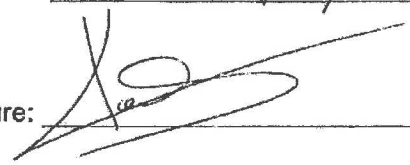
APPENDICES

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: Luis G. Lopez / Plant Manager

Signature: 

Date: 02/09/18

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.	50
§ 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.	52
§ 112.7(b)	Fault analysis.	79
§ 112.7(c)	Secondary containment.	82
§ 112.7(d)	Contingency planning.	82
§ 112.7(e)	Inspections, tests, and records.	85
§ 112.7(f)	Employee training and discharge prevention procedures.	88
§ 112.7(g)	Security (excluding oil production facilities).	89
§ 112.7(h)	Loading/unloading (excluding offshore facilities).	91
§ 112.7(i)	Brittle fracture evaluation requirements.	92
§ 112.7(j)	Conformance with State requirements.	93
§ 112.7(k)	Qualified oil-filled equipment	95
§ 112.8	Requirements for onshore facilities (excluding production facilities).	96
§ 112.8(a)	General and specific requirements.	96
§ 112.8(b)	Facility drainage.	96
§ 112.8(c)	Bulk storage containers.	98
§ 112.8(d)	Facility transfer operations, pumping, and Facility process.	102

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 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

The ICP was revised on December 11, 2017 to update the contact information, address new State Release Reporting Requirements, new State AST Rules and the SPCC Plan, including the tank inventory. Detailed information on update history (i.e., a record of amendments) is provided and maintained in Section 10.0.

The ICP was further revised on February 6, 2018 in response to a request for additional information from the Florida Department of Environmental Protection in support of the renewal application for the Used Oil Processing permit, EPA ID Number FLD 981 758 485. The changes involved updating contact information and emergency response equipment information, secondary containment details, and signing applicable forms within the document.

3.0 CEMEX MIAMI CEMENT PLANT FACILITY INFORMATION

Facility name: CEMEX Miami Cement Plant

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: Luis G. Lopez, Plant Manager
1200 NW 137th Avenue
Miami, Florida 33182

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

Luis G. Lopez, Plant Manager – Plan maintenance
CEMEX Construction Materials Florida, LLC
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, used 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. See Appendix A, Figure 3 – Evacuation Route Map
- ❑ Notify the Florida Department of Environmental Protection through the State Watch Office 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 the 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:

- Land Line - telephone lines available
- FAX unit
- Cellular telephones
- Two-way radios (walkie-talkies)
- CB radio system
- 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.

The Miami-Dade County Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM) 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 Office 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.

Fire control is provided by multiple hydrants and fire stations located in strategic areas throughout the Facility. Water is supplied by a diesel-powered water pump that is operated frequently to check dependability. Each building or structure in the Facility has a designated Miami Dade Fire permit number and is inspected by the Miami Dade Fire Department annually.

CEMEX Miami maintains a separate Fire Plan. For more specific details refer to the Fire Plan and see Section 9.3.

Initial response equipment available on-site includes:

- Basic firefighting equipment, including properly rated extinguishers (including Type BC Dry Chemical) placed strategically around equipment and inside buildings where appropriate or required.
- Containment equipment, such as frontend loaders can be used to erect earthen berms or barriers to contain and divert spills.
- Decontamination equipment and supplies include water and sand to clean and absorb spills
- First aid equipment

Facility communications and alarm systems (discussed in Section 4.3), fire protection equipment, spill control and response equipment and decontamination equipment are tested and maintained as necessary to assure proper operation. Following a response emergency, the equipment is tested, maintained and replaced as necessary.

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. Note the release reporting requirements implemented by the State in June 2017 on pages iii and iv in the front of the ICP.

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).

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. See Appendix A, Figure 3, for the on-site evacuation meeting place and evacuation route map. 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 Committee (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

Fire control is provided by multiple hydrants and fire stations located in strategic areas throughout the Facility. Water is supplied by a diesel-powered water pump that is operated frequently to check dependability. CEMEX has decided not to fight fires that cannot be extinguished with a fire extinguisher. In that event, the local Miami Dade Fire Department is called (9-1-1). CEMEX partnered with Miami Dade to allow their response units to practice firefighting and rescue techniques on machinery within the Facility that is no longer operable. CEMEX maintains a separate Fire Plan document. Please refer to that document for more 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, 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: April 17, 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
2) Added a SPCC Plan

Revision Date 3 & **4**: December 11, 2017 and **February 6, 2018**
(Current Plan)

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

Revisions conducted:
1) Updated contact information and some reformatting of ICP Plan
2) Added state release reporting requirements
3) Updated SPCC Plan with new reporting information and inventory and added new State AST compliance regulations
4) Updated Site Plan
5) Updated Secondary Containment Details and Integrity Testing Plan

10.1 Response Critique and Plan Review

This ICP will be reviewed annually and amended as applicable. 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 (CEMEX MIAMI HURRICANE PLAN)

The purpose of this document is to provide general guidelines for how the Miami Cement Plant will handle potential hurricane weather conditions. When advised of the approach of a hurricane, the following general steps shall be taken:

- Plant manager will assemble site managers to decide on a plan of action concerning plant shut down, evacuation, and implementation of the Miami Hurricane Plan.

- Coordinate with local authorities, the CEMEX Florida region and corporate officials.
- Coordinate with employees to provide adequate time to secure the plant and their homes. Keep in mind school closures, where they live, evacuation orders, flood zone, and how the storm impacts them and their families.
- If the plant may need to shut down, consider time to cool kiln, grind-out mills, and secure all equipment as listed below while also considering the available resources. Use of the NOAA forecast can show when wind speeds are probable to exceed 40 mph.

11.1.1 General Plan

Based on the storm conditions and likelihood of impact, the Plan can be adjusted. Track storm conditions on the NOAA Weather website to maintain consistent unbiased information. Refer to the FM Global wind storm and flood checklists located, I:\Cement\Plants\Safety\Emergency Plan, Crisis Management.

Hurricane Watch

If a *Hurricane Watch* is issued for South Florida (24-36 hours prior):

- Secure all loose items in the yards. Move trash receptacles and similar inside of buildings.
- Print and distribute to management the most recent employee list and contact information.
- Top off all fuel tanks

Hurricane Warning

If a *Hurricane Warning* is issued for South Florida (winds in excess of 74 mph are expected in 24 hours or less):

Kiln

- It will be taken down as soon as the warning is issued in order to give enough time to cool it down and release all the employees from the plant. (For Safety reasons, we do not want people performing their duties during hurricane weather conditions). It is going to take 24 hours to cool the kiln down and park it.

Cement Load-out

- If the Hurricane Warning is issued during business hours, we will stay open for the remainder of the day and close the following day.
- If the Hurricane Warning is issued after business hours, the cement load out will open at regular business hours the next day and close at noon.

Finish Mills

- They will remain running for 16 hours after the kiln is taken down.

General Preparation

- Trim trees annually as needed.
- Water pumps and portable generators maintained in ready state.
- Doors are functional (able to be closed and secured) .
- Drainage paths are maintained clear.

Hurricane supplies and equipment are to be stored in the Lab storeroom by the Automation Engineers office unless noted otherwise. Supplies include the following (quantities are approximate):

Plastic Sheeting (Visqueen) 10'x100'x.004	(4 rolls)	Lab Storeroom
Flashlights batteries	(200 AA, 50 C's)	Lab Storeroom
Manila rope 1/2"x600' coil	(6 coils)	Lab Storeroom
Rain suits (large)	(20 ea.)	Lab Storeroom
Gas cans, spring loaded MSHA approved	6 minimum	Yard
Drinking water (5 gallon bottles)	(1 rack w/30 - 5 gal bottles)	Lab Storeroom
Heat Lamps	16 ea.	Lab Storeroom
Ice	Full Freezer	Lab Storeroom
Two-way Radios	One for each person + spares	Each Dept.
Diesel Fuel Tanks (mobile equipment and kiln)	Full	Lab Storeroom
5/8" 4x8 sheets of plywood sheeting	1 pallet	Lab Storeroom
Sand Bags	300 ea.	Lab Storeroom

11.1.2 Personnel Responsibilities for Hurricane Warning - Area Preparations

Department Manager/Supervisors

Department Managers and Supervisors will poll department personnel and establish list of who can and cannot work. Supervisors will be responsible for all hurricane protection within their department or area of responsibility. Each area of the plant listed below has the primary person responsible for carrying out preparations.

Shift Foremen

Shift Foremen will have the responsibility of carrying out protection for Overhead Cranes, Mills, Preblend, Kiln, and Fire Pumps.

Fire Pumps
1. Verify weekly test performed and top-off diesel fuel.

Preblend System
1. Ensure piles are as full as possible as hurricane approaches to minimize start-up delays as much as possible.
2. Park Reclaimer next to pile and move stacker towards center of building above a pile.
3. Boom stacker down on pile.
4. Lock brakes (e-stop), and chock and block to prevent movement.
5. Make sure exterior rain covers are locked down.
6. If considered necessary, lash belts every 20 feet.
7. Ensure doors and hatches on system are secured shut.
8. Ensure doors to PREBOS building are closed and secured.

Raw Mill
1. If present, close and secure bay doors with drums of balls.
2. Make sure exterior rain covers are locked down.
3. If considered necessary, lash belts every 20 feet.
4. Ensure doors in RAMOS building are secured.

Baghouse
1. Ensure all screw conveyors covers are secured.
2. Ensure all doors are secured.

Homogenization Silo
1. Ensure silo cover is secured.

Preheater Tower

1. Ensure all loose materials are taken down and stored in storage rooms below tower. This includes exterior fire extinguishers.
2. Secure all doors in electric and equipment rooms.
3. Ensure all bucket elevators doors are sealed and secured.
4. Ensure all air slides are sealed and hatches or ports secured closed.
5. Secure analyzer building and gas bottles.

Kiln/Cooler

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 generator and fill with fuel.
5. Park tower passenger elevator at ground floor level. Elevator shall not be operated in winds over 40 mph regardless of hurricane status.
6. Clean clinker pit to avoid material hardening after the storm.
7. Install hurricane panels on control room.
8. Cover induced draft fan motors.
9. Remove new shell scanner heads and cover rest of unit with plastic.
10. Berm as needed to prevent water flow into pan conveyor pit.
11. Ensure that kiln oil and diesel tanks are full. Once kiln is shut down due to hurricane, fuel oil pumps are disabled.

Coal Mill Building

1. If present, close all doors and block with drums.
2. Run system so that the coal bin can be emptied if shutdown is required.
3. Fill CO_2 system as needed.
4. Ensure doors and hatches on system are secured shut.

Clinker Silo

1. Ensure doors and hatches are secured at the top.
2. Secure passenger elevator at the ground level. Elevator shall not be operated in winds over 40 mph regardless of hurricane status.

Bridge Cranes

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

Finish Mill Buildings

1. If present, close and secure bay doors with drums of balls (berm doors with sand bags as needed).
2. Cover all Mill motors (Electricians).
3. If possible, open bottom of elevators and clean out cement.

Top of Cement Silos

1. Secure all silo hatches on silo roof.
2. Cover all silo vents on silo roof.
3. Secure passenger elevator at the ground floor. Elevator shall not be operated in winds over 40 mph regardless of hurricane status.

Tank Farm and Pump House Area (including oil water separator)

1. Ensure tank isolation valves are closed.
2. Bolt all tank hatch covers down tight.
3. Cover outside electric controls with plastic.
4. Shut all power off in switch gear room.
5. Tie off truck hose in containment area and place trash cans inside pump house.
6. Make sure all tanks are 50 percent full or more, if possible.
7. Open all valves in rail car containment area.
8. Cover windows in pump room - close, lock, and berm doors.

Alternate Fuels Storage Building (ATS)

1. Shut off all power on switch gear unit.
2. Secure switchgear doors and seal in place.
3. Pick all loose equipment, trash cans, tools, etc., and put in steel lock up container.
4. Place all rolling stock (trucks, trailers, forklift, and bobcat) etc. inside ATS building against the south wall.

Yard Foreman

The Yard Foreman has the responsibility to see that all yard equipment has been properly secured. In addition, he/she must see that all loose material throughout the plant is secured or removed. He/She also has the responsibility for carrying out hurricane procedures in the Car Unloading Station, and Coal Loading System.

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. Consider auxiliary power /pump for flooding.
5. Secure covers on all conveyors.
6. Park locomotive under scale house and lock brake and chock.
7. Bring any light towers in from the raw material piles and secure in Warehouse/Maintenance Shop.

Raw Coal System

1. Make sure exterior rain covers are locked down.
2. If considered necessary, lash belts every 20 feet.

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 and 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.
6. Relocate all garbage cans inside buildings.

Packhouse / Shipping Manager & Supervisor

The Packing /Shipping Manager & Supervisor are responsible for the Packing & Shipping Department. They may call upon Maintenance and Electrical Departments for assistance.

Terminal and Packhouse

1. Loading and dust collection spouts in silos must be secured from swinging. All baskets must come down and be secured.
2. Empty and seal all floor screws in Packhouse so water cannot get into screws and harden cement.
3. Empty all supply bins in Packhouse #1 through #7.
4. Open cement bucket elevators and empty bottoms out, if possible.
5. Turn off air to silos.
6. Cover the control panels in the silos and the Packhouse.
7. Cover the MCC's in the silos and the Packhouse.
8. Move empty pallets into Packhouse.
9. Remove all scrap pallets and other debris from all terminal areas.
10. Cover electronic track scale controls.
11. Stack 2 full pallets securely against each rollup door in the Packhouse to protect door against the wind.
12. Move all empty bags inside secured dry storage areas.
13. Elevate all bags onto two extra pallets to keep bags out of standing water.
14. Store all essential paperwork in locked file cabinets and move away from windows.
15. Clean out all drainage points so water will flow.
16. Secure shaker with hurricane tie down cables.

Laboratory Manager & Supervisor

Laboratory will be responsible for carrying out the following procedures:

1. Secure Gamma Metric units/Nuclear source material. Ensure all doors are closed and secured.
2. Check out boots and raincoats.
3. Secure outside doors including coordination of securement of Changehouse doors.
4. Secure all outside gas cylinders.

Electrical Supervisor

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

1. Check operation of all sump pumps in manholes and cable runs.
2. Check all motor heaters.
3. Check emergency generator for proper operation.
4. Ensure electric rooms are sealed and bermed, particularly MCC 6.
5. Assist other Departments in covering electrical equipment as requested.
6. Cover FM1, 2, 3, & 5 mill motors once shut down.
7. Secure all windows in main switchgear room.
8. Lockout out all main motors; must be megged prior to restart.

Mechanical Supervisors

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

1. Where present, close all doors to machine shop, and mobile shop (block with drums of balls).
2. Secure all windows in machine shop, mobile shop, and Butler Building.
3. Secure all windows in compressor room.
4. Close all doors in compressor room.
5. Assist other Departments as needed.
6. Ensure that emergency fire pumps are operational.

Oil Drum Building

1. Shut off power at switch gear unit.
2. Pickup and secure all loose items and equipment.
3. Secure oil /water cleaner and cover.
4. Crush cleaned drums or fill with dirt.
5. Arrange for pump-out of oil pits prior to storm.

Main Office Managers

The managers in the main office will be responsible for carrying out the following steps:

Front Office

1. Relocate Server to Network closet, raise off floor.
2. Open closet doors to prevent overheating if A/C unit fails.
3. Remove Flag and secure rope.
4. Remove garden hoses and secure.
5. Remove reportable sign letters/numbers.
6. Sand bag east, south, west doors.
7. Verify roof drains have been cleaned, check PM.
8. Look for other loose debris around the office and dispose of prior to the storm.
9. Secure bikes/trikes.
10. Park the Main Office Truck at office and chock wheels.

Guardhouse

1. Relocate fire extinguisher inside.
2. Confirm door locks are functioning.
3. Relocate trash can.
4. Remove incoming and outgoing barrier sticks.
5. Remove garden hose and secure.
6. If all employees to be sent home:
    a. Arrange for barricading of entrance and use of the 14th Street Entrance.
        i. All site managers should have a key and agree on when the main entrance will be opened, guards restored, etc.
    b. Coordinate with security services

11.1.3 Securing of the Facility

- Team should decide what power will remain on. Systems that operate the DCS, FAA lights, and other emergency functions should remain on if possible even while personnel are not present at the Facility.
- Secure the main gate and use the 14th Street Entrance once all tractor trailers are parked.
- Notify all Operation Managers for the site.
- All other items not included in this document should be discussed with the Management Team.
- Back-up all PC's and shutdown equipment. Move critical information to a secure location.

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.

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).

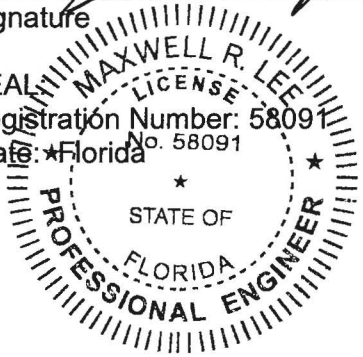
Description of Technical Amendment (if applicable, attach details as needed)	**Affected Pages**	**P.E. Certification Required (Y/N)**

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

2/9/2018
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 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 critical 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. Although the Facility has a total oil storage capacity greater than 1 million gallons, it has secondary containment that will contain oil from the largest tank plus sufficient freeboard to allow precipitation (40 CFR 112, Appendix C, Attachment C-1).

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

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

17.1 Physical Layout

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

17.2 Facility Diagram

This Plan includes Facility diagrams, which mark the location of tanks and other oil related storage, equipment and activities. The Facility diagrams include the location of above ground tanks, transfer stations and connecting pipes, if present. The Facility diagram is presented in Appendix A as Figure 1.

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 storage areas are shown on Figure 1.

Stormwater 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 (15) aboveground double walled stationary tanks and two (2) drum storage areas. The quarry includes (7) tanks. The quarry tanks are not included in this ICP as the quarry maintains a separate SPCC Plan. Each storage area/tank has a unique identifier. The products are used for fueling and maintenance of vehicles and mobile equipment. An inventory of materials subject to this Plan is presented in Tables 1-3 below. Storage area and tank identification numbers correspond to those presented in Figure 1 in Appendix A.

Table 1 – Bulk Storage Container (Above Ground) and Drum Inventory

Tank ID	Legend ID	Description	Product	Capacity (gallons)	Year Installed	Safety Features	Containment and Spill Control Features
Cement plant (see Legend on Figure 1 for location) – FDEP Facility ID 8521974							
1	5	Fueling Station	Vehicular Diesel	20,000	1958	Level gauges/alarm	Concrete containment under, roof
4	9	Old Kiln Day Tank	Vehicular Diesel	30,000	1958	Level gauges/alarm	*Out of service* - cleaned, piping removed. *To be removed by 3/2018*
5, 6	15	Bulk Storage	Used Oil	2 - 633,000	1958	Level gauges/alarms	*Field Erected Tanks* For kiln - surrounded by earthen dike, double bottom, on concrete
7-12 *CEMEX formerly ID'd these as 9-13 & 15)*	13/14	Waste Water (misc. Petrol Based Product)	Oily Water	6 - 25,000	All 1990	Level gauges/alarms	*All Out of Service – to be removed by 2020* *Field Erected Tanks* Concrete containment
13	2	Used Oil	Used Oil	30,000	2000	Level gauges/alarm	Concrete containment
15	2	Kiln Day Tank	Vehicular Diesel	12,000	2016	Level gauges/alarm	Dbl walled – concrete containment
--	12	Used for prior Soil Treatment Plant	Oily Water	2,000	1987	Level gauge	*Empty/Inactive* Concrete containment, under roof
--	3	Oil Storage Bldg. Tank	Used Oil	1,000	1984	Level gauge	Concrete barrier, under roof
--	4	Emergency Fire Pump	Diesel	150	1958	Level gauge	Concrete containment, under roof
				SubTotal 1,511,150 gallons	*1,329,150 gallons in-service*		
N/A	6	Mobile Shop	Lubricating/ Motor Oil	4, 350 gal	N/A	N/A	30' x 30' storage area - concrete containment under roof
N/A	8	Lubrication/Distribution Center (Receiving & Drum Storage)	Clean Oil of various weights	~24, 55 gal	N/A	N/A	20' x 40' storage area – concrete containment under roof
N/A	6	Oil/Lubricant Warehouse Storage (Drum Storage)	Oil (waste and hydraulic), Lubricant	~150, 55 gal drums ~10, 320 gal polyure. totes	N/A	N/A	60' x 8' storage area - concrete containment under roof Totes within metal frame
				Subtotal 14,170 gallons			
				TOTAL 1,343,320 gallons (Active Only)			*Inventory as of 12/2017*

Table 2 – Oil Filled Equipment

Equipment & Legend ID	Description	Product	Capacity (gallons)	Containment and Spill Control Features
Legend ID 1	Emergency Generator	Diesel	500	Concrete floor-under roof. Filled within a containment structure.
Legend ID 7	Emergency Generator	Diesel	560	Concrete pad-under roof. Filled within a containment structure.
L61-LQ2	Grinding Roller Lube Sys.	Castrol Alpha SP 220	90	Concrete flood, under cover, within steel cabinet
L61-GB1	Gearbox - Px8110-P3	Castrol Alpha SP 320	69 GL	On concrete platform, inside building structure
110-HS1	Hydraulic Reservoir	Castrol Hyspin AW46	90 GL	On concrete, under cover
110-HS3	Hydraulic Reservoir	Castrol Hyspin AW46	200 GL	Inside enclosed building on concrete floor
	Oil	DIALA AX	200 GL	Inside enclosed building on concrete floor
	Oil	DIALA AX	200	Inside enclosed building on concrete floor
	Sump	Castrol Hyspin AW46	160	Inside enclosed building on concrete floor
	Sump	Castrol Hyspin AW46	160	Inside enclosed building on concrete floor
	Hyd. Reservoir	Castrol Hyspin AW46	180	Inside enclosed building on concrete floor
	Reservoir	Castrol Alpha SP 320	180	Inside enclosed building on concrete floor
	Reservoir	Castrol Alpha SP 320	820	Inside enclosed building on concrete floor
	Thrust Bearing Casing	Castrol Alpha SP 320	85	Inside enclosed building on concrete floor
	Main Gear Spray	BEL-RAY SF-100	55	Inside enclosed building on concrete floor
	Main Reducer	Castrol Alpha SP 460	65	On concrete, under cover, steel catchment tray
471-HD1	Hydraulic Unit	Castrol Hyspin AW68	450	On concrete, under cover
	Slide Shoe Oil Sump 1	Castrol Alpha SP 680	159	On concrete, under cover
	Slide Shoe Oil Sump 2	Castrol Alpha SP 680	159	Inside enclosed building on concrete floor
	Voith Fluid Coupling	Castrol Hyspin AW32	1410	Inside enclosed building on concrete floor
566-LQ6	Reducer Lube Unit	Castrol Optigear BM 460	594	Inside enclosed building on concrete floor
	Coolant	Extended Life Antifreeze 50/50 Mix	57 GL	Inside enclosed building on concrete floor
	Coolant	Extended Life Antifreeze 50/50 Mix	57	Inside enclosed building on concrete floor
HD1	Hydraulics	Castrol Hyspin AW32	210	Inside enclosed building on concrete floor
HD2	Hydraulics	Castrol Hyspin AW32	210	Inside enclosed building on concrete floor
	Reservoir	DIALA AX	200	Inside enclosed building on concrete floor
L61-HS1	Hydro- Pneu Spring Syst.	Castrol Hyspin AW 46	61	On concrete, under cover with catchment tray

Inventory as of 12/2017

Table 3 – Transformer Inventory

Transformer Group ID No.	Product	Capacity (gallons)	Containment and Spill Control Features	Location
1	SIL	189	Inside building	Main SWGR Rm Bank #1
1	SIL	189	Inside building	Main SWGR Rm Bank #2
1	SIL	189	Inside building	Main SWGR Rm Bank #3
2	SIL	189	Inside building	Finish Mill 2nd Flr
2	SIL	181	Inside building	Finish Mill 2nd Flr
2	SIL	181	Inside building	Finish Mill 2nd Flr
3	SIL	167	Inside building	Pack House - top
4	SIL	181	Inside bermed area	Silos – between truck loading bays 2 & 3
4	LFH	298	Inside bermed area	Silos - between truck loading bays 2 & 3
5	LFH	181	On concrete – concrete walls on 3 sides	Raw Mill – under main baghouse - outside
6	LFH	298	On concrete – under cover, concrete walls on 3 sides	ER-1 preblend area north of 25000 gal diesel tank
7	LFH	442	On concrete – under cover, concrete walls on 3 sides	ER-2 main baghouse transformer compressor room
8	MIN	350	On concrete – under cover, concrete walls on 3 sides	ER-3 under preheat tower south of main baghouse fan
8	LFH	298	On concrete – under cover, concrete walls on 3 sides	ER-3 under preheat tower south of main baghouse fan
8	LFH	516	On concrete – under cover, concrete walls on 3 sides	ER-3 under preheat tower south of main baghouse fan
9	LFH	298	On concrete – concrete walls on 3 sides	ER-4 south end of clinker cooler
9	LFH	298	On concrete – concrete walls on 3 sides	ER-4 south end of clinker cooler
9	LFH	298	On concrete – concrete walls on 3 sides	ER-4 south end of clinker cooler
10	SIL	181	On concrete – concrete walls on 3 sides	ER-5 fm 6 east side mcc
11	SIL	298	On concrete – concrete walls on 2 sides	ER-8 car shaker in raw mill storage yard
12	LFH	298	On concrete – concrete walls on 3 sides	ER-10 Ramos bldg. east of raw mill, near control room
		Total		

Inventory as of 12/2017

SIL = silicone based oil
LFH = Fluorinated Hydrocarbon based oil
MIL = mineral oil

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

The FERC has the direct responsibility for implementing the provisions of the SPCC Plan. He/she 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 Figure 1 in Appendix A.

The following practices are recommended:

- 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)

18.1 Procedures for 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 used oil and crushed drums off-site for disposal. Alternatively used oil can be burned in the kiln as fuel. Loading of petroleum occurs within the spill containment located within that area.

18.2 Procedures for Unloading

Unloading of petroleum products occurs within containment areas with the exception of filling the two emergency generator diesel fuel tanks.

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.

18.3 Procedures for 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.

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

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. It is CEMEX's practice not to fill fuel or oil tanks to their maximum capacity.

Specifically, the used oil tanks have secondary containment as follows:

- ✓ The two 633,000 gallon used oil tanks are double bottomed, are on a concrete slab, and within an earthen berm that would contain a leak or discharge.
- ✓ The 30,000 gallon kiln day tank is within a concrete walled containment system designed to hold 110% of the tank's maximum capacity.
- ✓ The 1,000 gallon tank is within a concrete walled containment system designed to hold 110% of the tank's maximum capacity.

Visible discharges within a secondary containment area that result in a loss of oil from the container will be promptly corrected. These include but are 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 paramount. Also, timely notification of the appropriate management officials is of the utmost importance.

In the case of an oil spill, 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 an oil spill. The FERC will report any oil spill occurrence as applicable to other company officials. After direct inspection of the scene, the FERC will notify the appropriate local, state and federal agencies as applicable.

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 company will clean up minor spills using on-site personnel and equipment.

A cleanup contractor will be utilized to remediate major spills that are beyond the capabilities of the Facility.

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 State Watch Office 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 Plant Manager or FERC***
2. ***Under the direction of the Plant 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 DERM at 305-372-6955**
   - **State Watch Office 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).

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
Maurice R. Hogg **9615 SW 152 Ave** **Miami, FL 33196**	**Facility Emergency Response Coordinator:** Environmental Manager/Plan Coordinator	305-229-2949	786-853-1828	
Luis G Lopez **2398 SW 185 Ave** **Miramar, FL 33029**	**Asst. Facility Emergency Response Coordinator**: Environmental Manager/Plan Coordinator	305-229-2950	786-449-5351	
Roberto Guzman 19421 NW 3 Court Pembroke Pines, FL 33029	Production Manager	305-228-4372	954-680-4475	
Jeff Passerello 15034 SW 51 St. Davie, FL 33331	Quality Control Manager	305-229-2925	305-216-5098	
Anthony Debow 18799 SW 293 Terr. Homestead, FL 33030	Production Coordinator/Yard; On-Scene Process Supervisor at Main Control Room	305-229-2917 or cell 305-484-7557	305-229-2920 *Main Control No. Room is manned 24/7*	

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: STATE WATCH OFFICE/Emergency Mgmt	State	800-320-0519
National Response Center (NRC)	Federal	800-424-8802 (24 hr.) or online http://www.nrc.us.uscg.mil
U.S. Coast Guard National Response Center	Federal	800-424-8802
US EPA Region 4	Federal	800-241-1754
FEMA Region IV	Federal	303-646-2500 (Washington) 770-220-5200 (Atlanta, GA)
FDEP Southeast District – Office of Emergency Response Release Reporting*	State	561-681-6767 3301 Gun Club Rd, MSC7210-1 West Palm Beach, FL 33406
FDEP –Emergency Support Report storm related environmental hazards	State	850-921-0223
Miami-Dade Dept. of Emergency Management and Homeland Security	Local	305-468-5400
Miami-Dade County Dept. of Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM)	Local	305-372-6955 (24 hr)
Florida Marine Patrol, Miami	Local	305-795-2145
Local Emergency Planning Committee District 11	Local/ Regional	305-468-5421 Niel Batista, Bureau Manager niel.batista@miamidade.gov
CHEMTREC	Chemical Info	800-424-9300
Cleanup Contractors	SWS Emergency Response	954-957-7271
	Cliff Berry	954-763-3391

Local Reporting

The Miami-Dade County Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM) 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) Office of Emergency Response (OER) is designated as the State Watch Office in the event of a hazardous materials incident.

The OER responds to environmental pollution threats in every form; including, but not limited to, incidents involving petroleum spills caused by vehicle accidents to chemical plant explosions to coastal oil spills. OER provides technical and on-site assistance to ensure threats to the environment and human safety are quickly and effectively addressed.

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

The incidents listed below are reportable to the OER through the State Watch Office 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 24 hours, or before the close of the next business day, a copy of the Discharge Reporting Form (DRF) must be submitted to the District OER Office in West Palm Beach. A DRF form is provided in Appendix F. For a petroleum spill, follow the specific EPA guidelines provided in Appendix G. An Incident Notification Form is also provided in Appendix F along with instructions on reportable incidents.

Note: New state release reporting requirements (as of June 30, 2017) are listed at the end of the EXTERNAL EMERGENCY CONTACT AND NOTIFICATION LISTS on pages iii and iv in the front of the ICP, and in Appendix E.

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 formally reported within 60 days 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.

The following information must be reported to the NRC immediately following identification of a discharge to navigable waters or adjoining shorelines (a copy of the DRF in Appendix F must be sent to the NRC and see the EPA Oil Discharge Reporting Fact Sheet in Appendix G):

- *Discharge/Discovery Date*
- *Time of Discharge*
- *Facility Name*
- *Facility Location (Address/Lat-Long/Section Township Range)*
- *Name of Reporting Individual*
- *Telephone Number*
- *Type of Material Discharged*
- *Estimated Total Quantity Discharged*
- *Source of the Discharge*
- *Media Affected (Soil, Water, Other)*
- *Actions Taken*
- *Damage or Injuries*
- *Evacuation Needed (if applicable)*
- *Organizations and Individuals Contacted (NRC, Cleanup Contractor, etc.)*

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 of the Facility*
- *Your name*

- *Location of the Facility*
- *Maximum storage or handling capacity of the Facility and normal daily throughput*
- *Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements*
- *An adequate description of the Facility, including maps, flow diagrams, and topographical maps, as necessary*
- *The cause of such discharge as described in 40 CFR 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred*
- *Additional preventative measures you have taken or contemplated to minimize the possibility of recurrence*

Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

Additionally, in accordance with 40 CFR 279.52(b)(6)(ix), the details of any incident requiring the implementation of this contingency plan must be documented and submitted in writing to the Regional Administrator within 15 days after an incident. The information required to be reported is as follows:

- *Name, address, and telephone number of owner/operator and the Facility;*
- *Date, time and type of incident;*
- *Name and quantity of materials involved;*
- *The extent of injuries, if any;*
- *An assessment of actual or potential hazards to human health or the environment, where applicable; and,*
- *The estimated quantity and disposition of recovered material that resulted from the incident.*

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 safe location and secure the area.
- Notify your supervisor or the FERC
- 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.
- 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 drainage ditches, swales, and retention pond if feasible.
- 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 plant resources will be used to ensure that a spill does not reach Mud Creek or the quarry lakes.
- Berms can be established in the creek 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.

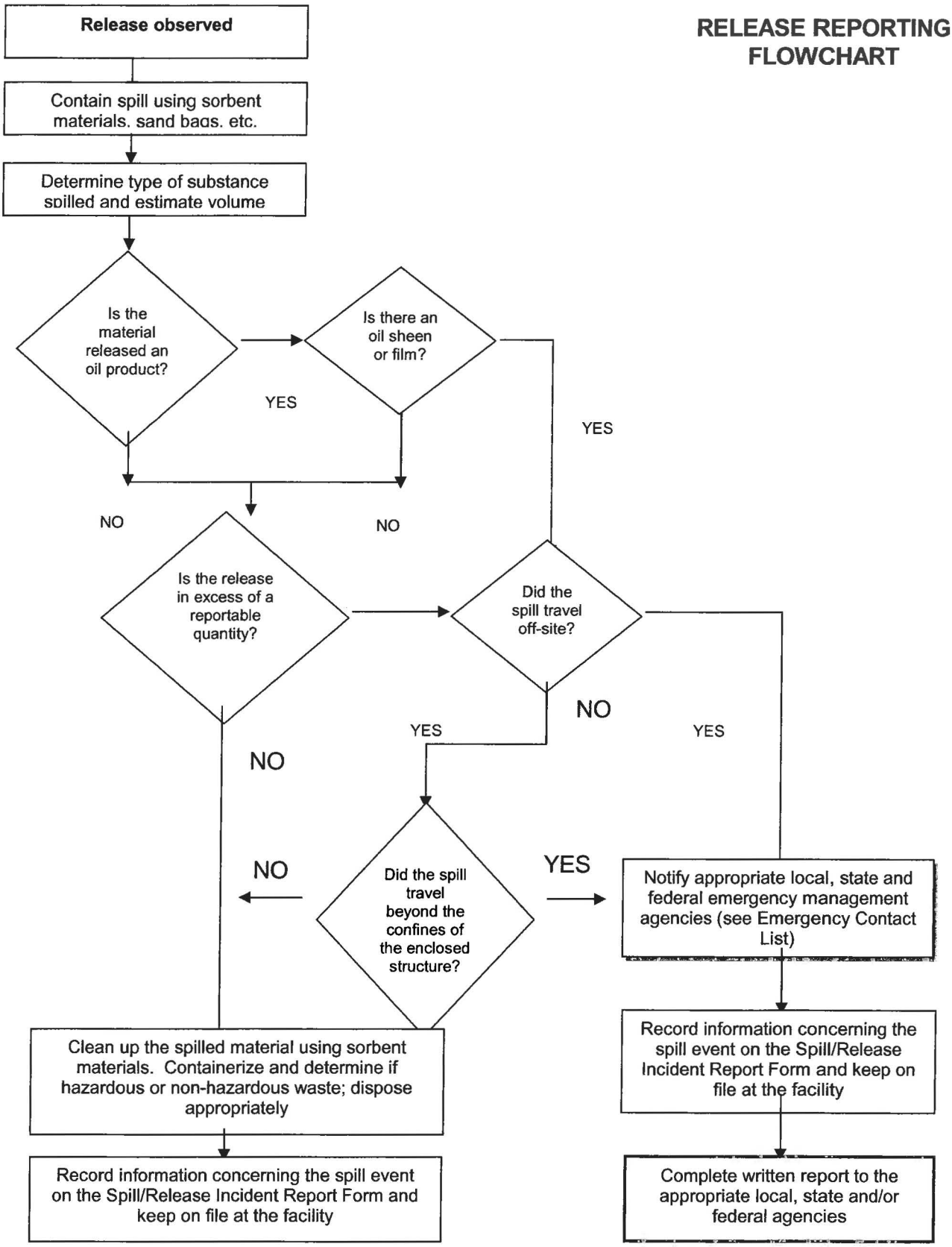
- This may involve assessing whether the threat can be prevented or minimized by controlling the source of the contamination at or near the area where the hazardous substances were originally located (source control measures) and/or whether additional actions will be necessary because the hazardous substances 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.

NOTE: The following guide does not include the state release reporting requirements effective as of June 30, 2017. See pages iv and v in the front of the ICP and Appendix E for more information.

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, Tables 1 through 3 for Area Identification).

22.1 Discharge Prediction from Loading Equipment Failure

Equipment Area ID: *Area No. 8* – **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* **- Used 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. 8* – **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* – **Used 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: **1,000** gallons/minute
Prediction of total quantity of oil: **12,000** gallons (total tank volume)

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. 8* – **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* - **Used 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**
Prediction of the direction of oil flow: **SW**
Prediction of rate of flow: **1,000** gallons/minute
Prediction of total quantity of oil: **2,000** gallons tanks (total volume two tanks)

Equipment Area ID: *Area No. 13* - **Used 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: **150,000** 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)

Other Equipment Area ID: **Group ID 1 - 10**
Other Equipment Description: **Transformers**
Prediction of the direction of oil flow: **Varies by transformer location but will only flow one direction as surrounded by concrete walls on 3 sides.**
Prediction of rate of flow: **516** gallons/minute
Prediction of total quantity of oil: **516** gallons (estimate of largest capacity transformer)

Other Equipment Area ID: **ALL**
Other Equipment Description: **Oil Filled Equipment - various**
Prediction of the direction of oil flow: Varies by equipment location
Prediction of rate of flow: **1,000** gallons/minute
Prediction of total quantity of oil: **1,410** gallons (estimate of largest vessel)

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

This Plan provides a description of the containment and/or diversionary structures or equipment to prevent a discharge. For secondary containment details, see Tables 1 and 2 in Section 17.4.

The Facility uses the following prevention systems or 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 clean-up supplies 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. Note that there is a separate checklist for portable containers. 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:

- STI-SP001-05
- 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. See the Portable Container Monthly Inspection List provided in Appendix H.

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. Training will be conducted at least annually and provided to each new employee at the time of hire. 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
- Company specific SOPs, if applicable
- General facility operations
- For annual training, topics will also include known discharges or failures, malfunctioning components, and any recently developed precautionary measures

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)]

The Facility must secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.

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

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

Conformance with Chapter 62-762, F.A.C., Aboveground Storage Tank Systems is also applicable since the Facility has an AST with a regulated substance with a capacity greater than 550 gallons. The AST rule was revised in January 11, 2017. The tanks at the Facility are subject to the following State rules, at a minimum:

- 62-762.301 Applicability
- 62-762.401 Facility Registration
- 62-762-411 Notification
- 62-762.421 Financial Responsibility
- 62-762.431 Incidents
- 62-762-441 Discharges
- 62-762.501 Storage Tank System Requirements for Shop Fabricated Storage
- 62-762-601 Release Detection Requirements for Shop Fabricated Storage Tanks
- 62-762-701 Repairs, Operation and Maintenance of Shop Fabricated Storage Tanks
- 62-762.711 Recordkeeping
- 62-762.801 Out-of-Service and Closure Requirements for Shop Fabricated Storage Tanks
- 62-762.901 Storage Tank Forms

A general reminder fact sheet of new requirements is provided in Appendix H. The complete rule can be found at the Florida Department of Environmental Protection website: https://www.flrules.org/gateway/ChapterHome.asp?Chapter=62-762.

30.2 Conformance with Local Requirements

If any local requirements (Miami-Dade County) are applicable and more stringent than the applicable standards from 40 CFR 112, conformance with the local standards is required.

31.0 QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT [112.7(k)]

Oil-filled operational equipment is equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device. An inventory of oil-filled equipment at the Facility with a description of secondary containment is provided in Table 3 in Section 17.4.

32.0 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.

32.1 Facility Drainage [112.8(b)]

32.1.1 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 storm water 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.

32.1.2 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.

32.1.3 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.

32.1.4 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.

32.1.5 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.

32.1.6 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."

32.2 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.

32.2.1 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."

32.2.2 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."

32.2.3 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.

[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 AL, FL, GA and SC"

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."

32.2.4 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."

32.2.5 Drainage of Uncontaminated Rainwater [112.8(c)(3)]

Drainage of uncontaminated rainwater from a diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the Facility treatment system is not

allowed unless the Facility:

- Normally keeps the bypass valve sealed closed.
- Inspects the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b).
- Open the bypass valve and reseal it following drainage under responsible supervision; and

Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.

32.2.6 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. There are no buried metallic storage tanks at the Facility.

32.2.7 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. There are no buried or bunkered metallic tanks at the Facility.

32.2.8 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 is required at the Facility. 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."

32.2.9 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.

31.2.10 Procedures for Tests
Liquid level sensing devices are regularly tested to ensure proper operation. There are no liquid level sensing devices at the Facility.

31.2.11 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. There are no internal heating coils at the Facility.

32.3 Facility Transfer Operations, Pumping, and Facility Process [112.8(d)]

32.3.1 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."

32.3.2 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.

32.3.3 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.

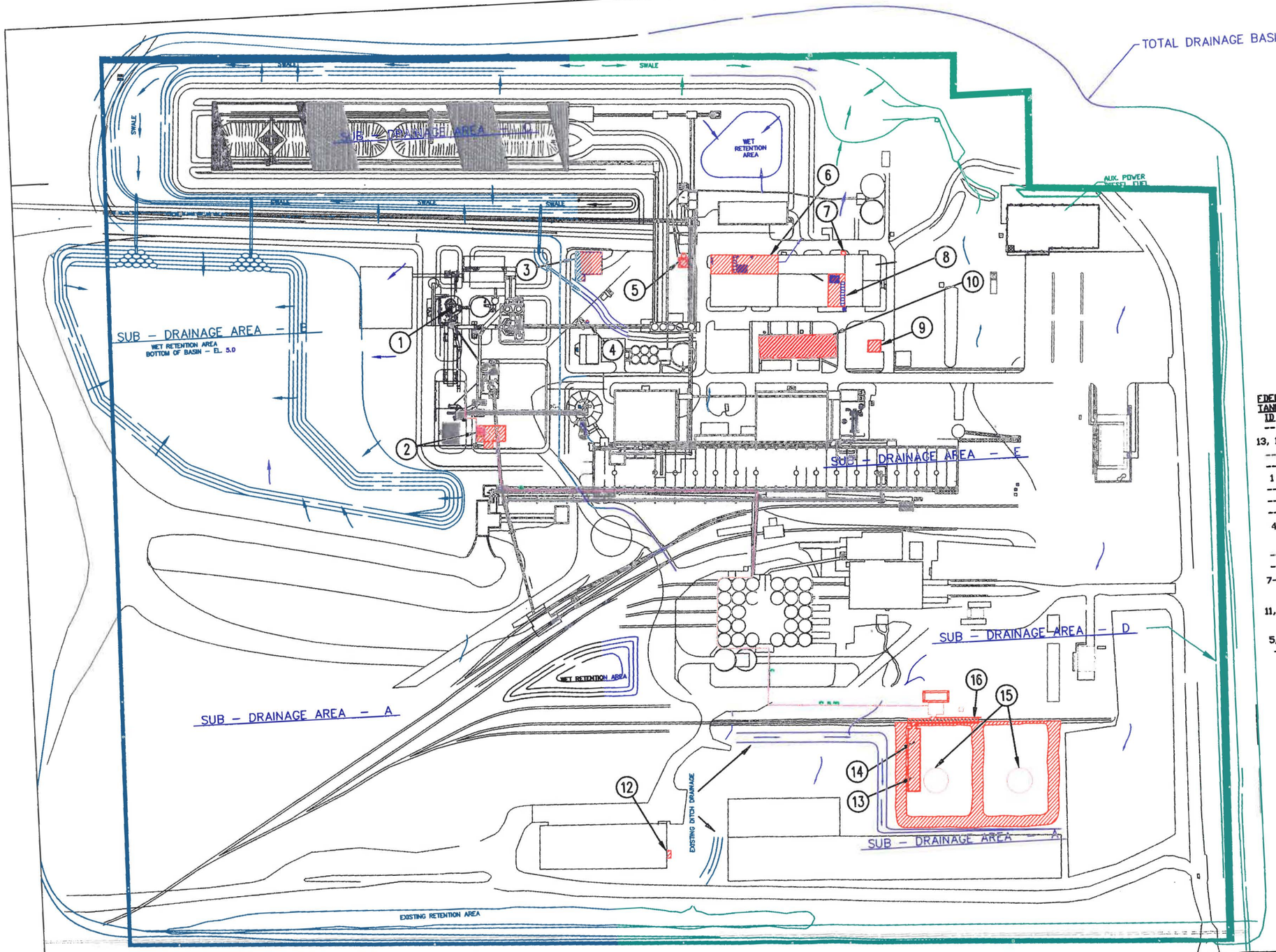
Industry Standards

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."

APPENDIX A

FIGURES



LEGEND

EDEP TANK ID	AREA ID	OIL STORAGE LOCATIONS/VOLUME TYPE
--	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

0 100 200

SCALE: 1" ~ 237.2'

N

SPCC PLAN
APPENDIX A, FIGURE 1- SITE PLAN
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: FACILITYDIAGRAM\SPCCP_VJW_2018_02_05.DWG
PROJECT: 263_17_17

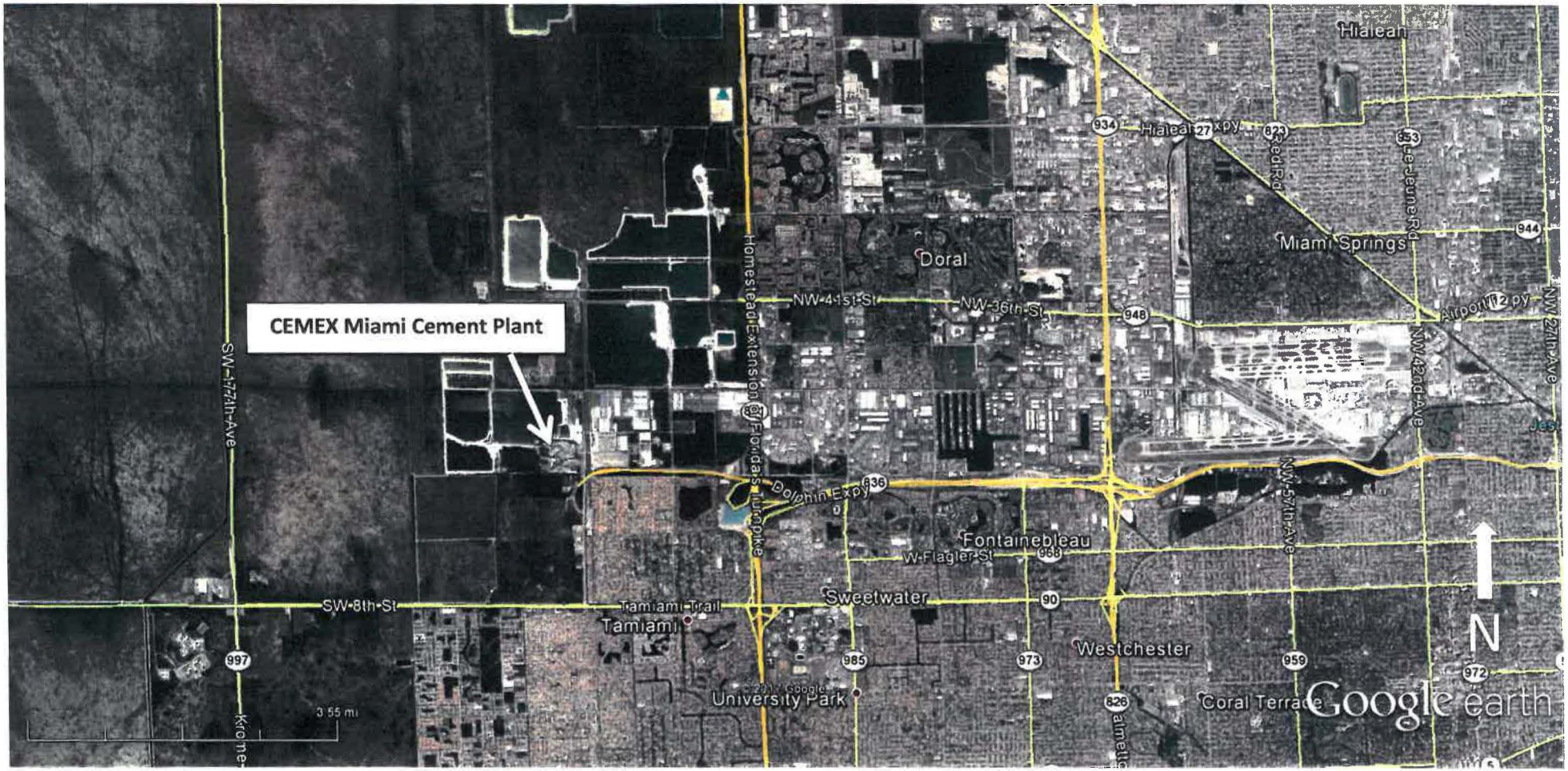
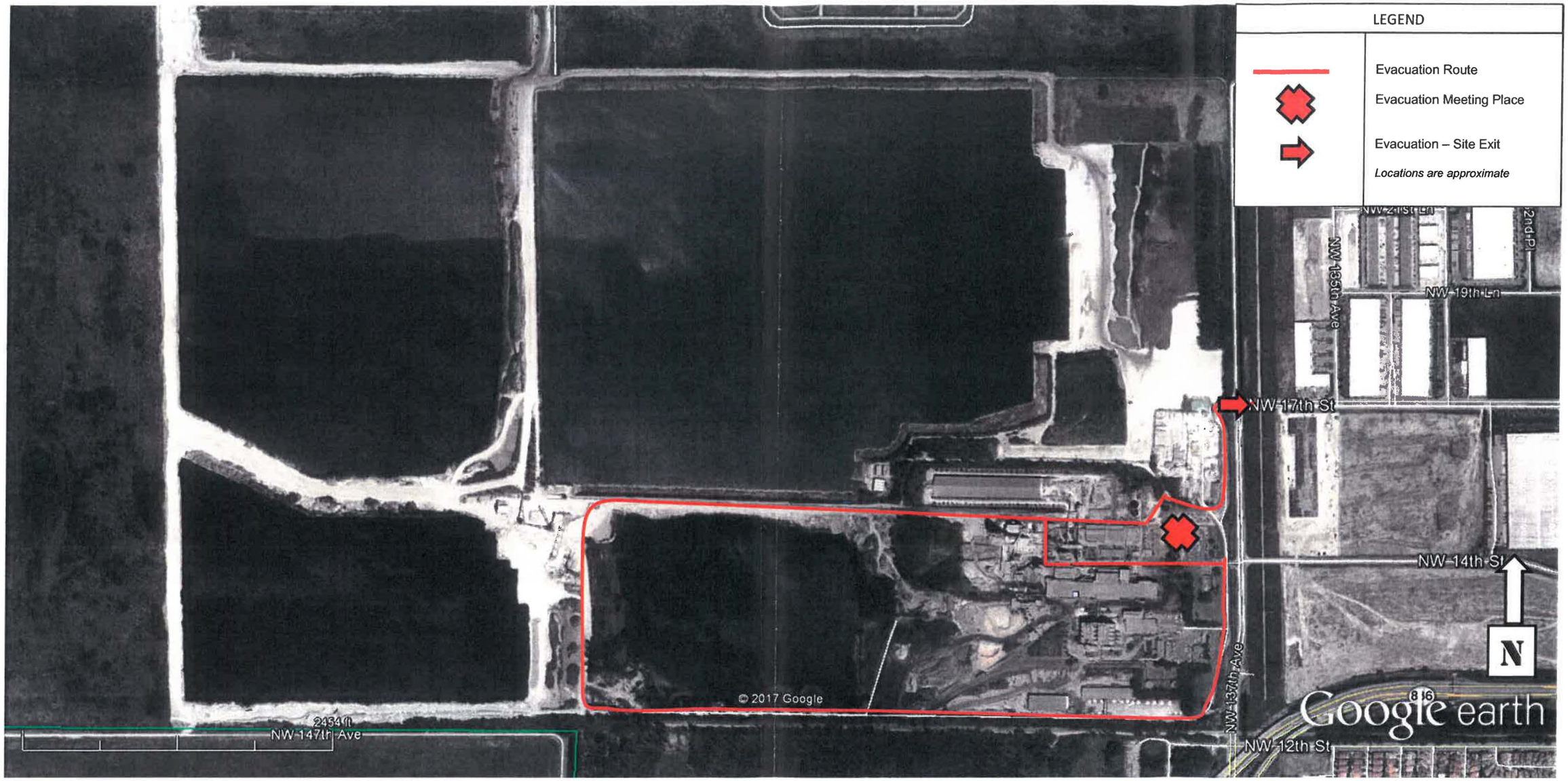


Image Date: 3/21/2017

Figure 2 - Site Location Map
CEMEX Miami Cement Plant
Used Oil Processing Facility
Permit 56307-HO-004
CEMEX Construction Materials Florida, LLC
Miami, Miami Dade County, Florida

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX 377-7158



Scale +/- 1"= 400' *Aerial Images from Google Earth* *Image Date 03/21/2017* Drawing No. 263-17-17	**Figure 3 - EVACUATION ROUTE** **CEMEX Miami Cement Plant** **Used Oil Processing Facility** **Permit 56307-HO-004** **CEMEX Construction Materials Florida, LLC** **Miami, Miami Dade County, Florida**	KOOGLER & ASSOCIATES ENVIRONMENTAL SERVICES 4014 NW THIRTEENTH STREET GAINESVILLE, FLORIDA 32609 352/377-5822 • FAX 377-7158

APPENDIX B

ADDITIONAL APPLICABLE 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.

APPENDIX C

SUBSTANTIAL HARM CRITERIA CHECKLIST

SUBSTANTIAL HARM CRITERIA CHECKLIST [40 CFR 112.20(e)] CERTIFICATION OF THE APPLICABILITY

FACILITY NAME: CEMEX Miami Cement Plant
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: Luis G. Lopez
Title: Plant Manager
Signature:
Date: 03/14/18

APPENDIX D

INTERNAL DISCHARGE NOTIFICATION FORM

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 DERM 305-372-6955		
FL State Watch Office 800-320-0519		
Discharge threatens or enters waters of the state. National Response Center 800-424-8802		

Copy this form as necessary

APPENDIX 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
Maurice R. Hogg **9615 SW 152 Ave** **Miami, FL 33196**	**Facility Emergency Response Coordinator:** Environmental Manager/Plan Coordinator	305-229-2949	786-853-1828	
Luis G Lopez **2398 SW 185 Ave** **Miramar, FL 33029**	**Asst. Facility Emergency Response Coordinator**: Environmental Manager/Plan Coordinator	305-229-2950	786-449-5351	
Roberto Guzman 19421 NW 3 Court Pembroke Pines, FL 33029	Production Manager	305-228-4372	954-680-4475	
Jeff Passerello 15034 SW 51 St. Davie, FL 33331	Quality Control Manager	305-229-2925	305-216-5098	
Anthony Debow 18799 SW 293 Terr. Homestead, FL 33030	Production Coordinator/Yard; On-Scene Process Supervisor at Main Control Room	305-229-2917 or cell 305-484-7557	305-229-2920 *Main Control No. Room is manned 24/7*	

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: **STATE WATCH OFFICE/Emergency Mgmt**	**State**	**800-320-0519**
National Response Center (NRC)	**Federal**	**800-424-8802 (24 hr.) or online http://www.nrc.us.uscg.mil**
U.S. Coast Guard National Response Center	**Federal**	**800-424-8802**
US EPA Region 4	**Federal**	**800-241-1754**
FEMA Region IV	**Federal**	**303-646-2500 (Washington) 770-220-5200 (Atlanta, GA)**
FDEP Southeast District – Office of Emergency Response Release Reporting*	**State**	**561-681-6767 3301 Gun Club Rd, MSC7210-1 West Palm Beach, FL 33406**
FDEP –Emergency Support Report storm related environmental hazards	**State**	**850-921-0223**
Miami-Dade Dept. of Emergency Management and Homeland Security	**Local**	**305-468-5400**
Miami-Dade County Dept. of Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM)	**Local**	**305-372-6955 (24 hr)**
Florida Marine Patrol, Miami	**Local**	**305-795-2145**
Local Emergency Planning Committee District 11	**Local/ Regional**	**305-468-5421 Niel Batista, Bureau Manager niel.batista@miamidade.gov**
CHEMTREC	**Chemical Info**	**800-424-9300**
Cleanup Contractors	**SWS Emergency Response**	**954-957-7271**
	Cliff Berry	**954-763-3391**

***NOTE: New Public Notice of Pollution Reporting Requirements – June 30, 2017**

Section 403.077, Florida Statutes, defines a "reportable release" and requires the reporting of any "release or discharge of a substance from an installation to the air, land, or waters of the state which is discovered by the owner or operator of the installation, which is not authorized by law, and which is reportable to the State Watch Office within the Division of Emergency Management pursuant to any department rule, permit, order, or variance."

- The preferred method for reporting is electronically using the following link: http://dep.state.fl.us/pollutionnotice/.
- Reporting entities may also report via e-mail using the Pollution Notice Form and e-mailing it to pollution.notice@dep.state.fl.us.
- Reporting entities should be aware that, while submission of a notice through the website complies with the requirements of Section 403.077, F.S., it does not relieve them of any obligation to report to the State Watch Office.

Per the statutory requirements, an owner or operator of the installation at which the reportable pollution release occurred must provide to DEP within 24 hours of discovery a notice containing the information reported to the State Watch Office, which may include:

- The name and address of the installation where the reportable pollution release occurred.
- The name and title of the reporting person and the nature of his or her relationship to the installation.
- The identification numbers for any active department permits, variances, registrations, or orders that are relevant to the reportable pollution release.
- The name and telephone number of a contact person for further information
- The substance released.
- The estimated quantity of the substance released and, if applicable, the estimated quantity that has since been recovered.
- The cause of the release.
- The source of the release.
- The location of the release.
- The date, time, and duration of the release.
- The medium into which the substance was released, including, but not limited to, the outdoor air, land, groundwater, aquifer, or specified waters or wetlands.

- Whether the released substance has migrated to land or waters of the state outside the property boundaries of the installation and the location of such migration.
- The owner or operator may also include in the notice any other information he or she wishes in order to assist in the protection of the public health, safety, and welfare.

These reports may be amended if new information becomes available. In addition, after providing notice, an owner or operator determines that a release has migrated outside the property boundaries of the installation, additional notice must be provided to the department within 24 hours after such discovery.

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:

Mayor of Miami Dade County:
Carlos A. Gimenez
Office: 305-375-5071
mayor@miamidade.gov

Chairman:
Jean Monestime
District Office: 305-694-2779
Fax: 305-694-2781

Deputy Mayor Regulatory & Infrastructure/Svc: Economic Res.
Jack Osterholt
Office: 305-375-5695
josterholt@miamidade.gov

Deputy Mayor of Public
Alina T. Hudak, County Manager
Office: 305-375-2531
ATH2@miamidade.gov

Director of Miami Dade Police Dept.
Juan J. Perez
Office: 305-375-5071

Commissioner:
Jose "Pepe" Diaz, District 12
District Office: 305-599-1200

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

Fire Rescue:
David Downey, Fire Chief

Medical Facilities

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

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

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

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

ALL KEY REGULATORY CONTACTS (FEDERAL, STATE AND LOCAL)

EPA Region 4 (Southeast)
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303
404-562-9900
1-800-241-1754; FAX: 404-562-8174

EPA Region IV Contacts
Air - Beverly Banister (Regional Air Toxics Coordinator), 404-562-9077
Stationary Engines – Lee Page, 404-562-9131

EPCRA - Patricia Rubin, 404-562-8986

Water Protection Director – Mary Walker, 404-562-9345

Solid Waste – Florida Compliance Assistance Coordinator, (404) 562-8594

Florida Department of Environmental Protection - Tallahassee, Florida.
2600 Blair Stone Road
Tallahassee, FL 32399-2400; 850-717-9000

FDEP Contacts:
Air – Jeff Koerner Director, 850-717-9091; Jeff.koerner@dep.state.fl.us
David Read, Permitting Section Administrator; 850-717-9075; david.read@dep.state.fl.us
Environmental Compliance Admin - Jessica Dalton, 850-717-9106;
jessica.dalton@dep.state.fl.us

EPCRA - EPCRA/CERCLA Hotline: 800-535-0202

Hazardous Waste Reg. Section – Bryan Baker; 850-245-8787; Bryan.Baker@dep.state.fl.us

Groundwater Mgmt. (watershed) - Rick Hicks, 850-245-8229; richard.w.hicks@dep.state.fl.us
Solid Waste – Joe Ullo, 850-245-8690; Joseph.Ullo@dep.state.fl.us
Bejnar Tor, 850-245-8743; Tor.Bejnar@dep.state.fl.us (South, SE and SW DEP Districts)

Storage Tank Regulation - Bill Burns, 850-245-8842; Bill.Burns@dep.state.fl.us Closure Guidelines / Assessments

Florida Department of Environmental Protection – S.E. District Air Resources Office
Southeast District
3301 Gun Club Road
West Palm Beach, FL 33406

Jennifer Smith, Director

Jason Andreotta, Asst. Director

SE District Air Resource Permitting Environmental Administrator
Rusty Richards, 561-681-6624; Rusty.Richards@dep.state.fl.us

SE District Air Resource Compliance Assurance Program Administrator
Rusty Richards, 561-681-6624; Rusty.Richards@dep.state.fl.us

SE District Water Facilities Permitting Program
Lisa Self, 561-681-6699; lisa.self@dep.state.fl.us

SE District Water Facilities Compliance Assistance Program
Lisa Self, 561-681-6699; lisa.self@dep.state.fl.us

SE District Hazardous Waste Section
Norva Blandin, 561-681-6728.

Industrial Wastewater Section
Lisa Self, 561-681-6699; lisa.self@dep.state.fl.us

SE District Solid Waste Section
Ben Fisch, 561-681-6617; Ben.Fisch@dep.state.fl.us

SE District Storage Tank Section
Judy Dolan, 561-681-6733; Judy.Dolan@dep.state.fl.us

FDEP Bureau of Emergency Response in Southeast Florida
Kenton Brown, 561-681-6767; Kenton.Brown@dep.state.fl.us

Miami-Dade County Environmental Resources Management – Pollution Regulation & Enforcement Division (DERM)
701 NW 1st Court
Miami, FL 33136
305-372-6789

Air Quality Management – Bernardo Bieler PE Chief Air Section, 305-372-6934; bbieler@miamidade.gov

Air Environmental Resource – Rick Garcia, 305-372-6925; Garciam@miamidade.gov

Air Compliance Engineer – Anthony Blaha, 305-372-6925; Antonin.Blaha@miamidade.gov

Air Permitting - Anthony (Tony) Radhay, 305-372-6643; radhaa@miamidade.gov

Solid Waste Inspector - Francisco Teresa-Calleja Inspector, 305-372-6618; CalleF@miamidade.gov

Pollution Regulation Division – Rashid Z. Istambouli P.E., Chief;
Keith McIntosh, Solid Waste Permitting Engineer, 305-372-6600; mcintk@miamidade.gov

Industrial Waste Water Inspector – IWS Inspector, 305-372-6602

Storage Tank – Victor Cabrera, 305-372-6600

Miami-Dade County Office of Emergency Management
Emergency Management Contact:
C. Douglas Bass, Director
9300 NW 41st Street
Miami, FL 33178
Internet Address: http://www.miamidade.gov/fire/emergency-management.asp
eoc@miamidade.gov
Office: 305-468-5400; Fax: 305-468-5401
Answer Center: 3-1-1

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

CHEMTRAC
1-800-424-9300, 24-hour emergency number
(Chemical Transportation Emergency Center)
Connection with manufacturers and/or shippers who will provide advice on handling rescue gear, decontamination considerations, and etc.

ATSDR
1-404-639-0615, 24-hour emergency number
(Agency for Toxic Substances and Disease Registry)
Provides health-related support in hazard materials emergencies including on-site assistance, if necessary.

APPENDIX F

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

IMPLEMENTATION GUIDANCE;

DISCHARGE REPORTING FORM AND INSTRUCTIONS; AND,

INCIDENT NOTIFICATION FORM AND INSTRUCTIONS

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
Office of Emergency Response
West Palm SE
3301 Gun Club Rd MSC 7210-1
West Palm Beach, Florida 33406
Phone: (561) 681-6767

For Reportable Incidents, see the attached Incident Notification form and Instructions.

Copy and fill out forms as necessary. These forms are also available for download at:
https://floridadep.gov/waste/permitting-compliance-assistance/content/storage-tank-system-rules-forms-and-reference

Department of Environmental Protection

2600 Blair Stone Road ♦ Tallahassee, Florida 32399-2400

DEP Form: 62-762.901(1)
Form Title: Discharge Report Form
Effective Date: January 2017
Incorporated in Rule 62-762.411, F.A.C.

DISCHARGE REPORT FORM

Complete all applicable blanks, and submit copies of any analytical or field test results confirming contamination to soils, surface water, or groundwater to the County via email or mail.

Facility ID Number (If Registered):_____ Date of Form Completion:_____ Date of Discovery: _____

Facility Name:_____ County:_____

Facility (Property) Owner:_____ Telephone Number:_____

Owner Mailing Address:_____

Location of Discharge (Facility Street Address):_____ Lat/Long:_____

Date of receipt of any test or analytical results confirming a discharge:_____ Estimated number of gallons discharged:_____

Discharge affected: (Check all that apply)

- ☐ Soil
- ☐ Groundwater
- ☐ Soil water (water body name) _____
- ☐ Drinking water well(s)
- ☐ Shoreline
- ☐ Other (specify) _____

Evidence of discharge: (Check all that apply)

- ☐ Visual observation of sheen
- ☐ Results or receipt of results of analytical tests
- ☐ Stained soils
- ☐ Visual observation of free product
- ☐ Spill or vehicle overfill > 25 gallons to a pervious surface
- ☐ Other (explain in comments)

Method of discovery and confirmation of discharge: (Check all that apply, see rule language explanation on instructions for this form)

- ☐ Visual observation
- ☐ Closure/Closure sampling assessment
- ☐ Surface water analytical results
- ☐ Groundwater analytical results
- ☐ Soil analytical results
- ☐ Other (specify)_____

Type of regulated substance discharged: (Check all that apply)

- ☐ Gasoline
- ☐ Jet fuel
- ☐ Mineral acids (ASTs)
- ☐ Diesel
- ☐ Used/waste oil
- ☐ Ammonia compound ☐ Chlorine compound
- ☐ Heating oil
- ☐ New motor/lube oil
- ☐ Biofuel blends
- ☐ Kerosene
- ☐ Pesticide
- ☐ Unknown
- ☐ Aviation gas
- ☐ Grade 5 & 6 residual oils
- ☐ Other (specify)_____
- ☐ Hazardous substance (USTs) – write name or Chemical Abstract Service (CAS) #:_____

Discharge originated from a: (Check all that apply)

- ☐ Tank
- ☐ Other secondary containment
- ☐ Railroad tankcar
- ☐ Piping
- ☐ Fitting or pipe connection
- ☐ Barge, tanker ship or other vessel
- ☐ Spill bucket
- ☐ Valve
- ☐ Pipeline
- ☐ Dispenser
- ☐ Tank truck
- ☐ Drum
- ☐ Piping sump
- ☐ Vehicle or customer vehicle
- ☐ Unknown
- ☐ Dispenser sump
- ☐ Aircraft
- ☐ Other (specify)_____

Cause of the discharge: (Check all that apply)

- ☐ Spill
- ☐ Material failure (crack, split, etc.)
- ☐ Collision
- ☐ Weather
- ☐ Overfill
- ☐ Material incompatibility
- ☐ Vehicle accident
- ☐ Human error
- ☐ Corrosion
- ☐ Improper installation
- ☐ Fire/explosion
- ☐ Unknown
- ☐ Puncture
- ☐ Loose connection
- ☐ Vandalism
- ☐ Other (specify)_____

Actions taken in response to the discharge:

Comments:

Agencies notified (as applicable):

- ☐ Fire Department
- ☐ County Program_____
- ☐ District Office _____
- ☐ State Watch Office 800-320-0519
- ☐ National Response Center 800-424-8802

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

Discharge Report Form Instructions

Oil spills to navigable waters of the United States, and releases of reportable quantities of CERCLA hazardous substances must be reported immediately to the National Response Center. Reports to the National Response Center of oil spills to navigable waters need not be repeated to any other federal, state, or local agency. Conditions at the site that do not involve spills to navigable waters of the United States, or CERCLA hazardous substances, that pose an immediate threat to human health or the environment must be reported to the State Watch Office or the Local Fire Department. Nevertheless, this form must be submitted for all discharges from facilities with storage tank systems, and sites in accordance with Chapters 62-761, 62-762, and 62-780, F.A.C.

State Watch Office	*National Response Center*	*Local Fire Department*
1-800-320-0519	*1-800-424-8802*	*911*

This form must be used to report any confirmed discharge, or of any one of the following, unless the discharge is from a previously known and reported discharge:

1. Results, or receipts of results, of analytical tests of surface water or groundwater indicating the presence of contamination, in excess of Department Cleanup Target Levels by:
    a. Petroleum products' contaminants of concern listed in Table B as applicable in Chapter 62-780, F.A.C.; or
    b. A regulated substance, other than petroleum products.

2. The presence of free product, a visible sheen, sludge, or emulsion of a regulated substance, or a regulated substance that is visibly observed in soil, on or in surface water, in groundwater samples, on basement floors, in open drainage ditches, in open excavations or trenches, in subsurface utility conduits or vaults, or in sewer lines at the facility;

3. A spill or overfill event of a regulated substance to soil or another pervious surface, equal to or exceeding 25 gallons, unless the regulated substance has a more stringent reporting requirement specified in 40 CFR Part 302, July 2002;

4. Results of analytical tests of soil indicating the presence of contamination, in excess of Department Cleanup Target Levels by:
    a. Petroleum products' contaminants of concern listed in Table B as applicable in Chapter 62-780, F.A.C.;
    b. A regulated substance, other than petroleum products.

According to Rules 62-761.440 and 62-762.441, F.A.C., a copy of this form must be delivered, emailed, or faxed to the County within 24 hours of the discovery of a discharge from a regulated storage tank system, or before the close of the County's next business day. If, however, this discovery is thought to be a previously reported discharge, the owner or operator will have 30 days to investigate and submit supporting documentation or this form. It is recommended that the original copy be sent in the mail. If the discharge occurs at a county-owned facility, the form must be delivered, emailed, or faxed to the local DEP District Office. Also, please remember to properly notify your insurance company of this reported discharge in accordance with the reporting requirements outlined in your insurance policy. This form must be maintained until storage tank system closure.

Department of Environmental Protection

2600 Blair Stone Road ♦ Tallahassee, Florida 32399-2400

DEP Form 62-762.901(6)
Form Title: Incident Notification Form
Effective Date: January 2017
Incorporated in Rule 62-762.411, F.A.C.

Incident Notification Form

Complete all applicable blanks

Facility ID Number (if registered): _____ **Date of Form Completion:** _____

Facility Name: _____ **Date of Discovery of Incident:** _____

Telephone Number: _____ **County:** _____

Facility Owner or Operator: _____

Mailing Address: _____

Location of Incident (facility street address): _____

Monitoring method or activity that indicates an incident: (Check all that apply)

- ☐ Visual Observation
- ☐ Primary integrity test
- ☐ Interstitial integrity test
- ☐ Containment integrity test
- ☐ Electronic sensors, probes or cables
- ☐ Interstitial monitoring
- ☐ Closure integrity evaluation
- ☐ Tracer or helium testing
- ☐ Closure
- ☐ Line leak detectors
- ☐ Automatic tank gauging
- ☐ Other (specify): _____

Type of regulated substance stored in the storage system: (Check all that apply)

- ☐ Gasoline
- ☐ Diesel
- ☐ Heating oil
- ☐ Kerosene
- ☐ Aviation gas
- ☐ Jet fuel
- ☐ Used/waste oil
- ☐ New motor/lube oil
- ☐ Pesticide
- ☐ Grades 5 & 6 residual oils
- ☐ Mineral acid (ASTs)
- ☐ Ammonia compound ☐ Chlorine compound
- ☐ Biofuel blends
- ☐ Unknown
- ☐ Other (specify): _____
- ☐ Hazardous substance (USTs) – write name or Chemical Abstract Service (CAS) #: _____

Incident involves or originated from: (Check all that apply)

A positive response of release detection device:

- ☐ 1. Visual observation
- ☐ 2. Alarm
- ☐ 3. Vacuum or pressure change
- ☐ 4. MLLD restricting flow
- ☐ 5. ELLD/other device shutting power off to pump
- ☐ 6. Liquid>1 inch in out-of-service tank (UST only)

A failed integrity test:

- ☐ 1. Double-walled tank
- ☐ 2. Double-walled piping
- ☐ 3. Containment sump
- ☐ 4. Spill containment system
- ☐ 5. Double bottom AST

Or:

- ☐ 1. Odors in the vicinity
- ☐ 2. Loss > 100 gallons on impervious surface
- ☐ 3. Loss > 500 gallons in AST dike field
- ☐ 4. Unusual operating conditions
- ☐ Other (specify): _____

Cause of the incident, if known: (Check all that apply)

- ☐ Improper installation
- ☐ Material failure (crack, split, etc.)
- ☐ Material incompatibility
- ☐ Faulty probe or sensor
- ☐ Spill/Overfill >100 gallons on impervious surface
- ☐ Spill/Overfill >500 gallons in AST dike field
- ☐ Corrosion
- ☐ Weather
- ☐ Human error
- ☐ Vandalism or theft
- ☐ Unknown
- ☐ Other (specify): _____

Actions taken in response to the incident:

Comments:

Agencies notified (as applicable):

☐ Fire Department ☐ County Program _____ ☐ District Office _____ ☐ State Watch Office 800-320-0519 ☐ National Response Center 800-424-8802

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 and Authorized Representative

Instructions for Completing the Incident Notification Form

This form must be completed to notify the County of the following incidents:

(a) The following positive responses of release detection devices or methods described in Rules 62-761.600, 62-762.601, and 62-762.602, F.A.C.:
   1. Any visual observation of regulated substances in a piping, dispenser, or sump;
   2. Any visual inspection of a storage tank system that reveals uncontrolled pitting corrosion, structural damage, leakage, or other similar problems;
   3. Any alarm that indicates that liquid, vacuum, or pressure monitoring levels are not being maintained, or that liquid has been detected by a sensor in a normally dry interstice or sump;
   4. Any visual observation that indicates that liquid monitoring levels are not being maintained;
   5. Any 50% pressure change from one month to the next, or any change in pressure exceeding 50% of the initial level or of a pressure level that is reestablished at the time of an incident investigation or annual testing of the gauge, and for vacuum systems, any complete loss of vacuum or positive pressure reading;
   6. Any visual inspection that indicates the presence of groundwater or surface water (other than condensate), or regulated substances in the interstice;
   7. Any instance where a mechanical line leak detector is restricting flow;
   8. Any instance where an electronic line leak detector has shut off power to the pump;
   9. Any instance where a monitoring device has shut off the pump; and
   10. Liquid in excess of one inch in an out-of-service storage tank (USTs).

(b) A failed integrity test for the following components:
   1. Double-walled storage tanks;
   2. Double-bottomed field erected storage tanks;
   3. Double-walled integral piping;
   4. Piping sumps;
   5. Dispenser sumps;
   6. Spill containment systems; and
   7. Hydrant sumps.

(c) Other unusual operating conditions, such as the erratic behavior of product dispensing equipment, the sudden loss of product from a storage tank system, or any unexplained presence of groundwater or surface water in a tank or an interstitial space;

(d) The presence of odors of a regulated substance from surface water or groundwater, soil, basements, sewers and utility lines at a facility or in the surrounding area from which it could be reasonably concluded that a release or discharge may have occurred;

(e) The loss of a regulated substance exceeding 500 gallons inside a dike field area with secondary containment (ASTs);

(f) The loss of a regulated substance from a storage tank system exceeding 100 gallons on impervious surfaces, other than secondary containment, such as driveways, airport runways, or other similar asphalt or concrete surfaces, provided that the loss does not come in contact with pervious surfaces; and

(g) A failed Closure Integrity Evaluation.

A copy of this form must be delivered, emailed, or faxed to the County within 72 hours of the discovery of an incident or before the close of the next business day. It is recommended that the original copy be sent in the mail. If the incident occurs at a county-owned facility, the form must be delivered, emailed, or faxed to the local DEP District Office. *However, if the investigation of the incident concludes within 72 hours of the discovery of the incident that a*

discharge did not occur (for example, the investigation shows that the situation was the result of a malfunctioning electronic release detection sensor); this form is not required to be submitted to the County.

An investigation shall be completed within 14 days of the date of discovery of the incident to determine if a discharge has occurred. Incident investigations that require additional time can be extended with the written approval of the Department or the County. However, if the investigation goes beyond 45 days of the date of discovery, the storage tank system shall be placed out-of-service until such time the investigation is completed and resolved.

Also, please remember to properly notify your insurance company of the incident in accordance with any reporting requirements outlined in your insurance policy.

This form, including test results and reports which support the investigation findings, must be maintained until storage tank system closure.

APPENDIX G

EPA OIL DISCHARGE REPORTING REQUIREMENTS

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

APPENDIX H

EPA BULK STORAGE CONTAINER INSPECTION FACT SHEET

AND REMINDER FACT SHEET OF NEW STATE AST REGULATIONS

AND

INSPECTION WORKSHEETS

United States Environmental Protection Agency

Office of Emergency Management

August 2013
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.

Implementing an inspection program based on a particular industry standard is ultimately 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

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.

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.

More information on industry standards:

API Standard 653 (API-653)–Tank Inspection, Repair, Alteration, and Reconstruction

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 (STI SP001)–Standard for the Inspection of Aboveground Storage Tanks

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/

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 should schedule integrity testing in accordance with industry standards as soon as possible and in accordance with both good engineering practice and the judgment of the certifying PE. Because the SPCC Plan must be reviewed at the facility every five years in accordance with §112.5(b), you should consider to begin collecting inspection data during the next five year period. As an example, a facility owner/operator is scheduling upcoming inspections for bulk storage containers at a facility he recently purchased. The owner/operator has no records of inspections or information on the in-service date (i.e. original construction date) for a 10,000-gallon aboveground storage container at the facility. The SPCC Plan was last amended on November 10, 2011. Therefore, in order to establish a baseline for the 10,000-gallon AST, the facility owner schedules the first (baseline) container inspection or integrity test 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 described an example that may be environmentally equivalent to the integrity testing requirements of the SPCC rule at that time. The example indicated 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 was 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 example was established at a time when the rule specifically required that integrity testing include more than just a visual inspection. While the 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

[1] *SPCC Guidance for Regional Inspectors*, November 28, 2005. The guidance was updated August 28, 2013 http://www.epa.gov/emergencies/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.

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 without having to certify the measures described in the PMAA letter as an environmentally equivalent method of integrity testing.

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. Furthermore, the Plan must provide the reason for the deviation, describe the alternative approach (e.g. a site-specific or "hybrid" inspection program), and explain how it achieves environmental protection equivalent to the applicable industry standard.[3]

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.

Can I use a site-specific (hybrid) inspection program instead of an industry standard?

Yes. Although the rule requires that you consider industry standards when developing an inspection program, you can incorporate an environmentally equivalent inspection program when you and the certifying PE decide that another inspection 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 (i.e., hybrid) 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.

If you are the owner or operator of a Tier II qualified facility and you choose to develop an alternative inspection program rather than follow an applicable industry standard, then you must have a PE certify the environmentally equivalent measures as described in §112.6(b)(4). You cannot deviate from applicable industry standards if you are the owner or operator of a Tier I qualified facility when following the requirements for Tier I qualified facilities in §112.6(a).[3]

Can I use a site-specific (hybrid) inspection program to 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.

Your Plan should describe what industry standard applies, how the site-specific (hybrid) inspection program deviates from the applicable industry standard, and how the inspection program meets the minimal recommended elements of a hybrid inspection program.

[3] For more information on how to document an inspection program in your SPCC Plan see *Section 7.6.2* of the *SPCC Guidance for Regional Inspectors* at http://www.epa.gov/emergencies/content/spcc/spcc_guidance.htm.

If you are the owner or operator of a Tier II qualified facility and you choose to deviate from a portion of an applicable industry standard, then you must have a PE certify the environmentally equivalent measures as described in §112.6(b)(4). You cannot deviate from applicable industry standards if you are the owner or operator of a Tier I qualified facility when following the requirements for Tier I qualified facilities in §112.6(a).[4]

Can I use a site-specific (hybrid) inspection program if no industry standard applies to my container?

Yes. However, it is likely that at least one industry standard will apply in most circumstances. Two commonly used steel tank inspection standards are STI SP001 and API 653. The scope of these two standards addresses many of the steel storage tanks in service at SPCC-regulated facilities and it is likely that one of these inspection standards can be applied.

If in the judgement of a PE or qualified facility owner/operator, no industry standard applies to a particular container, 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.

Tip
Although existing industry standards are not specific to integrity testing of AFVO bulk storage containers or tanks operated at elevated temperatures (e.g. asphalt), facilities with these storage containers can follow API Standard 653, "Tank Inspection, Repair, Alteration, and Reconstruction" because the scope is written broadly to include any steel tank constructed in accordance with a tank specification.

A customized, site-specific (i.e., hybrid) inspection program should be based on relevant industry standards (in whole or in part) and other good engineering principles. The hybrid inspection program should be designed to measure the structural soundness of a container shell, bottom, and/or floor to contain oil, and may include leak testing to determine whether the container will discharge oil. API 653 and STI SP001 provide the foundation for integrity testing and inspecting containers, and in many cases it may still be appropriate to consider these standards when developing a hybrid inspection program.

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, 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. These records can be helpful to inform changes in the inspection program.[4]

It is unlikely that qualified facility owner/operators will have bulk storage containers for which no industry standard applies. However, if you are the owner or operator of a qualified facility and you determine that no industry standard applies, then you should follow the procedures described above to develop an inspection program for bulk storage containers. No environmental equivalence determination is necessary in this case and a PE does not need to certify the hybrid inspection program; however, you should consider consulting with a tank inspection professional or a PE. You should also clearly explain why current industry standards do not apply and how the hybrid inspection program meets the minimal recommended elements described below.

What are some recommended elements for a site-specific integrity inspection and/or testing program (hybrid inspection program)?

[4] For more information on how to document an inspection program in your SPCC Plan see *Section 7.6.2* of the *SPCC Guidance for Regional Inspectors* at http://www.epa.gov/emergencies/content/spcc/spcc_guidance.htm.

The hybrid program should be designed to measure the structural soundness of a container shell, bottom, and/or floor to contain oil, and may include leak testing to determine whether the container will discharge oil. 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. Alternatively, the PE can recommend an inspection program following a specific standard, even when the standard does not specifically identify the container in its scope, if he believes that the inspection elements of that standard are appropriate for the container(s) at the facility and in accordance with good engineering practices.

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.

For more information on how to document an inspection program in your SPCC Plan see *Section 7.6.2* of the *SPCC Guidance for Regional Inspectors at* http://www.epa.gov/emergencies/content/spcc/spcc_guidance.htm.

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.

A facility owner/operator with AFVO bulk storage containers may follow an applicable industry standard, such as API 653, to conduct inspections in accordance with the requirements of §112.12(c)(6)(i), follow the requirements of §112.12(c)(6)(ii) (if applicable), or provide an environmentally equivalent measure in the SPCC Plan in accordance with §112.7(a)(2) of the SPCC rule. If a hybrid inspection program is used to meet the integrity testing requirements in §112.12(c)(6), the Plan must state the reasons for nonconformance and explain how the hybrid inspection program provides equivalent environmental protection. The Plan should also address how the program effectively minimizes the risk of container failure and allows detection of leaks before they become significant.

A PE must review and certify the environmental equivalence determination. If a PE develops a hybrid inspection program for a facility, rather than uses an applicable industry standard, then the PE must describe why the hybrid inspection program does not follow the applicable industry consensus standard and how the hybrid inspection program is environmentally equivalent to the industry standard and meets the minimal recommended elements for a hybrid inspection program (described above).

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.

Leak testing is often referred to as "tank tightness testing." Tank tightness tests include a wide variety of methods. Other terms used for these methods include "precision," "volumetric," and "nonvolumetric" testing. The features of tank tightness testing vary by method, as described in EPA Guidance on meeting UST system requirements:

§§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.

- Many tightness test methods are "volumetric" methods in which the change in product level in a tank over several hours is measured very precisely (in milliliters or thousandths of an inch).
- Other methods use acoustics or tracer chemicals to determine the presence of a hole in the tank. *With such methods, all of the factors in the following bullets may not apply.*
- For most methods, changes in product temperature also must be measured very precisely (thousandths of a degree) at the same time as level measurements, because temperature changes cause volume changes that interfere with finding a leak.
- For most methods, a net decrease in product volume (subtracting out volume changes caused by temperature) over the time of the test indicates a leak.
- The testing equipment is temporarily installed in the tank, usually through the fill pipe.
- The tank must be taken out of service for the test, generally for several hours, depending on the method.
- Many test methods require that the product in the tank be a certain level before testing, which often requires adding product from another tank on-site or purchasing additional product.
- Some tightness test methods require all of the measurements and calculations to be made by hand by the tester.
- Other tightness test methods are highly automated. After the tester sets up the equipment, a computer controls the measurements and analysis.
- A few methods measure properties of the product that are independent of temperature, such as the mass of the product, and so do not need to measure product temperature.
- Some automatic tank gauging systems are capable of meeting the regulatory requirements for tank tightness testing and can be considered as an equivalent method.

Describe the method and schedule for testing your completely buried tanks in the SPCC Plan. For more information on tank tightness testing, see: http://www.epa.gov/oust/ustsystm/inventor.htm. For more information on preventing and detecting underground storage tank system leaks see http://epa.gov/oust/prevleak.htm.

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), 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

§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)

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.

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.

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:

For More Information

Review the Oil Pollution Prevention regulation (40 CFR part 112):
http://www.gpoaccess.gov/cfr/

SPCC Guidance for Regional Inspectors
http://www.epa.gov/emergencies/content/spcc/spcc_guidance.htm

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

General Reminders for Regulated AST Owners/Operators

Registration Fees - Placard

Storage tank registration fees are due to the Department each year by July 1. Ensure that your contact information is up-to-date with the Department in order to receive updates concerning your annual registration fees. Once fees are paid, you must print a copy of your placard from the Department's website: http://www.fldepportal.com/go/submit-registration/. In general, you are not legally allowed to receive motor fuel without a valid placard on display at your facility.

Financial Responsibility

If your ASTs store petroleum or petroleum products, you are required to demonstrate and maintain financial responsibility (FR), such as insurance, for pollution liability. FR must be maintained until your ASTs have been properly closed and your Closure Report/Limited Closure Report Form has been submitted to and approved by the Department.

Release Detection - Visual Inspections

You are required to visually inspect your storage tank system components every month (not to exceed every 35 days) and document your findings. Your findings must be maintained for 3 years and made available for inspection by the Department or contracted county. A monthly visual inspection is not required for any component that uses an electronic release detection method; however piping and dispenser sumps that use electronic devices must also be visually inspected every 6 months and records kept for 3 years.

Release Detection - Electronic Devices

Electronic release detection devices shall be inspected for proper operation every month (not to exceed every 35 days). A record or summary of the alarm history, sensor status and testing results shall be printed from the device and kept for 3 years. If the device does not have print capability, then a manual log must be maintained.

Release Detection - Line Leak Detectors & Valves

As of January 11, 2017, (*the effective date of the Department's updated Aboveground Storage Tank Systems rule*) line leak detectors are required for new storage tank systems with pressurized small diameter piping in contact with the soil; and anti-siphon valves as well as isolation block valves are required in instances where the tank places a gravity head on the small diameter piping positioned below the product level in the tank. For storage tank systems installed prior to the effective date of the new rule, line leak detectors, anti-siphon valves, and isolation block valves are required by January 11, 2018.

Annual Operability Testing - Release Detection Devices & Overfill Protection Equipment

All release detection devices and overfill protection equipment must be tested for operability annually at intervals not exceeding 12 months to ensure proper operation. Initial operability testing for overfill protection devices shall be conducted by January 11, 2018.

Periodic Integrity Testing

Periodic testing of storage tank system components shall occur according to the following schedule:

a. Below grade spill containment and hydrant sumps - by January 11, 2018, and every 3 years thereafter;
b. Below grade piping and dispenser sumps - by October 13, 2018, and every 3 years thereafter.

Incident Response

An incident is a condition or situation indicating that a release or discharge may have occurred. Incident investigations must be initiated within 24 hours, and if the investigation does not confirm within 72 hours of discovery that a discharge did not occur, then the incident must be reported to the contracted county. All positive responses of release detection devices (such as alarms) must be investigated and a determination made as to whether a discharge occurred. Records of all incidents must be maintained along with the incident investigation findings for inspection by the Department or contracted county.

Repairs, Operation and Maintenance

Storage tank system equipment shall be maintained in sound operational condition to reduce the likelihood of releases and incidents. Corrosion to metal components must be minimized by periodic maintenance. Water in excess of one inch in depth or any regulated substances collected in secondary containment shall be removed within 72 hours of discovery and properly disposed.

Closure Integrity Evaluations

A closure integrity evaluation must be conducted no more than 45 days prior to closure of double-walled ASTs, double-bottomed field erected ASTS, double-walled integral piping, piping sumps, dispenser sumps, hydrant sumps, and spill containment systems that are in contact with the soil to determine whether closure sampling is required. In all cases, when closing these components, a Closure Report or Limited Closure Report, dependent on the situation, must be submitted within 60 days.

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Retain Until Date: _____ (36 months from inspection date)

Prior Inspection Date: _____ Inspector Name: _____

Tanks Inspected (ID #'s): _____

Inspection Guidance:

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- (*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- **In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

Item	Task	Status	Comments
1.0 Tank Containment			
1.1 Containment structure	Check for water, debris, cracks or fire hazard	□Yes* □No □N/A	
1.2 Primary tank	Check for water	□Yes* □No	
1.3 Containment drain valves	Operable and in a closed position	□Yes □No* □N/A	
1.4 Pathways and entry	Clear and gates/doors operable	□Yes □No* □N/A	
2.0 Leak Detection			
2.1 Tank	Visible signs of leakage	□Yes* □No	
2.2 Secondary Containment	Visible signs of leakage from tank into secondary containment	□Yes* □No	
2.3 Surrounding soil	Visible signs of leakage	□Yes* □No □N/A	
2.4 Interstice	Visible signs of leakage	□Yes* □No □N/A	

Item	Task	Status	Comments
3.0 Tank Equipment			
3.1 Valves	a. Check for leaks.	☐Yes* ☐No ☐N/A	
	b. Tank drain valves must be kept locked.	☐Yes* ☐No ☐N/A	
3.2 Spill containment boxes on fill pipe	a. Inspect for debris, residue, and water in the box and remove.	☐Yes* ☐No ☐N/A	
	b. Drain valves must be operable and closed.	☐Yes* ☐No ☐N/A	
3.3 Liquid level equipment	a. Both visual and mechanical devices must be inspected for physical damage.	☐Yes ☐No* ☐N/A	
	b. Check that the device is easily readable	☐Yes ☐No* ☐N/A	
3.4 Overfill equipment	a. If equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery powered. Replace the battery if needed	☐Yes ☐No* ☐N/A	
	b. If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	☐Yes ☐No* ☐N/A	
3.5 Piping connections	Check for leaks, corrosion and damage	☐Yes* ☐No	
4.0 Tank Attachments and Appurtenances			
4.1 Ladder and platform structure	Secure with no sign of severe corrosion or damage?	☐Yes ☐No* ☐N/A	
5.0 Other Conditions			
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site spill prevention plan?		☐Yes* ☐No	

Additional Comments:

STI SP001 Portable Container Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Retain Until Date: _____ (36 months from inspection date)

Prior Inspection Date: _____ Inspector Name: _____

Containers Inspected (ID #'s): _____

Inspection Guidance:

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- (*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.

Item	Area: _____		Area: _____		Area: _____		Area: _____	
1.0 AST Containment/Storage Area								
1.1 ASTs within designated storage area?	☐Yes	☐No*	☐Yes	☐No*	☐Yes	☐No*	☐Yes	☐No*
1.2 Debris, spills, or other fire hazards in containment or storage area?	☐Yes*	☐No	☐Yes*	☐No	☐Yes*	☐No	☐Yes*	☐No
1.3 Water in outdoor secondary containment?	☐Yes*	☐No	☐Yes*	☐No	☐Yes*	☐No	☐Yes*	☐No
1.4 Drain valves operable and in a closed position?	☐Yes	☐No*	☐Yes*	☐No	☐Yes*	☐No	☐Yes*	☐No
1.5 Egress pathways clear and gates/doors operable?	☐Yes	☐No*	☐Yes*	☐No	☐Yes*	☐No	☐Yes*	☐No

Item	Area: _____	Area: _____	Area: _____	Area: _____
2.0 Leak Detection				
2.1 Visible signs of leakage around the container or storage area?	☐Yes* ☐No	☐Yes* ☐No	☐Yes* ☐No	☐Yes* ☐No
3.0 Container				
3.0 Noticeable container distortions, buckling, denting or bulging?	☐Yes* ☐No	☐Yes* ☐No	☐Yes* ☐No	☐Yes* ☐No

Comments:

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date: _____ Retain Until Date: _____ (36 months from inspection date)

Prior Inspection Date: _____ Inspector Name: _____

Tanks Inspected (ID #'s): _____

Inspection Guidance:

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- (*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

Item	Task	Status	Comments
1.0 Tank Containment			
1.1 Containment structure	Check for: • Holes or cracks in containment wall or floor • Washout • Liner degradation • Corrosion • Leakage • Paint failure • Tank settling	☐Yes* ☐No ☐N/A	
2.0 Tank Foundation and Supports			
2.1 Foundation	Settlement or foundation washout?	☐Yes* ☐No	
2.2 Concrete pad or ring wall	Cracking or spalling?	☐Yes* ☐No ☐N/A	

Item	Task	Status	Comments
2.3 Supports	Check for corrosion, paint failure, etc.	□Yes* □No □N/A	
2.4 Water drainage	Water drains away from tank?	□Yes □No* □N/A	
2.5 Tank grounding	Strap secured and in good condition?	□Yes □No* □N/A	
3.0 Cathodic Protection			
3.1 Gavlvanic cathodic protection system	Confirm system is functional, includes the wire connections for galvanic systems	□Yes □No* □N/A	
3.2 Impressed current system	a. Inspect the operational components (power switch, meters, and alarms).	□Yes □No* □N/A	
	b. Record hour meter, ammeter and voltmeter readings.	□Yes □No* □N/A	
4.0 Tank Shell, Heads, Roof			
4.1 Coating	Check for coating failure	□Yes* □No	
4.2 Steel condition	Check for: • Dents • Buckling • Bulging • Corrosion • Cracking	□Yes* □No	
4.3 Roof slope	Check for low points and standing water	□Yes* □No □N/A	
5.0 Tank Equipment			
5.1 Vents	Verify that components are moving freely and vent passageways are not obstructed for: • Emergency vent covers • Pressure/vacuum vent poppets • Other moving vent components	□Yes* □No	

Item	Task	Status	Comments
5.2 Valves	Check the condition of all valves for leaks, corrosion and damage.	□Yes* □No	
5.2.1 Anti-siphon, check and gate valves	Cycle the valve open and closed and check for proper operation.	□Yes □No* □N/A	
5.2.2 Pressure regulator valve	Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only)	□Yes □No* □N/A	
5.2.3 Expansion relief valve	Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)	□Yes □No* □N/A	
5.2.4 Solenoid valves	Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)	□Yes □No* □N/A	
5.2.5 Fire and shear valves	a. Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely.	□Yes □No* □N/A	
	b. Valves must not be wired in open position.	□Yes □No* □N/A	

Item	Task	Status	Comments
	c. Make sure fusible element is in place and correctly positioned.	□Yes □No* □N/A	
	d. Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.	□Yes □No* □N/A	
5.3 Interstitial leak detection equipment	Check condition of equipment, including: • The window is clean and clear in sight leak gauges. • The wire connections of electronic gauges for tightness and corrosion • Activate the test button, if applicable.	□Yes □No* □N/A	
5.4 Spill containment boxes on fill pipe	a. If corrosion, damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit.	□Yes* □No □N/A	
	b. Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary.	□Yes* □No □N/A	
	c. Drain valves must be operable and closed	□Yes* □No □N/A	
5.5 Strainer	a. Check that the strainer is clean and in good condition.	□Yes □No* □N/A	

Item	Task	Status	Comments
5.5 Strainer	b. Access strainer basket and check cap and gasket seal as well as bolts.	□Yes □No* □N/A	
5.6 Filter	a. Check that the filter is in good condition and is within the manufacturer's expected service life. Replace, if necessary.	□Yes □No* □N/A	
	b. Check for leaks and decreased fuel flow	□Yes □No* □N/A	
5.7 Flame arrestors	Follow manufacturer's instructions. Check for corrosion and blockage of air passages.	□Yes* □ No □N/A	
5.8 Leak detector for submersible pump systems	Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.	□Yes □No* □N/A	
5.9 Liquid level equipment	a. Has equipment been tested to ensure proper operation?	□Yes □No* □N/A	
	b. Does equipment operate as required?	□Yes □No* □N/A	
	c. Follow manufacturer's instructions	□Yes □No* □N/A	
5.10 Overfill equipment	a. Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification.	□Yes □No* □N/A	
	b. Confirm device is suited for above ground use by the manufacturer	□Yes □No* □N/A	

Item	Task	Status	Comments
6.0 Insulated Tanks			
6.1 Insulation	Check condition of insulation for: • Missing sections • Areas of moisture • Mold • Damage	□Yes* □ No □N/A	
6.2 Insulation cover or jacket	Check for damage that will allow water intrusion	□Yes* No □N/A	
7.0 Miscellaneous			
7.1 Electrical wiring and boxes	Are they in good condition?	□Yes □No* □N/A	
7.2 Labels and tags	Ensure that all labels and tags are intact and readable.	□Yes □No* □N/A	

Additional Comments:

APPENDIX I

ANNUAL EMPLOYEE TRAINING

ANNUAL EMPLOYEE SPCC TRAINING (Attach additional forms as necessary) Page 1 of _

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)**

CEMEX MIAMI CEMENT PLANT

(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

APPENDIX J

INTEGRITY TESTING PLAN AND PROCEDURES

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. 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).*

AST – Integrity Testing Schedule and Requirements

CEMEX Miami Cement Plant

Active Tanks <5,001 gallons 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
1/5	Fueling Station	Vehicular Diesel	20,000	Dbl wall/Concrete containment	Monthly Visual Inspection and Formal External Inspection by Certified Inspector	Every **20** years	1/10/2018	1/2038
5 & 6/15	Bulk Storage	Used Oil	2 – 633,000*	Earthen berm, dbl bottom, concrete base, leak detection system	Monthly Visual Inspection and Formal External Inspection by Certified Inspector and Formal Internal Inspection by Certified Inspector	Formal Internal Inspections: No 5 – West July 16, 2015 No. 6 – East July 18, 201s	No 5 – West July 16, 2015 No. 6 – East July 18, 2016	External – 2020 & 2021 2025 & 2026
13/2	Kiln Day Tank	Used Oil	30,000	Concrete containment w/roof	Monthly Visual Inspection and Formal External Inspection by Certified Inspector	Every **20** years	N/A (Tank installed 2000)	2020
15/2	Kiln Area	Vehicular Diesel	12,000	Dbl walled, concrete containment	Monthly Visual Inspection and Formal External Inspection by Certified Inspector	Every **20** years	N/A (Tank installed 2016)	2036

** At the time this ICP/SPCC was updated (12/2017) Tank 6 was empty, but still in active status.*

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 earthen 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 reviewed and updated if there are changes to registered tanks at the facility.*
3. *Refer to latest STI SP001 and API 653 for full regulations.*
4. *Maintain testing records for life of container.*
5. *This Scheduled is based on tank installation dates as per the FDEP registration and plant data, and an assumption that the tanks were new at the time of installation.*