

## Blandin, Norva

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**From:** Blandin, Norva  
**Sent:** Thursday, May 2, 2019 11:16 AM  
**To:** Maria T Rodriguez; mauricer.hogg@cemex.com  
**Cc:** Lancellotti, Romina; Stark, Justin  
**Subject:** FDEP Compliance Evaluation Inspection- Exit Interview- CEMEX Miami EPA ID FLD981758485

Good morning Maria:

Based on the inspection conducted on April 25, 2019 the facility appeared to be out of compliance with RCRA and used oil regulations during the time of inspection.

The following noncompliance items were observed during the inspection:

- ✓ 40 CFR 279.54(d)(2) - Inadequate secondary containment condition - the inspectors observed that the secondary containment of 30,000 gallon tank of used oil is not free of debris or materials. It was observed that ¼ of the secondary containment was full of dust or material which compromise the 110% capacity of the secondary containment. Please provide a photo of secondary containment properly clean and free of debris.
- ✓ 40 CFR 262.15 - Satellite container of 5 gallon hazardous waste was observed open during the inspection – violation was corrected during the time of inspection.
- ✓ 62-710.401(6), F.A.C - Used oil labeling – The inspectors observed one- oil drain pan for used oil filters – that collects used oil of approximately 25 gallon that was unlabeled. The inspectors provided a label and it was corrected at the time of inspection.

Also, please provide the following documentation for the Department review:

- ✓ SPCC/Contingency Plan and notification letters to the authorities
- ✓ Closure Report for the 30,000 gallon tank that was removed
- ✓ Last employee training in used oil and hazardous waste management
- ✓ Closure Plan
- ✓ Facility inspection logs (daily or monthly)
- ✓ Copy of the last manifest for HW

This is your exit interview for your records. Please provide a response and evidence of your corrective action within 15 calendar days.

Best regards,



**Norva Blandin, MSEM**

**Environmental Manager**

**Compliance Assurance Program (CAP)**

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