

Blandin, Norva

From: Maurice R Hogg <mauricer.hogg@cemex.com>
Sent: Wednesday, June 5, 2019 2:04 PM
To: Blandin, Norva
Cc: Lancellotti, Romina; Stark, Justin; Maria T Rodriguez; Kothur, Bheem; George Foster
Subject: RE: Request of Additional Information --CEMEX Miami EPA ID FLD981758485

Tank ID No. 4 (Legend ID no. 9 in the image) held used oil, not diesel fuel.



M. Roger Hogg, P.E.

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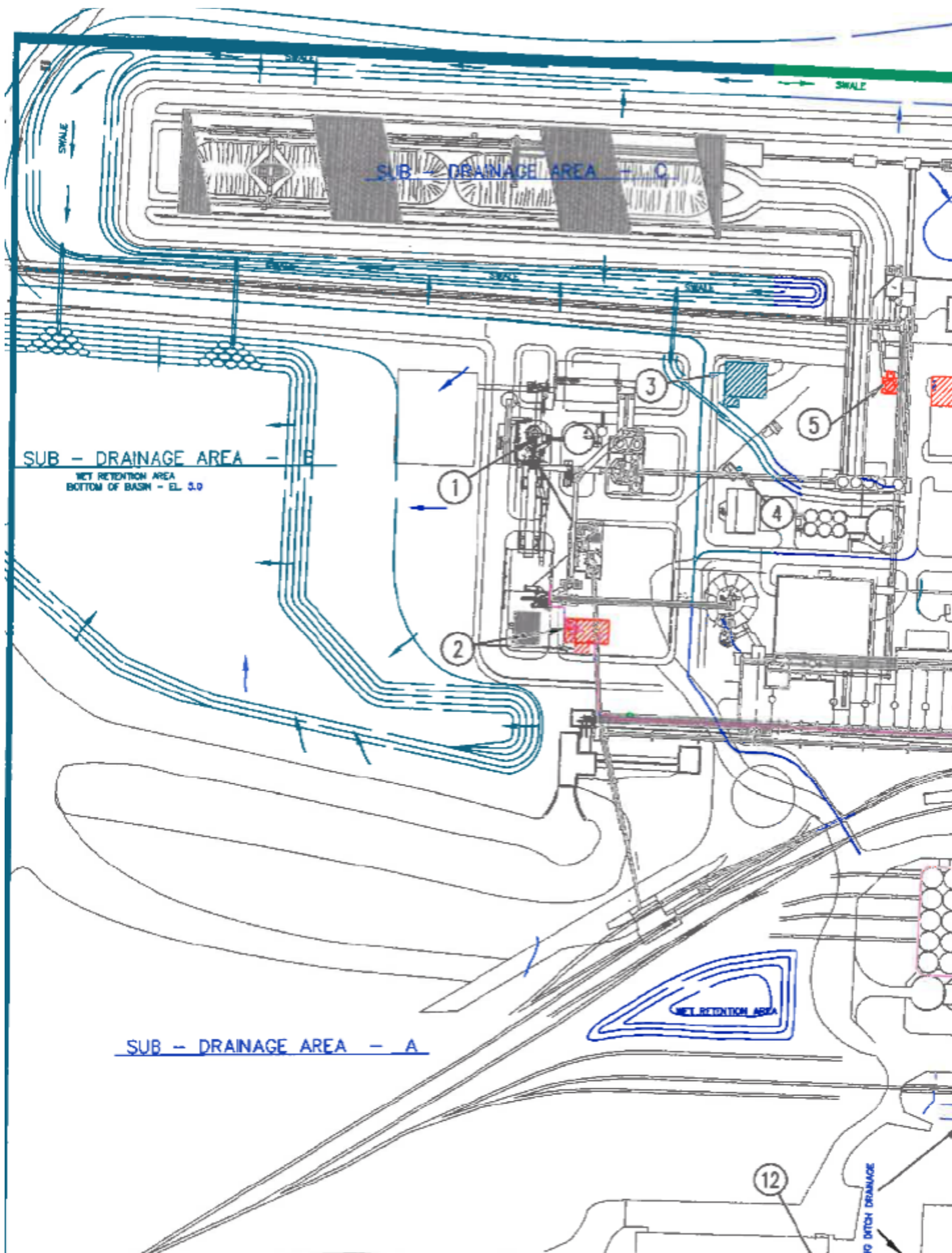
From: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>
Sent: Wednesday, June 5, 2019 13:44
To: Maurice R Hogg <mauricer.hogg@cemex.com>
Cc: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Stark, Justin <Justin.Stark@FloridaDEP.gov>; Maria T Rodriguez <mariat.rodriguez@cemex.com>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; George Foster <gfoster@creativeenvironmental.com>
Subject: RE: Request of Additional Information --CEMEX Miami EPA ID FLD981758485

Maurice,

After further review of the permit with Bheem Kothur, Tank ID No. 4 it was designated to hold Vehicular Diesel Product. **Can you clarify if indeed the removal was for this tank described in the Attachment B of the Permit? If so, I just want to confirm if the content removed was used oil or diesel fuel?**

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

Tank ID	Legend ID	Description	Product	Capacity (gallons)	Year Installed	Safety Features	Containment and 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
4	9	Old Kiln Day Tank	Vehicular Diesel	30,000	1958	Level gauges/alarm	Out of service - clean removed. To be removed
5, 6	15	Bulk Storage	Used Oil	2 - 633,000	1958	Level gauges/alarms	Field Erected Tanks For kiln - surrounded by dike, double bottom
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 – 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	Double walled – concrete
--	12	Used for prior Soil Treatment Plant	Oily Water	2,000	1987	Level gauge	Empty/Inactive Concrete containment
--	3	Oil Storage Bldg. Tank	Used Oil	1,000	1984	Level gauge	Concrete barrier, underground
--	4	Emergency Fire Pump	Diesel	150	1958	Level gauge	Concrete containment
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 containment under
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
N/A	6	Oil/Lubricant Warehouse Storage (Drum Storage)	Oil (waste and hydraulic), Lubricant	~150,55 gal drums ~10,320 gal polyurethane totes	N/A	N/A	60' x 8' storage area containment under Totes within metal building
Subtotal 14,170 gallons							
TOTAL 1,343,320 gallons (Active Only)					Inventory as of 12/2017		





Norva Blandin, MSEM

Environmental Manager

Compliance Assurance Program (CAP)

Florida Department of Environmental Protection

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The Department of Environmental Protection values your feedback as a customer. Please take a few minutes to comment on the quality of service you received by completing the [DEP Customer Survey](#).

From: Maurice R Hogg <mauricer.hogg@cemex.com>

Sent: Tuesday, June 4, 2019 4:22 PM

To: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>

Cc: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Stark, Justin <Justin.Stark@FloridaDEP.gov>; Maria T Rodriguez <mariat.rodriguez@cemex.com>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; George Foster <gfooster@creativeenvironmental.com>

Subject: RE: Request of Additional Information --CEMEX Miami EPA ID FLD981758485

Norva,

Below serves as a summary of the main points of communication between CEMEX/Miami-Dade DERM/FDEP prior to the closure of the 30,000 gallon used oil tank (Tank ID No. 4) that was closed and physically removed from the facility.

- 8/23/2017:
Miami-Dade DERM performed an Annual Storage Tank Facility Inspection. Among the deficiencies noted was that the subject tank had been registered out of service for over 10 years. As such, the tank had to be closed and removed from the facility or tested and placed back into service.
- 10/19/2017:
Charlie Walz, the former Environmental Manager for CEMEX Miami Cement Plant, submitted an email request to Miami-Dade DERM for an extension to the deadline to close and remove the tank from the facility. Miami-Dade DERM forwarded this request to Ms. Judy Dolan in the FDEP Southeast District office for consideration.

- 11/2/2017:
Mr. Walz followed up with DERM regarding the deadline extension request. DERM responded saying they were still waiting to hear back from Ms. Dolan.
- 11/8/2017:
Maria Rodriguez of CEMEX again followed up on the extension request. DERM received confirmation of the extension until March 31, 2018 from Ms. Dolan (with approval from Mr. Bill Burns of FDEP). This information was forwarded to Ms. Rodriguez and Mr. Walz. The extension was granted with the condition that a contract with the completion date for the removal of the tank be submitted to DERM/FDEP prior to the commencement of field activities.
- 2/13/2018:
Contract for the removal of the building was submitted to DERM and FDEP via email.

We would appreciate if the Department would take into consideration the fact that the tank was housed in a dedicated building that also functioned as secondary containment, and therefore there were additional permitting and administrative requirements that that delayed the final removal of the tank from the property until early June 2018. Due to the age of the building, an asbestos survey was conducted and asbestos containing materials had to be removed and disposed of separately per federal, state and local regulations. Additional permitting and inspections were required to demolish the building surrounding the tank, and were completed per local building codes. Required documentation was submitted to Miami-Dade DERM regarding the removal of the tank under the Storage Tank program.

I have attached the following documents per your request:

1. Copy of the Miami-Dade DERM report for the inspection on 8/23/2017. On page 7 of 10, item 4) you will see where the 30,000 gallon used oil tank was identified for removal.
2. Email approval of the March 31, 2018 deadline extension from FDEP, provided by DERM.
3. The site assessment report (SAR) and transmittal letter dated 2/5/2019 and submitted on behalf of CEMEX by our consultant, Creative Environmental Solutions, Inc.
4. Miami-Dade DERM response to the SAR dated 3/15/2019.

Please let me know if you need any additional information.



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From: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>

Sent: Monday, June 3, 2019 15:56

To: Maurice R Hogg <mauricer.hogg@cemex.com>

Cc: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Stark, Justin <Justin.Stark@FloridaDEP.gov>; Maria T Rodriguez <mariat.rodriguez@cemex.com>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>

Subject: RE: Request of Additional Information --CEMEX Miami EPA ID FLD981758485

Good afternoon Maurice,

I am currently reviewing all the documentation that you submitted and I have questions related to the closure report of the 30,000 gallons of AST for used oil conducted on October .

- Do CEMEX notified the Department about this closure per permit condition part III page 17?
- Do DERM provided a resolution or comments of the SAR? When CEMEX submitted the SAR to DERM? The Department do not have any documentation of this report neither the notification.

The Department need more clarification in this particular matter due to the violation of the conditions described in the Part III of your permit [40 CFR 279.54 (h) and in F.A.C. 62-710.800(5)] are considered significant noncompliance. Please provide the requested information by **COB Thursday June 6, 2019**.

Best regards,



Norva Blandin, MSEM
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From: Maurice R Hogg <mauricer.hogg@cemex.com>
Sent: Wednesday, May 8, 2019 5:31 PM
To: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>
Cc: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Stark, Justin <Justin.Stark@FloridaDEP.gov>; Maria T Rodriguez <mariat.rodriguez@cemex.com>
Subject: CEMEX Miami EPA ID FLD981758485 - Requested documentation (Part 2 of 2)

Norva,

Due to the size of the requested files, we are sending the requested documentation in 2 parts.

Per your request, this email (part 2 of 2) contains the following attachments:

1. Closure Report for the 30,000 gallon tank that was removed
2. Miami-Dade County DERM Response Letter to the above closure report
3. Used Oil Attendant training certification

Please let me know if you have any questions or concerns about the attached information.



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From: Maurice R Hogg

Sent: Wednesday, May 8, 2019 11:23

To: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>

Cc: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Stark, Justin <Justin.Stark@FloridaDEP.gov>; Maria T Rodriguez <mariat.rodriguez@cemex.com>

Subject: RE: FDEP Compliance Evaluation Inspection- Exit Interview- CEMEX Miami EPA ID FLD981758485

Norva,

Attached for your review/records are photographs of the corrective action completed which addresses the following non-compliance item:

- 40 CFR 279.54(d)(2) – Inadequate secondary containment condition. The secondary containment of the 30,000 gallon used oil kiln day tank was cleared of debris, restoring the required 110% capacity of the containment area. Please refer to the attached document for details.

The remaining information requested will be sent separately. Please do not hesitate to contact me if you have any comments or questions.

Regards,



M. Roger Hogg, P.E.

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From: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>

Sent: Thursday, May 2, 2019 11:16

To: Maria T Rodriguez <mariat.rodriguez@cemex.com>; Maurice R Hogg <mauricer.hogg@cemex.com>

Cc: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Stark, Justin <Justin.Stark@FloridaDEP.gov>

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

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Florida Department of Environmental Protection

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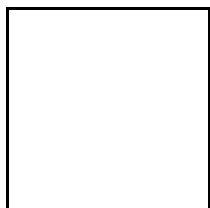
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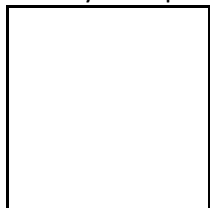
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