From: Maurice R Hogg
To: Reis, Juliana
Cc: Maria T Rodriguez; Lillian F Deprimo
Subject: RE: CEMEX Miami Cement Plant & SCL Quarry (EPAID FLD981758485) - Exit Interview (Submittal 2 of 2)
Date: Tuesday, January 5, 2021 4:44:42 PM
Attachments: image004.png
image005.png
image006.png
5b. Used oil filters records - 2018.pdf
5e. analysis for on-spec oil received from CBI -2018.pdf
5c. 2018-2020 Lab (hazardous) waste manifests.zip
5d. 2018-2020 Universal waste manifests.zip
5f. 2017-2019 Used Oil Reports.zip
5g. 2018-2020 Monthly AST.SPCC Inspection.zip
5a. 2018-2020 Used oil acceptance.pdf

Ms. Reis:

See below responses to the items requested on December 21, 2020. I have responded to each item in-line with the original message. My comments are in **bold red text.** Please note that the demonstrations of compliance requested for the other items are part of a separate submittal. Please do not hesitate to contact me if any additional information is required.

5. **Recordkeeping**

Provide the last 3 years of the following documents:

a. Used oil acceptance records **Attached 2018-2020 records**
b. Used oil and used oil filters shipments records **Attached 2018-2020 records**
c. Hazardous waste disposal manifests **Attached 2018-2020 records**
d. Universal waste shipment (batteries, lamps and aerosol cans) **Attached 2018-2020 records**
e. Waste analysis/waste profiles from the on-spec oil received by CBI **Attached several examples from 2018 operating year. Every delivery manifest is accompanied with a laboratory analysis affirming used oil received is on-spec. If you wish to review all the documentation for 2018-2020 we will need more time. The facility receives multiple loads of used oil daily which results in a large volume of paperwork that is not stored electronically.**
f. Annual Report of used oil and used oil filters **Attached 2017-2019 annual reports**
g. Monthly used oil tanks/containers inspection log **Attached 2018-2020 records**

Best regards,

M. Roger Hogg, P.E.
Environmental Manager - Miami Cement Plant - Florida - United States of America
Office : +1(305)-229-2949 Mobile: +1(786)-853-1828
Address:1200 NW 137 Avenue, Miami, FL 33182
e-Mail: mauricer.hogg@cemex.com
www.cemexusa.com

From: Maria T Rodriguez <mariat.rodriguez@cemex.com>
Sent: Tuesday, December 22, 2020 17:33
To: Reis, Juliana <Juliana.Reis@FloridaDEP.gov>; Maurice R Hogg <mauricer.hogg@cemex.com>
Subject: RE: CEMEX Miami Cement Plant & SCL Quarry (EPAID FLD981758485) - Exit Interview

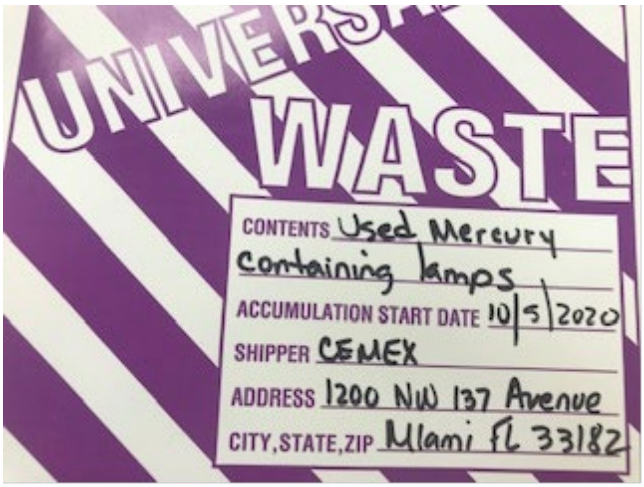
Juliana, I have attached documentation and photos to close items 1, 6 and 7 listed on the CEI report.

Please find attached a photo for item number **1 Waste determination – 40 CFR 262.11**
The water generated at the wash area by the Transport show is NOT Oily Water. The residual water from truck wash area gets filtered and flows out to collection pond on the south side of the wash pit.

Please find attached the Closure Report of 30,000 gallon tank as requested for item number **6 Closure Report of 30,000 gallon tank.**

The photos below taken 12-22-20 , demonstrate that item **7 Universal waste lamps – 40 CFR 273.13(d)** of the CEI has been resolved. The spent mercury containers have been properly closed and sealed to prevent breakage, and labeled as specified.

7. Universal Waste Lamps



Let me know if you have any questions or comments.

Kind Regards,

Maria Rodriguez
Environmental Coordinator – Miami Cement Plant- United States of America
Office : 305-229-2945 | Mobile: 305-283-0354

From: Reis, Juliana <Juliana.Reis@FloridaDEP.gov>
Sent: Monday, December 21, 2020 3:10 PM
To: Maurice R Hogg <mauricer.hogg@cemex.com>; Maria T Rodriguez <mariat.rodriguez@cemex.com>
Subject: FW: CEMEX Miami Cement Plant & SCL Quarry (EPAID FLD981758485) - Exit Interview

CAUTION: External Email | PRECAUCIÓN: Correo electrónico externo | VORSICHT: Externe E-Mail | ATTENTION: Courriel externe

Good afternoom,

This email serves as an exit interview for the Compliance Evaluation Inspection (CEI) conducted on Thursday, December 17, 2020, by the Florida Department of Environmental Protection (FDEP) to determine this facility compliance with the hazardous waste Federal and state regulations.

Thank you for your time and assistance throughout the inspection.

<Please confirm upon receipt>

Please provide the following information and documentation to the Department:

1. **Waste determination – 40 CFR 262.11**

a. Please inform on the waste determination conducted at the residual water from the trucks

washing area at the Transport Shop (picture attached).

If it is oily water, please store it properly and provide the disposal manifests from the previous three years, per 62-710.401(6), F.A.C.

2. **Aisle Space – 40 CFR 279.52(a)(6)**
   a. Please provide a corrective action picture of the drums area at the Quarry shop (picture attached) compliant with adequate aisle space to allow unobstructed movement of facility personnel.

3. **Secondary containment - 62-710.401(6), F.A.C**
   a. Please provide a corrective action picture of the 30,000-gallon tank secondary containment free of debris (attached picture).

4. **Facility maintenance - 40 CFR 279.52(a)(1)** the facility shall ensure is maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water which could threaten human health or the environment.

   At the Central Accumulation Area (CAA) was observed with characteristic hazardous waste EPA Waste Code D001, used oil and used oil water stored in the same area (picture attached).

   a. Provide a picture of the CAA properly maintained.

5. **Recordkeeping**

   Provide the last 3 years of the following documents:

   a. Used oil acceptance records
   b. Used oil and used oil filters shipments records
   c. Hazardous waste disposal manifests
   d. Universal waste shipment (batteries, lamps and aerosol cans)
   e. Waste analysis/waste profiles from the on-spec oil received by CBI
   f. Annual Report of used oil and used oil filters
   g. Monthly used oil tanks/containers inspection log

6. **Closure Report of 30,000-gallon tank**
   a. Provide the last submitted report to DERM.

7. **Universal waste lamps – 40 CFR 273.13(d)**
   a. Provide pictures of the spent mercury lamps containers (attached picture) properly closed and sealed in order to prevent breakage.

      Spent mercury lamps shall be specifically labeled as “universal waste-mercury-containing lamps”, “waste mercury-containing lamps” or “used mercury-containing lamps”.
   b. Provide a corrective action picture of spent mercury lamp’s containers properly labeled.

8. **Used oil filters – 62-710.850(5)(a) F.A.C.**

a. Provide corrective action picture of the used oil filter container at the Quarry shop properly closed and labeled (picture attached).

Please provide this information and documentation to the Department as they are available and within **15 days (by 01/05/2021).**

In case of questions or concerns please contact me.

Kind regards,

Juliana Reis
Environmental Specialist I
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Juliana.Reis@floridadep.gov
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