



May 5, 2009

Via Certified Mail  
Return Receipt Requested  
Article No. 7008 1300 0001 0514 9814

Ms. Melissa Madden  
Environmental Specialist  
Solid Waste Section  
Florida Department of Environmental Protection  
Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637

Dept. Of Environmental Protection  
MAY 08 2009  
Southwest District

Re: Solid Waste Compliance Inspection Report

Dear Ms. Madden:

In response to your letter Dated February 19, 2009; detailing the results of your inspection and the required action; CEMEX has prepared the following list of the required actions and the response.

1. A modification of Conditions of Certification PA82-17N and Facility Operations Plan should be submitted to the Department prior to construction of Kiln #2 waste tire processing equipment in accordance with section XXXII.C of PA 82-17N to reflect changes in operation and increased capacity and financial assurance.

Response:

Coastal Engineering is reviewing the potential changes required by PA 82-17N and the facility Operations Plan. CEMEX will complete the changes resulting from this review.

2. TECO Gannon Ash Pile #3 should be adequately graded (at least 3H : 1V) under the tarp to allow for adequate stormwater flow and slope stability.

Response:

Ash Pile No. 3; the smaller of the two piles, is the pile form which we remove the ash to be use in the process. Pile No. 3 is covered with a tarp unless there an active face where material is being removed. We are diligent in trying to ensure that the pile is covered when material is not being removed and the tarp prevents stormwater intrusion that might destabilize slopes. The tarps are vary large and could sustain sever damage and expose large sections of the pile; if the tarps are

**Brooksville South Cement Plant**

10311 Cement Plant Rd., Brooksville, FL 34601. USA, (352) 799-7881, Fax (352) 799-6088

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Solid Waste Section  
April 22, 2009

removed to grade slopes. The ash is compacted sufficiently to prevent any sluffing of material. The front-end loader can't just scoop the material out of the pile; it has to work at removing (dig it out of the pile) the ash.

3. Provide details about the newly constructed A-frame building, including floor and containment.

Response:

The covered materials storage building for line 2 has a floor of compacted clay, as require in the Air Construction Permit, and the area is graded for stormwater collection/run off to the exiting perimeter ditch.

4. Provide details about the TECO slag storage areas, including floor and containment features

Response:

The two storage of TECO slag are stored on compacted lime stone and the areas around the piles is graded for stormwater collection/run off to the exiting perimeter ditch

5. The 2008 inflation-adjusted cost estimates submitted by Coastal Engineering's Joseph Calamari on April 9, 2008 appear to have been calculated incorrectly due to the wrong inflation multiplier. Based on conversations on February 6, 2009, Mr. George Townsend indicated that he would be sending updated estimates soon. 2009 inflation-adjustments should be submitted after approval of the 2008 estimates.

Response:

The resubmitted 2008 inflation adjusted financial assurance from the waste operation closure have been resubmitted and approved and the 2009 inflation-adjustment were submitted on March 24, 2009.

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6. Additionally, it does not appear that the solid waste and/or industrial by-products are stored and managed within a groundwater monitoring system that meets the requirements of Chapter 62-701, Florida Administrative Code. Please be advised that based on the response and information gathered at the site, the management of the solid wastes and industrial by-products at the site may require new permits, modifications of the site's groundwater monitoring plan, stormwater management plan, BMPP, permits or authorization.

Response:

Historically, the piles noted during the inspection have been managed in there current locations. The material (boiler slag/black beauty) is basically inert material.

Respectfully,



George Townsend  
Environmental Manager

pc: Jim Daniel, Plant Manager  
Lillian DePrimo, Director, Environmental

**Madden, Melissa**

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**From:** Townsend, George [gtownsend@cemexusa.com]  
**Sent:** Wednesday, May 06, 2009 4:02 PM  
**To:** Madden, Melissa  
**Cc:** Joe Calamari  
**Subject:** Solid Waste Inspection Response  
**Attachments:** 2-19-09 Inspection Response.pdf; image001.gif



**George Townsend**

Environmental Manager - Brooksville South - United States of America

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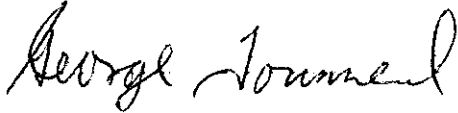
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