

Betancourt, Amaury

From: Betancourt, Amaury
Sent: Tuesday, June 09, 2015 6:02 PM
To: George Townsend (george.townsend@cemex.com)
Cc: Henry, Danielle D.; Tafuni, Steven
Subject: FW: Multiple Air & SW Items
Attachments: 0530021_EU044_TST_Dec14.pdf; 40778_2015Financials.pdf; 0530021_Kiln1_2015_VE_Test_Comments.xlsx

George,

I hope you are well. I have several requests and I thought it would be easier to address all in one e-mail, both for air and solid waste. I have copied Danielle and Steve to keep them in the loop since they review my inspection reports.

Thank you for always being so prompt with all your replies and I understand how busy you are, so I thought one e-mail would be easier. I've numbered the items below and if you want to discuss over the phone, let me know:

I. Air Pollution:

- (1.) **Kiln 2 has not had its THC/VOC CEMS RATA yet**, as far as our records indicate. It looks like from the attached notification that it was scheduled in December 2014, but I never received the report. If it was done, please let me know and send over. If it hasn't been done yet, it needs to be done at least once every four calendar quarters as far as I am aware, so please schedule as soon as possible.
- (2.) I have attached a spreadsheet with **comments regarding the 2015 Kiln 1 VE tests** (let me know what your thoughts are on these).

II. Solid Waste:

- (3.) Please provide the **2015 Financial Assurance for the Brooksville South (WACS ID 40778) Waste Tire Permit 22787-003-WT/02**. You did send us an e-mail regarding this financial assurance, but you may have accidentally attached the 2014, not 2015, financial report (see attachment to this e-mail).
- (4.) Please provide the **Semiannual Q4/Q1 2014 Groundwater Monitoring Report for Brooksville North, WACS ID 40777** (the report that covers the fourth quarter of 2013 and the first quarter of 2014). I spoke with John Morris and he was able to provide me with the other one I requested from you, but not the one I am requesting here.
- (5.) Please explain the waste tire discrepancy on the **Q1 2015 Waste Tire Report for Brooksville South, WACS ID 40778**. The adjustment factor does not seem to add up to the total waste tires accepted and I can't read the comment you put in the report for the adjustment factor (see attachment).
- (6.) Please provide the **Q4 2014 Waste Tire Report for Brooksville South**.

Thank you in advance, and let me know how much time you need to provide the above items. I think you already have most of them, it's just a matter of submitting or resubmitting.

Sincerely,
Amaury

Amaury Betancourt
Engineering Specialist II
Florida Department of Environmental Protection (FDEP)
Southwest District Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813) 470-5905
Fax: (813) 470-5995
e-mail: amaury.betancourt@dep.state.fl.us

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Betancourt, Amaury

From: SWD_Air (Shared Mailbox)
Sent: Monday, April 06, 2015 8:05 AM
To: Betancourt, Amaury
Cc: Henry, Danielle D.
Subject: FW: 307-14-09 / 0530021-047-AV / CEMEX, Brooksville / Air Emission Measurements
Attachments: 307-14-09 Test Notification 12092014.pdf

This one looks like one of your requests. No AirCom Activity was created.

Cindy Falandysz
Environmental Consultant
Southwest District
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637
cynthia.falandysz@dep.state.fl.us
Office: (813) 470-5791
Fax: (813) 470-5993

From: Chris Enwall [mailto:cenwall@kooglerassociates.com]
Sent: Friday, April 03, 2015 3:21 PM
To: SWD_Air (Shared Mailbox); Betancourt, Amaury
Cc: George Townsend (george.townsend@cemex.com)
Subject: FW: 307-14-09 / 0530021-047-AV / CEMEX, Brooksville / Air Emission Measurements

Amaury,

Attached is the original notification letter that was sent to Region 4, Erin DiBacco was copied on the original email as you can see below in the email chain. It was nice talking with you today and I will see you next week.

Respectfully,

Christian K. Enwall
Office No.: (352) 377-5822 EXT 24
Office Fax No.: (352) 377-7158
Cell Phone No.: (352) 317-3105

Koogler and Associates, Inc.
4014 NW 13th Street
Gainesville, FL 32609

From: Kim Hasko
Sent: Thursday, July 03, 2014 11:45 AM
To: 14045628174@efaxsend.com
Cc: spagg.beverly@epa.gov; worley.gregg@epa.gov; gtownsend@cemexusa.com; Shelley K Huskey (shelleyk.huskey@cemex.com); JDaniel@cemexusa.com; lroberts@deltapowerservices.com; Erin.DiBacco@dep.state.fl.us; Chris Enwall
Subject: 307-14-09 / 0530021-047-AV / CEMEX, Brooksville / Air Emission Measurements

Dear Ms. Banister:

The notification of air emissions compliance and NESHAP testing to be conducted at the CEMEX Construction Materials Florida, LLC facility in Brooksville, Florida on December 9-12, 2014 is attached for your records. If you have any questions or concerns, please do not hesitate to contact Project Manager Christian Enwall at (352) 377-5822 ext. 24 or via e-mail at cenwall@kooglerassociates.com.

Respectfully submitted,

Kim Hasko

Office Manager

Koogler and Associates, Inc.

4014 Northwest 13th Street
Gainesville, Florida 32609-1923
(352) 377-5822 Ext. 29
(352) 281-2496 Mobile
(352) 377-7158 Fax
khasko@kooglerassociates.com
www.kooglerassociates.com

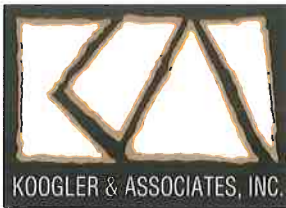
[Please consider the environment before printing this email.]

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Version: 2014.0.4592 / Virus Database: 3986/7785 - Release Date: 07/02/14



KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 ■ FAX/377-7158

307-14-09
July 3, 2014

Via E-mail and Fax

Mrs. Beverly Banister
U.S. EPA Region 4, Air Division
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

***Subject: CEMEX Construction Materials Florida, LLC
Brooksville South Cement Plant
Air Emission Measurements
Line No. 2 Cement Plant
Brooksville, Florida
Permit No. 0530021-047-AV& 40 CFR 63 Subpart LLL (NESHAP)***

Dear Mrs. Banister:

Koogler and Associates, Inc. **was** scheduled to conduct annual air emissions compliance and NESHAP testing at the CEMEX Construction Materials Florida, LLC complex in Brooksville, Florida. Testing was to take place on emission unit 044/ 060 (In-Line Cement Kiln 2, Pre-heater, Pre-calciner and Clinker Cooler) during the period of September 23-25, 2014. Koogler and Associates, Inc. **is now scheduled** to conduct the testing during the period of December 9-12, 2014. Our test crew is scheduled to arrive on-site Monday, December 8, 2014 to setup equipment. The purpose of the testing is to satisfy the annual compliance demonstration and NESHAP requirements of the above captioned permit.

NESHAP and compliance testing on the Line No. 2 cement kiln will be conducted in accordance with test methods of 40 CFR 60 Appendix A and Appendix B. Emission

measurements will be conducted on the Line No. 2 cement plant for volatile organic compounds and Dioxin Furan with a 7 percent oxygen correction.

The following table lists the emissions to be tested:

Operating Scenario	Pollutant	Performance Test/ RATA	Test Method	Test Duration	Expected Test Date
Raw Mill Operating (RMU)	D/F	30 Month	EPA Method 23	3 X 3-hours	December 9, 2014
Raw Mill Operating (RMU)	O2	30 Month	EPA Method 3A	3 X 3-hours	December 9, 2014
N/A	VOC	Annual/ RATA	EAP Method 25A	9 X 21-minutes	December 9, 2014

Operating Scenario	Pollutant	Performance Test/ RATA	Test Method	Test Duration	Expected Test Date
Raw Mill Not Operating (RMD)	D/F	30 Month	EPA Method 23	3 X 3-hours	December 10, 2014
Raw Mill Not Operating (RMD)	O2	30 Month	EPA Method 3A	3 X 3-hours	December 10, 2014
N/A	VOC	Annual/ RATA	EAP Method 25A	9 X 21-minutes	December 10, 2014

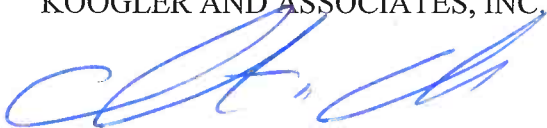
Volatile organic compounds emissions and dioxin furan measurements will be conducted in accordance with EPA Methods 23 and 25A, respectively. Method 3A will be conducted simultaneously with all tests for an oxygen correction factor. Visible emissions observations will be conducted in accordance with EPA Method 9. All test methods are described in 40 CFR 60, Appendix A and Appendix B, and adopted by FDEP by reference in 62-297.401, F.A.C.

Mrs. Beverly Banister
July 3, 2014

3

If you have any questions regarding this schedule, please do not hesitate to contact me at
352-377-5822 ext. 24 or cenwall@kooglerassociates.com.

Very truly yours,
KOOGLER AND ASSOCIATES, INC.



Chris Enwall
Project Manager

CKE/kh

cc: George Townsend, CEMEX
Shelley Huskey, CEMEX
Jim Daniel, CEMEX
Larry Roberts, Florida Power Development
Erin DiBacco, FDEP Southwest District



Betancourt, Amaury

From: George Townsend <george.townsend@cemex.com>
Sent: Friday, February 27, 2015 11:30 AM
To: Betancourt, Amaury
Subject: RE: (Amaury) Brooksville South FA Submittal 2015_Permit No.71066-005-WT/02
Attachments: Financial Assurance_Submittal_01302014.pdf

Financial assurance for Brooksville South



George Townsend
Environmental Manager - Brooksville South - United States of America
Office: (352) 799-7881 Fax: (352) 799-6088 Mobile: (352) 238-9102
Address: 10311 Cement Plant Road, Brooksville, FL 34601
e-Mail: george.townsend@cemex.com
www.cemexusa.com



Please consider the environment before printing this email

From: "Betancourt, Amaury" <Amaury.Betancourt@dep.state.fl.us>
To: George Townsend/US/Cemex@CEMEX
Cc: "Watson, Edward" <Edward.Watson@dep.state.fl.us>, "Tafuni, Steven" <Steven.Tafuni@dep.state.fl.us>
Date: 02/26/2015 05:37 PM
Subject: RE: (Amaury) Brooksville South FA Submittal 2015_Permit No.71066-005-WT/02

George,

Your e-mail below indicates you intended to submit the financial report for CEMEX - Brooksville South but when I open the attached report, the contents appear to be the same as the CEMEX - Brooksville North quarterly waste tire report. Can you confirm and resend the correct attachment(s)?

In addition, my last e-mail to you from a few minutes ago states that the sender was "SWD_Waste", but it was actually me, Amaury. Sorry for the confusion.

Sincerely,
Amaury

Amaury Betancourt
Engineering Specialist II
Florida Department of Environmental Protection (FDEP)
Southwest District Compliance Assurance Program
13051 North Telecom Parkway

Temple Terrace, FL 33637-0926
Telephone: (813) 470-5905
Fax: (813) 470-5995
e-mail: amaury.betancourt@dep.state.fl.us

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From: George Townsend [<mailto:george.townsend@cemex.com>]
Sent: Thursday, January 08, 2015 3:37 PM
To: SWD_Waste (Shared Mailbox)
Subject: (Amaury) Brooksville South FA Submittal 2015_Permit No.71066-005-WT/02

Attached is the financial assurance submittal for the waste tire facility_Permit No. 71066-005-WT/02



George Townsend
Environmental Manager - Brooksville South - United States of America
Office: (352) 799-7881 Fax: (352) 799-6088 Mobile: (352) 238-9102
Address: 10311 Cement Plant Road, Brooksville, FL 34601
e-Mail: george.townsend@cemex.com
www.cemexusa.com



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[attachment "FA Cost Estimate 2015.pdf" deleted by George Townsend/US/Cemex]

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January 30, 2014

Electronic Submittal

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

Re: CEMEX Construction Materials Florida, LLC – Brooksville **South** Cement Plant
Waste Tire Processing Facility, **2014** Financial Assurance Cost Estimate
FDEP Permit No. 22787-003-WT/02, Site Certification PSA 82-17

Dear Ms. Madden:

The above referenced facility has experienced no changes the management of waste tires and is operating in compliance with the permit requirements. The maximum quantity of tires allowed to be stored on site is 300 tons. The anticipated disposal cost for the maximum storage quantity is calculated as follows:

2013 Disposal Cost Estimate = \$33,649.00
FDEP Inflation Multiplier **2014** = 1.017
2014 Disposal Cost Estimate (1.017 x \$33,649.00) = \$34,221.85
Current Bond Amount - \$58,440.00, Travelers Bond No. 105316798

Should you have any questions and/or comments or require additional information, please contact me at 352-799-7881, ext. 104, or george.townsend@cemex.com.

Respectfully,

George Townsend
Environmental Manager

pc: James S. Daniel, Plant Manager

D:\Documents and Settings\gtownsend\My Documents\Brooksville South\BrS Waste Tires\Scrap Tires 2014\FA Cost Estimate 2014.doc

Betancourt, Amaury

From: Betancourt, Amaury
Sent: Thursday, February 26, 2015 5:37 PM
To: 'George Townsend'
Cc: Watson, Edward; Tafuni, Steven
Subject: RE: (Amaury) Brooksville South FA Submittal 2015_Permit No.71066-005-WT/02
Attachments: FA Cost Estimate 2015.pdf

George,

Your e-mail below indicates you intended to submit the financial report for CEMEX - Brooksville South but when I open the attached report, the contents appear to be the same as the CEMEX - Brooksville North quarterly waste tire report. Can you confirm and resend the correct attachment(s)?

In addition, my last e-mail to you from a few minutes ago states that the sender was "SWD_Waste", but it was actually me, Amaury. Sorry for the confusion.

Sincerely,
Amaury

Amaury Betancourt
Engineering Specialist II
Florida Department of Environmental Protection (FDEP)
Southwest District Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813) 470-5905
Fax: (813) 470-5995
e-mail: amaury.betancourt@dep.state.fl.us

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From: George Townsend [mailto:george.townsend@cemex.com]
Sent: Thursday, January 08, 2015 3:37 PM
To: SWD_Waste (Shared Mailbox)
Subject: (Amaury) Brooksville South FA Submittal 2015_Permit No.71066-005-WT/02

Attached is the financial assurance submittal for the waste tire facility_Permit No. 71066-005-WT/02



George Townsend
Environmental Manager - Brooksville South - United States of America
Office: (352) 799-7881 Fax: (352) 799-6088 Mobile: (352) 238-9102
Address: 10311 Cement Plant Road, Brooksville, FL 34601
e-Mail: george.townsend@cemex.com
www.cemexusa.com



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January 8, 2015

Electronic Submittal

Ms. Susan J. Pelz, P.E. III
Solid Waste Section
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Re: CEMEX Construction Materials Florida, LLC, Brooksville **North** Cement Plant
Waste Tire Processing Facility Quarterly Report, Permit No. 71066-005-WT/02,
Facility ID No. SWD-27-40777

Dear Ms. Pelz:

Please find enclosed the completed Waste Tire Processing Facility Quarterly Report prepared for the aforementioned facility, for the **4th Quarter of 2014**. The Brooksville North Cement Plant was temporarily shut down on December 12, 2008 and remains closed, as of this report.

If there are any questions and/or comments concerning this submittal or you require additional information, please contact me at (352) 799-7881, ext 104 or george.townsend@cemex.com.

Respectfully

A handwritten signature in black ink that reads 'George Townsend'.

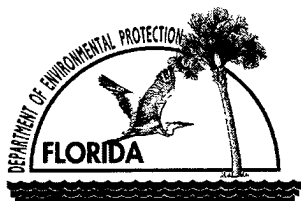
George Townsend
Environmental Manager

pc: James S. Daniel, Plant Manager

D:\Documents and Settings\gtownsend\My Documents\Brooksville North\BrN Waste Tires 2014\Quarterly Report 4th Quarter - 2013
Report Submittal - BrN.docx

Brooksville South Plant

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



Department of Environmental Protection

DEP Form # 62-701.900(21)
Waste Tire Processing Facility
Form Title <u>Quarterly Report</u>
Effective Date <u>3/22/00</u>
DEP Application No. _____ (Filled in by DEP)

Waste Tire Processing Facility Quarterly Report

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 10/01/14 - 12/31/14 (First quarter begins on January 1 of any given year)

1. Facility name: CEMEX Brooksvilleville South Cement Plant
2. Facility mailing address: 13601 Ponce De Leon Blvd.
 City: Brooksville County: Hernando Zip: 34614
3. Facility permit number: 71066-005-WT/02
4. Facility telephone number (352) 799-7881
5. Authorized person preparing report: _____
6. Affiliation with facility: _____
7. Telephone number (if different from above): ()
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires	----0----	----0----		----0----			----0----
Other whole Tires							
Processed tires							
Processing Waste							
Other							
Total							

a. Explain all inventory adjustments. _____

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets, if necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

<u>George Townsend</u> Print Name of Authorized Agent	 Signature of Authorized Agent	<u>1/08/15</u> Date
--	-----------------------------------	------------------------

Mail complete form to
the appropriate district office

Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way, Ste. 200 B
Jacksonville, FL 32256-7590
904-448-4300

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
407-894-7555

Southwest District
3804 Coconut Palm Dr.
Tampa, FL 33619
813-744-6100

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33902-2549
941-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

Kiln 1 2015 VE Test comments by Amaury Betancourt, FDEP, 06/09/2015				
EU	Process Rate During Test	Permit Process Rate Limit	New limit based on test	Comments
EU024	NA	NA	NA	Cement Storage Silos and railcar loadout system with baghouses, was not tested, but there was no explanation for why not.
EU001	35 TPH	45 TPH	37.5 TPH	
EU009	69 TPH	83 TPH	76 TPH	
EU010	69 TPH	83 TPH	76 TPH	
EU011	8 TPH	75 TPH	9 TPH	Can you double check on this one, why was the process rate so low?
EU012	99 TPH	122 TPH	109 TPH	Also, the silo dischargers were tested (M-08) but not the clinker feed belt baghouse (M-03). If you use M-03, it should be tested.
EU013	99 TPH	125 TPH	109 TPH	
EU019	99 TPH	120 TPH	109 TPH	
EU021	226.5 TPH	300 TPH	249 TPH	Report says 264 TPH, but bill of lading shows 26.4 tons loaded, with a VE test duration of 7 minutes, so I calculated 226.5 TPH
EU064 (M03)	91 TPH	122 TPH	100 TPH	
EU020 (Kiln 1)	69 TPH	See Comment	See Comment	I know you were scheduled to retest this unit while raw mill down (RMD) and raw mill up (RMU) June 4th and 5th, 2015, so keep me posted on the results.