



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

May 23, 2019

Alberto Calleros, Plant Manager
CEMEX Construction Materials Florida, LLC
10311 Cement Plant Road
Brooksville, Florida 34601
Alberto.Calleros@cemex.com

Re: CEMEX Brooksville South Cement Plant
Facility ID: 40778
Hernando County

Dear Mr. Calleros:

Department personnel conducted a compliance inspection of the above-referenced facility on May 10, 2019. Based on the information provided during and following the inspection, the facility was determined to be in compliance; however, two areas of concern were noted. Please implement the corrective actions provided in the attached inspection report to resolve these concerns. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Kaitlyn Newsome at (813) 470-5877, or via e-mail at: Kaitlyn.Newsome@floridadep.gov.

Sincerely,

A handwritten signature in blue ink that reads "Steven Tafuni". The word "for" is written in smaller letters to the left of the signature.

Steven Tafuni
Government Operations Consultant
Compliance Assurance Program
Southwest District
Florida Department of Environmental Protection

Enclosures: Inspection Report

cc: Steven Tafuni, FDEP Southwest District, Steven.Tafuni@floridadep.gov
Melissa Madden, FDEP Southwest District, Melissa.Madden@floridadep.gov
Kaitlyn Newsome, FDEP Southwest District, Kaitlyn.Newsome@floridadep.gov
Robin Simons, CEMEX, Robing.Simons@cemex.com



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: CEMEX BROOKSVILLE SOUTH PLANT (FKA FLORIDA CRUSHED STONE)

On-Site Inspection Start Date: 05/10/2019

On-Site Inspection End Date: 05/10/2019

WACS No.: 40778

Facility Street Address: NEAR CEMENT PLANT RD

City: BROOKSVILLE

County Name: HERNANDO

Zip: 34601

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Kaitlyn Newsome, Environmental Specialist I

Other Participants: Melissa Madden, Environmental Consultant; Robin Simons, Environmental Manager; David Singer, Environmental Specialist

INSPECTION TYPE:

Routine Operation Inspection for WPF - Waste Tire Processing Facility

Routine Operation Inspection for WPF - Material Recovery Facility - Class I/III

ATTACHMENTS TO THE INSPECTION CHECKLIST:

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

Note: Checklist items with shaded boxes are for informational purposes only.

1.0 - SECTION 1.0 - FILE REVIEW

4.0 - SECTION 4.0 - WASTE PROCESSING FACILITIES

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

Inspection Date: 05/10/2019

1.0 - SECTION 1.0 - FILE REVIEW

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	FILE REVIEW (Pre- or Post-Inspection, as appropriate.)	Ok	Not Ok	Unk	N/A
1.1	For landfills and C&D disposal facilities, does the facility have a current plan for the method and sequence of filling wastes? 62-701.500(2)(f) for landfills; 62-701.730(7)(a) for C&D debris sites				✓
1.2	For landfills, are the following records being reported to the Department?(Check any that are Not OK) <input type="checkbox"/> Waste reports (annually) 62-701.500(4) <input type="checkbox"/> Annual estimate of remaining life 62-701.500(13)(c)				✓
1.3	Is gas monitoring being performed as required by the permit? 62-701.500(9), 62-701.530(2)				✓
1.4	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)(c)				✓
1.5	Is water quality sampling and testing performed according to standard procedures and at the required frequencies? 62-701.510(2) for landfills; 62-701.730(8) and 62-701.730(10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.6	Do the results of the water quality testing suggest there may be adverse impacts to water quality from the operation of the solid waste facility? 62-701.510(3) and (4); 62-701.730(4)(c) and (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.7	For closed landfills and C&D disposal facilities with final elevations higher than 20 feet above grade, has a final survey report verifying the final elevations and contours of the facility been submitted to the Department? 62-701.600(6)(b), 62-701.730(9)(e)				✓
1.8	Is financial assurance adequate? 62-701.630 for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(a) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities. NOTE: The Solid Waste Financial Coordinator in Tallahassee can assist with this information.	✓			
1.9	Are cost estimates current and adjusted every year? 62-701.630(4) for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(b) and 62-713.600(6)(c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.	✓			
1.10	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by February 1st of each year? 62-701.730(12)				✓
1.11	For C&D recycling facilities with no disposal, is an Annual Report for the recycling facility submitted to the Department by February 1st of each year? 62-701.710(8)(b)				✓
1.12	For compost facilities, has the compost product been sampled and analyzed every 20,000 tons or every 3 months (whichever is sooner)? 62-709.530(1)				✓
1.13	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				✓

Inspection Date: 05/10/2019

4.0 - SECTION 4.0 - WASTE PROCESSING FACILITIES

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
4.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)	✓			
4.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
4.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
4.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event.) 62-701.300(2)(d)	✓			
4.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
4.5	Unauthorized open burning of solid waste prohibited, except in accordance with Department requirements? 62-701.300(3)	✓			
4.6	Are the following unauthorized wastes or special wastes properly managed? (Check any that are Not OK) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Used oil and oily wastes, except as exempted 62-701.300(11) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Liquids 62-701.300(10)	✓			
Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
4.7	For areas not enclosed, is litter controlled and are litter control devices maintained? 62-701.710(3)(a)	✓			
4.8	Is leachate collection and removal system maintained and operated as required? 62-701.710(3)(b)	✓			
4.9	Are all drains and leachate conveyances kept clean so that leachate flow is not impeded? 62-701.710(4)(g)	✓			
4.10	Are the following records or plans current and available on-site? (Check any that are Not OK) <input type="checkbox"/> Operation Plan 62-701.710(2)(e) <input type="checkbox"/> Contingency Plan 62-701.710(2)(g) <input type="checkbox"/> Operation records 62-701.710(8)(a)	✓			
4.11	Is the Operation Plan substantially followed? 62-701.710(4)(a)	✓			
4.12	Are putrescible wastes stored no longer than 48 hours or as otherwise allowed in the Operation Plan? 62-701.710(4)(b)	✓			
4.13	Are the operating hours posted at the facility? 62-701.710(4)(c)1	✓			
4.14	Is a trained operator on duty whenever the facility is operating? 62-701.710(4)(c)1				✓

Inspection Date: 05/10/2019

Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE	Ok	Not Ok	Unk	N/A
4.15	Is at least one trained spotter on duty at all times that waste is received at the facility to inspect the incoming waste, unless exempt under 62-701.710(1)(d)1? 62-701.710(4)(c)2				✓
4.16	Are unauthorized wastes removed from the waste stream and placed into appropriate containers for disposal at a permitted facility? 62-701.710(4)(c)2	✓			
4.17	Is the facility operated to control objectionable odors? 62-701.710(4)(d)	✓			
4.18	Is adequate fire protection equipment available and operational? 62-701.710(4)(e)	✓			
4.19	Is access to the facility controlled by fencing or other effective barriers to prevent disposal of unauthorized solid waste? 62-701.710(4)(f)	✓			
4.20	If the facility is a Transfer Station and is claiming the financial assurance exemption, does it manage the waste on a first-in, first-out basis and store waste for no greater than 7 days? 62-701.710(1)(d)1				✓
4.21	Are all additional specific conditions (not otherwise addressed above) in the permit, Department order, or certification, if any, being followed? 62-701.320(1), 403.161, F.S.	✓			
4.22	If the facility has reached its permitted capacity for storage of wastes or recyclable materials, has the permittee stopped accepting additional waste for processing? 62-701.710(4)(i)	✓			
Item No.	WASTE PROCESSING FACILITY CLOSURE	Ok	Not Ok	Unk	N/A
4.23	Has the solid waste or residue been properly disposed of within 30 days after receiving the final solid waste shipment? 62-701.710(6)(b)				✓
4.24	Has closure been completed within 180 days after receiving the final solid waste shipment? 62-701.710(6)(c)				✓

Inspection Date: 05/10/2019

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18))	Ok	Not Ok	Unk	N/A
9.1.1	Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a)	✓			
9.1.2	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
9.2	Unauthorized storage or disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) <input type="checkbox"/> 100 feet from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies?	✓			
9.3	Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event) 62-701.300(2)(d)	✓			
9.4	Unauthorized disposal or storage prohibited, except yard trash, within 200 feet of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(e)	✓			
9.5	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
9.6	If the facility accepts tires from the public, is a sign posted at the facility entrance stating operating hours, cost of disposal and site rules? 62-711.540(1)(a)				✓
9.7	Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(1)(b)				✓
9.8	If the facility accepts tires from the public, is an attendant always present on site when the site is open for business? 62-711.540(1)(c)				✓
9.9	Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d)	✓			
9.10	Is an annual fire safety survey conducted? 62-711.540(1)(d)		✓		
9.11	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)		✓		
9.12	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	✓			
9.13	Does the EPM contain the following information? (Check all that are Not OK) <input type="checkbox"/> Contact names and numbers 62-711.540(1)(e)1 <input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540(1)(e)2 <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e)3	✓			
9.14	Is the operator at the facility maintaining records of the quantity of waste tires received at the site, stored at the site, and shipped from the site? 62-711.540(1)(g) and 62-711.400(5)	✓			
9.15	If the operator of the site is not the owner of the property, has written authorization been obtained from the property owner to operate the facility? 62-711.540(1)(h)				✓
9.16	Is adequate communications equipment available at the site? 62-711.540(1)(i)	✓			
9.17	Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.540(1)(j)	✓			

Inspection Date: 05/10/2019

Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
		✓			
Item No.	WASTE TIRE FACILITY - STORAGE INDOORS	Ok	Not Ok	Unk	N/A
9.18	Are waste tire piles more than 50 feet in width? 62-711.540(2)(a)				✓
9.19	Are waste tire piles along a wall more than 25 feet in width? 62-711.540(2)(a)				✓
9.20	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)				✓
9.21	Is there less than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711.540(2)(c)				✓
9.22	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(d)				✓
9.23	If waste tires are stored up to 15 feet high, do walls between adjacent warehouse areas and between manufacturing and warehouse areas have at least a four-hour fire rating? 62-711.540(2)(e)				✓
9.24	If waste tires are stored over 15 feet high, do walls between manufacturing and warehouse areas have a fire rating of not less than six hours and do steel columns have one-hour fireproofing? If the top of storage exceeds 20 feet in height, do columns and their connections with other structural members have two-hour fireproofing? 62-711.540(2)(f)				✓
9.25	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h)				✓
Item No.	WASTE TIRE FACILITY - STORAGE OUTDOORS	Ok	Not Ok	Unk	N/A
9.26	Is the waste tire site operated within 200 feet from a body of water? 62-711.540(3)(a)	✓			
9.27	Does the waste tire pile have a width less than 50 feet? 62-711.540(3)(b)	✓			
9.28	Does the waste tire pile have an area less than 10,000 sq. ft? 62-711.540(3)(b)	✓			
9.29	Does the waste tire pile have a height less than 15 feet? 62-711.540(3)(b)	✓			
9.30	Is there a 50 feet wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c)	✓			
9.31	Is there unobstructed access to the fire lane? 62-711.540(3)(c)	✓			
9.32	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)	✓			
9.33	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f)	✓			
9.34	Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e)	✓			
9.35	Are residuals contained on-site and disposed of in a permitted solid waste management facility or properly recycled? 62-711.540(5)	✓			
9.36	Does the waste tire site qualify for the exceptions to the technical and operational standards as allowed by rule? 62-711.540(6)				✓
Item No.	WASTE TIRE FACILITY - COLLECTION CENTER	Ok	Not Ok	Unk	N/A
9.37	Are no more than 1,500 tires at the collection center at any one time? 62-711.550(1)(a)				✓
9.38	Are all waste tires, which are not used tires, removed from site yearly for recycling, processing, or disposal? 62-711.550(1)(b)				✓

Current Areas Of Concern:

Inspection Date: 05/10/2019

Rule: 62-711.540(1)(d)

Question Number: 9.10

Explanation: During the inspection, the facility indicated that a fire inspection has not been completed since 2017. On May 17, 2019, the facility provided a fire safety report, completed on May 16, 2019 by Hernando County Fire Rescue, with violations noted. The facility indicated that these issues will be resolved by May 30, 2019.

Corrective Action: Please provide an inspection report from Hernando County Fire Rescue indicating that existing violations noted in the May 16 fire safety report are resolved within 30 days of receiving this report.

Rule: 62-711.540(1)(d)

Question Number: 9.11

Explanation: See Item 9.10.

Corrective Action: Per permit condition 10 of Permit No. 22787-005-WT/02, Waste Tire Quantity reports are due to the Department each quarter, i.e. July 15 and every three months thereafter. Please ensure that the May 2019 fire safety survey is included in the next quarterly report.

COMMENTS:

Item 4.10, 9.14: During the inspection, Department personnel reviewed records for incoming and consumed alternative fuel materials (AFM) and waste tires. On May 17, 2019, the facility provided incoming waste tire receipts and tire fluff invoices for June 2018, and fuel cube invoices for May 2019.

ATTACHMENTS:

Tire Storage Trailers



Waste Tire Storage Area - Kiln 1



Inspection Date: 05/10/2019

Waste Tire Storage Area - Kiln 1

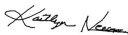


Alternative Fuel Material Storage



Inspection Date: 05/10/2019

Signed:

Kaitlyn Newsome	Environmental Specialist I
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE
	FDEP
PRINCIPAL INSPECTOR SIGNATURE	ORGANIZATION
	05/22/2019
	DATE

Melissa Madden	Environmental Consultant
INSPECTOR NAME	INSPECTOR TITLE

NO SIGNATURE REQUIRED	FDEP
INSPECTOR SIGNATURE	ORGANIZATION

Robin Simons	Environmental Manager
REPRESENTATIVE NAME	REPRESENTATIVE TITLE

NO SIGNATURE REQUIRED	CEMEX
REPRESENTATIVE SIGNATURE	ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

David Singer	Environmental Specialist
REPRESENTATIVE NAME	REPRESENTATIVE TITLE

NO SIGNATURE REQUIRED	CEMEX
REPRESENTATIVE SIGNATURE	ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Report Approvers:

Approver: Alexis R Black	Inspection Approval Date: 05/23/2019
--------------------------	--------------------------------------