

# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

April 13, 2011

*Electronically Sent – Received Receipt Requested*

Mr. Tom Messer, Plant Manager  
Suwannee American Cement, LLC  
Post Office Box 410  
Branford, Florida 32008

Re: Project No. 1210465-021-AC  
Amends Permit No. 1210465-020-AC  
Suwannee American Cement, Branford Cement Plant, Kiln 1  
Extension of Trial Period for Agricultural Plastics  
Letter of Authorization

Dear Mr. Messer:

The Department acknowledges receipt of your request (dated April 13, 2011) for an additional 30 days to complete the trial burn of non-chlorinated agricultural plastics, which is authorized in air construction permit No. 1210465-020-AC for the existing Branford Cement Plant located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The non-chlorinated agricultural plastics have been fired for 25 operating days out of the 30 days allowed by the permit; however, only 812 short tons of the material have been fired so far out of the 1,250 tons allowed by the permit. The bales of non-chlorinated agricultural plastics have had a high soil content, which caused initial delays in processing and feeding the material. Therefore, Suwannee American Cement requests an additional 30 days to complete the trial burn of the remaining 438 tons of non-chlorinated agricultural plastics. Based on the given circumstances, the Department approves your request. Specifically, the Department extends from 30 to 60 total operational days to complete the trial burn for the remaining amount of non-chlorinated agricultural plastics.

The Department will consider this action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, of the Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

## Letter of Authorization

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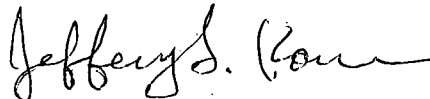
A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Deputy Director  
Division of Air Resource Management

For  
//

TLV/jfk/scd

**Letter of Authorization**

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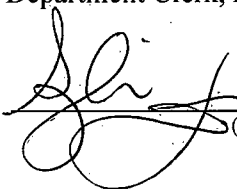
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this authorization was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 4/13/11 to the persons listed below.

Mr. Tom Messer, Suwannee American Cement, LLC (tomm@vcsmc.com)  
Mr. Celso Martini, VCSMC (celsom@vcsmc.com)  
Mr. Joe Horton, Suwannee American Cement, LLC (JBHorton@vcnainc.com)  
Mr. Krishna Cole, Suwannee American Cement, LLC (krishnac@vcsmc.com)  
Mr. Max Lee, Ph.D., P.E., K&A (mlee@kooglerassociates.com)  
Mr. Chris Bird, Director of Alachua County Department of Environmental Regulation (chris@alachuacounty.us)  
Ms. December McSherry (lmcsh2001@aol.com)  
Ms. Annette Long, Save Our Suwannee, Inc. (long5892@bellsouth.net)  
Mr. Thomas Ellison (dmt51@aol.com)  
Chair, Suwannee County Board of County Commissioners (commissioners@suwcounty.org)  
Chair, Alachua County Board of County Commissioners (bocc@alachuacounty.us)  
Mr. Greg Strong, DEP Northeast District (greg.strong@dep.state.fl.us)  
Mr. Chris Kirts, DEP Northeast District (christopher.kirts@dep.state.fl.us)  
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)  
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)  
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

4/13/11  
\_\_\_\_\_  
(Date)

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Wednesday, April 13, 2011 3:13 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'mlee@kooglerassociates.com'; 'krishnac@vcsmc.com'; Kirts, Christopher; 'dmot51@aol.com'; Strong, Greg; 'commissioners@suwcounty.org'; 'bocc@alachuacounty.us'; 'chris@alachuacounty.us'; 'long5892@bellsouth.net'; 'lmcsh2001@aol.com'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** SUWANNEE AMERICAN CEMENT; 1210465-021-AC  
**Attachments:** 1210465-021-AC\_Authorization.pdf

Dear Sir/ Madam:

Attached is the official **Final Letter of Authorization** for the request referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.021.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.021.AC.F_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

**Project Number:** 1210465-021-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**Facility County:** SUWANNEE

**Processor:** Christy DeVore

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)717-9000.

Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (New Phone)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvania

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**From:** Messer Tom [tommm@vcsmc.com]  
**Sent:** Wednesday, April 13, 2011 3:18 PM  
**To:** Livingston, Sylvania  
**Subject:** Re: SUWANNEE AMERICAN CEMENT; 1210465-021-AC

Received

-----Original Message-----

**From:** Livingston, Sylvania  
**To:** Tom Messer  
**Cc:** Joe B Horton  
**Cc:** Martini Celso  
**Cc:** [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Cc:** Cole Krishna  
**Cc:** Christopher L. Kirts  
**Cc:** [dmot51@aol.com](mailto:dmot51@aol.com)  
**Cc:** Strong, Greg  
**Cc:** [commissioners@suwcounty.org](mailto:commissioners@suwcounty.org)  
**Cc:** [bocc@alachuacounty.us](mailto:bocc@alachuacounty.us)  
**Cc:** [chris@alachuacounty.us](mailto:chris@alachuacounty.us)  
**Cc:** [long5892@bellsouth.net](mailto:long5892@bellsouth.net)  
**Cc:** [lmcshe2001@aol.com](mailto:lmcshe2001@aol.com)  
**Cc:** [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)  
**Cc:** [abrams.heather@epa.gov](mailto:abrams.heather@epa.gov)  
**Cc:** Gibson, Victoria  
**Cc:** DeVore, Christy  
**Cc:** Koerner, Jeff  
**Cc:** Walker, Elizabeth (AIR)  
**Subject:** SUWANNEE AMERICAN CEMENT; 1210465-021-AC  
**Sent:** Apr 13, 2011 3:13 PM

Dear Sir/ Madam:

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Click on the following link to access the documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.021.AC.F.pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.021.AC.F.pdf.zip)

Owner/Company Name: SUWANNEE AMERICAN CEMENT CO. Facility Name: SUWANNEE AMERICAN CEMENT  
Project Number: 1210465-021-AC Permit Status: FINAL Permit Activity: CONSTRUCTION Facility  
County: SUWANNEE

Processor: Christy DeVore

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## Livingston, Sylvania

---

**From:** rprtcard [rprtcard@bellsouth.net]  
**Sent:** Thursday, April 14, 2011 3:35 PM  
**To:** Merrilleart@aol.com  
**Cc:** long5892@bellsouth.net; Imcshe2001@aol.com; David Wiles; Joy Ezell;  
karen@pcecweb.org; linda@bystrak.com; tomm@suwanneecement.com; Livingston, Sylvania;  
Linero, Alvaro; forney.kathleen@epa.gov  
**Subject:** Re: Fwd: SUWANNEE AMERICAN 1210465-021-AC

All-  
Just noted that Collins Center just gave the Best Practices 'Sustainability' Award to Buckeye Technologies of nearby Taylor County. To burn another 430+ tons of the plastic debris fits right in the overall "Air Protection" climate of the state.

Ms. Livingston was signing off for the Adage biomass plant \*55MW in Hamilton County and we see the patterning across northern and panhandle Florida.

\*Smokestack\* industry  
Suwanee American cement to Buckeye pulp & paper.  
Georgia-Pacific, Palatka to JEA Jacksonville  
~~~~

There is no benchmark of 'Clean Air' and no restraint of DEP Air permitting.  
David Wiles

--- On **Thu, 4/14/11**, **Merrilleart@aol.com** <[Merrilleart@aol.com](mailto:Merrilleart@aol.com)> wrote:

From: Merrilleart@aol.com <[Merrilleart@aol.com](mailto:Merrilleart@aol.com)>  
Subject: Fwd: SUWANNEE AMERICAN CEMENT; 1210465-021-AC  
To: Merrilleart@aol.com  
Date: Thursday, April 14, 2011, 1:41 PM

Sent: 4/14/2011 8:13:40 A.M. Eastern Daylight Time  
Subj: Fwd: SUWANNEE AMERICAN CEMENT; 1210465-021-AC

**Fresh Air ALERT** -- The Suwannee American tire/coal/garbage burning cement plant, a mile and a half from beautiful Ichetucknee Springs, is getting a month long extension to burn remaining 438 tons of **agricultural plastic black plastic**, irrigation tubing, roundbale casings. **1,250 tons has been permitted by DEP** - Dept. of Poison.

D-

-----Original Message-----

From: "Livingston, Sylvania" <[Sylvia.Livingston@dep.state.fl.us](mailto:Sylvia.Livingston@dep.state.fl.us)>  
To: "tomm@suwanneecement.com" <[tomm@suwanneecement.com](mailto:tomm@suwanneecement.com)>  
CC: "jbhorton@suwanneecement.com" <[jbhorton@suwanneecement.com](mailto:jbhorton@suwanneecement.com)>,  
"celsom@vscmc.com" <[celsom@vscmc.com](mailto:celsom@vscmc.com)>, "mlee@kooglerassociates.com"  
<[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)>, "krishnac@vscmc.com" <[krishnac@vscmc.com](mailto:krishnac@vscmc.com)>,  
"Kirts, Christopher" <[Christopher.Kirts@dep.state.fl.us](mailto:Christopher.Kirts@dep.state.fl.us)>, "dmot51@aol.com"

<dmot51@aol.com>, "Strong, Greg" <Greg.Strong@dep.state.fl.us>, "commissioners@suwcounty.org" <commissioners@suwcounty.org>, "bocc@alachuacounty.us" <bocc@alachuacounty.us>, "chris@alachuacounty.us" <chris@alachuacounty.us>, "long5892@bellsouth.net" <long5892@bellsouth.net>, "lmcsh2001@aol.com" <lmcsh2001@aol.com>, "forney.kathleen@epa.gov" <forney.kathleen@epa.gov>, "abrams.heather@epa.gov" <abrams.heather@epa.gov>, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>, "DeVore, Christy" <Christy.DeVore@dep.state.fl.us>, "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>, "Walker, Elizabeth (AIR)" <Elizabeth.Walker@dep.state.fl.us>

Date: Wed, 13 Apr 2011 15:13:03 -0400

Subject: SUWANNEE AMERICAN CEMENT; 1210465-021-AC

Dear Sir/ Madam:

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**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

**Project Number:** 1210465-021-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**Facility County:** SUWANNEE

**Processor:** Christy DeVore

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Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)717-9000.

Sylvia Livingston

Division of Air Resource Management (DARM)

Department of Environmental Protection

## Livingston, Sylvia

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**From:** Dennis [guana@bellsouth.net]  
**Sent:** Thursday, April 14, 2011 6:01 PM  
**To:** Livingston, Sylvia  
**Cc:** long5892@bellsouth.net; December McSherry; David Wiles; Joy Ezell; Karen Ahlers; linda@bystrak.com; tomm@suwanneecement.com; Linero, Alvaro; forney.kathleen@epa.gov  
**Subject:** Re: Fwd: SUWANNEE AMERICAN 1210465-021-AC

My fervent hope Sylvia is that some day in the future, your pulmonologist does not look at you and sadly say: "Mrs. Livingston, you have stage four COPD and must go on a continuous oxygen supply today at 4 liters per minute, and start taking 40mg of Prednisone daily in hopes of retarding further deterioration of your critically important alveolar sacs." If this should ever occur, then you will realize what a very important position you had, and you allowed yourself and the mission of your agency to be compromised. Agency people must fight every day to make sure that the Florida statutes and agency rules are being strictly and fairly implemented to achieve the stated goals and objectives of the agency. If the agency staff doesn't do it every day, then who will? In my short professional agency career in Florida from 1967-1986, I saw the water quality in almost every watershed in Florida seriously degraded or essentially destroyed as a robust and productive ecosystem. Today, when you buy a Florida fishing license, you get a small telephone book-sized document that tells you the dozens of lakes and rivers in the State that have restrictions and limitations relative to whether you can eat your catch, or how many of that species can you eat a week without risking injury. How bad is that? Next it will be how many inhalations can I make while running a race in Suwannee County without exceeding the state standard of some toxic substance in my precious lungs. I direct this appeal to all environmental regulatory staff in Florida in the hope that you will begin to work diligently, persistently and with true grit that our atmosphere, like our surface waters, are not sacrificed on the altar of development, money, and political power.

I will pray for you.

Dennis Auth  
[guana@bellsouth.net](mailto:guana@bellsouth.net)



## Livingston, Sylvia

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**From:** DiamondtelDeb@aol.com  
**Sent:** Friday, April 15, 2011 10:58 PM  
**To:** Livingston, Sylvia  
**Subject:** Dept of Poison, Fresh Air Alert: SUWANNEE AMERICAN ...  
**Attachments:** 1210465-021-AC\_Authorization.pdf

How could you? We used to live near SAC (nothing American about it). We fought the cement plant when they wanted to double the size. We were forced to move. Couldn't breathe. neighbors on oxygen. SOX, NOX mercury, particulate and resulting MOLD in the area horrendous. Fish poisoned.

Again, how could you continue to allow more poison into the air and water? There are lots of things of things we can do for money. What does it profit a man/woman to gain the whole world and lose his/her own soul?

Sylvia, I am sure you know what to do to live in peace with yourself and the rest of us. Please do that.

Sincerely,

Former resident of Ft. White who can now breathe easier!

## Livingston, Sylvania

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**From:** LWheeler45@aol.com  
**Sent:** Saturday, April 16, 2011 4:16 PM  
**To:** Livingston, Sylvania; cig@eog.myflorida.com  
**Cc:** lwheeler45@aol.com; randsney@gmail.com  
**Subject:** Notice probable FDEP violation Clean Air Act/ Clean Water Act / 1210465-021-AC

## Report an Environmental Violation - Information submitted

Thank you for submitting information on a possible environmental violation. The information will be reviewed by EPA enforcement personnel. This notice will be the only response you will receive regarding your submission. Due to the sensitive manner in which enforcement information must be managed by EPA, we can not provide status reports or updates regarding any submission we receive through the Report an Environmental Violation form.

page

Your Name: Leonard e wheeler  
Your Email: LWheeler45@AOL.com  
Your Address: 521 West Seminole Ave  
Your City: Eustis  
Your State: Florida  
Your Zip: 32726  
Your Phone: 352 483 9555

Suspected Violation Date: 04/15/2011

Suspected Violator Name: Suwannee American Cement Plant

Suspected Violator Address: Taylor co

Suspected Violator City: unknown

Suspected Violator State: Florida

Suspected Violator Zip: 32301

Still Occurring: yes

Notified State: yes

DEP/DEQ/DEM:

Department: fdep

Contact:

Characterized incident as:

Intent: Intentional  
Type: Release  
Media: Air  
Media: Land  
Media: Water  
Media: Worker  
Media: Documents  
Entity: Company

Description of incident or hazard: Subj: Fwd: SUWANNEE AMERICAN CEMENT; 1210465-021-AC -- The Suwannee American tire/coal/garbage burning cement plant, a mile and a half from beautiful Ichetucknee Springs, is getting a month long extension to burn remaining 438 tons of agricultural plastic black plastic, irrigation tubing, roundbale casings. 1,250 tons has been permitted by DEP

WHAT INITIAL STEPS HAS EPA TAKEN IN DECIDING WHETHER MATERIALS ARE A SOLID WASTE FOR PURPOSES OF CAA SECTION 129?

As a preliminary step to help us assess whether secondary materials are, or are not, a solid waste, the Agency published an **Advanced Notice of Proposed Rulemaking** (ANPRM) on January 2, 2009 (see <http://www.epa.gov/waste/nonhaz/definition.htm>.)<sup>1</sup>

In the ANPRM, the Agency identified nine fuel groups and six ingredient groups which it believes account for the vast majority of all secondary materials used as fuels or ingredients. The nine fuel groups include: biomass; construction and debris materials (building related, disaster debris, and land clearing debris); scrap tires; **scrap plastics**; spent solvents; coal refuse; waste water treatment sludge; used oil; and resinated biomass. The six ingredient groups include: blast furnace slag; cement kiln dust; coal combustion products (fly ash, bottom ash, and boiler slag); foundry sand; silica fume; and secondary glass material.

Much of EPA's reasoning in the ANPRM is drawn from previous rulemakings on the Resource Conservation and Recovery Acts (RCRA) definition of solid waste and ...court decisions providing somewhat complicated tests for EPA to consider in identifying solid waste. As a result, the ANPRM identified two potential key factors in determining if secondary materials are solid wastes when used in combustion units.

- Whether these secondary materials have been "discarded" (applying the plain meaning of discard i.e., disposed of, abandoned, thrown away), and whether it is used as a "legitimate" fuel or ingredient; and
- If they have been discarded, whether the secondary materials have been sufficiently processed to produce a legitimate "non-waste" product.

<sup>1</sup> An ANPRM is a notice that is published in the Federal Register which seeks public comment and information

Specific :

Eliza Buck, Agricultural Resources Committee Coordinator Last month we examined opportunities for extending the growing seasons. AG plastics for high and low tunnel hoop houses are definitely useful for getting crops earlier and later in the year as well as a number of other agricultural uses. In fact, Washington State University has a whole webpage dedicated to **plasticulture** or the broad and general use of plastics in agriculture (<http://www.hortla.wsu.edu/links/plasticulture.html>). There are a multitude of plastic derived products used for agriculture including: mulch film, drip irrigation tape, row covers, tunnel film, box liners, greenhouse film, peat moss bags, haylage bale stretch-wraps, **Super Sacks**, plastic twine, silage bags, bunker covers, buckets, barrels, drums, nursery pots and trays, and irrigation pipe. Though these products have helped farmers around the world, they also are adding to the **ever-increasing problem of plastics disposal**. Two common practices for AG plastics disposal are burning or sending to landfills. Both create problems. Burning plastic (especially at smoldering temperatures) releases highly

toxic vinyl chloride and other potentially cancer-causing chemicals (i.e., dioxins and furans) into the air; this pollution also aggravates asthma and emphysema and can increase the risk of heart disease in susceptible people. Residue from burning contaminates the soil and groundwater and can enter the human and livestock food chain by settling on crops and in waterways.