

HAZARDOUS WASTE MANAGEMENT PERMIT - PART II OF THE PERMIT
EPA AUTHORIZATION UNDER THE HAZARDOUS AND SOLID WASTE AMENDMENTS OF 1984

Pursuant to Section 227 of the Hazardous and Solid Waste Amendments of 1984 (hereafter referred to as "HSWA"), 18 U.S.C. § 6926, the United States Environmental Protection Agency (hereafter referred to as "EPA") is granted authority to issue or deny permits or those portions of permits affected by the requirements established by HSWA. By this authority and pursuant to Sections 3001(g), 3001(h), 3002(b), 3004(d), and 3005 of the Resource Conservation and Recovery Act ("RCRA") as amended by HSWA, 42 USC §§6921(g), 6921(h), 6922(b), 6924(d), and 6925, EPA hereby grants Lone Star Industries, Inc., dba Buzzi Unicem USA as the facility owner and operator (hereafter referred to as the "Permittee"), EPA ID Number MOD981127319, permission to perform activities required by HSWA at their facility located at 2524 South Sprigg Street, Cape Girardeau, Missouri, north latitude 37° 16' 003", west longitude 89° 32' 023", in accordance with the conditions of Part II of this Permit.

Part II of this Permit addresses other HSWA requirements as administered and enforced by EPA. Applicable regulations are found in 40 Code of Federal Regulations (CFR) Parts 260 through 264, 266, 268, 270, and 124, as specified in Part II of this Permit.

All regulations cited in Part II of this Permit refer to regulations in effect on the date of Part II of this Permit issuance. With the exception of regulations in existence at the time of Permit issuance and referenced in Part II of this Permit, the only other RCRA regulations applicable to this facility during the life of Part II of this Permit will be self-implementing regulations.

The Regional Administrator has delegated authority to perform all actions necessary to issue, deny, modify, or revoke and reissue Permits for owners and operators of hazardous waste treatment, storage, and disposal facilities pursuant to Section 3005 of RCRA to the Director of Region VII, Air and Waste Management Division, (hereafter referred to as "Director") or the Director's designated representative, by delegation.

Part II of this Permit is based on the assumption that the information applicable to the Permit, in the Permit application dated January, 1998 and the revisions dated February 2, 1998, and subsequent applications and revisions approved as Permit modifications are accurate and that the facility will be operated as specified in the application, subsequent applications and revisions.

Any inaccuracies found in the application or other submitted information may be grounds for the modification, revocation and reissuance, or termination of Part II of this Permit in accordance with 40 CFR §§ 270.41, 270.42, and 270.43, or for enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. The Permittee must inform EPA of any deviation from or changes in the application that would affect the Permittee's ability to comply with Part II of this Permit.

Part II of this permit shall be issued at 12:01 AM on February, 16, 1999, and shall remain in effect until 12:00 AM on February 16, 2009 unless revoked and reissued, terminated or continued in accordance with 40 CFR §§270.41, 270.43, and 270.51. It shall remain in effect even if Part I is terminated or has expired.

Modifications to this Part II of the Permit are done at Kansas City, Kansas, this 4th day of June, 2012.

//signature on original John J. Smith for Becky Weber//

Becky Weber
Director, Air and Waste Management Division

U.S. ENVIRONMENTAL PROTECTION AGENCY

**CLASS 3 PERMIT MODIFICATION
PART II OF THE HAZARDOUS WASTE MANAGEMENT PERMIT**

**LONE STAR INDUSTRIES, INC. dba BUZZI UNICEM USA
CAPE GIRARDEAU, MISSOURI
RCRA ID# MOD981127319**

The U.S. Environmental Protection Agency Region 7 has prepared this permit modification in accordance with the requirements of 40 CFR part 124 and 40 CFR parts 264, 266 and 270. Lone Star Industries, Inc. dba Buzzi Unicem USA (Lone Star), requests modification of the hazardous waste management permit to provide authorization to combust hazardous waste in the pre-calciner section in addition to the rotary kiln section of the cement kiln. Lone Star submitted its request in a letter and application dated October 28, 2011, and revised permit application dated February 19, 2012, March 5, 2012 and March 8, 2012, as a Class 3 permit modification request which requires approval of the agency.

The Regional Administrator of EPA Region 7 has delegated authority to perform all actions necessary to issue, deny, modify, or revoke and reissue permits for owners and operators of hazardous waste treatment, storage, and disposal facilities pursuant to Section 3005 of RCRA to the Director of the Air and Waste Management Division of EPA Region 7 or the Director's designated representative, by delegation No. R7-8-6; January 1, 1995 and revised September 16, 2007.

The hazardous waste management permit issued February 16, 1999, as subsequently modified, to Lone Star is proposed to be further modified as set out below with the permit condition being entirely replaced with the proposed language shown in *italics*.

1. Permit Condition D.1 is replaced in its entirety with the following:

Permit Condition D.1 – Authorization of Hazardous Waste Combustion

This Permit provides authorization to the Permittee pursuant to RCRA to combust hazardous waste as specified herein in addition to the requirements for hazardous waste combustors found at 40 CFR Part 63, Subpart EEE (promulgated pursuant to the Clean Air Act (CAA)). It is the duty of the Permittee to resolve any conflicting provisions of RCRA set forth herein and those for which the facility is subject to under the CAA, i.e., this Permit is not a shield to CAA compliance, and vice versa.

The Permittee is authorized pursuant to 40 CFR Part 266, Subpart H, to combust the hazardous waste identified with process code T81 in the Part A permit application signed February 21, 2012 included in the February 2012 permit modification request in an industrial furnace at the Facility. The Permittee's industrial furnace consists of a dry-process rotary cement kiln with a 4-stage pre-heater, a pre-calciner, a bypass duct, and an air pollution control system consisting of a bypass duct baghouse, a bypass duct spray tower, a pre-heater outlet duct spray dryer, a main baghouse, and an exhaust stack for the combined exhaust gases from the bypass duct and pre-heater. Liquid hazardous waste may be burned via injection with one burner pipe assembly in the discharge end of the rotary

kiln and one burner pipe assembly in the pre-calciner. Solid hazardous wastes are packaged in small closed containers, approximately five gallons each, which may be injected into the discharge end of the rotary kiln with a pneumatic container feed system.

The authorization to combust hazardous waste is contingent upon the Permittee's continued and continuous compliance with the requirements for hazardous waste burning cement kilns found at 40 CFR Part 63, Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors. The Permittee's non-compliance with 40 CFR Part 63, Subpart EEE, or cessation of Portland cement manufacturing may be grounds for termination of the authorization to combust hazardous waste.

2. Permit Condition D.14 is added:

Permit Condition D.14 - Hazardous Waste Combustion Risk Assessment

Within 150 days of completion of the comprehensive performance test conducted in accordance with an approved test plan to demonstrate performance and determine emissions from the additional hazardous waste combustion in the pre-calciner, the Permittee shall revise and resubmit the report titled "Multipathway Risk Assessment for the Lone Star Cement Company, Cape Girardeau, Missouri" dated November 1998. The revised multipathway risk assessment report shall evaluate all increased emissions of pollutants, all emissions of pollutants not previously evaluated for which appropriate data is now available and all other changes in toxicity or methodology which may result in a determination of increased risk to human health and the environment. The Permittee shall provide additional information, respond to comments and revise the report as the Director may specify in writing.

Any inaccuracies found in the application or other submitted information may be grounds for the modification, revocation and reissuance, or termination of Part II of this Permit in accordance with 40 CFR §§270.41, 270.42, and 270.43, or for enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. §6928. The Permittee must inform EPA of any deviation from or changes in the application that would affect the Permittee's ability to comply with Part II of this Permit.

Part II of this permit shall be issued at 12:01 AM on February, 16, 1999, and shall remain in effect until 12:00 AM on February 16, 2009 unless revoked and reissued, terminated or continued¹ in accordance with 40 CFR §§270.41, 270.43, and 270.51. It shall remain in effect even if Part I is terminated or has expired.

These modifications are issued and effective this 4th day of June, 2012.

¹ This permit has been continued in accordance with 40 CFR §270.51