

RESPONSE SUMMARY

RESPONSE TO COMMENTS ON THE DRAFT PERMIT FOR Lafarge-North America Paulding, Ohio OHD 987 048 733

I. INTRODUCTION

This summary is issued in response to all of the significant comments raised during the public comment period. The public comment period for the draft permit extended from August 16 to September 30, 2010.

II. COMMENTS, RESPONSES, AND CHANGES

The following comments were submitted by Lafarge-North America:

- 1. Comment: Pg.3 of 14; Section I.E.3 Permit Expiration:** This section includes the statement that “Unless revoked or terminated, this permit and all conditions herein will be effective for approximately seven years from this permit’s effective date.” Since the term of the permit has been definitely established in the cover of the draft permit, Lafarge believes that the use of the phrase “approximately seven years” has the potential to be misinterpreted later. Thus, Lafarge requests that the sentence be revised as follows:

“Unless revoked or terminated, this permit and all conditions herein will be effective until the permit expiration date of October 2, 2017.”

Response: EPA will accept this comment and will modify the draft permit accordingly.

Change: SECTION I.E.3 Permit Expiration, “Unless revoked or terminated, this permit and all conditions herein will be effective for approximately seven years from this permit’s effective date.” This sentence will be changed to read: “Unless revoked or terminated, this permit and all conditions herein will be effective until the permit expiration date of October 2, 2017.”

- 2. Comment: SECTION II – AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS, Page 11 of 14, Section II.A.4 Valves in Gas/Vapor Service or in Light Liquid Service:** The regulations at 40 CFR § 264.1057(c) include reduced frequency for testing of valves if no leaks are found for two consecutive months. The draft permit does not include this option. Thus, Lafarge requests that the following language be inserted into the permit:

“Any valve for which a leak is not detected for two successive months may be monitored the first month of every succeeding quarter, beginning with the next quarter, until a leak is detected for two successive months. (40 CFR § 264.1057(c)(1) and (2))”

Response: EPA will accept this comment and will modify the draft permit accordingly.

Change: Section II.A.4 Valves in Gas/Vapor Service or in Light Liquid Service, Section II.A.4.b will be created to insert the following paragraph: “Any valve for which a leak is not detected for two successive months may be monitored the first month of every succeeding quarter, beginning with the next quarter, until a leak is detected for two successive months. (40 CFR § 264.1057(c)(1) and (2))”

3. **Comment: SECTION II – AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS, Page 13 of 14, Section II.A.8: Alternative Standards for Valve in Gas/Vapor Service or in Light Liquid Service: Percentage of Valves Allowed to Leak:** This section contains a typographic error. In the second sentence, please replace “elcted” with “elected.”

Response: EPA will accept this comment and will modify the draft permit accordingly.

Change: Section II.A.8: Alternative Standards for Valve in Gas/Vapor Service or in Light Liquid Service: Percentage of Valves Allowed to Leak: “. . . elcted . . .” will be changed to “. . . elected . . .”

The following comment was submitted by a local citizen:

4. **Comment:** “I contacted the EPA about a year or so ago. Lafarge wanted a permit to burn their waste products in kilns with the residue coming out of the smoke stacks as they’ve been doing now, for too many years. I complained to EPA with deafened ears from them. They were granted the permit then and I imagine you’ll grant it too, now. I used live in Cecil. It’s a very small town just north of Lafarge, very close to Lafarge. Lafarge is far too close to neighboring farms (Farm Crops) and the small town of Cecil is just a couple of miles north on Road 105 north of Lafarge.

I lived there from 1993 until 2006. I ended up with breast and lymph node cancer. I had heart trouble in 1998 and it got worse after the cancer treatments – 6 chemotherapies and 31 radiations. We’ve had cancer in several residents of Cecil and surrounding farms. Some of people died of it. I don’t have a complete list. You need to investigate and find out more

about that. I feel it's the hazardous materials they've burned over the years. I'm seriously thinking of a law suit. The EPA (you) should not allow this to go on. You could get more names of people from Cecil and the surrounding area who have or had cancer, plus the names of those who have died of cancer. The scary part is once you've had cancer, you never know if it will come back. I had a lump in my chest (2008) and had to have a rib removed to get to the lump. It wasn't cancerous. I've really been carved up. The treatment made my heart worse. I have a bad aortic valve. Two heart murmurs are present. My family never had anyone with cancer before me. There are many more people who have had and who have cancer in and around Cecil. Many are already deceased. You are just quietly to allow this to go on."

Response: The proposed federal RCRA permit specifies regulatory requirements concerning air emission leaks from equipment such as valves, flanges, and closed-vent system. The stack emissions from cement kilns burning hazardous waste and its consequent risk problems are not included in this federal draft permit. Since the State of Ohio was authorized to implement the regulations of Boilers and Industrial Furnace (BIF) in October 2007, the regulatory requirements for the cement kilns will be addressed in the State RCRA permit. The Ohio Environmental Protection Agency (OEPA) will evaluate any potential human health risk issues from Lafarge's burning hazardous waste during the OEPA's state RCRA permitting process.

When we issued a federal RCRA permit in June 2000, as a part of RCRA permitting process, we evaluated a site-specific risk assessment (SSRA) to determine whether the stack emissions of burning hazardous waste at the cement kilns would cause any unacceptable harm to the human health. EPA requested Lafarge to perform a SSRA, and a final risk report was submitted in 1999. The report was based on a May 1998 trial burn data. The SSRA considered exposure to four potential receptors: adult resident, child resident, subsistence farmer, and a fisher. Impacts were evaluated using the results of stack emission testing, dispersion modeling, and indirect risk assessment estimating procedures outlined in the guidance published by EPA. Potential impacts to ecological receptors were also evaluated. The report concluded that no additional risks are posed due to the operation of the rotary kilns when complying with the maximum air emission standards. Lafarge demonstrated its compliance with the maximum air emission standards during the stack emission test conducted in July and August of 2009.

Change: No change is made per this comment.