



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 30 2019

REPLY TO THE ATTENTION OF:

Mr. Timothy Weible  
Senior Area Environmental Manager  
Holcim (US) Inc. Paulding Plant  
11435 County Road 176  
Paulding, Ohio 45879

Re: Final Federal RCRA Permit, Holcim (US) Inc. Paulding Plant  
Paulding, Ohio, OHD 987 048 733

Dear Mr. Weible:

Enclosed is a copy of the final Federal portion of a Resource Conservation and Recovery Act (RCRA) Hazardous Waste permit for the above-referenced facility. The complete RCRA Hazardous Waste permit contains both Federal permit conditions (contained herein) and State permit conditions, which will be issued separately by the State of Ohio RCRA program authorized under Title 40 of the Code of Federal Regulations (40 C.F.R.) Part 271. Any hazardous waste activity not included in the Federal portion of the RCRA permit or in the State portion of the RCRA permit is prohibited when such activity requires a RCRA Hazardous Waste permit.

The draft Federal RCRA permit was publicly noticed in the Paulding Progress Newspaper and announced on the "WDFM 98.1" radio station on or about March 15, 2019. A copy of the draft Federal RCRA permit was available for review at the Paulding County Carnegie Library, 205 South Main Street, Paulding, Ohio. The public comment period extended from March 22, 2019 to May 10, 2019.

The U.S. Environmental Protection Agency received no comments on the draft Federal RCRA permit during the public comment period.

This Federal permit is effective on October 30, 2019 and valid until October 30, 2029, unless the Federal permit is revoked and reissued, or terminated pursuant to 40 C.F.R. § 270.41 and § 270.43. Failure to comply with any conditions of the Federal permit may result in civil and/or criminal penalties.

You may appeal the issuance of this permit by filing a petition for review with the Environmental Appeals Board as provided at 40 C.F.R. § 124.19.



A petition for review of any condition of a RCRA permit decision must be filed with the Environmental Appeals Board within 30 days after EPA serves notice of the issuance of the final permit decision. 40 C.F.R. § 124.19(a)(3). When EPA serves the notice by mail, service is deemed to be completed when the notice is placed in the mail, not when it is received. However, to compensate for the delay caused by mailing, the 30-day deadline for filing a petition is extended by three days if the final permit decision being appealed was served on the petitioner by mail. 40 C.F.R. § 124.20(d). Petitions are deemed filed when they are received by the Clerk of the Board at the address specified for the appropriate method of delivery. 40 C.F.R. § 124.19(a)(3) and 40 C.F.R. § 124.19(i). Additional information regarding petitions for review may be found in the Environmental Appeals Board Practice Manual (January 2013) and A Citizen's Guide to EPA's Environmental Appeals Board, both of which are available at [http://yosemite.epa.gov/oa/EAB\\_Web\\_Docket.nsf/General+Information/Environmental+Appeals+Board+Guidance+Documents?OpenDocument](http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/General+Information/Environmental+Appeals+Board+Guidance+Documents?OpenDocument).

Eligibility to appeal the Federal permit is discussed further in 40 C.F.R. § 124.19. General filing requirements are contained in the Environmental Appeals Board Practice Manual and A Citizens' Guide to EPA's Environmental Appeals Board.

All documents that are sent through the U.S. Postal Service (except by Express Mail) must be addressed as follows:

Clerk of the Board  
U.S. Environmental Protection Agency  
Environmental Appeals Board  
1200 Pennsylvania Avenue, NW  
Mail Code 1103M  
Washington, DC 20460-0001

Documents that are hand-carried in person, delivered via courier, mailed by Express Mail, or delivered by a non-U.S. Postal Service carrier (e.g., Federal Express or UPS) must be delivered to:

Clerk of the Board  
U.S. Environmental Protection Agency  
Environmental Appeals Board  
1201 Constitution Avenue, NW  
WJC East, Room 3334  
Washington, DC 20004



A copy of the petition should also be sent to:

Land and Chemicals Branch (LL-17J)  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

The procedures for filing an appeal are found in 40 C.F.R. § 124.19. The administrative appeal procedures must be completed prior to any action seeking judicial review.

If you have any questions concerning this permit, please contact Mr. Jae Lee of my staff, at (312) 886-3781.

Sincerely,

A handwritten signature in blue ink, appearing to read "Edward Nam".

Edward Nam  
Director  
Land, Chemicals and Redevelopment Division

Enclosures

cc: Bradley Mitchell, OEPA



**FINAL**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**RESOURCE CONSERVATION AND RECOVERY ACT PERMIT**

**Facility Name and Location:** Holcim (US) Inc. Paulding Plant  
11435 County Road 176  
Paulding, Ohio 45879

**Owner:** Holcim (US) Inc.  
8700 West Bryn Mawr Ave., Suite 300N  
Chicago, Illinois 60631

**Operator:** Holcim (US) Inc.  
8700 West Bryn Mawr Ave., Suite 300N  
Chicago, Illinois 60631

**EPA Identification Number:** OHD 987 048 733

**Effective Date:** October 30, 2019

**Expiration Date:** October 30, 2029

**Authorized Activities:**

The U.S. Environmental Protection Agency hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the "permit") to Holcim (US) Inc. Paulding Plant (hereinafter referred to as the "Permittee" or addressed in the second person as "you") in connection with your hazardous waste management operations at your facility in Paulding, Ohio.

This permit is issued under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 United States Code (U.S.C.) § 6901 *et seq.*) (collectively referred to as "RCRA") and EPA's regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 C.F.R.)).

Specifically, this permit addresses air emission standards for equipment leaks. See 40 C.F.R. Part 264, Subpart BB.

The RCRA permit consists of both this permit, which contains the effective federal RCRA permit conditions issued by EPA, and the effective state RCRA permit conditions issued by the state of Ohio's RCRA program, authorized under 40 C.F.R. Part 271 (state RCRA permit).

The state RCRA permit was issued on September 30, 2019. (The effective and expiration dates of the state RCRA permit are September 30, 2019 and September 30, 2029, respectively.) Any hazardous waste activity which requires a RCRA permit, but is not included in the provisions of the RCRA permit, is prohibited.

**Permit Approval:**

On June 30, 1989, the state of Ohio received final authorization to administer the pre-HSWA RCRA hazardous waste program in accordance with Section 3006 of RCRA, 42 U.S.C. § 6926, and 40 C.F.R. Part 271. The state of Ohio has also received final authorization to administer certain additional RCRA requirements on several occasions since that time.

Because EPA has not yet authorized the state of Ohio to administer certain HSWA regulations, including the air emission standards for equipment leaks (40 C.F.R. Part 264 Subpart BB), however, EPA Region 5 is issuing the RCRA permit requirements for operations at your facility which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all the conditions contained herein, the documents attached hereto, all documents cross-referenced in these documents, approved submittals (including plans, schedules and other documents), the applicable regulations in 40 C.F.R. Parts 124, 260, 261, 262, 264, 270, and applicable provisions of RCRA.

This permit is based on the assumption that the information submitted in your RCRA Part B Permit Application on December 22, 2017, including RCRA Part B Renewal Application, dated August 8, 2018, the revised Part A Application, dated February 26, 2019, and all other modifications to that application (hereinafter referred to as the "Part B Permit Application"), is accurate, and the facility is configured, operated and maintained as specified in the Part B Permit Application and other relevant documents.

Any inaccuracies in the submitted information may be grounds for EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 C.F.R. §§ 270.41, 270.42 and 270.43, and for enforcement action. You must inform EPA of any deviation from, or changes in, the information in the Part B Permit Application and other pertinent documents that might affect your ability to comply with the applicable regulations or conditions of this permit.

**Opportunity to Appeal:**

Petitions for review must be submitted within 30 days after EPA serves notice of the final permit decision. Any person who filed comments on the draft permit or participated in the public hearing may later petition the Environmental Appeals Board to review any



condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may file a petition for review, but only to contest changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 C.F.R. § 124.19.

**Effective Date:**

This permit is effective as of **October 30, 2019** and will remain in effect until **October 30, 2029**, unless revoked and reissued under 40 C.F.R. § 270.41, terminated under 40 C.F.R. § 270.43, or continued in accordance with 40 C.F.R. § 270.51(a).

By:                       Date: 9/20/19  
Edward Nam  
Director  
Land, Chemicals and Redevelopment Division

**OHD 987 048 733  
Holcim (US) Inc. Paulding Plant**

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## SECTION I—STANDARD PERMIT CONDITIONS

### I.A EFFECT OF PERMIT

This permit contains the federal Resource Conservation and Recovery Act (RCRA) permit conditions. You also have an effective State of Ohio RCRA permit. You are hereby allowed to manage hazardous waste at Holcim (US) Inc. Paulding Plant (“facility”) in accordance with this permit and the effective State RCRA permit. Your transfer and disposal of RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the transfer and disposal of RCRA hazardous wastes are subject to the conditions in the State-issued portion of the RCRA permit. Any hazardous waste activity which requires a RCRA permit and is not included either in this permit or the State RCRA permit, is prohibited.

Subject to 40 C.F.R. § 270.4, compliance with the RCRA permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which: (1) become effective by statute; (2) are promulgated under 40 C.F.R. Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 C.F.R. Part 264 regarding leak detection systems; or (4) are promulgated under Subparts AA, BB, or CC of 40 C.F.R. Part 265 limiting air emissions. (40 C.F.R. § 270.4).

This permit does not: (1) convey any property rights or any exclusive privilege (40 C.F.R. § 270.30(g)); (2) authorize any injury to persons or property, or invasion of other private rights; or (3) authorize any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued, or any action brought, under: (1) Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; (2) Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §§ 9601 *et seq.* (commonly known as “CERCLA”); or (3) any other law protecting public health or the environment.

### I.B PERMIT ACTIONS

#### I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination

EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 C.F.R. §§ 270.41, 270.42, and 270.43. EPA may also review and modify this permit, consistent with 40 C.F.R. § 270.41, to include any terms and conditions it determines are necessary to protect human health and the environment under Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or

anticipated noncompliance on your part will not stay the applicability or enforceability of any permit condition. (40 C.F.R. § 270.30(f)).

You may request a modification of this permit under the procedures specified in 40 C.F.R. § 270.42. A Class 1 modification is generally allowed without prior approval by EPA, except under certain conditions as described in 40 C.F.R. § 270.42(a)(2). A Class 2 modification requires prior approval by EPA as described in 40 C.F.R. § 270.42(b). You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective.

You may perform construction associated with a Class 2 permit modification request beginning 60 calendar days after submission of the request, unless the Director establishes a later date. (40 C.F.R. § 270.42(b)(8)). (Pursuant to Chapter 8-6 of the Region 5 Delegation Manual, the authority assigned to the Regional Administrator as Director under 40 C.F.R. § 270.42(b)(8) has been delegated to the Director of the Land, Chemicals and Redevelopment Division of EPA, Region 5. Thus, for the purposes of this permit, the term Director must refer to the Division Director of EPA Region 5's Land, Chemicals and Redevelopment Division). Procedures for a Class 3 modification are specified in 40 C.F.R. § 270.42(c).

#### **I.B.2 Permit Renewal**

This permit may be renewed as specified in 40 C.F.R. § 270.30(b) and Section I.E.2 of this permit. In reviewing any application for a permit renewal, EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 C.F.R. § 270.30(b) and RCRA Section 3005(c)(3)).

#### **I.C SEVERABILITY**

This permit's provisions are severable. If any permit provision, or the application of any permit provision to any circumstance, is held invalid, such provision's application to other circumstances and the remainder of this permit will not be affected. Invalidation of any statutory or regulatory provision on which any condition of this permit is based does not affect the validity of any other statutory or regulatory basis for that condition. (40 C.F.R. § 124.16(a)).

#### **I.D DEFINITIONS**

The terms used in this permit will have the same meaning as in 40 C.F.R. Parts 124, 260 through 266, 268 and 270, unless this permit specifically provides otherwise. Where

neither the regulations nor the permit define a term, the term's definition will be the standard dictionary definition or its generally accepted scientific or industrial meaning.

## **I.E DUTIES AND REQUIREMENTS**

### **I.E.1 Duty to Comply**

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (40 C.F.R. § 270.61). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and will be grounds for: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 C.F.R. § 270.30(a)).

### **I.E.2 Duty to Reapply**

If you wish to continue an activity this permit regulates after its expiration date, you must apply for and obtain a new permit. You must submit a complete application for a new permit at least 180 calendar days before the permit expires, unless the Director grants permission for a later date. The Director will not grant permission to submit the complete application for a new permit later than the permit's expiration date. (40 C.F.R. §§ 270.10(h) and 270.30(b)).

### **I.E.3 Permit Expiration**

Unless revoked or terminated, this permit and all conditions herein will be effective until 10 years from the effective date of the final permit. This permit and all conditions herein will remain in effect beyond the permit's expiration date if you have submitted a timely, complete application (40 C.F.R. § 270.10 and §§ 270.13 through 270.29), and, through no fault of your own, the Director has not made a final determination regarding permit reissuance. (40 C.F.R. §§ 270.50 and 270.51).

### **I.E.4 Need to Halt or Reduce Activity Not a Defense**

In an enforcement action, you are not entitled to a defense that it would have been necessary to halt or reduce the permitted activity to maintain compliance with this permit. (40 C.F.R. § 270.30(c)).

### **I.E.5 Duty to Mitigate**

In the event of noncompliance with this permit, you must take all reasonable steps to

minimize releases to the environment resulting from the noncompliance and must implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 C.F.R. § 270.30(d)).

#### **I.E.6 Proper Operation and Maintenance**

You must always properly operate and maintain all facilities and treatment and control systems (and related appurtenances) that you install or use to comply with this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires you to operate back-up or auxiliary facilities or similar systems only when necessary to comply with this permit. (40 C.F.R. § 270.30(e)).

#### **I.E.7 Duty to Provide Information**

You must provide the Director, within a reasonable time, any relevant information that the Director requests to determine whether there is cause to modify, revoke and reissue, or terminate this permit, or to determine permit compliance. You must also provide the Director, upon request, with copies of any records this permit requires. The information you must maintain under this permit is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 *et seq.* (40 C.F.R. §§ 264.74(a) and 270.30(h)).

#### **I.E.8 Inspection and Entry**

Upon the presentation of credentials and other legally required documents, you must allow the Director or an authorized representative to:

**I.E.8.a** Enter at reasonable times upon your premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

**I.E.8.b** Have access to and copy, at reasonable times, any records that you must keep under the conditions of this permit;

**I.E.8.c** Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

**I.E.8.d** Sample or monitor any substances at any location at reasonable times, to assure permit compliance or as RCRA otherwise authorizes.



Notwithstanding any provision of this permit, EPA retains the inspection and access authority which it has under RCRA and other applicable laws. (40 C.F.R. § 270.30(i)).

#### **I.E.9 Monitoring and Records**

**I.E.9.a** Samples and measurements you take for monitoring purposes must be representative of the monitored activity. The methods you use to obtain a representative sample of the feed streams, treatment residues, or other hazardous wastes to be analyzed must be the appropriate methods from Appendix I of 40 C.F.R. Part 261, or the methods specified in the "Waste Characteristics" section of your facility RCRA Part B permit application ("Application") (Section C of the Application), or an equivalent method approved by the Director. Laboratory methods you employ or use must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods* (SW-846, latest edition), *Methods for Chemical Analysis of Water and Wastes* (EPA 600/4-79-020), or an equivalent method, as specified in the referenced Waste Characteristics. (40 C.F.R. § 270.30(j)(1)).

**I.E.9.b** You must retain, at the facility, all records as specified in 40 C.F.R. § 264.74.

**I.E.9.c** You must submit all monitoring results at the intervals specified in this permit.

**I.E.9.d** You must retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records, or other documents, unless a different period is specified in this permit. The 3-year period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. (40 C.F.R. §§ 270.30(j) and 270.31).

#### **I.E.10 Reporting Planned Changes**

You must notify the Director as soon as possible of any planned physical alterations or additions to the permitted facility. (40 C.F.R. § 270.30(l)(1)).

#### **I.E.11 Reporting Anticipated Noncompliance**

You must notify the Director, in advance, of any planned changes in the permitted

facility or activity that may result in permit noncompliance. Advance notice will not constitute a defense for any noncompliance. (40 C.F.R. § 270.30(l)(2)).

#### **I.E.12 Certification of Construction**

You must not operate any RCRA air emission control devices completed after the effective date of this permit until you have submitted to the Director, by certified mail or hand-delivery, a letter signed both by your authorized representative and by a registered professional engineer, in accordance with 40 C.F.R. § 270.30(l)(2)(i). That letter must state that the portions of the facility covered by this permit have been constructed in compliance with the applicable conditions of this permit. In addition, you must not operate the permitted control devices until either:

**I.E.12.a** The Director or his/her representative has inspected those portions of the facility and finds them in compliance with the conditions of the permit; or

**I.E.12.b** Within 15 calendar days of the date of submission of the Certification of Construction letter referenced in Section I.E.12 of this permit, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage, or disposal of hazardous waste in accordance with 40 C.F.R. § 270.30(l)(2)(ii)(B).

#### **I.E.13 Transfer of Permits**

This permit is not transferable to any person, except after notice to and approval of the Director. You must inform the Director in writing and obtain prior written approval of the Director before transferring ownership or operational control of the facility. (40 C.F.R. § 270.42, Appendix I). Under 40 C.F.R. § 270.40, the Director may require permit modification, or revocation and reissuance to change the name of the Permittee and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, you must notify the Director and obtain prior approval, and notify the new owner or operator in writing of the requirements of 40 C.F.R. Parts 264, 268, and 270, and you must provide a copy of the RCRA permit to the new owner or operator. (40 C.F.R. §§ 264.12(c), 270.30(l)(3), and 270.40(a)).

#### **I.E.14 Twenty-Four Hour Reporting**

**I.E.14.a** You must report to the Director any noncompliance with this permit that may endanger human health or the environment. Any such information must be promptly reported orally, but no later than 24 hours after you become aware of the circumstances.

**I.E.14.b** The report must include the following: (1) Information concerning release of any hazardous waste that may endanger public drinking water supplies; (2) Information of a release or discharge of hazardous waste; or (3) Information of a fire or explosion from the hazardous waste management facility, which could threaten the environment or human health outside the facility. You must include the following information:

- (1) Name, title and telephone number of the person making the report;
- (2) Name, address and telephone number of the facility owner or operator;
- (3) Facility name, address and telephone number;
- (4) Date, time and type of incident;
- (5) Location and cause of incident;
- (6) Identification and quantity of material(s) involved;
- (7) Extent of injuries, if any;
- (8) Assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (9) Description of any emergency action taken to minimize the threat to human health and the environment; and
- (10) Estimated quantity and disposition of recovered material that resulted from the incident.

(40 C.F.R. § 270.30(l)(6)).

**I.E.14.c** In addition to the oral notification required under Sections I.E.14.a and I.E.14.b of this permit, a written report must also be provided within 5 calendar days after you become aware of the circumstances. The written report must include, but is not limited to, the following:

- (1) Name, address and telephone number of the person reporting;

- (2) Incident description (noncompliance and/or release or discharge of hazardous waste), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (3) Period(s) in which the incident (noncompliance and/or release or discharge of hazardous waste) occurred, including exact dates and times;
- (4) Whether the incident's results continue to threaten human health and the environment, which will depend on whether the noncompliance has been corrected and/or the release or discharge of hazardous waste has been adequately cleaned up; and
- (5) If the noncompliance has not been corrected, the anticipated period for which it is expected to continue and the steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance.

The Director may waive the requirement that written notice be provided within 5 calendar days; however, you will then be required to submit a written report within 15 calendar days of the day on which you must provide oral notice, in accordance with Sections I.E.14.a and I.E.14.b of this permit. (40 C.F.R. §§ 270.30(1)(6) and 270.30(h)).

#### **I.E.15 Other Noncompliance**

You must report all instances of noncompliance not reported under Section I.E.14 of this permit, when any other reports this permit requires are submitted. The reports must contain the information listed in Section I.E.14 of this permit. (40 C.F.R. § 270.30(1)(10)).

#### **I.E.16 Other Information**

**I.E.16.a** Whenever you become aware that you failed to submit or otherwise

omitted any relevant facts in the Application or other submittal, or submitted incorrect information in the Application or other submittal, you must promptly notify the Director of any incorrect information or previously omitted information, submit the correct facts or information, and explain in writing the circumstances of the incomplete or inaccurate submittal. (40 C.F.R. §§ 270.30(l)(11) and 270.30(h)).

**I.E.16.b** All other requirements contained in 40 C.F.R. § 270.30 not specifically described in this permit are incorporated into this permit and you must comply with all those requirements.

**I.F SIGNATORY REQUIREMENT**

You must sign and certify all applications, reports, or information this permit requires, or which are otherwise submitted to the Director, in accordance with 40 C.F.R. § 270.11. (40 C.F.R. § 270.30(k)).

**I.G REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR**

Except as otherwise specified in this permit, all reports, notifications, or other submittals that this permit requires to be sent or given to the Director should be sent by certified mail or express mail, or hand-delivered to the U.S. Environmental Protection Agency Region 5, Land and Chemicals Branch, at the following address:

Land and Chemicals Branch, LL-17J  
Land, Chemicals and Redevelopment Division  
U.S. EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**I.H CONFIDENTIAL INFORMATION**

In accordance with 40 C.F.R. Part 2, Subpart B, you may claim any information this permit requires, or otherwise submitted to the Director, as confidential. You must assert any such claim at the time of submittal in the manner prescribed on the application form or instructions or, in the case of other submittals, by stamping the words "Confidential Business Information" on each page containing such information. If you made no claim at the time of submittal, the Director may make the information available to the public without further notice. If you assert a claim, the information will be treated in accordance with the procedures in 40 C.F.R. Part 2. (40 C.F.R. § 270.12). You have the burden of

substantiating that the claimed information is confidential, and U.S. EPA may request further information from you regarding such claim, and may reasonably determine which such information to treat as confidential.

## **I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY**

You must maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and all amendments, revisions, and modifications to them.

### **I.I.1 Operating Record**

You must maintain in the facility's operating record the documents required by this permit, and by the applicable portions of 40 C.F.R. §§ 264.13, 264.73, 264.1064, 264.1084, 264.1088, and 264.1089.

### **I.I.2 Notifications**

You must maintain notifications from generators that are required by 40 C.F.R. § 268.7 to accompany an incoming shipment of hazardous wastes subject to 40 C.F.R. Part 268, Subpart C, that specify treatment standards, as required by 40 C.F.R. §§ 264.73, 268.7, and this permit.

### **I.I.3 Copy of Permit**

You must keep a copy of this permit on the facility site, including all of the documents listed in any attachments, and you must update it as necessary to incorporate any official permit modifications.

## **I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE**

**I.J.1** All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director's approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to enforcement action under Section 3008 of RCRA. This may include fines, or permit suspension or revocation.

**I.J.2** This permit also includes the documents attached hereto, all documents cross-referenced in these documents, and the applicable regulations contained in

40 C.F.R. Parts 124, 260, 261, 262, 264, 266, 268, and 270, and applicable provisions of RCRA, all of which are incorporated herein by reference.

**I.J.3** Any inconsistency or deviation from the approved designs, plans and schedules is a permit noncompliance. The Director may grant written requests for extensions of due dates for submittals required in this permit.

**I.J.4** If the Director determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Director may modify this permit according to procedures in Section I.B of this permit.

**I.J.5** If any documents attached to this permit are found to conflict with any of the conditions in this permit, the condition will take precedence.

## **I.K COORDINATION WITH THE CLEAN AIR ACT**

You must fully comply with the RCRA requirements contained in this permit. This permit does not include the requirements imposed by the Clean Air Act.

You must not operate at the facility process vents as defined in 40 C.F.R. § 264.1031.

## **SECTION II -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS (40 C.F.R. PART 264 SUBPART BB)**

### **II.A EQUIPMENT LEAKS**

#### **II.A.1 Applicable Equipment**

You must comply with all applicable requirements of 40 C.F.R. §§ 264.1050 through 264.1065 regarding air emission standards for equipment leaks. The applicable equipment contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight. Most of the pieces of equipment that contact or contain hazardous waste processed at this facility are considered "in light liquid service" as defined in 40 C.F.R. § 264.1031. However, some pieces of equipment also contain or contact hazardous waste streams that are considered "in gas/vapor service" as defined in 40 C.F.R. § 264.1031. The applicable equipment includes, but is not limited to: 1) valves, 2) flanges, and 3) a closed-vent system.

## **II.A.2 Pressure Relief Devices in Gas/Vapor Services (40 C.F.R. § 264.1054)**

**II.A.2.a** Each pressure relief device in gas/vapor service must be operated with no detectable emissions, as indicated by an instrument reading of less than 500 parts per million (ppm) above background, as measured by the method specified in 40 C.F.R. § 264.1063(c), except during pressure releases.

**II.A.2.b** After each pressure release, the pressure release device must be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release except as provided in 40 C.F.R. § 264.1059.

**II.A.2.c** No later than 5 calendar days after the pressure release, the pressure relief device must be monitored to confirm the condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 C.F.R. § 264.1063(c).

## **II.A.3 Open-ended Valves or Lines (40 C.F.R. § 264.1056)**

**II.A.3.a** Each open-ended valve or line must be equipped with a: 1) cap, 2) blind flange, 3) plug, or 4) second valve, which seals the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line.

**II.A.3.b** When a double block and bleed system is used, the bleed valve or line may remain open during operations that require venting the line between the block valves but must seal the open end at all other times.

## **II.A.4 Valves in Gas/Vapor Service or in Light Liquid Service (40 C.F.R. § 264.1057)**

**II.A.4.a** Each valve in light liquid service must be monitored monthly to detect leaks in accordance with 40 C.F.R. § 264.1057(a) and (c), except as provided in 40 C.F.R. §§ 264.1057(f), (g), and (h). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

**II.A.4.b** When a leak is detected, you must repair the leak as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 C.F.R. § 264.1059. The first attempt at repair must be made no later than five calendar days after the leak is detected.



**II.A.4.c** First attempts at repair include, but are not limited to, the best practices described under 40 C.F.R. § 264.1057(e).

**II.A.5 Pressure Relief Devices in Light Liquid Service, and Flanges and Other Connectors (40 C.F.R. § 264.1058)**

**II.A.5.a** Pressure relief devices in light liquid service and flanges and other connectors must be monitored within five days by the method specified in 40 C.F.R. § 264.1063(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

**II.A.5.b** When a leak is detected, you must repair the leak as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 C.F.R. § 264.1059. The first attempt at repair must be made no later than five calendar days after the leak is detected.

**II.A.5.c** First attempts at repair include, but are limited to, the best practices described under 40 C.F.R. § 264.1057(e).

**II.A.6 Delay of Repair (40 C.F.R. § 264.1059)**

**II.A.6.a** Delay of repair of equipment for which leaks have been detected will be allowed if: 1) the repair is technically infeasible without a hazardous waste management unit shutdown; or 2) the equipment is isolated from the hazardous waste management unit and does not continue to contain or contact hazardous waste with organic concentrations at least 10 percent by weight.

**II.A.6.b** Delay of repair for valves will be allowed if: 1) emissions of purged material resulting from immediate repair are greater than the emissions likely to result from delay of repair; and 2) when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 C.F.R. § 264.1060.

**II.A.6.c** Delay of repair for pumps will be allowed if: 1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and 2) repair is completed as soon as practicable, but not later than six months after the leak was detected.

**II.A.6.d** Delay of repair beyond a hazardous waste management unit shutdown will be allowed for a valve only if it meets the provisions of 40 C.F.R. § 264.1059(e).

**II.A.7 Closed-Vent Systems and Control Devices (40 C.F.R. § 264.1060)**

Closed-vent systems and control devices must comply with the provisions of 40 C.F.R. §§ 264.1033 and 264.1060.

**II.A.8 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Percentage of Valves Allowed to Leak (40 C.F.R. § 264.1061)**

You may elect to have all valves within a hazardous waste management unit comply with an alternative standard that allows no greater than 2 percent of the valves to leak if you comply with the provisions of 40 C.F.R. §§ 264.1061(b) and (c). You must notify the Director that you have elected to comply with the requirements of this alternative standards section.

**II.A.9 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Skip Period Leak Detection and Repair (40 C.F.R. § 264.1062)**

You may elect for all valves subject to the requirements of 40 C.F.R. § 264.1057 within a hazardous waste management unit to comply with one of the alternative work practices specified below. You must notify the Director before implementing one of the alternative work practices.

**II.A.9.a** After two consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 percent, you may begin to skip one of the quarterly leak detection periods for the valves.

**II.A.9.b** After five consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 percent, you may begin to skip three of the quarterly leak detection periods for the valves.

**II.A.9.c** If the percentage of valves leaking is greater than 2 percent, you must monitor valve leaks monthly in accordance with 40 C.F.R. § 264.1057, but you may again elect to use the alternative standards after meeting the requirements of 40 C.F.R. § 264.1057(c)(1).

**II.B TEST METHODS AND PROCEDURES (40 C.F.R. § 264.1063)**

You must comply with the leak test methods and procedures as specified in 40 C.F.R. § 264.1063.

**II.C RECORDKEEPING AND REPORTING REQUIREMENTS**  
**(40 C.F.R. §§ 264.1064 and 264.1065)**

You must comply with the recordkeeping and reporting requirements of 40 C.F.R. §§ 264.1064 and 264.1065.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 30 2019

REPLY TO THE ATTENTION OF:

Mr. Bradley Mitchell  
Ohio Environmental Protection Agency  
Division of Hazardous Waste Management  
Post Office Box 1049  
Columbus, Ohio 43266-0149

Re: Final Federal RCRA Permit, Holcim (US) Inc. Paulding Plant  
Paulding, Ohio, OHD 987 048 733

Dear Mr. Mitchell:

Enclosed please find a copy of the draft Federal Resource Conservation and Recovery Act permit and cover letter to the above-referenced facility.

If you have any questions, please contact Jae Lee of my staff at (312) 886-3781.

Sincerely,

A handwritten signature in blue ink that reads "Susan Mooney".

Susan Mooney, Chief  
RCRA C and D Section  
Land, Chemicals and Redevelopment Division

Enclosure





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 3 0 2019

REPLY TO THE ATTENTION OF:

Reference Desk  
Paulding County Carnegie Library  
205 South Main Street  
Paulding, Ohio 45879

Re: Final Federal RCRA Permit, Holcim (US) Inc. Paulding Plant  
Paulding, Ohio, OHD 987 048 733

To Whom It May Concern:

The U.S. Environmental Protection Agency intends to issue a final Hazardous Waste Management permit to the Holcim (US) Inc. Paulding Plant, Paulding, Ohio. In accordance with the public involvement procedures in Title 40 Code of Federal Regulations Part 124, the draft Federal RCRA permit was publicly noticed in the Paulding Progress Newspaper and announced on the "WDFM 98.1" radio station on or about March 15, 2019. A copy of the draft Federal RCRA permit was available for review at the Paulding County Carnegie Library, 205 South Main Street, Paulding, Ohio. The public comment period extended from March 22, 2019 to May 10, 2019.

Please make available for public examination this letter and the enclosed documents for at least 75 days under "Reference Materials – Holcim (US) Inc. Paulding Plant ". The following items are enclosed.

- Final Permit
- Response Summary

Thank you for your assistance. If you have any questions, please call me at 312-886-3781.

Sincerely,

A handwritten signature in black ink that reads "Jae B. Lee".

Jae B. Lee  
Permit Writer  
RCRA C and D Section  
Land, Chemicals and Redevelopment Division





## RESPONSE SUMMARY

### **RESPONSE TO COMMENTS ON THE FEDERAL DRAFT PERMIT FOR Holcim (US) Inc. Paulding Plant Paulding, Ohio, OHD 987 048 733**

No comments were received on the draft Federal RCRA permit during the public comment period (from March 22, 2019 to May 10, 2019). There was no public hearing held for the draft permit.

Therefore, no conditions of the draft permit were changed in the final permit, with the minor changes noted below:

1. The reference to the draft permit was changed in the final permit;
2. Update of the final State permit issuance date in page ii;
3. Update of names of U.S. EPA, Region 5, Division (Land, Chemicals and Redevelopment Division) and Branch (Land and Chemicals Branch); and
4. Update of the reference of the revised Part A Application in page ii.



**Administrative Record Index *(Final RCRA PERMIT)***

Holcim (US) Inc. Paulding Plant

Paulding, Ohio

OHD 987 048 733

<u>Title</u>	<u>Date</u>	<u>Prepared by</u>
1. Part B Application	December 22, 2017	Holcim
2. Subpart BB Information	December 22, 2017	Holcim
3. EJ Report	June 2017	EPA
4. Part B Renewal Application	August 8, 2018	Holcim
5. Revised Part A Application	February 26, 2019	Holcim
6. Permit Transfer Request	February 26, 2019	Holcim
7. State Draft RCRA Permit	March 2019	OEPA
8. Draft Permit Fact Sheet	March 2019	EPA/OEPA
9. Public Notice Documents	March 15, 2019	EPA/OEPA
10. Federal Draft RCRA Permit	March 2019	EPA
11. Federal Final RCRA Permit	September 2019	EPA

EPA: United States Environmental Protection Agency

Holcim: Holcim (US) Inc. Paulding Plant

OEPA: Ohio Environmental Protection Agency

RCRA: Resource Conservation Recovery Act

EJ: Environmental Justice

Subpart BB: Air Emission Standards for Equipment Leaks





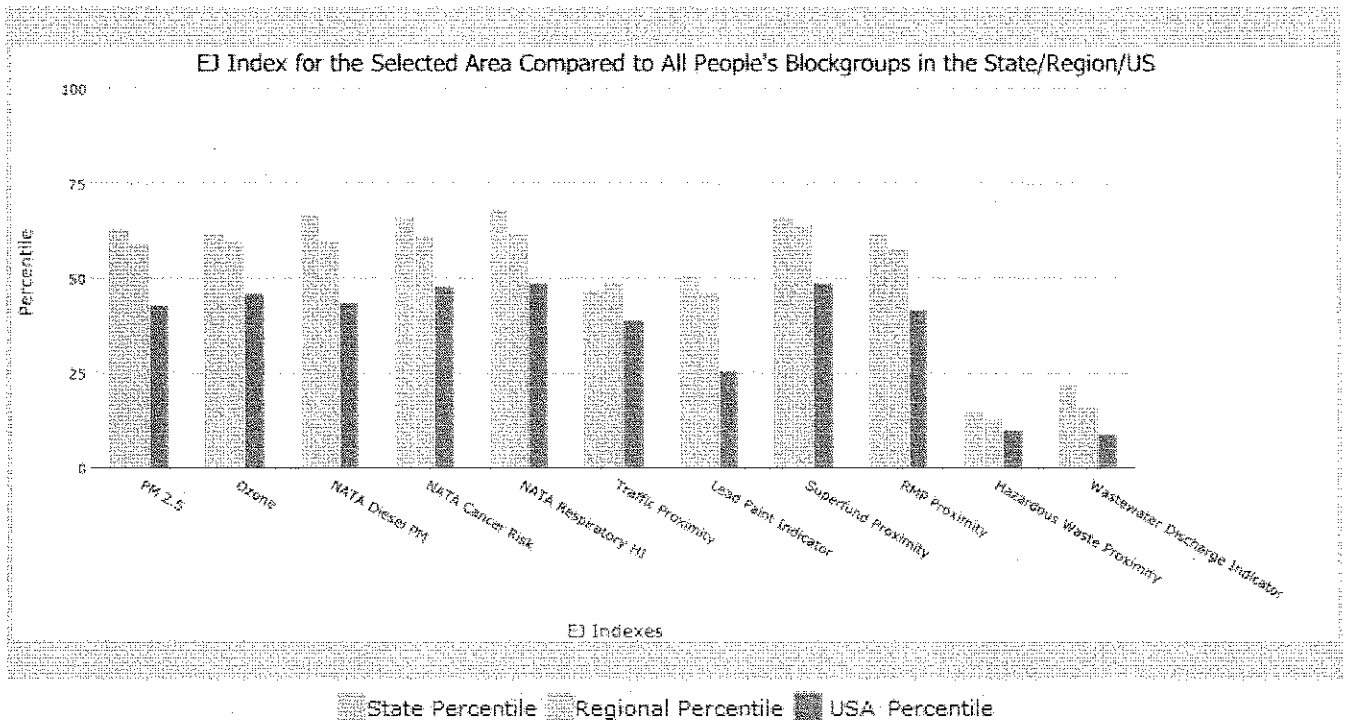
3 mile Ring Centered at 41.179440,-84.602962, OHIO, EPA Region 5

Approximate Population: 3,215

Input Area (sq. miles): 28.27

Lafarge

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	63	59	43
EJ Index for Ozone	62	60	46
EJ Index for NATA* Diesel PM	67	60	44
EJ Index for NATA* Air Toxics Cancer Risk	66	61	48
EJ Index for NATA* Respiratory Hazard Index	68	62	49
EJ Index for Traffic Proximity and Volume	47	49	39
EJ Index for Lead Paint Indicator	51	46	26
EJ Index for Superfund Proximity	66	64	49
EJ Index for RMP Proximity	62	58	42
EJ Index for Hazardous Waste Proximity	15	13	10
EJ Index for Wastewater Discharge Indicator	22	16	9



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

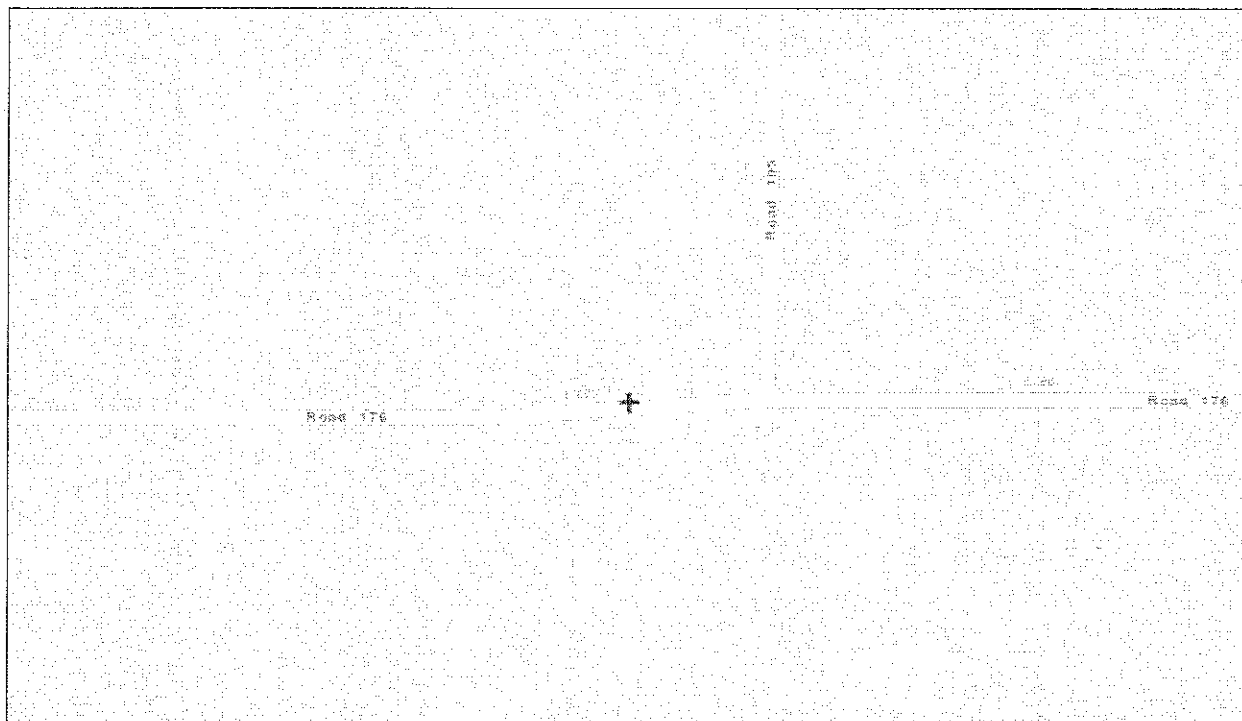


3 mile Ring Centered at 41.179440,-84.602962, OHIO, EPA Region 5

Approximate Population: 3,215

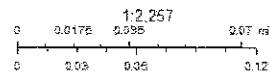
Input Area (sq. miles): 28.27

Lafarge



October 20, 2017

+ Digitized Point



Source: Esri, HERE, DeLorme, USGS, Imagery, Intermap, INRA, Swire, ANZ, JPN, METI, Sanjia, (Hong Kong), Swire, Esri (The Map), Swire, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	2

## EJSCREEN Report (Version 2017)



3 mile Ring Centered at 41.179440,-84.602962, OHIO, EPA Region 5

Approximate Population: 3,215

Input Area (sq. miles): 28.27

Lafarge

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	10.5	10.7	37	10.1	60	9.14	82
Ozone (ppb)	38.8	37.6	70	37.6	69	38.4	62
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.474	0.997	16	0.932	<50th	0.938	<50th
NATA* Cancer Risk (lifetime risk per million)	29	37	13	34	<50th	40	<50th
NATA* Respiratory Hazard Index	0.97	1.8	10	1.7	<50th	1.8	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	66	170	58	370	48	590	44
Lead Paint Indicator (% Pre-1960 Housing)	0.38	0.42	53	0.39	56	0.29	68
Superfund Proximity (site count/km distance)	0.024	0.095	24	0.13	14	0.13	21
RMP Proximity (facility count/km distance)	0.21	0.7	40	0.81	37	0.73	40
Hazardous Waste Proximity (facility count/km distance)	0.27	0.097	94	0.091	94	0.093	94
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.02	17	73	4.2	77	30	84
<b>Demographic Indicators</b>							
Demographic Index	27%	27%	64	29%	61	36%	44
Minority Population	13%	20%	57	25%	48	38%	28
Low Income Population	42%	34%	67	33%	70	34%	66
Linguistically Isolated Population	1%	1%	75	2%	67	5%	52
Population With Less Than High School Education	15%	11%	73	11%	75	13%	64
Population Under 5 years of age	9%	6%	80	6%	79	6%	77
Population over 64 years of age	18%	15%	70	14%	73	14%	74

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.







## Draft Hazardous Waste Permit Renewal and Comment Period

March 2019

**Facility Name:** Holcim (US) Inc. Paulding Plant  
**U.S. EPA I.D.:** OHD987048733

**Location:**  
11435 County Road 176  
Paulding, Ohio 45879

**Facility Owner:**  
Holcim (US) Inc.  
8700 West Bryn Mawr Avenue, Suite 300N  
Chicago, Illinois 60631

**Facility Operator:**  
Holcim (US) Inc.  
8700 West Bryn Mawr Avenue, Suite 300N  
Chicago, Illinois, 60631

**Activity:**  
Permit renewal for treatment of hazardous waste in two rotary kilns.

**Comment Period:**  
March 22, 2019 to May 10, 2019

**Submit Comments to:**  
Ohio EPA  
Brad Mitchell  
Division of Environmental Response and Revitalization  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
(614) 644-2924  
PUBLICCOMMENT@epa.ohio.gov

U.S. EPA, Region 5  
Mr. Jae Lee  
RCRA/TSCA Programs Section, LR-17J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
lee.jae@epa.gov

### What is the history of the hazardous waste program?

The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was passed in 1976. The main reason for the amendment was to address the growing volume of municipal and industrial solid waste generated across the United States. A few goals established by RCRA include: to protect human health and the environment from potential hazards of waste disposal, to reduce the amount of waste generated, and to ensure that waste produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent was for the states to assume primary responsibility for implementing the hazardous waste regulations with oversight from the United States Environmental Protection Agency (U.S. EPA). U.S. EPA must approve each state as an authorized state. To become an authorized state, each must demonstrate that the state program is at least equivalent to and consistent with federal laws, provides adequate enforcement authority and provides availability of information similar to the federal program. Since 1989, the State of Ohio has been an authorized state by U.S. EPA for the majority of their hazardous waste program.

Currently, the State of Ohio is not authorized by U.S. EPA to issue a permit for organic air emissions (40 CFR Part 264, Subparts AA, BB, and CC) from hazardous waste units. U.S. EPA has drafted a RCRA permit to address organic air emissions from equipment containing hazardous waste. U.S. EPA's draft permit and the State of Ohio's draft permit have been issued concurrently and both share the same comment period.

# Draft Hazardous Waste Permit Renewal and Comment Period

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## How can I become more involved?

All persons, including the applicant, may submit written comments relating to this draft action. Written comments or requests for a public meeting may be submitted before the end of the comment period to the address in the box on the front of the page. Ohio EPA and U.S. EPA will hold a public meeting if enough people request such a gathering. The agencies may modify the proposed permit or take other action based on new information or public comments, so your opinion is important.

The comment period begins on March 22, 2019 and ends on May 10, 2019. Copies of the permit application and the draft permit are available for review by the public at the following locations:

Ohio EPA, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, Ohio 43402  
(419) 352-8461

Ohio EPA, Central Office  
Division of Environmental Response and Revitalization  
Lazarus Government Center  
50 West Town St., Suite 700  
Columbus, Ohio 43215  
(614) 644-2924

U.S. EPA, Region 5  
RCRA Branch, LR-17J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
(312) 886-3781

Copies of the Ohio draft permit and the federal draft permit are available for review by the public at:

Paulding County Carnegie Library  
205 South Main Street  
Paulding, Ohio 45879  
(419) 399-2032

The Ohio draft permit is available for review by the public online under the "What's New" tab at:

<http://www.epa.ohio.gov/derr/EnvironmentalResponseandRevitalization>

The entire record for this draft action is available via Ohio EPA's eDocument portal:

<http://edocpub.epa.ohio.gov/publicportal/edoc/home.aspx>

Using the search function, search under the document type of "Permit" and then refine the search using the package number which is "537".

The federal draft permit is available for review by the public online at:

<https://www.epa.gov/oh/draft-federal-rcra-permit-holdcm-us-inc-paulding-plant>

Within sixty (60) days of the close of the public comment period, Ohio EPA will, without prior hearing, issue the permit (or deny the request) in accordance with Chapter 3734 of the Ohio Revised Code (ORC). If Ohio EPA approves the application, taking into account public comments, a renewal permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

After the close of the public comment period, U.S. EPA will review all comments received and decide whether to issue the permit. The final decision will include notification to those who submitted written comments during the official comment period. U.S. EPA will also prepare and send to all responders a document answering significant comments. Within 30 days of a final decision, any person who submitted written comments or made a statement at the hearing if one is held may petition U.S. EPA's Environmental Appeals Board to review the decision.

## Draft Hazardous Waste Permit Renewal and Comment Period

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### What does the facility do?

Holcim (US) Inc. produces Portland cement from raw limestone, clay, fly ash, sand and iron ore slurry mix in two rotary kilns. Fuels derived from hazardous waste, in addition to other non-hazardous fuels, are used to fire the kilns. No other hazardous waste activity for which a permit is required is performed at the site. The facility does not store waste on-site because all the hazardous waste is hard-piped from an adjacent fuel blender.

### What would this hazardous waste permit allow the facility to do?

This permit allows Holcim (US) Inc. to continue to treat hazardous waste by burning the hazardous waste in two rotary kilns. Holcim (US) Inc. will continue to be able to process up to 134,203 tons of hazardous waste in a calendar year. The hazardous waste may only be received from the adjacent fuel blending facility via above ground piping.

### What is the regulatory basis to support this permit renewal?

The Director has determined that Holcim (US) Inc. has submitted an application for renewal one hundred eighty (180) days prior to the expiration date of its present permit which was issued by Ohio EPA on October 2, 2007. The Director has considered the application, inspection reports, a report regarding the facility's compliance with the present permit, and the rules adopted under ORC Section 3734. The Director has found that the Part B permit application meets the Director's performance standards and that the facility has a history of compliance with this chapter, rules adopted under it, the existing permit, and orders entered into, which demonstrates reliability, expertise, and competency to subsequently operate the facility under this chapter, the rules, and the permit.

### Who can I contact for more information?

For additional information, please contact Gary Deutschman at (419) 373-3056 or Jae Lee of the U.S. EPA Regional Office in Chicago, Illinois at (800) 621-8431 ext. 63781.

