

**SECTION M**  
**SOLID WASTE MANAGEMENT UNITS**

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## **SECTION M – SOLID WASTE MANAGEMENT UNITS**

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## **SECTION M – SOLID WASTE MANAGEMENT UNITS**

### **1.0 SOLID WASTE MANAGEMENT UNITS**

Per the requirements for solid waste management units (SWMU) specified in 40 CFR 270.14(c) and (d) and 40 CFR 264 Subpart F, Central Plains Cement Company (CPCC) must identify the location of each SWMU at the facility and provide available information pertaining to any release of hazardous wastes or hazardous constituents from these units.

CPCC operates two cement kilns that are fed Fuel Quality Waste (FQW) via pipeline from the onsite Systech Tulsa facility. Information on the design, operation, and wastes managed is contained in Sections A and D of this application. The pipelines to the kilns and kilns are inspected daily for signs of release. Detection of a release is subject to immediate spill response, potential reporting and remediation. The CPCC cement kilns are subject to the closure requirements of the RCRA hazardous waste management rules and permit. Therefore, any issue such as a spill or release due to routine operations of transferring FQW into the cement kilns will be addressed immediately and documented in the facility records and/or at the time of closure. There have been no spills or releases related to the FQW from the pipelines to the kilns.

### **2.0 RELEASES FROM SOLID WASTE MANAGEMENT UNITS**

CPCC completed a RCRA Facility Assessment (RFA) in February 2010 for the initial hazardous waste permit issued in April 2010. Some of CPCC's SWMUs identified in the RFA required further investigations and remediation in accordance with the RCRA Facility Investigation (RFI) permit requirements. All SWMUs subject to the RFI were investigated and remediated with the exception of one area of concern. CPCC was unable to completely remediate soil that overlies active pipelines. Consequently, CPCC was required to deed record this area. Attachment A is a copy of the ODEQ approved deed restriction that was entered into the county deed for the CPCC property. Attachment B is a copy of the filed Deed Recordation. No further action is required regarding this area. Currently, CPCC does not operate land-based units that are subject to the requirements of 40 CFR 264 Subpart F.

Pursuant to CPCC's RCRA permit, a RFA is required if CPCC identifies a new SWMU or Area of Concern (AOC) on its property. In the event a SWMU or AOC is identified, CPCC will follow the procedures outlined in the RCRA permit for conducting the RFA and RFI, if required.