

SECTION III – HAZARDOUS WASTE BURNING

A. SECTION HIGHLIGHTS

The Tulsa Cement facility operates two dry process rotary kilns to produce Portland cement from limestone, clay, sand, and various raw material substitutes. The primary fuel fed to both kilns is fuel quality waste (FQW), which is essentially a mixture of hazardous waste solvents from various industries such as paints, inks, plastics, oils, petrochemicals, pharmaceuticals, and coatings industries. The FQW provides up to 35% of the energy required by the kilns each year. Coal, natural gas, and non-hazardous wastes may also be used in the kilns as supplemental fuels. All hazardous waste fuels burned in the kilns are supplied by the permitted hazardous waste storage facility Systech Environmental Corporation located within the property boundary of the Permittee.

B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

1. The Permittee may burn and accept hazardous waste from the onsite Systech Environmental Corporation facility subject to the terms of this Permit.
2. The Permittee is prohibited from the use of direct transfer of hazardous waste, as described in 40 CFR 266.111, from trucks to the Tulsa Cement kilns.
3. Results of waste analyses of hazardous waste fuel obtained from Systech Environmental Corporation must be incorporated into the Tulsa Cement facility operating record.

C. INSPECTION SCHEDULE AND PROCEDURES

The Permittee shall inspect all permitted equipment in accordance with the procedures and schedules outlined in the Inspection Plan, Permit Attachment 2. [40 CFR 264.174]

D. RECORDKEEPING

The Permittee shall place the results of all waste analysis, trial tests, and any other documentation showing compliance with the requirements of this Permit, as well as 40 CFR 264.17(b) and 264.177, in the facility operating record. [40 CFR 264.73]

E. AIR EMISSION REQUIREMENTS

Tulsa Cement implements a fugitive emissions detection program in accordance with 40 CFR Part 264, Subpart BB and OAC 252:205-3-2(f). The FQW within the Tulsa Cement plant is presumed to contain more than ten (10) percent organics and is a light liquid; therefore, equipment associated with FQW is subject to the Subpart BB requirements.

Air emissions from the kilns are regulated under a Title V air permit which includes the emission limits of 40 CFR 63, Subpart EEE, Hazardous Waste Combustor-Maximum Achievable Control Technology.