



June 30, 2009

Saba Tahmassebi, Ph.D., P.E.
Chief Engineer
Land Protection Division
Oklahoma Department of Environmental Quality
707 N. Robinson
Oklahoma City, Oklahoma 73102

RE: Lafarge Building Materials
Initial RCRA Part B Application
EPA ID No. OKD064558703

Dear Mr. Tahmassebi,

Lafarge Building Materials, Inc., (Lafarge) is submitting the enclosed RCRA Part B permit application for approval to construct facilities to allow the combustion of Fuel Quality Waste (FQW) in the two existing Lafarge cement kilns at the Tulsa, Oklahoma cement facility, 2609 North 145th East Ave., Tulsa, OK in Rogers County. The FQW will be supplied from an on-site FQW blending facility owned and operated by Systech Environmental Corporation which will be co-located on the Lafarge cement plant property. Systech is submitting a separate RCRA Part B application. The permit application addresses the installation of piping, controls and burn nozzles.

Three copies of the application are included, one with an original signature. Each copy also includes a complete electronic version of the application on compact disk. A check to cover the permitting fees will follow under separate cover.

Please contact me at (918) 437-3902, x-275 or Gary King with Schreiber, Yonley & Associates at 630-406-9705 if you have any questions regarding the enclosed. Thank you in advance for your attention to this matter. We look forward to working with you and your staff during the application review process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JBachmann', written over a white background.

James Bachmann
Plant Manager
Lafarge Building Materials, Inc.

Encl.

cc: Gary Elliott – Lafarge
Bob Schreiber – Schreiber, Yonley & Associates

LAFARGE NORTH AMERICA INC.
600 S.W. Jefferson, Suite 302
Lee's Summit, MO 64063
Office: (816) 251-2100
Fax: (816) 347-1884

Disclosure Statement (27A O.S. Supp. 1995, §2-10-302)
For
Lafarge Building Materials, Inc.
Hazardous Waste Permit Application

Part I. Applicant

1. Name (full): Lafarge Building Materials, Inc.
12950 Worldgate Dr., Suite 600
Herndon, VA 20170

Federal Employer Identification Number (FEIN): 22-2452187

2. Legal entity in which applicant holds a debt or equity interest of a least 5%

Name of business (full): Pre-Con Corporation
Business Address: 12950 Worldgate Dr., Suite 600
Herndon, VA 20170

Hunting Hills, Inc.
12950 Worldgate Dr., Suite 600
Herndon, VA 20170

3. Parent Company of applicant:

Name of business (full): Lafarge North America Inc
12950 Worldgate Dr, Suite 600
Herndon, VA 20170

4. Description of the ongoing organizational relationships as they may impact operations within the state.

Lafarge Building Materials, Inc. (LBM) is an indirect wholly owned subsidiary of Lafarge North America, Inc. (Lafarge). LBM is the owner of several of the cement plants that Lafarge operates in North America. The applicant, LBM, has continued to own and operate these cement plants for non-operational reasons. LBM will continue to operate this cement plant but whose management reports to Lafarge. Lafarge also owns and operates two other cement plants that have been using FQW: one since 1979 and the other since 1982.

5. Experience and credential of the applicant, including past or present permits, licenses, certifications, or operational authorizations relating to environmental regulation.

<u>Name Under Which Held</u>	<u>Facility Location or Business Address</u>	<u>Type of License</u>	<u>Issuing Agency</u>	<u>Date Held From/To</u>	<u>License/Registration/ EPA ID Number</u>
Lafarge	County Road 176 Paulding, OH	BIF	OEPA	1979-pres.	OHD 987 048 733
Lafarge Midwest, Inc.	1400 S. Cement Rd. Fredonia, KS	RCRA TSD RCRA BIF	KDHE EPA/KDHE	1982-1987	KSD 980 633 259
Lafarge Corp.*	PO Box 839 Demopolis, AL	RCRA TSD RCRA BIF	ADEM USEPA	1986-1988 1986-1993	ALD 981 019 045
Lafarge Corp.*	Ford Road Alpena, MI	RCRA TSD RCRA BIF	MDEQ USEPA	1986-1988 1986-2000	MID 981 200 835 MID 005 379 607
Lafarge Corp.**	St. Rt. XXX Lebec, CA	RCRA TSD	Cal. EPA	1986-1988	

* former name of Lafarge North America, Inc.

** This plant was sold to National Cement before federal permits were required for burning FQW.

Lafarge has been operating cement plants that have used FQW since 1979. Over the years, Lafarge has operated a total of five different cement plants that has used FQW. Two of these plants were sold and one ceased using FQW for economic reasons. Two plants, Paulding, OH and Fredonia, KS, continue to use FQW today.

6. Listing and explanation of any administrative, civil or criminal legal actions which resulted in a final agency order or judgment on appeal, in the ten years immediately preceding the filing of the application relating to solid or hazardous waste.

The following are the significant compliance actions related to solid and hazardous waste at the Lafarge cement plants. Minor NOVs were not included because they did not result in any fines or consent orders.

Ravena, NY plant

In 2005, the Lafarge cement plant in Ravena, NY violated a dust standard with respect to its on-site landfill in violation of its solid waste permit. This violation resulted in a \$7500 fine and a consent order.

Kansas City, MO Cement Distribution Operation

In 2007, a Lafarge distribution facility located in Missouri experienced a discharge of slurried fly ash into a nearby tributary of Mill Creek. Missouri DNR

issued a Notice of Violation that involved primarily the Clean Water Act but also included a citation for the discharge of solid waste in violation of the Lafarge solid waste and underground injection control permits. Remediation activities were immediately instituted and settlement discussions are ongoing.

Fredonia, KS plant (plant still using FQW)

From 2001-2008, KDHE issued a number of minor NOV's for various items, e.g., repairs not noted in inspection checklist, inspection sheet signatures missing, instrument calibration done in wrong quarter, contingency plan not updated with current names and phone numbers, regarding its hazardous waste permitted activities at the plant but no penalties were levied or consent orders filed.

Paulding, OH plant (plant still using FQW)

In 2006, OEPA issued an NOV because the training program was not structured according to their interpretation of the hazardous waste regulations. The program was amended and OEPA has accepted it.

7. Any permits denied or any sanctions imposed by any state regulatory agency or the USEPA.

None

8. Listing of all federal environmental agencies and all state agencies that have or have had regulatory responsibility over the applicant (includes other cement facilities owned and operated by Lafarge in the United States).

Lafarge Building Materials, Inc. facilities

U.S. Environmental Protection Agency (EPA)

Alabama Department of Environmental Management (ADEM)

South Carolina Department of Environment & Health Control (SC DEHC)

New York State Department of Environmental Conservation (NYS DEC)

Other Lafarge North America, Inc. facilities

Pennsylvania Department of Environmental Protection (PaDEP)

Illinois Environmental Protection Agency (IEPA)

Missouri Department of Natural resources (MoDNR)

Washington Department of Ecology (WaDOE)

Iowa Department of Natural Resources (IDNR)

Ohio Environmental Protection Agency (OEPA)

Kansas Department of Health & Environment (KDHE)

Michigan Department of Environmental Quality (MDEQ)

Maryland Department of the Environment (MDE)

Part II – All officers, directors and/or partners

1. Name, Business Address, Social Security Number

Name	Address	Social Security Number
Peter Keeley – Director/Officer	Lafarge North America, Inc. 12950 Worldgate Dr, Suite 600 Herndon, VA 20170	
<u>Sylvain Garnaud – Director/Officer</u>	Lafarge North America Inc 12950 Worldgate Dr, Suite 600 Herndon, VA 20170	
<u>Robert Fiolek – Officer</u>	Lafarge North America Inc 12950 Worldgate Dr, Suite 600 Herndon, VA 20170	
<u>Olivier Merindol – Officer</u>	Lafarge North America, Inc. 600 SW Jefferson, suite 302 Lees Summit, MO 64063	

2. Listing and explanation of any administrative, civil or criminal legal actions which resulted in a final agency order or judgment on appeal, in the ten years immediately preceding the filing of the application relating to solid or hazardous waste.

None

3. Any permits denied or any sanctions imposed by any state regulatory agency or the USEPA.

None

Part III – All persons employed as general or key managers who direct the operations of the site, which is the subject of this application.

1. Name, Business Address, Social Security Number

Name	Business Address	Social Security Number
John Ford	Lafarge North America, Inc. 600 SW Jefferson, suite 302 Lees Summit, MO 64063	

James Bachmann	Lafarge Building Materials, Inc. 2609 N. 145 th E. Ave. Tulsa, OK 74116	
Hans Schrama	Lafarge Building Materials, Inc. 2609 N. 145 th E. Ave. Tulsa, OK 74116	

2. Listing and explanation of any administrative, civil or criminal legal actions which resulted in a final agency order or judgment on appeal, in the ten years immediately preceding the filing of the application relating to solid or hazardous waste.

None

3. Any permits denied or any sanctions imposed by any state regulatory agency or the USEPA.

None

Part IV – All persons owning or controlling more than five percent (5%) of the applicant’s debt or equity.

1. Name, Business Address, Social Security Number

Name	Business Address	FEIN
Lafarge North America, Inc.	12950 Worldgate Dr, Suite 600 Herndon, VA 20170	58-1290226

2. Listing and explanation of any administrative, civil or criminal legal actions which resulted in a final agency order or judgment on appeal, in the ten years immediately preceding the filing of the application relating to solid or hazardous waste.

See attached list from Part I, Question 6 that includes both Lafarge Building Materials, Inc. and Lafarge North America, Inc. actions.

3. Any permits denied or any sanctions imposed by any state regulatory agency or the USEPA.

None


Part V – Certification and Oath

I certify Under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, of those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Signature of Applicant

29 JUNE 09.
Date



Signature of Notary Public

June 29, 2009
Date

My commission expires: Oct 23, 2010

