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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

OCT - 8 1998

Mr. Mark Hunter
310 West Chisholm Street
Alpena, Michigan 49707

Dear Mr. Hunter:

We are able to give you a partial response to your August 23, 1998 letter to Administrator Carol Browner regarding your concern about burning hazardous waste in cement kilns. You expressed particular concern about the Lafarge cement plant's hazardous waste burning activities in Alpena. You indicated that hazardous waste can be burned more efficiently and safely in commercial incinerators rather than cement kilns. Therefore, you state that the Environmental Protection Agency should phase out burning in cement kilns.

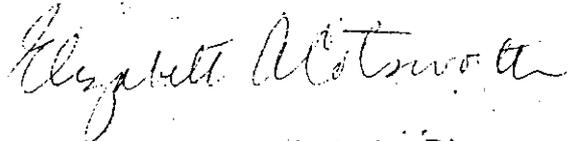
The Agency has established regulations and is updating those rules as part of a hazardous waste combustion strategy that will ensure that all hazardous waste combustion facilities are safe. As a factual matter, cement kilns can be designed and operated to burn hazardous wastes as safely as incinerators. Cement kilns have a combustion chamber that operates at extremely hot temperatures in order to adequately calcine and sinter raw materials to produce a clinker product. In addition, cement kilns have a large heat reservoir that is comprised of the heated raw materials and kiln refractory. The high temperatures and the heat reservoir help ensure the destruction of toxic organic compounds in the hazardous waste. Finally, when cement kilns burn hazardous waste fuels, they do so as an alternative to coal or other fuels. If these waste fuels were not used at cement kilns, these facilities would have to burn more of other fuels, which can raise environmental concerns as well.

I have forwarded your letter to our Chicago regional office to give them an opportunity to respond to your particular concerns about Lafarge's Alpena facility.

Faxback 14486

If you have further comments or questions regarding burning hazardous waste in cement kilns in general, please feel free to contact David Hockey, Project Director, National Hazardous Waste Combustion Strategy, at (703) 308-8846.

Sincerely yours,



Elizabeth A. Cotsworth, Acting Director
Office of Solid Waste

cc: Region V; Waste, Pesticides, and Toxics Division.