KEYSTONE

KEYSTONE CEMENT COMPANY

P.O. BOX A, BATH, PA 18014-0058 TELEPHONE: (610) 837-1881

February 28, 2011

Office of Enforcement and Compliance Assurance
Office of Federal Activities, International Compliance
Assurance Division (2254A),
Environmental Protection Agency,
1200 Pennsylvania Ave., NW.,
Washington, D.C. 20460

RE: Keystone Cement Company Bath, PA
EPA ID# - PAD002389559
2010 Annual HW Exporter Report

Dear Sir or Madam:

Pursuant to the requirements of 40 §CFR 262.56, Keystone Cement Company is providing this report regarding its hazardous waste exporting activity for the 2010 reporting year.

Primary Exporter:

Name and EPA ID No.:

Keystone Cement Company
EPA ID# - PAD002389559

Tel: 610-837-1881

Mailing Address:

Keystone Cement Company
P.O. Box A
Bath, PA 18014-0058

Site Address:

Keystone Cement Company
Route 329
Bath, PA 18014-0058

Calendar Year ("CY") for this Report:

CY 2010

ADMINISTRATION
RT. 329, BATH, PA 18014-0058
FAX 610—837-2267

PLANT
RT. 512, BATH, PA 18014-0058
FAX 610-837-2291

received
SON 3/1/11

From: (610) 837-1881 Origin ID: UKTA
Diana Borger
KEYSTONE CEMENT COMPANY
Route 329

BATH, PA 18014

FedEx Express

J11101012220225

Ship Date: 28FEB11
ActWgt: 1.0 LB
CAD: 5434379/INET3130

Delivery Address Bar Code

Ref #
Invoice #
PO #
Dept #

SHIP TO: (202) 272-0167 BILL SENDER

Internat'l Compliance Assurance Div
Office of Enforcement & Compliance
1200 PENNSYLVANIA AVE NW
U.S. EPA - MAILCODE 2254A
WASHINGTON, DC 20460

TUE - 01 MAR A1
STANDARD OVERNIGHT

TRK# 0201 7968 0946 8241

ZD RDVA

20460
DC-US
DCA

50DG1/396A/7EFB

After printing this label:
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic valueof the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental,consequential, or special is limited to the greater of $100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is $500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

Consignee:

Stablex Canada Inc.
760, boul. Industrial
Blainville, Quebec J7C 3V4

Hazardous Waste Description:

Hazardous Waste No. 1

Description:	Cement Kiln Dust from ancillary equipment for closure of RCRA permitted long-wet cement kiln
US EPA Hazardous Waste #:	F001[1], F002, F003, F004, F005, U001
DOT Shipping Name:	RQ Waste corrosive solid, basic, inorganic, n.o.s (calcium oxide)
Haz Class:	8
ID Number:	UN 3262
Shipping frequency:	1 shipment in 2010
Total Amount Shipped:	7,431 lbs
Transporter(s):	Horwith Trucks Inc., Route 329, Box 7 Northampton, PA 18067 U.S. EPA ID No. PAD146714878

[1] In addition to the six hazardous waste codes presented in this report, this material carried twenty-five additional waste codes due solely to the mixture and derived rules. The underlying hazardous constituents which comprise those additional codes were not present in significant concentrations. The additional waste codes are listed in Attachment No. 1.

Hazardous Waste No. 2

Description:	TSD tank farm piping from partial closure for RCRA permitted hazardous waste derived fuels facility
US EPA Hazardous Waste #:	F001[2], F002, F003, F004, F005, U001
DOT Shipping Name:	RQ Waste environmentally hazardous substances, solid, n.o.s (metals)
Haz Class:	9
ID Number:	UN 3077
Shipping frequency:	1 shipment in 2010
Total Amount Shipped:	13,914 lbs
Transporter(s):	Horwith Trucks Inc., Route 329, Box 7 Northampton, PA 18067 U.S. EPA ID No. PAD146714878

[2] In addition to the six hazardous waste codes presented in this report, this material carried fifty-seven additional waste codes due solely to the mixture and derived rules. The underlying hazardous constituents which comprise those additional codes were not present in significant concentrations. The additional waste codes are listed in Attachment No. 2.

40 CFR §262.56 (a)(5)(i) & (ii) Descriptions

Keystone Cement Company (Keystone) operates a Portland and masonry cement manufacturing facility in Bath Pennsylvania. Keystone utilizes liquid hazardous wastes as fuel within its onsite cement kiln.

Keystone primarily generates hazardous waste in the area of waste fuel management. Keystone makes a continual effort to reduce the volume or toxicity of hazardous waste generated onsite by implementing the following activities:

- Substitution for either process or maintenance materials.
- Initiation of pollution controls to enhance environmental effectiveness and reduce emissions.

- Improvement of operation through employee training.
- Improvement/modernization of physical plant for reduction of adverse environmental impacts.
- Daily facility inspections for equipment leaks, etc.
- Periodic changes in operating procedures to eliminate or reduce waste generation.
- Annual assessment and update (where necessary) of the facility Waste Minimization Program.

As part of a facility-wide modernization project, Keystone closed two of its RCRA permitted long wet kilns, and associated waste derived fuel piping, and replaced them with a single "preheater/ pre-calciner" kiln. The exported hazardous waste streams described above were generated during the closure of a long wet kiln and hazardous waste derived fuel tank farm piping.

In 2009 Keystone generated approximately 253 tons of hazardous waste at its Bath facility. In 2010 Keystone generated approximately 27 tons of hazardous waste at its Bath facility.

A certification statement, pursuant to the requirements of 40 CFR 262.56 (a)(6), is provided as Attachment No. 3 to this submittal.

Please do not hesitate to contact me directly at (610) 837-1881 extension 2237 if you have any questions.

Sincerely,

J.P. Kleinle
Environmental Compliance Coordinator

CC: PA DEP, Bureau of Waste Management
Rocco Marinaro, Keystone Cement Company
Stephen P. Holt, Keystone Cement Company

Shipped via FedEx

Attachment 1

In addition to the six hazardous waste codes presented in the attached report, hazardous waste No.1 materials carried the additional waste codes listed below due solely to the mixture and derived rules. The underlying hazardous constituents which comprise these additional codes were not present in significant concentrations.

Hazardous Waste No. 1

U002	K022
U004	K048
U009	K051
U012	K086
U019	
U031	
U051	
U052	
U055	
U056	
U057	
U112	
U113	
U115	
U117	
U140	
U154	
U159	
U161	
U169	
U188	

Attachment 2

In addition to the six hazardous waste codes presented in the attached report, hazardous waste No. 2 materials carried the additional waste codes listed below due solely to the mixture and derived rules. The underlying hazardous constituents which comprise these additional codes were not present in significant concentrations.

Hazardous Waste No. 2

D004	U002	K048
D005	U004	K051
D006	U009	K052
D007	U012	K086
D008	U019	
D010	U031	
D011	U039	
D018	U051	
D019	U052	
D020	U055	
D021	U056	
D022	U057	
D023	U112	
D024	U113	
D025	U115	
D026	U117	
D027	U140	
D028	U154	
D029	U159	
D030	U161	
D031	U169	
D032	U188	
D033	U220	
D034	U239	
D035		
D036		
D037		
D038		
D040		

Attachment 3

Certification: Keystone Cement Company 2010 Hazardous Waste Exporter Annual Report

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Stephen J. Hayden, Jr. Plant Manager

February 28, 2011

Diana L. Borger for
Stephen J. Hayden, Jr.
Signature