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NORTH CAROLINA
Environmental Quality

February 6, 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tim Basilone, Vice President
American Zinc Recycling
4955 Steubenville Pike, Suite 405
Pittsburgh, PA 15205

Re: **RCRA Status of Lead Chloride Material Proposed for Shipment To American Zinc Recycling Mooresboro, NC Facility**
EPA ID No. NCD 000159038

Dear Mr. Basilone:

On January 23, 2019, the NC Hazardous Waste Section (HWS) received information from NC DEQ agency documents concerning materials proposed for shipment to the American Zinc Recycling (AZR) Facility in Mooresboro, NC. The proposed materials will constitute a new material stream at the Mooresboro Facility.

Our review of these documents and further interagency discussions indicates AZR proposes to ship a material termed "lead chloride" generated at the Palmerton, PA Facility to the Mooresboro, NC Facility. Our discussions and review of these documents leads us to conclude that the material proposed for shipment could be a characteristic hazardous waste with waste code D008 (at a minimum). Prior to accepting this material at the Mooresboro Facility, AZR should submit the following information to the HWS:

1. Information, including sample analysis, that demonstrates whether the lead chloride material is or is not a hazardous waste;

2. If the waste is a hazardous waste, AZR must also submit the following:
    a. Request for a variance under one of the categories listed in 40 CFR 260, as adopted in 15 NCAC 13A .0103;
    b. The processes by which the lead chloride will be generated and stored prior to shipment to the Mooresboro, NC Facility;

c. A detailed description of the area where the lead chloride material will be stored at the Mooresboro, NC Facility;
d. An estimate of the length of time the lead chloride material will be stored prior to entering the process at the Mooresboro, NC Facility;
e. A detailed description of the method for loading the lead chloride into the processing equipment at the Mooresboro, NC Facility (include management of spills and releases);
f. A description of commodities that will be generated by the processing of the lead chloride material at the Mooresboro, NC Facility;
g. A description of wastes generated from processing of the lead chloride and how those wastes will be managed.

Acceptance of hazardous waste from an off-site facility requires a RCRA Treatment, Storage, or Disposal Permit. If AZR wishes to proceed with shipment of D008 hazardous waste to the Mooresboro, NC Facility, AZR should contact the HWS to determine next steps to obtain a RCRA Permit.

Please note that this new material stream (lead chloride) is not part of the January 7, 2014 letter from NCDENR (now DEQ) approving the request to classify materials generated on-site as non-hazardous. As such, AZR cannot accept the lead chloride material at the Mooresboro, NC Facility until the HWS reviews this additional documentation.

Please contact Sean Morris at 919-270-2714 or by email at sean.morris@ncdenr.gov if you have any questions or need additional information on this issue.

Sincerely,

Julie S. Woosley, Chief, NC HWS
NC Division of Waste Management/NC DEQ

ec: Brent Burch
Sean Morris
Michael Scott
Jay Osbourne
Jeff Menzel
Mark Wilkins