AMERICAN ZINC RECYCLING
Delivering a Sustainable Future

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Via Electronic Mail and Overnight Mail

June 11, 2019

Brent G. Burch
Compliance Branch Head, HWS
Division of Waste Management
North Carolina Department of Environmental Quality
1646 Mail Center
217 West Jones Street
Raleigh, NC 27603

Re: Lead Concentrate Shipment Information
American Zinc Products Facility, Mooresboro, North Carolina
EPA ID No. NCD000159038

Dear Mr. Burch:

At the request of Roberto Buso, Esquire, of U.S. EPA Region 4, I am enclosing a copy of correspondence sent to Mr. Buso on June 5, 2019, from counsel to American Zinc Products LLC ("AZP"), providing information on recent shipments of lead concentrate from the American Zinc Recycling Corporation ("AZR") facility in Palmerton, Pennsylvania to North Carolina. Also enclosed is a table that was included with the correspondence to Mr. Buso, which lists the shipments. Please see the letter to Mr. Buso for an explanation of the information in the table. Finally, the overnight package being sent to you will also include a disc containing copies of the shipping documents that were sent to Mr. Buso and described in the letter to him. Per the letter to Mr. Buso, the table and shipping documents contain information that the company considers to be confidential business information and are labeled as such, and therefore we request that NCDEQ maintain these documents as confidential.

As described in my letter to Ms. Julie Woosley of March 20, 2019 (a copy of which is also enclosed), lead concentrate is a material similar to Waelz Oxide (WOX), the primary feedstock for AZP's Mooresboro metal production facility. Lead concentrate, a by-product of calcining WOX at the Palmerton facility, contains metals including zinc, lead and cadmium in the form of sulfates, oxides, chlorides and fluorides. AZP and AZR have been evaluating the possibility of processing lead concentrate at the Mooresboro facility, as an additional metals feedstock, to produce the same products and by-products that the Mooresboro facility was originally designed to produce. In addition, AZR has recently secured agreements with third-party recycling facilities to utilize the lead concentrate as a feedstock for metals recovery. As mentioned in the enclosed letter to Mr. Buso, for engineering and other reasons as part of preparing for restart of the Mooresboro facility, the company determined that at present recycling the lead concentrate under these agreements with third-party recyclers is the preferable approach. Therefore, the company plans to remove all of the lead chloride

shipments currently located in North Carolina for transport to third-party recycling facilities before the end of 2019.

In terms of the regulatory status of the lead concentrate, my March 20 letter to Ms. Woosley explained that lead concentrate is a by-product exhibiting one or more hazardous waste characteristics (D006 and D008) being reclaimed through recovery of various metal values, and accordingly is excluded from the definition of solid waste pursuant to 40 C.F.R. § 261.2(c)(3), as adopted at 15A N.C.A.C. 13A.0106(a). (Please note that under an existing Consent Decree entered into with EPA and the Pennsylvania Department of Environmental Protection governing, among other things, management of lead concentrate produced at the Palmerton facility, this material is to be managed under the hazardous waste requirements applicable to non-listed hazardous waste bearing the D006 and D008 waste codes.)

Please call me if you have any questions or would like further information.

Sincerely,

Timothy R. Basilone /bd

Timothy R. Basilone

enclosures