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January 21, 2020

Mr. John Johnston
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Mail Code: 9T25
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SUBJECT: **NC HWS Comments on December 2019 Initial Site Review Workplan**
American Zinc Products Facility
484 Hicks Grove Road
Mooresboro, North Carolina
NCR 000 159 038

The North Carolina Hazardous Waste Section (HWS) has reviewed the Initial Site Review Workplan (Workplan) for the American Zinc Products (AZP) Facility (the Facility) in Mooresboro, NC. Our comments on the Workplan are attached. Please contact me at 919-397-6642 or at mark.wilkins@ncdenr.gov if you have questions or need additional information about these comments.

Sincerely,

Mark Wilkins Digitally signed by Mark Wilkins
Date: 2020.01.21 16:14:06
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Mark Wilkins, NC Hazardous Waste Section
Division of Waste Management, NCDEQ

ATTACHMENTS

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1. As part of the site review report, AZP should provide a table listing all hazardous constituents used at, produced or generated (including any byproducts), or shipped to or from the Facility. This should include all constituents found or potentially found in the WOX, zinc concentrate, "final residue", "impurities" from the raffinate process, bleed treatment residues, zinc organic concentrate filter cake, leach residues, waste casting material, iron-rich material (IRM), and any other material utilized at the site;

2. Some materials removed from the West Ponds and the East Ponds were sampled and sent offsite as hazardous wastes. The Initial Site Review Report (Report) should identify which units managed these hazardous wastes. In the Report, the Facility should detail why these Ponds should not be considered units (surface impoundments) that managed (or are managing) hazardous wastes;

3. Section 3.0 of the Workplan discusses a January 7, 2014 letter from the HWS concerning the status of materials proposed to be generated at the Facility. The January 7, 2014 letter was based on information provided to the HWS at that time and prior to the Facility beginning operations. The January 7, 2014 letter did not include a determination of the regulatory status of the incoming WOX material.

4. Section 6.0 of the Workplan indicates 12 areas of concern were identified in the Consent Order. The Facility should include plans to investigate any additional areas of concern (such as the rail car washing area) not identified in the Order that are identified during the site review process;

5. The ISR Report should identify areas at the facility where IRM has been placed;

6. The ISR Report should identify all hazardous waste central accumulation areas currently or formerly utilized at the site. The ISR Report should provide a description of and the potential for release from these areas.