## **Environmental Emergency Response Plan**



Prepared for:

International Metals Reclamation Company, Inc. Ellwood City, Pennsylvania

February 2011

CORE Project No.: 1NM-2010-249

Prepared by:



# Appendix 2 Environmental Compliance

## Notification for Receipt of Batteries



## Pennsylvania Department of Environmental Protection

230 Chestnut Street Meadville, PA 16335-3481 April 19, 2000

Northwest Regional Office

Mr. John C. Onuska, Jr. International Metals Reclamation Company, Inc. P.O. Box 720 245 Portersville Road Ellwood City, PA 16117

Fax: 814-332-6117 APR 2 0 2000 ENV. HEALTH & SAFETY DEPT. JCO

814-332-6848

Re:

Universal Waste

Large Quantity Handler Notification

INMETCO .

ID No. PAD087561015

Ellwood City Borough, Lawrence County

Dear Mr. Onuska:

The Department of Environmental Protection acknowledges your April 4, 2000, notification as a Large Quantity Handler of Universal Waste under 25 Pa. Code Section 266b.1 and 40CFR Section 273.32.

Under this status, INMETCO shall manage Universal Waste batteries in full conformance with the following sections of 40CFR Part 273, Subpart C: Sections 273.33(a), 273.34(a), 273.35(b) and (c), and Sections 273.36 through 273.40.

If you have questions regarding this letter, please feel free to contact Robert Fellabaum at 814-332-6848.

Signa C. Tuck An Todd Carlson Solid Waste Specialist

cc:

Paul Gotthold-USEPA Region 3

D. Duffy - OCC

NRO

Tracking

County Specialist

TC:RB:kk

An Equal Opportunity Employer

www.dep.state.pa.us

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## Cover Page for Operating Permit

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#### PERMIT FOR HAZARDOUS WASTE TREATMENT, STORAGE, AND/OR DISPOSAL FACILITY

Permit No PAINN7561015

	Date issued	The state of the s
	Obis Expired	July 14, 2016
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Act 97, a permit for hazard	dous waste treatment, storag	nagement Act of July 7, 1980, ge, and/or disposal facility in
(municipality) <u>Filmood (iii)</u>	in the County of 1.a International Metals Re	eclamation Company, Inc.
is gramed to tapperaisti	One INMETCO Drive	A CONTRACTOR OF THE PROPERTY O
(aun ess)	Ellwood City, PA 1611	
This permit is applicable to ti	he facility named as	
International Metab R	relamation Company, Inc.	and described as
	Latitude: 40° 51° 25°	
	Longitude: 88° 16° 37"	
This permit is subject to mo	dification amendment and s	upplement by the Department
		vocation or suspension by the
		n of the applicable laws or the
rules and regulations adopt	ed thereunder, for failure to c	omply in whole or in part with
the conditions of this permit	t and the provisions set forth i	n the application no PAD08756101
which is made a part hereo	f, or for causing any condition	n inimical to the public health
safety or welfare.		
	B 8	
See attachment for waste lie	mitations and/or	
special conditions		
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## Cover Page for Operating Permit-Inspection



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

# 1975423

Company, installation name INMET CO
Name of Inspector Gerald A. Berg 05-24-2011
Location South of Route 488. Last of Route 65, Last of Ellwood City
County lawrence Municipality Effwood City
EPATD Number PAD 087561015 Employer LD Number (EIN)
Name of responsible official Mark Tomaszewski
Title President
Maifing Address ONL INMLTCO DRIVE, LELWOOD CITY, PA 16117
Area code and telephone number 724 758-5515
Name of person interviewed John Onuska
Mading address (if different from above) Same as above
Area code and telephone number Same as above
1. Site Characterization: [   freatment [X] Storage [ ] Disposal
Check all that apply:
☐ surface impoundments ☐ tanks ☐ incineration
chemical treatment
[ ] physical treatment [ ] waste piles [ ] recycle
[] biological treatment [] containment bldg [] landfill
Officer Specify
2 Does the facility generate hazardous waste?
3 Types of hazardous waste produced by Hazardous Waste Number
D 006 K 061
D 007
D 008
4 Are trazardous wastes transported off-site by the facility? ☐ Yes ☒ No
Dr. Mali HV English

ENV HEALTH & SAFELY DEPT ICO

Page  $\perp$  of q

## Cover Page for Air Permit



INMETCO/ELLWOOD CITY



#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date:

April 13, 2011

Effective Date:

April 13, 2011

Expiration Date: Ma

March 31, 2016

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.I., 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as 'State-Only' or "non-applicable" requirements.

#### TITLE V Permit No: 37-00243

Federal Tax Id Plant Code: 13-2858892-1

#### Owner Information

Name: INMETCO

Mailing Address: 1 INMETCO DR

ELLWOOD CITY, PA 16117-6231

Plant Information

Plant INMETCO/ELLWOOD CITY

Location: 37 Lawrence County

37002 Ellwood City Borough

SIC Code: 3341 Manufacturing - Secondary Nonferrous Metals

Responsible Official

Name: JOHN C ONUSKA Title: MANAGER EH & S Phone: (724) 758 - 2819

Permit Contact Person

Name: BERNADETTE P FRANK Title: SENKOR EH & SENGINEER

Phone: (724) 758 - 2818

[Signature]

JOHN F. GUTH, NORTHWEST REGION AIR PROGRAM MANAGER

# Cover Page for Air Permit-Inspection

pennsylvania		INSPECTION R	EPORT		Commonwealth of epartment of Environ Air Quality P	mental Protection
Date(s) of Inspection: TV  PA SM  GP NM  MEGA		Permit #(s): Expirate  37-243F	on Date:	Cas		24/1793
Company Name.		Municipality:		Cou	nty	
1 VMETCO		Ellwood City B	mangh		LANTENCE	
Plant Name:		Physical Location:		Fed	eral ID — Plant Code #:	
Responsible Official:					3-285389	2-1
			Address			
John Unyska			LANNET		Urive	
Margo EH+5		The state of the s	Hwood		1 PA 10	11-7
Phone #(s):						
724 758 2819						
Mark (X) All Inspection Types T	hat	Apply To This Inspecti	on:			
Full Compliance Evaluation (FCE)	To	Pian Approval Inspection		In	File Review (FR)	
Operating Permit Inspection (PI)		Initial Permit Inspection (IPI)			Complaint Inspection	(CI)
Routine/Partial (RTPT)	-					
		Follow-Up Inspection (Ref. Date	3)		Sample Collection (S	
Minor Source(s) Inspection (RFD)		Stack Test Observation			Multi-Media Inspectio	n (MM)
Other	10	Announced				
Annual Compliance Certification Received:	] YE	S NO NA	Date Received			
AIMS Report Received	] YE	S NO NA	Date Received			
Mark (X) All Activities That App	lv:			0.1		
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Visible Emissions Observations		Verify Operation of CEMS			Other Other	
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This document is official notification that a represent inspection are shown above and on any attached p sample results or from any additional review of Depa	oages.	and may include violations uncovere	d durand the inspec	tion \	/inlations may also be dis	site. The findings of t covered upon review
Page of H eFacts Inspe	ection	ID#: Date:		R	eviewed By	

## INMETCO COMPLIANCE HISTORY

## January, 1984 to December 2010 NOTICES OF VIOLATION From

# THE PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

T	
January 27, 1984	Failure to install monitoring wells around hazardous waste holding impoundment
February 28, 1984	Failure to note hazardous waste manifest discrepancies
February 28, 1984	Improper and incomplete hazardous waste manifest being accepted
August 15, 1985	Consent Order and Agreement (COA) between the PA-DEP Bureau of Air Quality control to conduct Electric Arc Furnace emissions, and lower pressure drop across the Electric Arc Furnace baghouse. Payment of fines was suspended on November 22, 1988. Compliance was met on with the issuance of an operating permit July 6, 1990
August 15, 1985	Consent Order and Agreement (COA) between the PA-DEP Bureau of Air Quality Control to control Rotary Hearth Furnace particulate matter emissions. The Rotary Hearth Furnace compliance was met in 1989 and has an operating permit which was issued on July 6, 1990
November 20, 1985	Improperly filled out and incomplete hazardous waste manifest being accepted
September 30, 1986	Failure to indicate in notice to EPA Company operated a hazardous waste pile storage
June 26, 1987	Failure to give notification of the types of hazardous waste being processed,
	failure to obtain approval from the Department to store waste, failure to control accidental ignition of ignitable waste, failure to control leaks from flue dust silos, failure to prescreen wastes before processing.
October 5, 1987	failure to obtain approval from the Department to store waste, failure to control accidental ignition of ignitable waste, failure to control leaks from flue
	failure to obtain approval from the Department to store waste, failure to control accidental ignition of ignitable waste, failure to control leaks from flue dust silos, failure to prescreen wastes before processing.
October 5, 1987	failure to obtain approval from the Department to store waste, failure to control accidental ignition of ignitable waste, failure to control leaks from flue dust silos, failure to prescreen wastes before processing.  Failure to take action to eliminate leaks from flue dust silos  Hazardous waste manifest violations, improperly filled out form, emissions
October 5, 1987 September 28, 1988	failure to obtain approval from the Department to store waste, failure to control accidental ignition of ignitable waste, failure to control leaks from flue dust silos, failure to prescreen wastes before processing.  Failure to take action to eliminate leaks from flue dust silos  Hazardous waste manifest violations, improperly filled out form, emissions from flue dust silos, leaking containers  Visual emission being observed leaving the Submerged Electric Arc Furnace
October 5, 1987 September 28, 1988 August 29, 1989	failure to obtain approval from the Department to store waste, failure to control accidental ignition of ignitable waste, failure to control leaks from flue dust silos, failure to prescreen wastes before processing.  Failure to take action to eliminate leaks from flue dust silos  Hazardous waste manifest violations, improperly filled out form, emissions from flue dust silos, leaking containers  Visual emission being observed leaving the Submerged Electric Arc Furnace baghouse stack—Resulted in monetary fine  Failure to have labels on all containers of hazardous waste, failure to maintain aisle space between containers, leaking containers of hazardous

MHSW Processor Audit Report INMETCO

July 2, 1993	Fugitive emission from the INMETCO Submerged Electric Arc Furnace
August 22, 1994	Fugitive emission from the INMETCO facility
August 23, 1994	Fugitive emission from the INMETCO facility
August 24, 1994	Fugitive emission from the INMETCO facility
September 2, 1994	Fugitive emission from the INMETCO facility
September 20, 1996	Failure to keep container of hazardous waste with-in the permitted storage areas
April 23, 1998	Failure to file a request for determination in a timely manner, The report was filed on April 22, 1998
December 4, 1998	Exceeding permitted emission limits for VOC's in 1997 and should have submitted an updated RACT proposal to the Department prior to operating as such. Operating as a major VOC source without the required RACT proposal.
May 3, 1999	Operating ingot-casting process without required control device.
May 13, 1999	Material being stored beyond the permitted storage areas, exceeding 7 day limit in temporary storage areas, improper labeling of containers in temporary storage areas and containers stored in non-permitted storage area. Permit modification has been filed.
August 3, 1999	Fugitive emissions from the Inmetco facility EAF resulting from a Maintenance error.
October 29, 2003	Exceedance of facility-wide VOC emission limit. Failure to maintain equipment to monitor and record on a continuous basis the pressure drop across the venture throat, the water flow rate through the scrubber system and the pH of the recirculating water. Failure to record twice-weekly maintenance inspections of the scrubber system. All violation parameters have been satisfied.
November 6, 2003	Containers marked as hazardous waste were seen stored beyond the boundaries of Laydown areas #1 and #2 and outside of Main Production Building designated storage. The condition was abated on February 18, 2004.
January 10, 2006	Florescent bulbs not properly labeled and Container Storage Area #4 appeared to be holding greater number of containers than permit allowed.
October 15, 2007	Notice of Violation for exceedance of Title V particulate emissions for the Rotary Hearth Furnace. (Satisfied as of November, 2009)

Note: The Pennsylvania Department of Environmental Protection, PADEP, has inspection violations listed on their website (<a href="http://www.dep.state.pa">http://www.dep.state.pa</a>) under Efacts. The violations resulting in an official Notice of Violation have been listed in this document. **Violations are closed unless listed as open.** 

# Appendix 3 Insurance Certificates

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ACORD 25 (2010/05)

Catherine O'Leary

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# Appendix 4 Products

#### **Process Description**

#### Feeding Of Granulated Scrap Plastic To The Rotary Hearth Furnace

The International Metals Reclamation Company, Inc., Inmetco, is proposing the Department through a Request for Determination, RFD, to feed granulated plastic to the process Rotary Hearth Furnace, RHF, as a replacement and/or enhancement for carbon fines in the production of green pellets.

Inmeteo's primary raw materials include flue dust, mill scales and grinding swarfs from stainless steel and other specialty alloy production/processing facilities. Carbon fines are added as a reductant to convert metal (iron and nickel) oxides contained in these materials to their metallic states. The carbon fines are added prior to the pelletization of the raw materials. Green pellets are then processed in Inmeteo's RHF under controlled thermal and atmospheric conditions.

The RHF conditions promote an oxide to metallic conversion while removing volatile metals such as zinc and lead that are captured in Inmetco's emissions control equipment. Hot reduced pellets, generated by the RHF, are transferred to an electric arc furnace in which they are smelted to produce an iron-nickel-chromium alloy that is used as a raw material in the production of stainless steel and specialty alloys. The addition of waste plastic, and the carbon and hydrogen units contained within, will promote the reduction of iron and nickel oxides to their metallic states resulting in an annual net energy-cost savings.

Inmetco petitioned the state in November of 2009 to conduct an R&D feasibility study while feeding the granulated plastic. The Department-approved testing was conducted on March 3, 2010. The Department required stack testing of the RHF baghouse for predetermined parameters (refer to attachment Table 1, Inmetco Plastic Feed Test, Rotary Hearth Furnace). A baseline test was conducted on March 2, 2010, for all required parameters except for dioxins and furans, which was conducted on March 4, 2010 (refer to aforementioned Table 1 for all results). Feed to the RHF during the baseline and trial tests were maintained at the Department requirement of 90% of the design capacity or 12.3 dry tons/hour, 296 tons/day and/or 108,040 tons/year equating to a range between 11 and 12 tons/hour (refer to the document titled *Throughput Data*).

The Department expressed concerns for the apparent increase in sulfur dioxide emissions between the base and trial test. The increase in sulfur has no relevance to the addition of plastic pellets to the system. Rather, the increase is more realistically a result of sulfur variability in Inmetco's normal feed or those in carbon fines fed during both tests. We, additionally, reported RHF SOx emissions in the 2009 AIMS report as 8.8 TPY which is significantly higher than either the baseline or trial tests (refer to the document Pennsylvania Depart of Environmental Protection, Bureau of Air Quality, Emission Inventory Production, Report, Page 3). The AIMS data was compiled from a prior Department-approved stack test which indicates sulfur variability in Inmetco's primary raw feed materials.

#### Frank Bernie

From: matwilliam@state.pa.us

Sent: Thursday, September 16, 2010 10:24 AM

To: bfrank@inco.com; Frank Bernle

c: RA-eprfdonline@state.pa.us; hflaherty@state.pa.us

Subject: DETERMINATION RENDERED: Request For Determination (RFD) Application (RFD Number - 1700)

for INMETCO/ELLWOOD CITY

The Request for Determination of Exemption from Plan Approval and/or Operating Permit automitted for INMETCO/ELLWOOD CITY in Lawrence county, Eliwood City township/municipality to DEP on 09/02/2010 has been reviewed and a determination of eligibility for exemption from Plan Approval and/or Operating Permit has been rendered.

The official Determination is now available in RFD\*Online. Please login to RFD\*Online and select RFD # 1700 on your User Home Page to view the Determination Approved Home Page. This page provides links to view and print the Notice of Determination and conditions, if any, in PDF format and the associated Cover Letter, if applicable.

Please print these documents and retain copies for your records.

If you have any questions, need assistance with the process, or believe you have received this e-mail in error, please call the Help Desk at (717) 705-3768 between the hours of 8:00 AM to 4:30 PM or e-mail ep-efactshelpdeskteam@state.pa.us

Note: This is an automated e-mail message. Please do not reply to this e-mail.

Thank you for using RFD\*Online!



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# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES October 25, 1993

Bureau of Waste Management

(717) 787-6239

Mr. Richard H. Hanewald President The International Metals Reclamation Company, Inc. 245 Portersville Road P.O. Box 720 Ellwood City, Pennsylvania 16117

Re: INMETCO Slag Coproduct Determination

Dear Mr. Hanewald:

This letter is in response to information submitted to the Department regarding classification of INMETCO's slag as a coproduct under Pennsylvania's Hazardous Waste Management Regulations (25 Pa. Code Article VII.). The initial information relevant to the subject coproduct determination was submitted to the Department at an August 6, 1993 visit of INMETCO's facility. Additional information, concerning results of slag analyses performed in 1993, was submitted via an August 20, 1993 letter.

As you know, the Department had some initial concern regarding the higher levels of manganese in the slag as compared to the levels of manganese in the natural aggregates and blast furnace slags used as a basis for comparison under the definition of "coproduct" found at 25 Pa. Code \$260.2. This concern was based on review of literature which indicated that manganese may cause adverse human health effects due to inhalation. After review of additional information submitted by INMETCO (October 15, 1993 letter to Samuel Fang) and a more in-depth analysis of the physical characteristics data contained in INMETCO's August 6, 1993 submittal, the Department believes that inhalation risks will not be present.

In summary, the Department believes that INMETCO has compiled sufficient data and information to support a coproduct determination for seven of the eight slag uses described in an August 10, 1993 letter and listed below:

 As an aggregate in road base or sub-base, road surface, road shoulder, parking lot, driveway, and related applications.

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(2) As granular fill for unpaved parking and storage areas, pipe and tank backfill, berm construction, and other similar industrial and construction activities.

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- (3) As railroad ballast.
- (4) As an additive in concrete.
- (5) In surface pavement, surface treatment, seal coat, slurry coat, and cold patch applications.
- (6) As a replacement for natural aggregate in various uses at steel mills.
- (7) As a neutralizing agent for mine drainage and industrial discharges.

As discussed during recent telephone conversations between INMETCO and Department staff, additional information is necessary in order to justify the remaining proposed use of INMETCO's slag, which is as a lime conditioning agent for soil. This use may present an inhalation exposure risk when the slag is prepared through pulverization.

We want to emphasize, as mentioned in your August 10, 1993, that the coproduct determination requires the slag to be either transferred in good faith as a commodity in trade for use on a regular basis or to be used by the manufacturer or producer on a regular basis. The Department is not in a position to monitor these activities and INMETCO must decide whether this obligation is being met. The proper use of any material is imperative for the protection of human health and the environment. When a coproduct is abandoned or disposed, the material will become a "waste" and must be managed accordingly.

If you have any questions regarding this matter, or believe we may be of further assistance, please telephone me at (717) 787-6239.

Sincerely,

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Leon L. Kuchinski, Chief Division of Hazardous Waste Management