

Environmental Emergency Response Plan

ENVIRONMENTAL EMERGENCY RESPONSE PLAN

Prepared for:

International Metals Reclamation Company, Inc.
Ellwood City, Pennsylvania

February 2011

CORE Project No.: INM-2010-249

Prepared by:



CORE

Environmental
Services, Inc.

4068 Mt. Royal Blvd.
Suite 225, Gamma Building
Allison Park, PA 15101-2951
(412) 487-6000 • Fax (412) 487-9785

Appendix 2
Environmental Compliance

Notification for Receipt of Batteries



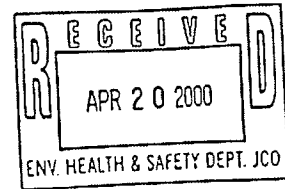
Pennsylvania Department of Environmental Protection

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

Northwest Regional Office

814-332-6848
Fax: 814-332-6117

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



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.

Sincerely,



for Todd Carlson
Solid Waste Specialist
Waste Management

cc: Paul Gotthold-USEPA Region 3
D. Duffy - OCC
NRO
Tracking
County Specialist

TC:RB:kk

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MHSW Processor Audit Report
INMETCO

Cover Page for Operating Permit

2510-EM1 (R) (M) (D) (S) Rev. 9/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

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

Permit No. PAD087561015
Date issued July 14, 2006
Date Expired July 14, 2016

Under the provisions of the Pennsylvania Solid Waste Management Act of July 7, 1980, Act 97, a permit for hazardous waste treatment, storage, and/or disposal facility in (municipality) Elwood City in the County of Lawrence is granted to (applicant) International Metals Reclamation Company, Inc. (address) One INMETCO Drive
Elwood City, PA 16117

This permit is applicable to the facility named as International Metals Reclamation Company, Inc. and described as

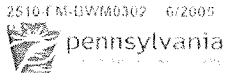
Latitude: 40° 51' 25"
Longitude: 80° 16' 37"

This permit is subject to modification, amendment and supplement by the Department of Environmental Protection and is further subject to revocation or suspension by the Department of Environmental Protection for any violation of the applicable laws or the rules and regulations adopted thereunder, for failure to comply in whole or in part with the conditions of this permit and the provisions set forth in the application no. PAD087561015 which is made a part hereof, or for causing any condition inimical to the public health, safety or welfare.

See attachment for waste limitations and/or special conditions


FOR THE DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Cover Page for Operating Permit-Inspection



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Inspection Date: 5-24-2011
Time Start: 10:55 am
Time Finish: 12:55 pm

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, East of Route 65, East of Lillwood City
County Lawrence Municipality Ellwood City
EPA ID Number PAD 087561015 Employer ID Number (FIN) _____
Name of responsible official Mark Tomaszewski
Title President
Mailing Address ONE INMET CO DRIVE, LILLWOOD CITY, PA 16117
Area code and telephone number 724 758-5515
Name of person interviewed John Omaska
Mailing address (if different from above) Same as above
Area code and telephone number Same as above

1. Site Characterization: Treatment Storage Disposal

Check all that apply:

- | | | |
|---|--|---------------------------------------|
| <input type="checkbox"/> surface impoundments | <input checked="" type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input checked="" type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg | <input type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? Yes No

3. Types of hazardous waste produced by Hazardous Waste Number
D 006 K 051
D 007
D 008

4. Are hazardous wastes transported off-site by the facility? Yes No



Page 1 of 9

Cover Page for Air Permit



37-00243

INMETCO/ELLWOOD CITY



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: April 13, 2011
Expiration Date: March 31, 2016

Effective Date: April 13, 2011

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 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: SENIOR EH & S ENGINEER Phone: (724) 758 2818	
[Signature] _____ JOHN F. GIULI, NORTHWEST REGION AIR PROGRAM MANAGER	

Cover Page for Air Permit-Inspection

2700-FM-AQ0023 Rev 1/2008 pennsylvania <small>DEPARTMENT OF ENVIRONMENTAL PROTECTION</small>		INSPECTION REPORT		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program			
Date(s) of Inspection: 12-21-10		TV <input type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input checked="" type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 37-243F	Expiration Date:	Case #:	PF ID #: 241793
Company Name: INMETCO		Municipality: Ellwood City Borough		County: Lawrence			
Plant Name:		Physical Location:		Federal ID - Plant Code #: 13-2853892-1			
Responsible Official: John Onuska			Mailing Address: 1 Inmetco Drive Ellwood City, PA 16117				
Title: Manager EH+S			Phone #(s): 724 758 2819				
Mark (X) All Inspection Types That Apply To This Inspection:							
<input type="checkbox"/> Full Compliance Evaluation (FCE)	<input checked="" type="checkbox"/> Plan Approval Inspection	<input type="checkbox"/> File Review (FR)					
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)					
<input type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ret. Date: _____)	<input type="checkbox"/> Sample Collection (SC)					
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Slack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)					
<input type="checkbox"/> Other	<input checked="" type="checkbox"/> Announced						
Annual Compliance Certification Received <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A			Date Received:				
AIMS Report Received <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A			Date Received:				
Mark (X) All Activities That Apply:							
<input type="checkbox"/> File Review	<input type="checkbox"/> Pre-Inspection Briefing	<input type="checkbox"/> Exit Interview/Briefing					
<input type="checkbox"/> Pre-Inspection Observations	<input type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected					
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other					
Comments/Recommendations: Enforcement since last FCE <input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach summary)							
I met with Bernie Frank to conduct an EOP wipe test for plan approval 37-243F for the RHF basins. The facility performed FPM testing on 10-23-09 and the Department approved the results on 12-3-09. The FPM during testing was 0.0017 ug/dscf and the limit is 0.02 ug/dscf. The facility conducted NOx + CO testing on the RHF basins on 10-23-09 and the Department approved the results on 12-3-09. The facility conducted NOx + CO testing on both the RHF basins and the Impact basins on 6-15-10 and 8-10-10 and the Department approved the results on 11-24-10 and 12-11-10 respectively.							
Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report			Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Company Representative: John Onuska		Title: Manager EH+S	Signature: 	Date: 12-21-10			
DEP Representative: H. Thomas Flaherty		Title: Air Engineer	Signature: 	Date/Time: 12-21-10			
<small>This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.</small>							
Page <u>1</u> of <u>4</u>		eFacts Inspection ID#: _____		Date: _____ Reviewed By: _____			
<input type="checkbox"/> White - Regional Office		<input type="checkbox"/> Yellow - Site		<input type="checkbox"/> Pink - District Office			

INMETCO COMPLIANCE HISTORY

January, 1984 to December 2010

NOTICES OF VIOLATION

From

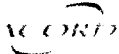
THE PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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 take action to eliminate leaks from flue dust silos
September 28, 1988	Hazardous waste manifest violations, improperly filled out form, emissions from flue dust silos, leaking containers
August 29, 1989	Visual emission being observed leaving the Submerged Electric Arc Furnace baghouse stack -Resulted in monetary fine
January 8, 1992	Failure to have labels on all containers of hazardous waste, failure to maintain aisle space between containers, leaking containers of hazardous waste, unsealed cracks in container storage area
October 21, 1992	Manifest violations, improperly filed by generator shipping waste to INMETCO
February 4, 1993	Fugitive emission from the INMETCO Submerged Electric Arc Furnace

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 (<http://www.dep.state.pa>) 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



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY):

THIS CERTIFICATE IS ISSUED AS A MATTER OF COURSE AND DOES NOT CONFER ANY RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an **ADDITIONAL INSURED**, the policy must be endorsed. If **SUBROGATION IS WAIVED**, subject to the terms and conditions of the policy, certain coverages may be provided. A statement on this certificate does not confer rights to the certificate holder in lieu of subrogation.

PRODUCER	Name		Address		City, State, Zip		Phone		FAX	
INSURED	Name		Address		City, State, Zip		Phone		FAX	

COVERAGE	DESCRIPTION	REVISION NUMBER
GENERAL LIABILITY
AUTOMOBILE LIABILITY
WORKERS COMPENSATION AND EMPLOYERS LIABILITY
...

CERTIFICATE HOLDER: _____

...

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CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
05/07/2011

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Marsh USA, Inc. 1155 Avenue of the Americas New York, NY 10036 Attn: NewYork.certs@Marsh.com Fax: 212-948-0500 067576-CAS-11-12 INSURED The International Metals Reclamation Company Inc. (INMETCO) One Inmetco Drive Ethwood City, PA 16117	CONTACT NAME: PHONE: [A/C, No, Ext]: E-MAIL: ADDRESS: INSURER(S) AFFORDING COVERAGE INSURER A : Greenwich Insurance Company INSURER B : INSURER C : INSURER D : INSURER E : INSURER F :	FAX [A/C, No]: NAIC # 22322
---	---	--

COVERAGES	CERTIFICATE NUMBER: NYC-005954547-11	REVISION NUMBER:
------------------	---	-------------------------

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTA	TYPE OF INSURANCE	ADDL SURR INSR_WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	GENERAL LIABILITY					EACH OCCURRENCE \$
	COMMERCIAL GENERAL LIABILITY					DAMAGE TO RENTED PREMISES (Ea occurrence) \$
	CLAIMS-MADE OCCUR					MED EXP (Any one person) \$
						PERSONAL & ADV INJURY \$
	GEN'L AGGREGATE LIMIT APPLIES PER:					GENERAL AGGREGATE \$
	POLICY PROJECT LOC					PRODUCTS - COMP/OP AGG \$
	AUTOMOBILE LIABILITY					COMBINED SINGLE LIMIT (Ea accident) \$
	ANY AUTO	SCHEDULED				BODILY INJURY (Per person) \$
	ALL OWNED AUTOS	AUTOS				BODILY INJURY (Per accident) \$
	HRED AUTOS	NON-OWNED AUTOS				PROPERTY DAMAGE (Per accident) \$
	UMBRELLA LIAB	OCCUR				EACH OCCURRENCE \$
	EXCESS LIAB	CLAIMS-MADE				AGGREGATE \$
	DED RETENTION \$					\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY					WC STATUTORY LIMITS OTHER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NJ)	Y/N				E.L. EACH ACCIDENT \$
	If yes, describe under DESCRIPTION OF OPERATIONS below	N/A				E.L. DISEASE - EA EMPLOYEE \$
						E.L. DISEASE - POLICY LIMIT \$
A	POLLUTION & REMEDIATION		PEC002640403	05/15/2011	05/15/2012	PER INCIDENT/AGGREGATE 15,000,000
	LEGAL LIABILITY					SIR 250,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

CERTIFICATE HOLDER Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling and Waste Management Division of Hazardous Waste Management RCSOB - 14th Floor / PO Box 8471 Harrisburg, PA 17105-8471	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE of Marsh USA Inc. Catherine O'Leary
---	---

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Appendix 4
Products

Plastic Reductant

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.

Inmetco'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 Inmetco'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 SO_x 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 Bernie
Cc: 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 submitted for INMETCO/ELLWOOD CITY in Lawrence county, Ellwood 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-efacts@helpdeskteam@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!

Use of Co-Product/Aggregate (Slag)



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:

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

Recycled Paper



October 25, 1993

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



Leon L. Kuchinski, Chief
Division of Hazardous Waste Management