

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH  
FILE TRANSMITTAL & DATA ENTRY FORM**

**Your Name:** Jeff Menzel

**Facility ID Number:** NCR000159038

**Facility Name:** Horsehead Metal Products, Inc.

**Document Group:** Enforcement (E) **Document Type:** I - Compliance Schedule Evaluation (CSE)

**Description for File (for CARA):** CSE follow up inspection to determine compliance with violations noted IANOV  
Docket # 2016-006

**Date of Document:** 6/29/2016

**Author(s) of Document:** Jeff Menzel/Mark Wilkins

**Inspector ID #:** NC014

**Suborganization:** Western Region

**Comments for RCRAInfo:** CSE follow up inspection to determine compliance with violations noted IANOV Docket #  
2016-006

**County (if not on report):** Rutherford

**For Violations:**

**Enforcement Date:** 10/28/2015

**Docket Number:** 2016-030

**Enforcement Type:** IANOV

**How many violations were there?** 2

**For IANOV or CO:** The facility is a SNC (SNY Evaluation)

**Outcome Measures for CSE for IANOV or CO:**

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

**Violation #1:**

**Date Determined:** 10/14/2015

**Scheduled Return to Compliance:** [Click here to enter a date.](#)

**Actual Return to Compliance:** 6/29/2016

**Regulation Description:** 40 CFR 262.11 Facility did not preform a waste determination for waste disposed of from the cell house containment area to the ground.

**Comment:** Sampling was conducted to determine that each of the constituents were below the corresponding residential soil level.

**For CSE, Corrections to Violations were:** Documented

**Violation #2:**

**Date Determined:** 10/14/2015

**Scheduled Return to Compliance:** [Click here to enter a date.](#)

**Actual Return to Compliance:** 6/29/2016

**Regulation Description:** 15A NCAC 13A .0109(a) Hazardous waste may have been disposed of and or treated without complying with permitting requirements of Parts 264 and 265

**Comment:** Concentration of Zinc in soil samples indicate the potential for a release to have occurred, since detected concentrations for all constituents of concern were below residential soil standards, no additional investigation or remediation for this release is required.

**For CSE, Corrections to Violations were:** Documented



**Waste Management**  
ENVIRONMENTAL QUALITY

PAT MCCRORY

*Governor*

DONALD R. VAN DER VAART

*Secretary*

MICHAEL SCOTT

*Director*

June 29, 2016

Mr. James Harris  
Environmental Manager  
Horsehead Metal Products, Inc.  
484 Hicks Grove Road  
Mooresboro, North Carolina

**Subject: Comments on March 2016 Cell House Investigation Report**  
Submitted March 8, 2016  
Horsehead Metal Products Inc. Facility - Mooresboro, North Carolina  
EPA ID# NCD 000159038

Dear Mr. Harris:

The North Carolina Hazardous Waste Section (HWS) has reviewed the March 8, 2016 Cell House Investigation Report for the Horsehead Metal Products Inc. Facility in Mooresboro, NC. The analytical results for Cadmium, Total Chromium, and Lead in all samples collected during the sampling event indicate the concentration of each of these constituents were below their corresponding residential soil standard and within the range of concentrations detected during background soil sampling at the Facility. The concentration of Zinc detected in all samples was below the residential soil standard. However, the concentration of Zinc detected in some sample intervals in SB-01, SB-02, and SB-03 was above the range of concentrations for Zinc detected during background soil sampling at the Facility.

Although the concentration of Zinc detected in these soil samples indicates the potential for a release to have occurred, since detected concentrations for all constituents of concern were below residential soil standards, no additional investigation or remediation for this release is required.

If you have any questions about this letter, please contact me at 919-707-8207 or by email at [mark.wilkins@ncdenr.gov](mailto:mark.wilkins@ncdenr.gov).

Sincerely,

Mark Wilkins, Hydrogeologist, Hazardous Waste Section  
Division of Waste Management, NCDENR

cc: Laurie Digaetano, US EPA, Region 4  
Brent Burch  
Jeff Menzel  
Julie Woosley  
Mark Wilkins



State of North Carolina | Environmental Quality | Waste Management

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