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June 2, 2010

Via E-Mail

Mr. Charles French
Metals and Minerals Group
Sector Policies and Program Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code: D243-02
Research Triangle Park, NC 27709

Re: Meeting with RSR Corporation

Dear Mr. French:

On behalf of RSR Corporation (RSR), I write to thank you for meeting with us on May 27, 2010, to discuss the extraordinary reductions in emissions of lead and other hazardous air pollutants that RSR has achieved at its Quemetco, Inc. (Quemetco) subsidiary in City of Industry, California. We found the meeting productive and informative and very much appreciate you taking the time to discuss this important technology with us.

Quemetco's installation of a Wet Electrostatic Precipitator (WESP) and a Regenerative Thermal Oxidizer (RTO) has yielded dramatic reductions in air emissions from its operations. For example, prior to the installation of the WESP and RTO, Quemetco emitted 614.95 pounds of lead annually. After installing the technology, lead emissions plummeted to 1.22 pounds per year -- a 99.8 percent reduction. The table below highlights equally impressive reductions in other air pollutants at the Quemetco facility.

Pollutant	Pre-WESP/RTO Emissions (lbs/year)	Post-WESP/RTO Emissions (lbs/year)	Percent Reduction (%)
Arsenic	96.01	1.59	98.3
1,3-butadiene	2,024.88	16.49	99.2
Cadmium	6.55	0.53	91.9
Chromium (VI)	0.33	0.06	81.8
Dioxins	0.0004	3.83×10^{-7}	99.9
Benzene	1,653.07	681.09	58.8



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Pollutant	Pre-WESP/RTO Emissions (lbs/year)	Post-WESP/RTO Emissions (lbs/year)	Percent Reduction (%)
Lead	614.95	1.22	99.8
Formaldehyde	5,815.93	179.36	96.9
Acetaldehyde	3,996.93	330.69	91.7
Nickel	7.07	0.18	97.5

RSR's primary goal in installing this technology was to ensure consistent compliance with the revised National Ambient Air Quality Standard (NAAQS) for lead and to invest in its ability successfully to operate in arguably the most challenging air district in the nation -- the South Coast Air Quality Management District. RSR could have chosen more conventional -- and less costly -- technology to achieve these ends. And there was appreciable risk associated with the installation of the WESP/RTO technology; this particular configuration and approach had never been successfully implemented before at a secondary lead smelter. After considerable research and analysis, however, the company chose the WESP/RTO approach because it believes the technology will achieve world class reductions in emissions of lead and other hazardous pollutants from its operations.

The results speak for themselves. The technology is even more effective than the company originally hoped. The substantial reductions in emissions listed above means that the cancer risk attributable to emissions of these compounds was slashed by approximately 87 percent to 2.88 cancer cases in one million exposed individuals over a 70-year evaluation period. Because of the overwhelming success of the technology, RSR intends to install the WESP/RTO technology at its Indianapolis, Indiana, facility this year and at its Middletown, New York, facility in 2011.

Meaningful reductions in the residual risks posed by secondary lead smelters are achievable. RSR has proven this with the successful installation of the WESP/RTO technologies at its operations. As EPA develops the rulemaking for the Residual Risk Maximum Achievable Control Technology (MACT) rule for secondary lead smelters, we thus strongly urge EPA to evaluate fully the potential that this technology can bring to bear. EPA need look no further for its MACT floor.

As you requested, appended are the Quemetco fence line monitoring data from 2007 (pre-WESP/RTO) and 2009 (post-WESP/RTO). After you have had time to review the data, we would welcome the opportunity to visit with you again to answer any questions and to discuss the data in more detail. I will be in touch shortly to schedule a follow-up meeting.



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Once again, I want to thank you for meeting with us.

Sincerely,

Christopher R. Bryant

Attachment

cc: Mr. Robert E. Finn (w/attachment) (via e-mail)
Mr. John A. De Paul (w/attachment) (via e-mail)
Mr. Homer P. Hine (w/attachment) (via e-mail)
Mr. Mike Buckantz (w/attachment) (via e-mail)