



320243

**Harbison-Walker Refractories Company  
Debtor-in-Possession**

400 Fairway Drive  
Cherrington Corporate Center  
Moon Township, PA 15108

Michael A. Schalk  
Corporate Secretary  
Phone No. (412) 375-6701  
Fax No. (412) 375-6724

Overnight delivery

April 10, 2006

Ms. Linda Mangrum  
U.S. Environmental Protection Agency  
Remedial Enforcement Support Section  
77 W. Jackson Blvd., SR-6J  
Chicago, IL 60604-3590

Re: Your letter of March 21, 2006  
USS Lead Site, East Chicago, Indiana

Dear Ms. Mangrum;

Enclosed is a response previously made concerning a request for information for the subject site. I had left a message for Mr. Kaiser and have not heard a response. We are therefore hopeful that the enclosed response will suffice.

Please be advised that Harbison-Walker Refractories Company continues to operate under the protection of the United States Bankruptcy Code. The co-operation of Harbison-Walker in providing responses to the queries of the USEPA should not be taken as, and it is not intended by Harbison-Walker as, a waiver of any protections it may have as a bankrupt debtor.

Please contact the undersigned if you require any additional response.

Very truly yours,

Michael A. Schalk  
Corporate Secretary

Enc

cc: Steven P. Kaiser, Esq.

**Harbison-Walker Refractories Company,  
Debtor-in-Possession**

**400 Fairway Drive  
Cherrington Corporate Center  
Moon Township, PA 15108**

**Michael A. Schalk  
Corporate Secretary  
Phone No. (412) 375-6701  
Fax No. (412) 375-6724**

September 12, 2005

United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Your letter of August 15, 2005

Dear Sir/Madam;

The purpose of this letter is to respond to the request for information contained in your letter of August 15, 2005 relating to the residential portion of the USS Lead Site, 5300 Kennedy Avenue (the area bounded by Chicago Avenue to the north, Parish Avenue to the east, USS Lead to the south and Aster Avenue to the west), East Chicago, Indiana ("Site").

The responses are found below numbered in accordance with the numbered questions in Enclosure 2 of your letter. Please note as part of the responses you will see that the 5501 Kennedy Avenue, Hammond, Indiana plant ("Facility") of Harbison-Walker was sold to Resco Products, Inc. ("Resco") on March 3, 2000. Please accept this response as notice for RCRA purposes that the Facility is no longer owned or operated by Harbison-Walker. If you require additional information on the sale, please contact the undersigned.

Although not specifically requested in your letter, please be advised that Harbison-Walker Refractories is currently operating under provisions of Chapter 11 of the United States Bankruptcy Code, having filed its petition on February 14, 2002.

As noted above, Harbison-Walker sold the Facility and possesses very little in the way of documents relating to the Facility. Further most of the employees with historic knowledge of the Facility are currently employed by Resco.

We, therefore, conducted interviews with current employees who had knowledge of the historic operations of the Facility and the products produced at the Facility. The responses are limited to the best recollections of such individuals who in most cases could not refer to records or historic documents.

1. Chester Zalewski, consultant, formerly Environmental Engineer.

Thomas Herrman, Managing Director, Manufacturing Operations formerly Assistant Plant Manager, Hammond plant.

David Shipley, Senior Manager, Engineering Services, formerly Plant Engineer, Hammond Facility.

Thomas Kleeb, Director Product Technology, formerly, Director of Research and Development.

David Michael, Manager of Intellectual, formerly Supervisor, Basic Refractories Research.

Rhonda Vete, Managing Director, Compliance Programs and Manufacturing

Michael Schalk, Corporate Secretary, Senior Attorney

2. Under the terms of sale of the Facility to Resco, Harbison-Walker was required to divest all records and documents relating to the Facility and the products produced there to Resco. Harbison-Walker was not permitted to retain copies. Therefore, Harbison-Walker does not possess records specific to the Facility or to those specific products historically produced at the Facility.

3. See response to number 6 below.

4. The EPA Identification number for the Facility that is now owned by Resco Products, Inc. is IND016366551.

Other Harbison-Walker facilities have the following Identification Numbers:

ALD000737494

Fairfield, AL

MOD057752164

Fulton, MO

MOD064646706

Vandalia, MO

PAD083960286

West Mifflin, PA

OHD046626628

Windham, OH

5. Harbison-Walker has no record and the personnel consulted have no knowledge of any release of hazardous substances or threatened release of hazardous substances at the Facility that may have migrated or been deposited at the Site.

6. In addition to those people mentioned above, Robert Williamson, Anthony Baggetta, John Castilano, former plant managers of the Facility, and Richard Copp, former plant engineer at the Facility. All believed to be currently employed by Resco. Michael Lukart, former Manager, Environmental Health and Safety.

7. From circa 1956 to March 3, 2000.

8. The Facility historically has been used for the manufacture of basic refractory brick. The normal process would include the sizing or crushing of raw materials, usually magnesite and chrome ores, the addition of other materials, blending these materials, pressing those materials into the desired shape (usually in the form of a brick) and firing or heating such materials to obtain desired refractory properties.

9. Permit issued by Indiana Department of Environmental Management ("IDEM"), applied for through Hammond Air Pollution Control. Annual air emissions inventory reports were submitted to IDEM.

10. A. To the best of the knowledge of all personnel questioned, Harbison-Walker has not used any lead or lead-containing materials as an ingredient or additive to its processes. In fact, the personnel were not aware of any instance where lead was present as an impurity in the products.

B. Not applicable.

C. Not applicable.

D. Not applicable.

E. None, to the best of the knowledge of the personnel questioned.

11. A. Stack testing of various sources at the Facility.

B. Compliance testing began in the 1990's.

C. To the best of our knowledge, such monitoring demonstrated compliance.

D. We do not have the records that would indicate who performed the testing.

E. All records and other documents relating to any such non-attainment events would have been transferred to Resco. Our response is limited to the best information and recollection of the personnel questioned.

12. The only instance that the personnel consulted were aware of was a citation from Hammond Air Quality Control Board concerning the installation of equipment without a permit. We do not have any record or specific recollections of a non-attainment event.

13. The personnel questioned were not aware of any material located or generated within the boundaries of the Facility that were used as fill material beyond the boundaries of the Facility.

This response is limited because of the lack of records and documents available to Harbison-Walker because of the transfer of the Facility to Resco. Please contact the undersigned if you require additional information. In the event that you have information that may be inconsistent with the responses above, please contact the undersigned and we will provide any additional information that is available to us.

In the event you require additional information about the current bankruptcy proceedings involving Harbison-Walker, you may obtain information at [www.rhireorg.com](http://www.rhireorg.com) or you can contact the undersigned.

I certify under penalty of law that this document was prepared under my direction in accordance with reasonably diligent procedures to assure that those individuals with relevant knowledge disclosed all information available to them. Based upon the inquiry of such persons or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge true, accurate and complete, in light of the unavailability of pertinent records. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment

Very truly yours,

Michael A. Schalk  
Corporate Secretary

1. The following Resco employees were consulted to answer these questions:
  - A. Mr. Bob Williamson – Plant Manager from 1994 – Present. Began working at the plant in 1974
  - B. Mr. Anthony Baggetta- Plant Manager of the Hammond facility from 1981 - 1989. Currently the Executive Operations Manager of Resco Products Inc.
  - C. Mr. John Castalano – Vice President of Manufacturing of Resco Products Inc. Mr. Castalano also worked at the plant for several years.
  - D. Mr. Gregory McDonough – Corporate Safety & Environmental Manager for the past two years
2. No specific documents were reviewed in preparation of this questionnaire. The corporate knowledge of this plant goes back over 30 years. The operations and types of materials used have not significantly changed over that time.
3. Besides the aforementioned, we know of no such person who would be able to provide us with additional or more complete information concerning the Information Request.
4. Our EPA identification number is IND 016 366 551.
5. We know of no acts or omissions of any person or persons that may have released or have had the threat of releasing any hazardous substances which may have migrated or been deposited on the site.
6. This facility is no longer owned by Harbison-Walker. It has been owned and operated by Resco Products Inc. since March of 2000. In addition, this facility is located in Hammond, Indiana (5501 Kennedy Avenue), rather than East Chicago, Illinois.

Our Hammond plant does not typically dispose of regulated waste. However, regulated waste in the form of “Liquid Phenolic Resin” was disposed in 2003 (Manifest Document number MI 8119174). In addition, a “PCB-Containing Transformer and Capacitor” were disposed of in 1997 and 2003. The 1997 disposal was reported on the “1997 Biennial Hazardous Waste Report Submittal”. The disposal in 2003 consisted of PCB-contaminated concrete and debris (State Manifest Document number MI 8119174). Specific documents are available upon request.

Our non-regulated waste streams primarily consist of spent oil and hydraulic fluid. Out of spec or broken refractory brick is recycled. All raw materials involved in the production of refractory brick are used in process.

7. The former Harbison-Walker plant operated at 5501 Kennedy Drive in Hammond, Indiana from 1957 through March of 2000. In 2000, Resco purchased the plant, and is the current owner.
8. The Hammond plant primarily manufactures Magnesite-Carbon refractory brick. To this end, raw materials must be crushed / ground and screened to the specific particle size necessary to complete a particular batch. All required raw materials are mixed and transported to the appropriate press. Hydraulic presses are used to produce the specified shape of brick. The brick produced at the Hammond facility is not fired, but they are cured in a drying oven.
9. Effective April 5, 2006 the Hammond plant was converted from a Title V facility to a FESOP. The permit number for the Title V was TO89-7791-00222. Our FESOP permit number is F089-21631-00222, and will not expire until April 5, 2011.
10. The Hammond plant does not and has not used lead or any lead-containing products during any current or past production process.
11. This plant has never treated, stored, disposed of or otherwise handled lead or lead-containing materials.
12. We have at no time provided lead or lead-containing materials to any person or company located in Hammond or Unincorporated Lake County, Indiana.
13. Lead is neither a component nor by-product of refractory manufacturing. No airborne form of lead-containing material has ever been generated.
14. The Hammond plant last had air emissions monitored in February 2004. Additional particulate sampling was conducted in November 1998. The following sub-paragraphs pertain to the 2004 sampling.
  - A The stack testing of 2004 was conducted for the measurement of PM, PM-10 and Visible Emissions from three separate baghouses associated with three separate stacks.
  - B PM, assumed to be PM-10 for measurement purposes, for stacks D-1, D-2 and D-11 was 0.425, 0.100 and 0.007 pounds of particulate per hour, respectively. All of the Visible emissions were measured at 0% opacity.
  - C This monitoring was conducted by Air Analysis Inc. out of Plainfield, Indiana. Mr. Mike Dicen, Mr. Terry Kauffman and Mr. Ronald Stapert participated in the sampling.
  - D The test result summaries for both sets of sampling are attached for your review (**Attachment 1**).

- 15.** To the best of our knowledge, the Hammond plant was involved in one non-attainment event. This event is described below. A letter from the Indiana Department of Environmental Management (IDEM) is attached for your review (**Attachment 2**).
- A. This event was discovered during stack testing conducted February 17 and 18, 2004.
  - B. The PM10 emission from one of our dust collectors (unit # D-1) was in compliance for the emissions in pounds per hour, but not in compliance with tons/year
  - C. The duration of this event is not known since it was discovered during stack testing.
  - D. The estimated quantity of material released can not be estimated with any degree of accuracy, but it is not believed to be a significant event.
  - E. As previously stated, this issue was noted as a result of stack testing for PM and PM10.
  - F. As stated in the attached letter, an internal and external inspection of the dust collector took place by dismantling the entire unit. Even though no mechanical malfunctions were discovered, the unit was completely refurbished. Additional emission testing on this stack was conducted and found to be in compliance.
- 16.** There are no processes conducted at the facility that has had the potential to release lead or lead-containing airborne particles into the environment.
- 17.** The Hammond plant has never caused or allowed materials located or generated within its boundaries to be used as fill material at any other location or locations.



I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Gregory J. McDonough, MS, CHMM  
Corporate Safety & Environmental Manager

2 Attachments:

1. Air emission summaries from February 2004 and November 1998
2. Non-Attainment Event in 2004

△Air Analysis, Inc.

Recso Products, Inc.  
Project Number 200

**Executive Summary**

Air Analysis, Inc. was contracted by Recso Products, Inc. to perform air emissions sampling of D-1, D-2 & D-11 magnesite manufacturing operations in Hammond, Indiana, on February 17-18, 2004. The objective of the test program was to determine compliance to Indiana air permit requirements for Particulate Matter (PM) and Particulate Matter ≤ 10 microns (PM10) emissions. The following personnel were involved with the testing program:

Air Analysis	Mike Dicen
Air Analysis	Terry Kauffman
Air Analysis	Ronald Stapert
HDEM	Kristina Massey
Recso Products, Inc.	Bob Williamson

The testing program included performing EPA Methods 1-5, 202, 9 for PM/PM10 and visible emissions during production. Three sets of one-hour test runs were performed on February 17-18, 2004. The following table includes the results of the testing:

**Test Summary**

**Table 1**

Date	3 Runs each	Time	Pollutants	Mass Emissions PM/PM10	Pollutant Concentration PM
02/18/04	D-1	8:00-15:07	PM/PM10	0.4257 lbs/hr	0.0106 gr/dscf
02/17/04	D-2	10:00-15:25		0.1001 lbs/hr	0.0011 gr/dscf
02/17/04	D-11	10:00-15:25		0.0071 lbs/hr	0.0035 gr/dscf
02/18/04	D-1	8:00-15:15	Visible Emissions	0 % opacity	
02/17/04	D-2	10:00-14:50		0 % opacity	
02/17/04	D-11	10:30-15:20		0 % opacity	

Permitted Emission Limits

	PM <sub>10</sub>	PM <sub>10</sub>
	lb/hr	lb/hr
21	0.55	0.017
32	0.41	0.012
01	0.5	0.020

based on FE

35 lb/hr  
35 lb/hr  
20 lb/hr

multiplied by 20 (more restrictive) than the actual calculated emission limits

$0.4257 / 35 \text{ lb/hr} = 0.012$   
 $0.4257 / 20 \text{ lb/hr} = 0.021$

$0.59 / 35 = 0.017$

March 11, 2004

**BOB WILLIAMSON**  
PLANT MANAGER HAMMOND OPERATIONS



April 27, 2004

Kristina Massey  
HDEM Engineer  
5925 Calumet Avenue  
Hammond IN 46320

RE: Title V Part 70 Operating Permit T089-7791-00222 Section C.19  
Report on RESCO Hammond Facility Air Permit Compliance Testing

Dear Kristina Massey:

Stack testing requirements as identified in Section D.1.3 for Emission Units PD-2, PD-11 and PD-1 for the above Operating Permit were performed on February 17-18, 2004. Testing data generated for Emission Units PD-2 and PD-11 demonstrate full compliance with the PM<sub>10</sub> Emission Limits (lbs/ton and lbs/hr). The D-1 emission unit demonstrated full compliance with the PM<sub>10</sub> Emission Limit lbs/hr but was in noncompliance with lbs/ton.

In compliance with Section C.19 (a) the D-1 unit was taken out of service April 19 – 26, 2004. A complete internal and external inspection was conducted by dismantling the unit. No defects in any materials or malfunctions in the operating components could be identified. While the D-1 was disassembled we took the opportunity to completely refurbish the unit using new OEM parts.

A retest for the D-1 emission unit will be will be scheduled in the time frame outlined in Section C.19 (b) to demonstrate compliance.

Sincerely,

A handwritten signature in cursive script that reads 'Bob Williamson'.

Bob Williamson  
Plant Manager  
RESCO Products, Inc.  
Hammond Plant

cc: IDEM-OAQ  
Elaine Yarabinetz

Harbison-Walker Refractories Company  
400 Fairway Drive  
Moon Twp., PA 15108

Steven P. Kaiser  
Associate Regional Counsel  
U.S. Environmental Protection Agency  
77 W. Jackson Blvd., SR-6J  
Chicago, IL 60604-3590