



## **RSR CORPORATION'S POSITIONS ON IMPORTANT ISSUES IN THE SECONDARY LEAD INDUSTRY**

To ensure sustained environmental improvement, RSR Corporation is adopting the following positions on issues that are currently being debated within the industry and by Federal, State, and Local regulatory agencies. These issues are of paramount importance to the environment, our country, and all international stakeholders; and therefore warrant a position that is consistent with the principles stated below. These principles are exceedingly attainable and RSR encourages their expeditious implementation.

- Our company recommends that the EPA revise the secondary lead Maximum Achievable Control Technology (MACT) standard to include: (1) emission standards for lead and other hazardous air pollutants that reflect the best air pollution control technologies currently utilized by the secondary lead industry, but in any event by limiting emissions to no more than 9 pounds of lead per year from process stacks (directly from furnaces, refining kettles, feed dryers, etc); and (2) a cumulative, facility-wide stack emission limit of no more than 25 pounds of lead per year.
- RSR encourages the EPA to require ambient emission monitors, used to document compliance with the National Ambient Air Quality Standard (NAAQS) for lead, be located at the property line of all secondary lead smelters and at the likely receptor locations in the neighborhoods surrounding the smelters.
- Our company also encourages the EPA to maintain the ambient lead monitoring system currently required under the NAAQS.
- We encourage OSHA to revise its worker protection standards for the secondary lead industry to require that workers be removed from working in areas of exposure when their blood lead concentration exceeds 20 µg/dL. Workers should not be allowed to return to work in areas of exposure until their blood lead concentrations are below 15 µg/dL for three consecutive months, and only after their return to work in areas of exposure is approved by a physician.
- Our country has a responsibility to manage with certainty how hazardous materials, such as spent batteries, are disposed of. To be certain that spent batteries are being recycled in a highly regulated and environmentally conscious manner, and therefore to ensure there is full protection to human health, history shows us that this will only be guaranteed and accomplished by banning the export of all spent/used batteries.