

PPC 9444.1984(09)

ZINC PLATING (SEGREGATED BASIS) ON CARBON STEEL

JUN 13 1984

RE: WIBBS840102

MEMORANDUM

SUBJECT: Zinc Plating (Segregated Basis) on Carbon Steel

FROM: Matthew A. Straus, Acting Chief
Waste Identification Branch (WH_562B)

TO: William H. Minor, Chief
Technical Permits and Compliance Section
Waste Management Division
Region V

After evaluating the information supplied by the Gulf and Western Stamping Division regarding their phosphating operations and zinc plating line, it is our conclusion that the wastes generated from both their operations meet the description of EPA Hazardous Waste No. F006. More specifically, the EPA Background Document defines phosphating as a component of electroplating of chemical conversion coating. Other components of this category include coloring, chromating, and immersion plating. Accordingly, wastes generated from the phosphating operation at Gulf and Western would be considered hazardous wastes.

With respect to their other operation, wastewater treatment sludges generated from zinc plating operations on carbon steel are not considered hazardous wastes when the waste stream from these operations is maintained and treated separately (segregated) from other waste stream generated at the facility. However; Gulf and Western's zinc plating line also includes a chromate passivating bath in which the low carbon steel stampings are dipped after plating. Chrome passivating is considered a component of chemical conversion coating and therefore the wastewater treatment sludges generated from this operation would also be considered hazardous.

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Therefore, wastewater treatment sludges generated by both operations at Gulf and Western are considered EPA Hazardous Waste No. F006 and subject to regulation under 40 CFR 262.266. If you have further questions regarding this matter, please do not hesitate to call Mr. William Sproat of my staff at FTS 382-4783.