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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAY 8 1987

Michael Sanderson, Chief
RCRA Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

Dear Mr. Sanderson:

This letter is in response to your April 20, 1987 memo regarding certain wastes generated at Everco Industries' Ottumwa, Iowa plant. Specifically, you requested an interpretation as to whether wastewater treatment sludges generated at their plant meets the definition of EPA Hazardous Waste No. F006.

We have reviewed the description of Everco's processes and agree that the wastewater treatment sludge does not meet the definition of F006. The non-cyanide zinc plating process is specifically excluded from the listing as "zinc plating (segregated Basis) on carbon steel." Likewise the coating processes, both before and after the process change, are not within the scope of the listing as explained in the December 2, 1986 Interpretive Rule. It is also noted that the cleaning and stripping operations are also specifically excluded from the listing as "cleaning/stripping associated with tin, zinc, and aluminum plating on carbon steel." Thus, the waste would only be considered hazardous if it exhibits any of the Subpart C hazardous waste characteristics.

Should you have any questions regarding this interpretation, please contact me, or David Topping of my staff, at FTS 475-8551.

Sincerely,

Original Document signed

Matthew A. Straus, Chief
Waste Characterization Branch

RO 11245