

PPC 9441.1984(24)

DELISTING OF WASTE GENERATED FROM ZINC PHOSPHATING ON
CARBON STEEL

SEP 6 1984

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

Mr. Harold Nash
Vice President
Environmental Technology, Inc.
Ashland, Virginia

Dear Mr. Nash:

The purpose of this letter is to respond to our telephone conversation of September 4, 1984 and the delisting petition submitted for Rappahannock Wire, Inc. Fredericksburg, Virginia. The petition addresses the waste generated from zinc phosphating on carbon steel and requests an exclusion from EPA Hazardous Waste No. F006 (wastewater treatment sludges from electroplating operations).

There are several processes which are exempt from the F006 listing, one of which is zinc plating (segregated basis) on carbon steel. Since the Agency's current definition of electroplating includes phosphating processes, the exemption for zinc plating on carbon steel also applies to zinc phosphating on carbon steel. As indicated in the petition, Rappahanock Wire's waste is generated from a zinc phosphating operation which solely involves carbon steel as the base metal. Furthermore, you indicated that the phosphating process is not used with any other process which could generate a hazardous waste, and the wastestream from this process is not commingled with any other hazardous waste. Therefore you characterize Rappahanock Wire's process as segregated. If this representation of Rappahanock's Wire's zinc phosphating process is accurate, the Agency considers the waste to be exempt from EPA's F006 Hazardous Waste listing and therefore not a listed hazardous waste under the Federal Hazardous Waste Management System.

RO 12297

As a result of this determination no further action will be taken on the delisting petition received on August 29, 1984. The phosphating waste may be handled as a non-hazardous waste providing that the generator has fulfilled the requirement of testing the waste for the four characteristics, (ignitability, corrosivity, reactivity, and EP toxicity), identified under §261.20 of the RCRA regulations. With regard to this last point it should be noted that sample number 4-3187 in the petition failed the EP toxicity Limit for cadmium and therefore the waste represented by this sample would be considered hazardous by the EP Toxicity characteristic. Rappahanock Wire is required to handle all waste that fails any characteristic as a hazardous waste. The waste may be retreated and if it no longer exhibits the characteristic it may then be handled as a non-hazardous waste.

Due to the variability of heavy metal mobility exhibited by Rappahanock Wire's waste (as revealed by the EP Toxicity data in the petition), the Agency is very concerned about the potential fertilizer use option cited in the petition. Due to the ability of this waste to leach high concentrations of cadmium, the Agency cannot recommend the use of this waste in the production of fertilizers. This potential problem has been noted by this office and we have informed both the EPA Region III Office and the Virginia Department of Health/Division of solid and Hazardous Waste Management of this situation.

If you have any question regarding this letter do not hesitate to call me at (202)-382-4782.

Sincerely,

Original Document signed

Myles E. Morse
Environmental Protection Specialist
Waste Identification Branch
Office of Solid Waste

cc: Sam Rotenberg
OSW/EPA Region III

William Gilley
Solid & Hazardous Waste
Virginia Dept. of Health