

9433.1991(01)

DELISTING PETITION-FUJI PHOTO FILM WASTEWATER TREATMENT  
SLUDGE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR -7 1991

Mr. Johnny S. Udo  
Safety/Environmental Engineer  
Fuji Photo Film, Inc.  
P.O. Box 1306  
Greenwood, South Carolina 29648

Dear Mr. Udo:

The purpose of this letter is to inform you that we have completed our review of Fuji Photo Film, Inc's (Fuji) petition (#0835). The petition is for dried wastewater treatment sludge filter cake resulting from the chemical conversion coating of aluminum generated at your Greenwood, South Carolina facility. As indicated in your petition, Fuji believes that this waste is currently classified as EPA Hazardous Waste No. F019.

Fuji stated in its petition that the Greenwood, South Carolina facility manufactures pre-sensitized plates for the lithographic industry. The surface preparation operation includes the following processes:

- Etching Process - an aqueous etching solution of sulfuric acid and aluminum sulfate is used to etch the aluminum surface and to remove any rolling oil from the aluminum surface;
- Desmuting Process - an aqueous solution of sulfuric acid and aluminum sulfate is used to remove surface smut produced in the etching process;
- Graining Process - nitric acid, aluminum nitrate, and ammonium nitrate, and a system of ferrite and carbon electrodes to electrochemically grain the aluminum surface;

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- Anodizing Process - an aqueous solution of sulfuric acid and aluminum sulfate, and a system of aluminum electrodes to, electrochemically anodize the aluminum surface; and,
- Silicate Process - sodium silicate is used to form a hydrophilic layer on the aluminum surface.

The spent aqueous solutions and other materials, along with rinse waters and wastewater from three fume scrubbers (sulfuric acid, nitric acid, and sodium hydroxide) generated from the above processes are neutralized on-site. The neutralized wastewaters then are clarified, and dewatered using a filter press and a sludge dryer. The resulting material is the subject of Fuji's delisting petition. We note that wastes generated from the subsequent surface coating operation (utilizing organic solvents) do not enter the petitioned wastestream.

Wastewater treatment sludges generated from (1) sulfuric acid anodizing of aluminum, and (2) chemical etching and milling of aluminum are specifically exempt from the EPA Hazardous Waste No. F006. Although wastewater treatment sludges generated from the chemical conversion coating of aluminum are listed as EPA Hazardous Waste No. F019, none of Fuji's processes (including its silicate process) utilize any chromate compounds or involve an oxide-conversion, phosphate-conversion, or chromate-conversion coating process. Therefore, we are not convinced that Fuji's surface preparation processes (including its silicate process) fall within the scope of the chemical conversion coating processes regulated by the EPA Hazardous Waste No. F019 listing (see "Background Document, Resource Conservation and Recovery Act, Subtitle C - Identification and Listing of Hazardous Waste," U.S. Environmental Protection Agency, office of Solid Waste, November 14, 1980). We suggest you contact South Carolina's Bureau of Solid and Hazardous Waste Management to confirm whether or not the waste you generate is Hazardous Waste No. F019.

Based on our review of Fuji's manufacturing processes, we do not believe that the petitioned waste is a listed hazardous waste, and therefore, have closed the petition file. However, we note that in accordance with 40 CFR §262.11, Fuji still is required to determine whether this waste exhibits any of the characteristics of a hazardous waste in 40 CFR §§261.21 to 261.24 (e.g., ignitability, corrosivity, reactivity, or TC

toxicity).

If you have any questions regarding the closing of your petition file, please call Narendra Chaudhari, of my staff at (202) 382-4787.

Sincerely yours,

Robert Kayser, Chief  
Delisting Section

cc: Doug McCurry, Region IV  
James Scarbrough, Region IV  
Narendra Chaudhari, EPA HQ  
Jim Kent, EPA HQ  
Howard Finkel, ICF Incorporated