

9444.1986(11)

May 22, 1986

Mr. Paul Yancey  
Facility Engineer  
Whirlpool Corporation  
6400 Jenny Lind Road  
Fort Smith, AR 72903

Dear Mr. Yancey:

The purpose of this letter is to respond to your question regarding the classification of sludge generated from treatment of cleaner solutions at your Fort Smith, Arkansas facility. It is my understanding that the first stages of your phosphating process are the cleaner stages. Treatment of the wastewater from the cleaning baths involves pH adjustment, flocculant addition, and filtration. The sludge that results from this treatment is not considered listed hazardous waste as long as wastewater generated from the listed process is kept entirely separate (the listed process occurs further down the line). The cleaning process is not a listed process, so this wastewater treatment sludge is not listed. This sludge may still be hazardous by characteristic, however, and you will need to test for that. If you have any further questions, please do not hesitate to call me at (202) 382-4519.

Sincerely,

Ann Burke Sarno  
Environmental Protection  
Specialist  
Waste Identification Branch  
(WH-562B)

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