

9444.1987(23)

ELECTROLESS ZINC PLATING WASTE NOT IN F006 LISTING

JUN 30 1987

Mr. Robert Williams
General Motors Corporation
Fisher Guide Division
200 Georgesville Road
Columbus, OH 43228-0512

Dear Mr. Williams:

The Assistance Branch has reviewed your letter dated February 27, 1987 regarding the EPA's clarification of the scope of EPA Hazardous Waste No. F006. This waste was the subject of your delisting petition #0177. We acknowledge your description of the major processes at your plant, including:

1. Zinc plating on carbon steel on a segregated basis
2. Mechanical or electroless zinc plating
3. Sulfuric acid anodizing on aluminum
4. Phosphating on steel.

Both zinc plating on carbon steel on a segregated basis and sulfuric acid anodizing of aluminum were listed as exemptions from the original F006 listing in November 1981. On December 2, 1986, a clarification of the F006 listing was published (51 FR 43350-43351) which specifically exempted electroless zinc plating and phosphating on steel. Therefore, we believe that your wastewater treatment sludge is not included in the scope of EPA Hazardous Waste No. F006.

Although your wastewater treatment sludge is not an EPA listed waste, you are still required to determine whether the waste exhibits any of the characteristics of hazardous wastes as defined by 40 CFR §261.21-261.24.

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Please contact Mr. Scott Maid, of my staff, at (202) 382-4783 if you have any questions.

Sincerely

Original Document signed

Suzanne Rudzinski, Chief
Assistance Branch

cc: Alan Debus, Reg. V
William Muno, Reg. V
Matthew Straus, HQ