

May 13, 1985

Mr. Dwayne Bell
Sanitation Superintendent
City of Forth Smith
P.O. Box 1908
Forth Smith, Arkansas 72902

Dear Mr. Bell:

This letter responds to our recent telephone conversations regarding zinc phosphating on carbon steel and the relationship of this operation to the Agency's Hazardous Waste No. F006 (wastewater treatment sludges from electroplating operation).

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. This exemption applies only if the wastestream from the zinc phosphating process is not comingled with any other hazardous waste. If the wastestream that you are describing is zinc phosphating on carbon steel and is segregated - i.e., it is not comingled with wastewaters from any other processes that contain hazardous constituents, then 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. Wastes falling under this category may be handled as non-hazardous 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.

The Agency has previously notified petitioners of this exemption and indicated in the attached letter to Rappahomack Wire, Inc. of Fredericksburg, Virginia. If you have any further questions regarding this determination or any other aspect of the delisting regulations call me at (202) 382-4782.

Sincerely yours,

Myles E. Morse
Environmental Protection Specialist
Waste Identification Branch

Faxback 11075