

9445.1985(03)

MAY 31 1985

Mr. William L. Ramus
Water Management, Inc.
2480 Broadway Avenue
Cleveland, OH 44115

Dear Mr. Ramus:

This letter is in response to your May 17, 1985 letter to Mr. Matthew Straus of the Waste Identification Branch. Specifically, you requested a clarification of the F019 listing and its applicability to wastewater treatment sludges from sulfuric acid anodizing of aluminum.

The F006 listing of wastewater treatment sludges from electroplating operations was published Interim Final on May 19, 1980 (45 FR 33123). Comments were taken on the proposed listing, which prompted several modifications. These modifications were incorporated into the final listing on November 12, 1980 (45 FR 74886-74887). First, wastewater treatment sludges from several specific processes were excluded from the listing. These processes include sulfuric acid anodizing of aluminum. Also, wastewater treatment sludges from chemical conversion coating of aluminum were listed separately, as F019, because these sludges were not expected to contain significant concentrations of cadmium and nickel. Thus, the F019 listing is, in effect, a subcategory of the F006 listing.

Since wastewater treatment sludges from sulfuric acid anodizing of aluminum are specifically excluded from the F006 listing, the sludges are not included under F019. At present, this exclusion also includes the coloring step and, thus, the process you describe results in an excluded waste unless the sludge is hazardous by characteristic (ignitability, corrosivity, reactivity, or EP toxicity).

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It is important to note that this waste is excluded from the listings because it meets the description in the F006 exclusion and not because the chemical conversion baths contain no chromium. Apart from the F006 exclusions, wastewater treatment sludges from all chemical conversion coating processes are listed hazardous wastes (F019 for aluminum, F006 other metals).

However, the Agency is currently re-evaluating the electroplating and metal finishing listings to determine whether phosphating and some other processes should continue to be included.

Should you have any questions related to this clarification or other aspects of the electroplating and metal finishing listings, please feel free to contact me at (202) 382-4690.

Sincerely,

Original Document signed

David A. Topping, Jr.
Environmental Scientist
Waste Identification Branch (WH-562B)

cc: Sally Swanson, EPA Region V