April 10, 1985

Mr. Gary T. Satterfield
Technical Director
American Hot Dip Galvanizers Association, Inc.
1110 Connecticut Ave., N.W., Suite 700
Washington, D.C. 20036

Dear Mr. Satterfield:

This letter is in response to your March 5, 1985, letter to Mr. Lee Thomas concerning the Agency's classification of electroplating wastes (F006) versus pickle liquor wastes (K062) as applied to galvanizing.

As way of background, the Agency originally promulgated an interim final rule on May 19, 1980, which listed a number of wastes from electroplating and steel finishing operations as hazardous wastes. These wastes were listed due to the high concentrations of certain toxicants (i.e., cadmium, chromium, nickel, and cyanide, for electroplating wastes, and chromium and lead for the steel finishing wastes) and their ability to migrate from the wastes and enter the environment. This conclusion was supported by data collected by the Agency and placed in the public docket. When these regulations were published on May 19, 1980, the Agency solicited comment on the listings as to their adequacy. In general, very few comments were received; however, several comments were received which indicated that certain processes should not be included in the electroplating listings—namely, sulfuric acid anodizing of aluminum; tin plating on carbon steel; zinc plating (segregated basis) on carbon steel; aluminum or zinc-aluminum plating on carbon steel; cleaning/stripping associated with tin, zinc, or aluminum plating on carbon steel, chemical etching and milling of aluminum. The agency also received comments indicating that lime stabilized waste pickle liquor sludge from steel finishing should not be regulated as a hazardous waste. Upon consideration of these comments, several changes were incorporated and, on November 12, 1980, we excluded these processes from the electroplating and steel finishing listings.

We have also evaluated the hot dip galvanization process with respect to the excluded category of zinc plating on carbon steel. Based on our review of the literature (i.e., Kirk Othmer), and information previously collected by the Agency (i.e., Development Documents for Effluent Limitations Guidelines and Standards for Electroplating and Coil Coating) we believe hot dip galvanizing is, by definition, zinc plating on carbon steel. Therefore, we believe that hot-dip galvanizing on carbon steel on a segregated basis to be excluded from regulation as an electroplating waste. Segregated basis applies when there are no other plating processes involved and cyanides are not used in the process (the presence of cyanides would indicate that the waste is an F008).

If you have additional questions, or need further assistance, please call Mr. James Poppiti at (202) 382-4565.

Sincerely,

Jack W. McGraw
Acting Assistant Administrator

March 5, 1985

Mr. Lee Mr. Thomas, Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Thomas:

In reviewing 40 CFR Part 261 regarding hazardous wastes, we have run across what appears to be an inconsistency which affects the members of the hot dip galvanizing (after fabrication) industry.

Our related industry, zinc electroplating, apparently has been exempted from being classified as a generator a hazardous wastewater treatment sludges. For waste number F006 it states: "Wastewater treatment sludges from electroplating operations except from the following processes: . . (3) zinc plating (segregated basis) on carbon steel, . . . (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel."

Hot dip galvanizing also coats carbon steel with zinc. It shares the requirement with plating that the steel must be clean and consequently uses an acid pickle to clean the steel similar to that employed in plating.

The inconsistency comes from classifying the waste pickle liquor (and consequently the wastewater treatment sludges from waters containing it) as a hazardous waste under K062.

Our question is very simple: Why are sludges from waste acids included as part of the wastewater from zinc plating operations being treated differently than sludges from waste acids included as part of the waste water from zinc galvanizing operations?

We realize the K063 waste designating has been deleted; however, in so doing Agency has not made an equivalency between zinc plating wastewater treatment sludges and (zinc) hot dip galvanizing (waste acid) wastewater treatment sludges. Both waste streams contain acid, iron and zinc and are treated by oxide precipitation techniques to produce a sludge acceptable for disposal.

Mr. Lee M. Thomas
March 5, 1985

We request that sludges from wastewater treatment of hot dip galvanizing operations be excepted from being categorized as a hazardous waste in the same manner as those sludges are for zinc electroplating (segregated basis) on carbon steel and for cleaning/ stripping associated with zinc plating on carbon steel.

Sincerely yours

Gary T. Satterfield