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SEP 3 1985

Mr. Ken Chiu  
Solid Waste Branch (HS-13)  
US EPA  
230 S. Dearborn St.  
Chicago, IL 60616

Dear Mr. Chiu:

I am writing this letter in response to the question you posed in our telephone conversation on August 30, 1985. According to the manufacturing process description that you provided, the surface impoundment at the Rockwell International, Newark, Ohio facility is considered a hazardous waste impoundment, listed as EPA Hazardous Waste No. F006.

It is my understanding that Rockwell International manufactures automotive gears. These gears are placed in an iron/manganese/phosphate tank to provide lubrication. The gears are then dipped in a rinse tank, and this contaminated rinse water enters the impoundment. The F006 listing applies to wastewater treatment sludges from electroplating operations. Any sludge that precipitates out of Rockwell International's wastewater is classified as hazardous.

Rockwell International's lubrication coating process is considered electroplating, as defined in the listing background document. A number of production processes, including coating, are considered subcategories of the electroplating industry. Electroplating is defined as the application of a surface coating, usually, but not always, by electrodeposition to provide corrosion protection, erosion resistance, anti-frictional characteristics or decoration. In particular, phosphate conversion coating produces a layer of insoluble crystalline phosphate on the surface of a metal that provides a base for lubricants.<sup>1</sup>

Consequently, Rockwell International's iron/manganese/phosphate lubricating process is considered electroplating, and sludge that results from treatment of the wastewater is considered hazardous

1/ US EPA. Development document for existing source pretreatment standards for electroplating point source category. EPA No.440/1-79/003. August, 1979.

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and listed as EPA Hazardous Waste No. F006. If Rockwell International feels that their sludge is non-hazardous, then please advise them to call this office and discuss submitting a delisting petition.

I hope that this letter helps to clarify the issue. If you have any additional questions, please do not hesitate to call me at (202) 382-4519.

Sincerely,

Original Document signed

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