

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

August 2, 1990

Mr. John D. Brennan
Stationary and Environmental Planning
and Compliance Assurance
Chrysler Motors Corporation
12000 Chrysler Drive
Highland Park, Michigan 48288-1919

Dear Mr. Brennan:

This is in response to your letter of July 20, 1990 requesting clarification concerning the scope and applicability of the F019 hazardous waste listing to Chrysler Corporation's wastewater treatment sludge from the tin coating of aluminum.

In your letter you state that the waste is generated from the treatment of wastewaters from a tin phosphate coating process on aluminum, which is non-electrolytic. You further state that this phosphate coating process does not use or generate chromium or cyanide, the primary constituents of concern in the F019 listing, nor does the waste exhibit a hazardous waste characteristic.

Based on your description of the process, the Agency agrees with your classification of the waste in question as a F019 listed waste. As you may know, EPA recently amended the description of F019 to exclude wastewater treatment sludges from zirconium phosphating of aluminum cans on February 14, 1990 (55 **FR** 5340). As discussed in that **Federal Register** notice, we acknowledged that there may be other industry wastes that do not contain or produce particular hazardous constituents (e.g., cyanide, chromium) and do not exhibit any hazardous waste characteristics. Such wastes, however, were not addressed in our February 14, rule as we did not have data in hand to review and act on. Thus, other such wastewater treatment sludges from the chemical conversion coating of aluminum, such as Chrysler's waste, continue to meet the F019 listing description unless and until delisted under 40 CFR 260.20 and 260.22.

Should you have any further questions, please feel free to contact Ms. Denise Wright at (202) 245-3519.

Sincerely,

David Bussard
Director

Characterization and Assessment Division

**CHRYSLER
MOTORS**

July 20, 1990

Ms. Denise Wright
Listing Section
Office of Solid Waste (OS-333)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington D.C. 20460

Dear Ms. Wright:

I am requesting clarification concerning the scope of the EPA Hazardous Waste No. F019 listing with respect to a particular waste stream generated by Chrysler Corporation. The particular waste stream in question is an industrial wastewater treatment plant sludge generated during the treatment of rinse water from the tin plating of aluminum.

This particular plating process consists of a tin phosphating coating on aluminum and does not involve chromium or cyanide nor are these materials generated as a byproduct of the process. The process is non-electrolytic. The sludges produced by the wastewater treatment of the various rinses and overflows from this process do not exhibit hazardous characteristics. This sludge is currently handled as a listed F019 hazardous waste.

After reviewing the rationale for the F019 listing (hexavalent chromium and cyanide) Chrysler is questioning whether we correctly identified this waste stream. Please advise on the Agency's interpretation of the hazardous waste listing for F019 wastes and whether Chrysler's F019 wastes fall within the F019 listing criteria.

Sincerely,

John D. Brenan
Stationary Environmental Planning
and Compliance Assurance

cc: J. A. Carlson

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