

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MARCH 4, 1993

Mr. Mark R. Slotta  
General Manager Environment  
Health and Safety  
Kelsey-Hayes Company  
Romulus, Michigan 48174

Dear Mr. Slotta:

We have reviewed Western Wheel Howell's (WWH) petition and an addendum to this petition you recently submitted in response to our September 9, 1992 additional information request letter to WWH's consultant. WWH's petition requests an exclusion for wastewater treatment sludge filter cake generated from the chemical conversion coating of aluminum automobile wheel at its Howell, Michigan facility. The waste is described in the petition as EPA Hazardous Waste No. F019.

Based on review of information and revised process diagrams provided in your addendum, WWH segregates wastewaters generated in different stages of its chromate conversion coating process. WWH's petition is for sludge generated from treatment of wastewaters collected from the alkaline, halo, and deoxidizer rinse stages, which occur prior to chromate conversion coating (see Attachment). Wastewaters from the alkaline wash, deoxidizer, chromic conversion, and deionized rinse stages are treated and managed separately.

Wastewater treatment sludges generated from treatment of contaminated rinse waters collected from stages prior to chromate conversion coating (i.e., WWH's petitioned waste) do not appear to fall within the scope of processes regulated by EPA's F019 listing (see "Background Document, Resource Conservation and Recovery Act, Subtitle C - Identification and Listing of Hazardous Waste," U.S. Environmental Protection Agency, Office of Solid Waste, November 14, 1980). You must contact Michigan's Department of Natural Resources (MDNR) to confirm whether or not WWH's petitioned waste is hazardous waste No. F019.

Because we do not believe WWH's petitioned waste is a listed hazardous waste, we are closing WWH's petition file. However, we note that in accordance with 40 CFR §262.11, WWH still is required to determine whether this waste exhibits any of the characteristics of a hazardous waste in 40 CFR §§ 261.21 to 261.24 (i.e., ignitability, corrosivity, reactivity, or TC toxicity).

Should you have any questions regarding the closing of WWH's petition file, please call Narendra Chaudhari of my staff at (202) 260-4787.

Sincerely,

Robert Kayser, Chief  
Delisting Section

cc: Narendra Chaudhari, EPA HQ  
Jim Kent, EPA HQ  
Allen Debus, Region V  
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