

9444.1987(27)

F006 LISTING DOES NOT INCLUDE ZINC PHOSPHATING WASTEWATER
TREATMENT SLUDGES

JUL 6 1987

Mr. Gerald J. Wurtsmith
Federal Screw Works
Romulus Division
34846 Goddard Road
Romulus, MI 48174

Dear Mr. Wurtsmith:

This letter is in response to your June 16, 1987, inquiry regarding wastes generated at Federal Screw Works' Romulus, Michigan plant. Specifically, you requested an interpretation as to whether the sludge (filter cake) generated from treatment of the rinse waters meets the definition of EPA Hazardous Waste No. F006.

Your understanding is correct that the U.S. EPA no longer considers wastewater treatment sludge from zinc phosphating on steel to be within the scope of the F006 listing. (See enclosed notice detailing our basis for this reinterpretation.) Since your manufacturing operations contain a pickling process, however, you should be aware that spent pickle liquor from facilities within SIC Codes 331 and 332 is listed as EPA Hazardous Waste No. K062. If your facility is included within these SIC Codes and spent pickle liquor is introduced into the wastewater treatment system, the sludge may meet the definition of K062. In addition, you should also be aware that the Michigan Department of Natural Resources (DNR) hazardous waste program may be more stringent than the Federal program. Therefore, you will need to contact the state to see how they would classify your filter cake.

Should you have any questions regarding this interpretation, please contact me at (202) 475-8551.

Sincerely,

Original Document signed

RO 12972

Matthew A. Straus, Chief
Waste Characterization Branch

Enclosure