United States Environmental Protection Agency

Office of Solid Waste and Emergency Response

EPA

DIRECTIVE NUMBER: 9444.09(84)

TITLE: Zinc Plating (Segregated Basis) on Carbon Steel

APPROVAL DATE: 6-13-84

EFFECTIVE DATE: 6-13-84

ORIGINATING OFFICE: Office of Solid Waste

☒ **FINAL**

☐ **DRAFT**

STATUS:

[ ] A- Pending OMB approval
[ ] B- Pending AA-OSWER approval
[ ] C- For review &/or comment
[ ] D- In development or circulating headquarters

REFERENCE (other documents):

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Key Words: Zinc Plating

Regulations: 40 CFR 262-266

Subject: Zinc Plating (Segregated Basis) on Carbon Steel

Addressee: William H. Minor, Chief, Technical Permits and Compliance Section, Waste Management Division, Region V

Originator: Matthew A. Straus, Acting Chief, Waste Identification Branch

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Summary:

Wastes generated from phosphating, coloring, chromating and immersion plating are hazardous wastes listed under F006.

Wastewater treatment sludges generated from zinc plating (or zinc phosphating) operations on carbon steel are not hazardous wastes when the waste stream from these operations is maintained and treated separately from other waste streams generated at the facility. However, chrome passivating is considered a component of chemical conversion coating; therefore, the wastewater treatment sludges generated from that operation are hazardous.

JUN 13 1984

RE: WIBBS840102

MEMORANDUM

SUBJECT: Zinc Plating (Segregated Basis) on Carbon Steel

FROM: Matthew A. Straus, Acting Chief
Waste Identification Branch (WH-562B)

TO: William H. Minor, Chief
Technical Permits and Compliance Section
Waste Management Division
Region V

After evaluating the information supplied by the Gulf and Western Stamping Division regarding their phosphating operations and zinc plating line, it is our conclusion that the wastes generated from both their operations meet the description of EPA Hazardous Waste No. F006. More specifically, the EPA Background Document defines phosphating as a component of electroplating of chemical conversion coating. Other components of this category include coloring, chromating, and immersion plating. Accordingly, wastes generated from the phosphating operation at Gulf and Western would be considered hazardous wastes.

With respect to their other operation, wastewater treatment sludges generated from zinc plating operations on carbon steel are not considered hazardous wastes when the waste stream from these operations is maintained and treated separately (segregated) from other waste stream generated at the facility. However, Gulf and Western's zinc plating line also includes a chromate passivating bath in which the low carbon steel stampings are dipped after plating. Chrome passivating is considered a component of chemical conversion coating and therefore the wastewater treatment sludges generated from this operation would also be considered hazardous.

Therefore, wastewater treatment sludges generated by both operations at Gulf and Western are considered EPA Hazardous Waste No. F006 and subject to regulation under 40 CFR 262-266. If you have further questions regarding this matter, please do not hesitate to call Mr. William Sproat of my staff at FTS 382-4783.

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