



DIRECTIVE NUMBER: 9444.13-85

TITLE: Application of the F006 Listing to Wastewater
Treatment Sludges from Electroplating Operations

APPROVAL DATE: 9/3/85

EFFECTIVE DATE: 9/3/85

ORIGINATING OFFICE: OSW

☒ **FINAL**

☐ **DRAFT**

STATUS:

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

REFERENCE (other documents): headquarters

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United States Environmental Protection Agency
Washington, DC 20460

OSWER Directive Initiation Request

Interim Directive Number

9444.1385

Originator Information

Name of Contact Person Ann Sarro	Mail Code - Branch	Telephone Number
Lead Office <input type="checkbox"/> OERR <input checked="" type="checkbox"/> OSW <input type="checkbox"/> OUST <input type="checkbox"/> OWPE <input type="checkbox"/> AA-OSWER	Approved for Review Signature of Office Director Date	

Title

Application of the F006 listing to Wastewater Treatment Sludges.
From Electroplating Operations

Summary of Directive

The letter discusses application of the F006 listing to wastewater treatment sludges from electroplating operations

Key Words:

Electroplating

Type of Directive (Manual, Policy Directive, Announcement, etc.)

Status

☐ Draft
☐ Final

☐ New
☐ Revision

Does this Directive Supersede Previous Directive(s)? ☐ Yes ☐ No Does It Supplement Previous Directive(s)? ☐ Yes ☐ No

If "Yes" to Either Question, What Directive (number, title)

Review Plan

☐ AA-OSWER ☐ OUST ☐ OECM ☐ Other (Specify)
☐ OERR ☐ OWPE ☐ OGC
☐ OSW ☐ Regions ☐ OPPE

This Request Meets OSWER Directives System Format

Signature of Lead Office Directives Officer	Date
Signature of OSWER Directives Officer	Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

pink

SEP 3 1985

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

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.¹

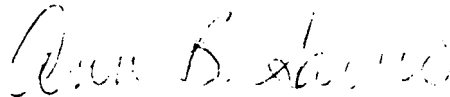
Consequently, Rockwell International's iron/manganese/phosphate lubricating process is considered electroplating, and sludge that results from treatment of the wastewater is considered hazardous

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

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,

A handwritten signature in cursive script, appearing to read "Ann B. Sarno".

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