PPC 9441.1984(29)

ZINC PLATING, WASTEWATER TREATMENT SLUDGES GENERATED FROM

SEP 24 1984

MEMORANDUM

SUBJECT: Zinc Plating (segregated basis) on Carbon Steel

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

TO: Michael Sanderson, Chief
Air and Hazardous Waste Compliance Branch
Air and Hazardous Materials Division
EPA Region VII

This is written in response to your September 18, 1984 request for clarification regarding zinc plating (segregated basis) on carbon steel.

With respect to electroplating operations, wastewater treatment sludges generated from zinc plating on carbon steel are considered non-hazardous only when the waste stream from this operation is maintained and treated separately (segregated) from other hazardous waste streams generated at a facility. In many cases, however, zinc plating is often followed by chemical conversion coating, which includes coloring, chromating, and immersion coating, as well as other plating operations. Chemical conversion coating is defined in EPA's listing background document as a component of electroplating and therefore, the wastewater treatment sludges generated from this operation would be considered hazardous. If the wastewater from a zinc plating line is combined with wastewaters from other electroplating operations, the resultant wastewater treatment sludge would be considered hazardous.

Therefore, wastewater treatment sludges generated from zinc plating operations, where the zinc waste stream is combined with other hazardous waste streams, are considered

EPA Hazardous Waste No. F006 and subject to regulation under 40 CFR 262-266. If you have any further questions on this matter, please do not hesitate to contact Mr. William Sproat of my staff at FTS 382-4783.