

9441.1986(29)

WASTEWATER TREATMENT SLUDGE EXEMPTION FOR ANODIZING OF ALUMINUM

4/9/86

MEMORANDUM

SUBJECT: Determination of Status of Waste Produced by
Wells Aluminum Corporation, North Liberty, Indiana

FROM: Matthew A. Straus, Chief
Waste Identification Branch

TO: William H. Miner, Chief
Hazardous Waste Enforcement Branch
EPA Region V

Based upon your description of the Almecolor process used by Wells Aluminum, it has been determined that the resulting wastewater treatment sludge is exempt from the F006 listing, as per exemption #1 -- sulfuric acid anodizing of aluminum. As you noted in your memo, the background document expands this excluded process to specifically encompass coloring and sealing steps whereby "unsealed anodic coatings on a aluminum are colored by immersion in a solution of organic or inorganic dyes," after which sealing is accomplished by "immersion in a hot solution of nickel or cobalt acetate." The Almecolor process you described appears to meet this description and is, therefore, excluded from the listing and would be regulated only if the resultant sludge meets the characteristics of a hazardous waste described in Subpart C. Even though this specific process may not have been evaluated when the exclusion was developed, the exclusion is still applicable, just as other electroplating processes which may have been developed after the listing was made final are included in the listing.

Should you have any questions regarding this interpretation, please contact me or David Topping of my staff at (202) 475-8551.