

TCLP; Nickel: 11 mg/l TCLP; Silver: 0.14 mg/l TCLP; Vanadium: 1.6 mg/l; Zinc: 4.3 mg/l TCLP.

## II. Disposition of Delisting Petition

### A. Summary of Delisting Petition Submitted by Bekaert Steel Corporation, Dyersburg, Tennessee (Bekaert)

Bekaert initially petitioned EPA, Region 6, in September 11, 1995, to exclude from the Rogers, Arkansas facility, a maximum annual weight of 1,250 cubic yards of its F006 waste, on a generator-specific basis, from the lists of hazardous wastes in 40 CFR part 261, subpart D. Because of the identical construction and operation of Rogers, Arkansas and the Dyersburg, Tennessee facilities, Bekaert petitioned EPA, Region 4, in October 28, 2002, to consider a delisting based on equivalent data and operations. Bekaert petitioned the EPA to exclude from the lists of hazardous wastes contained in 40 CFR 261.31 and 261.32, its wastewater treatment sludges from its electroplating operations. Specifically, in its petition, Bekaert petitioned the Agency to exclude its wastewater treatment filter cake presently listed as EPA Hazardous Waste No. F006—"Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (5) cleaning/stripping

associated with tin, zinc, and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum." The listed constituents of concern for EPA Hazardous Waste No. F006 are: cadmium, hexavalent chromium, nickel and cyanide (complexed). See 40 CFR part 261, Appendix VII. Bekaert petitioned the EPA to exclude this waste because it does not believe that the waste meets the criteria for which it was listed. Bekaert also believes that the waste does not contain any other constituents that would render it hazardous. Review of this petition included consideration of the original listing criteria, as well as the additional factors required by the Hazardous and Solid Waste Amendments (HSWA) of 1984. See section 222 of HSWA, 42 U.S.C. 6921(f), and 40 CFR 260.22(d)(2) through (4).

### B. What Delisting Levels Did EPA Obtain With DRAS and EPACMTP?

In support of its petition, Bekaert submitted the previous petition for the Rogers, Arkansas facility and documentation which supported equivalency of the Dyersburg, Tennessee facility. Included within the petition are: (1) Descriptions of its manufacturing and wastewater treatment processes, including schematic diagrams; (2) a list of all raw materials and Material Safety Data Sheets (MSDSs) for all trade name

products used in the manufacturing and waste treatment processes; (3) results from total constituent analyses for fourteen metals including the eight Toxicity Characteristic (TC) metals listed in § 261.24 (i.e., the TC metals) and antimony, beryllium, copper, nickel, thallium, and zinc from representative samples of the petitioned waste; (4) results from the Toxicity Characteristic Leaching Procedure (TCLP, SW-846 Method 1311) for fourteen metals which include the eight TC metals, and antimony, beryllium, copper, nickel, thallium, and zinc from representative samples of the petitioned waste; (5) results from total constituent analysis for total and reactive sulfide and cyanide for representative samples of the petitioned waste; (6) results from total oil and grease analyses from representative samples of the petitioned waste; (7) test results and information regarding the hazardous characteristics of ignitability, corrosivity, and reactivity; and (8) results from total constituent analyses for certain volatile and semi-volatile organic compounds from representative samples of the petitioned waste.

The hazardous constituents of concern for which F006 was listed are hexavalent chromium and cyanide (complexed). Bekaert petitioned the EPA to exclude its F006 waste because Bekaert does not believe that the waste meets the criteria of the listing.

TABLE 1.—WASTE WATER CONCENTRATIONS ZINC & COPPER  
[Metals Constituent Comparison Between Rogers, Arkansas F006 and Dyersburg, Tennessee F006]

	Cell 1	Cell 2	Cell 3	Cell 4	Cell 5	Average
Zinc Concentration mg/l:						
Dyersburg .....	19875	20867	Inactive .....	9978	Not present .....	16907
Rogers .....	11480	14350	Inactive .....	16502	28700 .....	17758
Copper Concentration mg/l:						
Dyersburg .....	0	22.6	Inactive .....	5.6	Not present .....	11.2
Rogers .....	70	50	Inactive .....	70	50 .....	60

TABLE 2.—METALS ANALYSIS F006 FILTER CAKE

Total Metals mg/kg	Dyersburg, Tennessee	Rogers, Arkansas: Petition	Rogers, Arkansas: 1997	Rogers, Arkansas: 1998	Rogers, Arkansas: 1999
Arsenic .....	<900	<5.00	.....	.....	.....
Barium .....	46.4	2.5	.....	.....	.....
Cadmium .....	0.24	3.1	.....	.....	.....
Chromium .....	13.6	68	.....	.....	.....
Copper .....	7.81	580	.....	.....	.....
Lead .....	12.5	<5.0	.....	.....	.....
Selenium .....	3.5	6.4	.....	.....	.....
Silver .....	<0.9	1.2	.....	.....	.....
Zinc .....	113	16000	.....	.....	.....
TCLP Metals mg/l:					
Antimony .....	<0.20	.....	.....	.....	.....
Arsenic .....	<0.20	<0.05	<0.10	1.92	<0.085
Barium .....	<0.050	1.3	0.18	0.078	<0.004
Cadmium .....	<0.040	<0.05	<0.01	<0.005	<0.005