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06/01/2005 04:18 PM To
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Subject
(151161821) F019 Comment Submission

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23. Question/Comments

Regarding delisting of F019 wastes from automotive facilities engaged in coating aluminum parts, it is not clear how, if in the future EPA delists this activity, EPA would propose that facilities currently not coating aluminum parts would demonstrate that concentrations of constituents of concern would be "below 'listing' levels" prior to commencing such activity. This could unnecessarily require changes in notifications of waste generation (EPA 8700-12 forms) and other waste management approaches taken by such facilities.

Is EPA considering an industry-wide exemption based on a review of the available industry data, or would facilities newly commencing coating of aluminum parts still be required to presume that the F019 listing applies to a particular waste until data is available to demonstrate that constituents of concern are below listed levels?

Also, if EPA's review of currently available data results in the presumed potential for wastes from some facilities to exhibit constituents of concern above listed levels (e.g., as a result of chemical additions to the phosphating treatment process used at a particular facility), would

EPA's intended delisting approach consider allowing facilities to employ a rebuttable presumption for such constituents of concern based on process knowledge, similar to that for determining the halogen content of used oil (cf. 40 CFR 279.44(b)(2))?

Thank you for the opportunity to comment.

Mark McNally
Senior Technical Specialist
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June 1, 2005
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