

ASK DR. GALV

Q. I'm confused, is dross and ash considered hazardous? Everyone seems to have a different opinion.

A. First, you should commend yourself for having the common sense to come to the ultimate source of all galvanizing knowledge, i.e. Dr. Galv. Secondly, I'll bet it was difficult growing up with a name like "Confused". Now to your question. I assume by your question that you're referring to the DOT Hazardous Material Regulations, HM-181, that were enacted last year. Under those regulations, zinc bottom dross would not be considered hazardous. Zinc ash would also not be consid-

ered hazardous if the material passes the Division 4.3 test. This simple test (section 4 of Appendix E to Part 173) checks to see if the material evolves hydrogen gas when it comes into contact with water. The galvanizer can perform the test and self-certify the results or the test can be done by a third party laboratory. To date, zinc ash from a "dry" kettle seems to be okay, but ash from a "wet" kettle usually fails the test. If the material fails the test, the approved containers must be labeled "Dangerous When Wet". In addition, the shipping papers must show the proper DOT shipping name: Zinc Ashes, 4.3, UN1435, PGIII. Since the orange-colored book that your friendly State Trooper carries show zinc ashes as hazardous, you'll need to attach a copy of the test results to the Bill of Lading even if the material passes the test.