

9444.1987(16)

MAY 20 1987

Ms. Karen S. Thirman
Solid and Hazardous Waste Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155

Dear Ms. Thirman:

I am responding to your letter of April 30, 1987, requesting the Agency's interpretation of the hazardous waste classification of an etching process waste. Specifically, you ask whether the process described in your letter generates a listed hazardous waste.

In reviewing your letter, we believe that the process described is considered to be a stripping process that employs cyanide chemicals, and the waste stream generated is EPA Hazardous Waste No. F009, "spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process". This point is substantiated in reviewing the listing background document for "Spent Waste Cyanide Solutions and Sludges", covering EPA Hazardous Waste Nos. F007, F008, and F009, where it specifically states (on page 7) that chemical etching is part of the listing.

If you require additional information, please feel free to contact Ed Abrams at (202) 382-4787.

Sincerely,

Matthew A. Straus
Chief, Waste Characterization Branch

Booz·Allen & Hamilton
Faxback 11251