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Mr. John H. Lovgren, Jr.
Environmental Engineer
Leach and Garner Company
Attleboro, MA 02703

Dear Mr. Lovgren:

This is a response to your November 17, 1987, letter to me regarding the regulatory classification of certain metal finishing sludges. Your letter describes a number of processes used in metal finishing, including pickling, tumbling, burnishing, heat treating and contact cooling. In addition, during a recent phone conversation you provided my staff with further details regarding the generation of several different wastestreams and sludges. Our decisions on the regulatory status of these residuals are discussed below.

On December 2, 1986, the Environmental Protection Agency (EPA) clarified the scope of the F006 listing (See Federal Register 43350); this clarification narrowed the scope of EPA Hazardous Waste No. F006 to include only wastewater treatment sludges from common and precious metals electroplating, anodizing, chemical etching and milling and stripping when associated with these processes.

In addition, the F006 listing applies only to the sludge generated from treatment of wastewaters associated with electroplating operations. Wastes resulting from treatment of spent baths and solutions that are not wastewaters would not be considered F006. However, sometimes these spent baths become mixed with wastewaters from electroplating operations; in these cases the sludges from treatment of the mixture would be F006. Also, depending on their composition, the spent baths and wastes derived from their treatment may meet the listing descriptions of other EPA hazardous wastes in 40 CFR 261.31 or exhibit one or more of the characteristics of hazardous waste defined in 40 CFR 261.21 through 261.24.

One wastestream you described is a spent solution from metal burnishing and polishing that contains soaps and metals. In the process, small pieces of metal are tumbled with rocks and soap to smooth the metal pieces. Under the Clean Water Act, the spent tumbling solution must be treated to remove the metals and soap before discharge. As you have described this mechanical burnishing and polishing process, it is not an electroplating, anodizing, chemical etching and milling, or chemical etching and milling, cleaning and stripping associated with these processes. Therefore, the metal hydroxide waste derived from treatment of the spent burnishing and polishing solution would not meet the F006 listing. If, however, the waste solution is mixed with "electroplating" wastewaters, the wastewater treatment sludge would be F006.

Another waste that you described was sludge from lime neutralization of a spent pickle bath. The pickling bath is used to remove oxide scale from precious metals and does not meet the definition of the K062 listing. In addition, the spent bath is neutralized, the resulting sludge would not be F006. If the metal is subsequently rinsed, however, and this pickling process is a cleaning or stripping operation associated with an electroplating process, then sludge from treatment of the rinsewater would meet the F006 listing.

A third process that you described (the manufacture of gold beads) also generates a spent bath. In this process, nitric acid is used to etch out the copper base metal in a gold bead. (The bead is moulded from gold-plated copper tubing.) Treatment of the spent nitric acid bath produces a metal hydroxide waste. The spent acid is not wastewater; thus, waste derived from direct treatment of the acid would not be F006. However, sludge from the treatment of wastewater associated with the etching process could be defined as F006.

You also inquired about the status of the sludge generated from the treatment of contact cooling water. If the contact cooling water is used only for cooling and is not, for example, also used as a rinsewater in an electroplating, anodizing, chemical etching and milling, or associated cleaning stripping operation, then the treatment sludge would not be F006. If, however, the cooling water is combined with other electroplating related wastewaters for treatment, the resulting sludge would meet the F006 listing.

I hope this answers your questions. If you require additional information, please contact Ed Abrams of my staff at (202) 382-4787.

Sincerely,

Marcia E. Williams
Director
Office of Solid Waste

L&G TECHNOLOGY DIVISION
ATTLEBORO, MASSACHUSETTS 02703

November 17, 1987

Ms. Marsha Williams
Director of Solid Waste
Environmental Protection Agency
WH562, 401 M Street SW
Washington, DC 20460

Dear Ms. Williams:

This letter is being submitted as a request for clarification of the F006 listing for hazardous waste from non-specific sources.

I represent the Leach & Garner Company which is in the precious metal product industry. Our operations range from producing intermediate precious metal products for further processing by our customers to the production of electrical contacts. These operations require a substantial amount of metal finishing operations such as pickling, tumbling, burnishing, heat treating and contact cooling. As a result of treating the effluent or wastewater, we generate a variety of metal hydroxide filter cakes and sludges. Two of the five operations which generate the wastewater sludges are involved with electroplating. One of the operations generates its sludges by chemically treating burnishing and tumbling solutions which contain soaps and metals. The sludge generated during this process has been tested for EP toxicity and has passed.

I have reviewed documentation from the Federal Register dated December 2, 1986 which refers me to the Effluent Guidelines for pretreatment standards for the electroplating point source category.

I would appreciate your interpretation as to the proper classification of our metal finishing sludges. If you require any further information regarding this request, please feel free to contact me at 617-222-7400, ext. 390.

Sincerely,

Original Document signed

John H. Lovgren, Jr.
Environmental Engineer

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