

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 15, 1992

MEMORANDUM

SUBJECT: Request for Assistance Regarding F006 Determination at the Eagle-Picher Colorado Springs, Colorado Facility

FROM: Sylvia K. Lowrance, Director Office of Solid Waste

TO: Robert L. Duprey, Director  
Hazardous Waste Management Division

This is in response to your request of December 3, 1991 for assistance in making a determination on a waste characterization issue at an Eagle-Picher Industries battery manufacturing facility in Colorado Springs, Colorado.

First, we agree that for the generic F-waste codes, a facility need not be subject to Effluent Guidelines Pretreatment Standards to be covered under the electroplating listings. Rather, a facility need only perform one of the processes defined as electroplating in the Effluent Guidelines Electroplating Background Document to be within the scope of the listing. For example, Continental Can Company petitioned the Agency to exempt them from F019 (wastewater treatment sludges from the chemical conversion coating of aluminum). They argued that since they were a can manufacturer, subject to the Effluent Guidelines Standards for Coil Coating rather than Electroplating, they were not generating F019 wastes. We rejected this argument.

Second, after reviewing the documentation which you have provided us, we have concluded that the submitted Eagle-Picher process of producing cathodes and anodes for battery production is not an electroplating operation. Instead, we feel that the process is more of an electrolysis reaction used to precipitate metal hydroxide ions into pores of the plaques. We do not see the connection between our definition of electroplating, i.e., metal ions being reduced or "plated" on a cathodic surface, and the Eagle-Picher process described in your memo which describes a metal hydroxide precipitating or being deposited in the pores of the plaques. Because of this distinction, we feel that sludges produced by this process should not be classified as F006 wastes. However, even though they are not included under the F006 code definition, these wastes may still exhibit a characteristic which would make them hazardous.

To summarize, we conclude that wastes from Eagle-Picher's battery manufacturing facility do not fall under the F006 waste code. If the Region were to take such an action, it would create a national conflict in regard to waste code characterization under RCRA.

If you have any questions or comments regarding this determination, please contact David Bussard, Director, Characterization and Assessment Division at FTS 260-4637 or have your staff contact David Carver at FTS 260-6775.

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