

PPC 9444.1984(14)

DRAGOUT FROM F007 - SPENT CYANIDE PLATING BATH SOLUTIONS

MEMORANDUM

DATE: July 30, 1984

SUBJECT: Dragout from EPA Hazardous Wastes No. F007 - Spent Cyanide Plating Bath Solutions from Electroplating Operations (Except for Precious Metals Electroplating Spent Cyanide Plating Bath Solutions)

FROM: Matthew A. Straus, Acting Chief
Waste Identification Branch (WH-562B)

TO: James H. Scarbrough, Chief
Residuals Management Branch
Air & Waste Management Division

This is written in response to your inquiry concerning dragout from plating bath solutions listed as EPA Hazardous Waste No. F007. Briefly, the process described at Georgia Tubing involves the transfer of parts from a plating bath solution to a chlorination tank to stop the plating process. During this transfer, dragout drips off the plated parts, is collected and transferred to the chlorination tank for treatment.

In general, your interpretation that the chlorination tank receives and treats a listed hazardous waste and is therefore a hazardous waste treatment tank is correct. However, it should be pointed out that the definition of EPA Hazardous Waste No. F007 refers to spent plating bath solutions only. Therefore, the plating bath solution itself would not be considered an F007 waste until it is spent. Only the dragout from the plating operation or if the plating bath solution itself was dumped would be considered an F007 waste because at that point in the operation it would be considered spent. In addition, any sludge that forms in the bottom of the chlorination tank would also be considered an F007 waste. The sludge would be considered an F006 waste only if wastewaters from the electroplating operation were to enter the chlorination tank for treatment in addition to the F007 waste. If you have any further questions on this matter, please do not hesitate to call Mr. William Sproat of my staff at FTS 382-4783.