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## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JULY 89

### 1. Clarification of F009 Listing

Title 40 CFR Section 261.31 describes the hazardous waste listing F009 as "spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process." Does this listing include all spent stripping and cleaning baths from cyanide electroplating processes or only those stripping and cleaning baths used at some point after the cyanide bath?

Discussion of the scope of F009 in the RCRA Listing Background Document indicates EPA's intent to regulate wastes that contain cyanide. A cleaning and stripping bath used prior to the cyanide plating bath would not contain cyanide contamination from carry over. Spent cleaning and stripping baths that follow cyanide plating baths at some point in the dip sequence would have levels of cyanide in them due to dragout. Therefore, it is EPA's intent to regulate only those spent cleaning and stripping baths from electroplating processes that are used at some point after the cyanide bath. However, if cleaning and stripping baths are commingled with other baths occurring during or after the cyanide baths or if cyanide containing solutions or wastes are introduced or recycled in the process upstream of the cyanide plating baths, then these cleaning or stripping baths would be F009.

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