PPC 9441.1991(06)

ELECTROPLATING WASTES

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAY 29 1991

Mr. Philip S. Bell
Amerock Corporation
4000 Auburn St
P.O. Box 7018
Rockford, IL 61125-7018

Dear Mr. Bell:

This is in response to your April 5 letter regarding the regulatory status of certain electroplating wastes and associated waste management activities. Our responses to your specific questions follow:

1. Anode bags

a. When, and under what conditions, do they become a hazardous waste?

The anode bags become a solid (and hazardous) waste when they are removed from the plating bath. At this point, they are considered to be a "spent material" that is reclaimed (i.e., washed to remove the cyanide solution) prior to reuse.

b. If they are washed and reused, are they hazardous waste during the time between removal and washing (if the washing does not occur in the same process tank)?

As described above, during this period, they are a "spent material" and a hazardous waste.

c. If and when they become a hazardous waste, when one washes the bags to remove the plating solution, must one have a RCRA Part B permit, or can one perform "treatment while accumulating" by meeting the requirements of 40 CFR 262.34 and 40 CFR 265 Subparts I and J?

Washing of the bags constitutes treatment of a hazardous waste. However, a RCRA permit would not be required if this

treatment occurs in tanks or containers during the accumulation period of not greater than 90 days and meets all of the requirements of 262.34(a).

d. If and when they become a hazardous waste, is the proper waste code for them solely D003 for CN content or do they also become a listed waste (such as F007) by virtue of some application of the mixture rule? (The assumption is that there are no hazardous characteristics other than reactivity due to cyanide.)

The waste would be considered both D003 and F007 (spent cyanide plating bath solution from electroplating operations). This is because the anode bag is both reactive and contains (has been soaked in) spent plating bath.

2. Filtered residues from cyanide plating baths

When a filtering apparatus which has been filtering a cyanide plating bath is opened for cleaning, is the residue and filter media (if it is to be discarded) solely D003 or a listed waste code (FO07?/FOO8?) in addition to the D003?

These wastes would be considered both D003 and F008 (spent plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process). While any F008 waste would contain some of the F007 plating solution from the tank in which it was generated, the F008 listing is the more specific description; thus, use of the F007 designation would not be appropriate.

3. A detergent cleaner and rinse prior to a cyanide plating bath

a. Was it USEPA's intent to include the Detergent Cleaner Solution (when spent) in the F009 listing?

The F009 listing applies to cyanide-containing cleaning and stripping baths (i.e., "where cyanides are used in the process" refers to the cleaning and/or stripping process). If the cleaning solutions are not cyanide-containing, the F009 listing is not applicable.

Should you have any questions regarding these

interpretations, feel free to contact David Bussard, Director of the Characterization and Assessment Division, at (202) 382-4637.

Sincerely,

Sylvia K. Lowrance