

1. Contaminated Electroplating Rinsewaters

During an electroplating operation, metal parts are removed from plating and stripping baths and immersed in rinsewater tanks. Small amounts of the plating and stripping solutions are carried on the parts into the rinsewater tanks. RCRA regulates spent cyanide plating bath solutions from electroplating operations and spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process as hazardous wastes F007 and F009, respectively (40 CFR Section 261.31(a)). When spent, would the contaminated rinsewaters be F007 and F009 respectively?

The F007 and F009 listings were intended to include only spent plating and spent stripping and cleaning baths. Rinsewaters from electroplating operations are not within the scope of the F007, F008, or F009 hazardous waste listings (Memo, Lowrance to Wagoner; April 7, 1988). Therefore, rinsewaters contaminated with plating bath solutions are not considered plating bath solutions and thus not F007 when spent. Similarly, rinsewaters contaminated with stripping and cleaning bath solutions are not considered stripping and cleaning bath solutions and thus not F009 when spent.

Further, the rinsewaters would not be F007 and F009 via the hazardous waste mixture rule. The mixture rule regulates as hazardous waste mixtures of hazardous waste and solid waste (Section 261.3(a)(2)(iv)). Trace amounts of plating and stripping solutions carried over to rinse tanks (sometimes referred to as "dragout") are not considered to be a solid or hazardous waste mixing with another solid waste, because these materials are in use and are not wastes until they are spent and removed from the process (Memo, Straus to Schiffman; July 28, 1987). The spent rinsewaters would only be regulated as hazardous waste if they exhibited a characteristic of hazardous waste or became mixed with a listed hazardous waste. Thus, if spent rinsewaters were to be mixed with hazardous waste F007 or F009, the resulting mixture would carry that listing code.