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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 87

6. Solid Waste Classification

An electronics manufacturer uses a wave soldering operation to imprint circuit boards. A "hot tin pot" containing a large mass of molten tin-lead solder is used as the source for the imprinting procedure. Solder from the pot is fed into the wave operation via a gulley or channel, and residual or excess solder is fed directly back into the pot for reuse. The solder becomes contaminated over time with copper and gold from the circuit boards and is no longer usable. The contents of the pot are then solidified in a large block and sent for gold recovery and solder reclamation. Would the block of solder be classified as a spent material, scrap metal, by-product or off specification commercial chemical product?

The contents of the "hot tin pot" would be classified as a spent material. Spent materials, per 50 FR 618, are materials that have been used and are no longer fit for use without being regenerated, reclaimed or otherwise reprocessed. The material would not meet the scrap metal classification because it is not a metal product discarded after consumer use or metal turning or fine. It would also be excluded from the off specification commercial chemical product category due to its prior use.

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