

RCRA/SUPERFUND HOTLINE MONTHLY REPORT
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1. Pickling Bath Carryover and K062

As part of a steel finishing line, a facility moves steel parts from a tank containing pickling liquor into a rinse tank containing only water. Small amounts of the pickling liquor are carried on the part into the rinsewater tank. RCRA regulates spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry (SIC Codes 331 and 332) as hazardous waste code K062 (40 CFR Section 261.32). When spent, would the contaminated rinsewaters be K062?

K062 is intended to cover only spent pickle liquor from steel finishing operations. As a result, the contaminated rinsewaters would not be considered spent pickle liquor and therefore not K062. This interpretation is consistent with Agency interpretations with respect to other listings under the same circumstances. For example, an April 7, 1988, Memo (Lowrance to Wagoner) and a July 28, 1987, Memo (Straus to Schiffman) both applied the same interpretation with respect to materials placed in rinsewaters following immersion in electroplating solutions, which would be listed as F007, F008, or F009, when disposed. The small amounts of electroplating solution on the materials when they are dipped into the rinsewaters are not wastes because they are not spent materials, but materials in use.

Nor would the contaminated rinsewaters be hazardous waste 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 pickling solutions carried over to rinse tanks (sometimes referred to as "dragout") are not considered to be a solid or hazardous waste mixed with another solid waste, because these materials are in use and are not wastes until they are spent and removed from the process.

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, for example, if a spent rinsewater were to be mixed with hazardous waste spent pickle liquor (K062), the resulting mixture would become a hazardous waste.