

9441.1988(13)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

APRIL 88

1. Notification Requirements for Recyclable Materials

A gold plating operation generates a spent cyanide solution. The solution is sent to a reclaimer so that the gold content can be recovered. The recyclable material, because of its free cyanide content, is a California listed waste. Does the generator have to send a notification to the reclaimer per Section 268.7?

The requirements for recyclable materials from which precious metals are reclaimed in Section 261.6(a)(2)(IV) subject the generator to regulation under Subpart F or Part 266. However, Section 261.6(a)(2) does not specifically free the generator of Part 268 regulations. Only those recyclable materials specifically listed in Section 261.6(a)(3) are not subject to Part 268 regulations.

Since this waste is California listed waste, the generator must provide proper notification to the reclaimer.

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