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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

JAN 27 1987

Mr. Tom Sauer  
General Electric Company  
1 Newmann Way  
Mail Drop N123  
Cincinnati, OH 45215

Dear Mr. Sauer:

This letter is in response to your January 13 telephone conversation with David Topping of my staff. Specifically, you requested a written interpretation as to whether electrochemical machining operations are within the scope of EPA Hazardous Waste No. F006.

As stated in the December 2, 1986 Interpretive Rule (51 FR 43350), the F006 listing includes wastewater treatment sludges from chemical etching and milling. The listing Background Document for F006 refers to the Development Document for Existing Source Pretreatment Standards for the Electroplating Category, August 1979, for details on specific processes. The latter document states that "chemical etching and milling" includes the specific processes of "...chemical milling, chemical etching, bright dipping, electropolishing, and electrochemical machining." Wastewater treatment sludges from electrochemical machining operations are, therefore, EPA Hazardous Waste No. F006.

Should you have any further questions regarding this interpretation, please contact me at (202)475-8551.

Sincerely,

Original Document signed

Matthew A. Straus, Chief  
Waste Characterization Branch

RO 11214