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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

AUGUST 89

3. Clarification of Electroplating Listings

The background document which supported the listing of F006 initially included electroless plating within the scope of the definition of electroplating. However, the December 2, 1986 Federal Register (54 FR 43351) clarified EPA's interpretation of the definition of electroplating as it pertained to the F006 listing. The clarification states that electroless plating was not considered an electroplating process. Would electroless plating baths which contain small concentrations of cyanide meet the F007 listing when disposed?

No. Although the December 2, 1986, clarification was written specifically for the F006 listing, the definition of electroplating may be applied analogously to the F007, F008 and F009 listings. Therefore, plating bath solutions from electroless plating operations will not meet the F007 listing when disposed. The bath would be regulated, however, if it exhibited one or more of the characteristics of hazardous waste.

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