

PPC 9444.1986(13)

MECHANICAL PLATING WASTES IN THE F006 LISTING, NON-INCLUSIVE OF

June 24, 1986

Mr. Reggie W. Carden
Chemical Safety Manager
Lisle Corporation
807 East Main Street
Clarinda, Iowa 51632

Dear Mr. Carden,

The purpose of this letter is to confirm our telephone conversation held on June 23, 1986 which dealt with the question of whether the Lisle Corporation's manufacturing process should really be considered an electroplating operation. Based on the information the Agency requested and received from Lisle Corporation on June 23, 1986, the mechanical plating system is not an electroplating operation as listed under 40 CFR 261.31.

On May 19, 1980, the Agency promulgated as an interim final rule the listing of "wastewater treatment sludges from electroplating operations" in 40 CFR 261.31 as EPA Hazardous Waste No. F006. As indicated in Appendix VII of Part 261 (45 FR 74892), the constituents of concern for this waste are cadmium, hexavalent chromium, nickel, and complexed cyanide. (This waste listing was finalized on January 16, 1981 (46 FR 4619) with some modification).

The mechanical plating operation utilized by Lisle Corporation involves the deposition of metallic coating on a base metal through mechanical action (i.e., impact of glass beads on the object to be coated in the presence of the coating metal) and is not considered an electrolytic process. We feel, therefore, that mechanical plating would not be considered an electroplating operation as defined in the background document and that wastewater treatment sludge previously generated from mechanical plating operations would not be considered a listed hazardous waste under 40 CFR 261.31 and thus, would not require delisting.

This, however, does not mean that the wastes already generated from this operation are non-hazardous. Each generator is ultimately responsible for determining whether his waste exhibits any of the characteristics of a hazardous waste (i.e., ignitability, corrosivity, reactivity and EP toxicity) as described in 40 CFR 261, Subpart C. If the waste exhibits a hazardous waste characteristic, the waste must be managed in accordance with the hazardous waste management regulations.

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Please feel free to contact me if you have any further questions, at (202) 382-4488.

Sincerely,

James R. Kent
Environmental Protection
Specialist