

OCT 3 1988

Ms. Robyn-Marie Lyon
McDermott, Will and Emery
2049 Century Park East
Suite 600
Los Angeles, CA 90067-3108

Dear Ms. Lyon:

I am responding to your letter dated September 7, 1988, to Bob Dellinger which requests confirmation of a hazardous waste interpretation of a waste stream generated by one of your clients. Specifically, your client uses a bronze plating process which plates a copper-tin alloy on carbon steel wires. No electrodes or electrolysis are employed in the process.

You have spoken with Mr. David Topping of my staff regarding this process. As Mr. Topping has informed you, this process is characterized as "immersion plating," rather than electroplating and, therefore, treatment of this process' wastewater will not generate F006 unless electroplating rinse waters are mixed with the immersion plating wastewaters prior to treatment.

You should advise your client that any wastes generated by the immersion plating process should be evaluated prior to disposal to determine whether they exhibit any of the hazardous waste characteristics (i.e., ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity - see 40 CFR 261.21-24).

Also, you should be aware that the States may have a regulatory program more stringent than the Federal program (i.e., the State hazardous waste program may consider these wastes as hazardous under State law). Therefore, you will have to contact the various States where your clients are located to determine how the wastes should be handled under State law.

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If you have any further questions, please contact Mr. Edwin F. Abrams at (202) 382-4787.

Sincerely,

Devereaux Barnes
Director,
Characterization and Assessment
Division

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