

9444.1987(19)

F006 LISTING APPLIED TO PRINTING INDUSTRY

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAY 22 1987

Mr. Edgar R. Santiago
Environmental & Safety Engineering
R.R. Donnelley & Sons Company
750 Warrenville Road
Lisle, IL 60532

Dear Mr. Santiago:

This letter is in response to your April 27, 1987 letter regarding the December 2, 1986 Interpretive Rule on EPA Hazardous Waste No. F006. Specifically, you requested an interpretation related to the inclusion of cleaning and stripping operations in that listing.

At line 10 of the first full paragraph on page 43351 of the Interpretive Rule, the F006 listing is said to include wastewater treatment sludges from "...cleaning and stripping when associated with electroplating operations (i.e., common and precious metals electroplating, anodizing, and chemical etching and milling).

In your letter, you imply that certain printing industry processes are not included in the F006 listing because they were exempted from the Effluent Guidelines Divisions' requirements for pretreatment standards for the electroplating point source category. We disagree with your interpretation. Neither the F006 listing background document, nor the August 1979 Development Document for Existing Source Pretreatment Standards for the Electroplating Point Source Category referenced therein, exclude the printing industry from the definition of electroplating operations. That is, while the Office of Water may have elected not to require the printing industry to meet the electroplating pretreatment standards, that action does not exclude from the F006 listing any electroplating wastewater treatment sludges that may be generated by the printing industry.

Finally, you inquired as to the status of EPA's action on the trivalent vs. hexavalent chromium issue. Comments were received

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on this issue in the Agency's proposed Organic Toxicity Characteristic (see 51 FR 21648, June 13, 1986). This issue will be addressed as part of that rulemaking.

Should you have any questions regarding this interpretation, please contact me, or david topping of my staff, at (202) 475-8551.

Sincerely,

Original Document signed

Matthew A. Straus, Chief
Waste Characterization Branch