

2. Applicability of F009 Listing to Cleaning Tank Sludge

During its electroplating operations, a facility generates an F009 spent cleaning solution in a cleaning tank. During use contaminants settle out and form a sludge on the bottom of the cleaning tank. When the spent cleaning bath is removed it is managed as a F009 waste. Would the sludge removed from the bottom of the cleaning tank also be classified an F009 waste?

Yes, the sludge removed from the bottom of the cleaning tank would be an F009 listed waste. The listing in 40 CFR Section 261.31 defines F009 wastes as "spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process." The settled materials forming the sludge are part of the spent stripping and cleaning bath solutions, and, therefore, are an F009 waste.