

PPC 9444.1986(32)

SCOPE OF WASTE LISTINGS F006 AND K062

12 DEC 1986

Mr. Richard M. Barrett
Teledyne Monarch Rubber Company
10 Lincoln Park
Hartville, OH 44632

Dear Mr. Barrett:

The purpose of this letter is to inform you that the Agency has reevaluated its previous interpretation of the hazardous waste listing for F006 wastes (Wastewater treatment sludges from electroplating operations) and has determined that it is overly broad. In particular, we believe that certain of the processes identified in the Listing Background Document that are not directly or indirectly implicated in the actual listing are not covered under the regulations as listed hazardous wastes. As a result, we now believe that F006 includes only common and precious metals electroplating, anodizing, chemical etching and milling, and cleaning and stripping when associated with these processes. On the other hand, the following processes are not included under the F006 listing: chemical conversion coating 1/, electroless plating, and printed circuit board manufacturing 2/. The Agency recently published an explanation of its determination on the F006 listing in the Federal Register 3/.

In addition, the Agency notes that your petition also identified the subject waste as EPA Hazardous Waste No. K062. The Agency has recently revised the scope of the K062 listing to include wastes from only those facilities described by

- 1/ Wastewater treatment sludges from the chemical conversion coating of aluminum is listed as EPA Hazardous Waste No. F019.
- 2/ Wastewater treatment sludges from printed circuit board manufacturing operations that include processes which are within the scope of the listing (e.g., chemical etching) are regulated as EPA Hazardous Waste No. F006.
- 3/ See 51 FR 43350, December 2, 1986 for an explanation of the F006 determination ???

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SIC codes 331 and 331. Based upon discussions with Mr. Richard Bohaychuk of Teledyne, we have concluded that the SIC code for your facility causes the waste to not meet the K062 listing description.^{4/}

Our records indicate that your petitioned waste is generated from processes that are not included in the scope of the F006 listing or that of the K062 listing, as described above. Therefore, we have discontinued the review of your petition. It should be noted that if your petitioned wastes are mixed with listed F006 wastes, listed K062 wastes, or any other listed hazardous wastes, the resulting mixture would be considered hazardous. Also, if your petitioned wastes or any mixture of wastes exhibit one or more of the characteristics of hazardous waste (40 CFR 261 Subpart C) then that waste would be considered hazardous.

If our records are incorrect or if your petitioned wastes are mixed with other hazardous wastes for which you still seek delisting, please contact us as soon as possible so that we can reactivate our review. Also, please note that this decision does not apply to any other listed wastes that may be generated at your facility.

If you have any questions regarding this matter, please contact Myles Morse of my staff, at (202) 382-4788.

Sincerely,

Myles Morse
Acting Chief
Variances Section

cc: Alan Debus, Region V
William Muno, Region V

^{4/} See 51 FR 19320, May 28, 1986 for an explanation of the K062 decision. Also, see 51 FR 33612, September 22, 1986 (correction notice).

RO 12819