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F006 or Not F006?

Determining whether a metal finishing and/or printed circuit board waste is a listed hazardous F006 waste or not isn't always easy. The F006 determination is predicated by the use of some very specific processes. To help clarify what is or is not a proper F006 determination, please reference the definition below:

RCRA Definition of F006

The Resource Conservation and Recovery Act or RCRA (pronounced "rick-rah") is the central law that gave EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage and disposal of hazardous waste. One of the most common RCRA-regulated wastes generated by the printed wiring board (PWB) and metal finishing industry is waste code F006. This waste is defined as wastewater treatment sludge from electroplating operations except from the following processes:

- Sulfuric anodizing of aluminum;
- Tin plating on carbon steel;
- Zinc plating (segregated basis) on carbon steel;
- Aluminum or zinc-aluminum plating on carbon steel;
- Cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel;
- Chemical etching and milling aluminum.

These processes are not F006 precursors so untreated liquid from them, if not otherwise hazardous (like a metal) is non-hazardous and can be solidified (not treatment by EPA) and landfilled in Subtitle B (non-hazardous landfill).

However, if wastewaters from the above exempted processes are combined with other electroplating wastewaters, then the entire quantity of resultant sludge falls under the definition of F006. The F006 listing extends to any material removed from an electroplating wastewater treatment system other than treated effluent (e.g., paper filters used for polishing the effluent).



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