COPY OF STATEMENT GIVEN TO BILL GALLAGHER AT TAOS 8/2/89 PRE-HEARING. PLEASE ENTER IN THE FORMAL HEARING RECORD. THE TECHNICAL PROSPECTUS WAS GIVEN TO GALLAGHER THANK YOU. M. Horan

TO NICK VAN CLEEF, EID 8/2/89 TAOS-
NICK, PLEASE GIVE THIS
TO WALTER YOUNGBLOOD, HEARING OFFICER.
M. Horan

P.O. Box 2262
Taos, New Mexico 87571-2262
2 August, 1989

Bill Gallagher, Chief
ALOMN Permits Section
U.S. EPA
1445 Ross Ave.
Dallas, TX. 75202-2733

c/o Walter Youngblood
Hearing Officer
NM EID/PHS
1190 St. Francis Drive
Santa Fe, NM 87503

PUBLIC COMMENT
LANL RCRA Permit
U.S. EPA Module VIII

ref: Module VIII
p. 2 Waste Minimization

add: (c) The permittee shall describe the efforts undertaken during the year to reduce the volume and toxicity of waste generated. 40 CFR Part 262.42 &7-1-87 Ed.) (6) applies

(d) The permittee shall describe the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984. 40 CFR Part 262.42 (7-1-87 Ed.) (7) applies

U.S. EPA should incorporate these CFR requirements in the permit Module VIII.

Biodegradeable and/or non-hazardous citrus terpene based solvent substitutes for chlorinated halogenated ozone destroying solvents and biodegradeable solvent substitutes for toluene (methylbenzene) and for xylene (dimethylbenzene) are available now. AT&T is using a citrus terpene solvent substitute for CFC-113 chlorofluorocarbon solvent.

Would you please direct the enclosed technical prospectus (Petroferm, Inc.) on non-hazardous and biodegradeable terpene and other non-hazardous solvent substitutes to the Waste Minimization Dept. of Waste Management at LANL for review. Dr. Stephen Anderson of U.S. EPA Global Change Divison and AT&T Engineering advised me about the BIOACT orange peel solvent substitutes.

I have been using Bioact DG-1 in my own business for degreasing bicycle parts. The results are superior to cleaning with Chevron 325 Parts Thinner.

I am suggesting BIOACT VS-5 as a replacement for toluene and for zxlene at LANL .

Apparently, someone at DOE/LANL commented to U.S. EPA Region Dallas that the citrus terpene based BIOACT is classified as hazardous because of its flash point. That is correct. The citrus based bioact is classed as hazardous only because it is ignitable, with a flash point below 141°F. However, it is still biodegradeable and a substitute for ozone destroying chlorinated solvents.

As a substitute for toluene and xylene, BIOACT VS-5 is non-hazardous by any criteria.

While toluene and xylene are not chlorinated halogenated solvents, substitution of Bioact VS-5 would reduce toxicity and is biodegradeable. Following is a comparison of flash points:

		Flash Point
BIOACT EC-7	(citrus terpene based)biodegradeable	117°F
BIOACT DG-1	" " " "	117°F
BIOACT MC-1	(pine terpene based) biodegradeable	120°F
BIOACT MC-2	" " " "	120°F
BIOACT VS-5	(proprietary) biodegradeable	200°F+
Toluene	(methylbenzene)	40°F
Xylene	(dimethylbenzene)	84°F

So, as you see above, the flash point of the citrus and pine terpene based BIOACTS are in the order of 3X that of toluene and BIOACT VS-5 is classed as non-hazardous and is also biodegradeable.

The bottom line is that since U.S. EPA Global Change Divison is working hard to bring these new chlorofluorocarbon substitutes to the attention of the marketplace, why can't DOE/LANL experiment with them as part of their waste minimization programme?

Sincerely,

Michael Horan
tel: (505) 758-3522
Taos, NM

Encl: Technical submittal
BIOACT solvent replacements
Waste Minimization, U.S. EPA #EPA530-SW-87-026