



Certified Mail - Return Receipt Requested

April 4, 1990  
EJJ 90-212



Mr. Nick Van Kleeck  
New Mexico Health and Environment Department  
1190 St. Francis Drive  
Santa Fe, NM 89503

Subject: Albuquerque and Farmington Service Centers  
Nonhazardous Status of New Immersion  
Cleaner Formula

Dear Mr. Van Kleeck,

This letter is to confirm, as you discussed with Sue Ryan last November, that the use of Safety-Kleen's new immersion cleaner (IC) formula does not result in a hazardous waste being generated. The existing formula contains chlorinated solvents and cresylic acid at levels which necessitate its regulation as a hazardous waste. It should be noted that these compounds are present at regulated levels prior to its use. The new formulation, a mixture of glycol-ether compounds, provides a significant reduction in toxicity and environmental risk by eliminating the methylene chloride, cresylic acid and ortho-dichlorobenzene present in the existing formula.

Analyses of the new IC have indicated that F-listed wastes and EP Toxic metals are not present in the used material at levels which would require its being regulated as a hazardous waste. In addition, it is not a characteristic waste using the criteria under 40 CFR 261.20 through 24. Copies of the analytical results and a product specification sheet are enclosed. Calculations to a) determine the appropriate number of samples to be analyzed, and b) confirm that a 90% confidence interval was achieved, were performed in accordance with SW 846 methods.

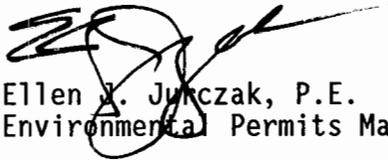
Safety-Kleen anticipates the new waste IC will be regulated as a hazardous waste under the new TCLP regulations (copy attached) and analyses necessary to determine the appropriate waste codes are currently in progress. The Company will submit revised Part A permit applications in accordance with 40 CFR 270.43 prior to the anticipated September, 1990 deadline. In addition, the Part B permit applications currently under review will be revised to include the new waste stream.

Mr. Nick Van Kleeck  
April 4, 1990  
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You stated during the telephone conversation that no additional facility permits (such as a solid waste permit) would be required to handle this waste. Please advise us as to whether this is acceptable to the Department.

If you have any questions or require further information, please contact me on extension 2246.

Sincerely,



Ellen J. Junczak, P.E.  
Environmental Permits Manager

EJJ/dfs

cc: NM Branch Managers (7-008-01, 7-008-21)  
B. Wachsmuth  
M. Romero  
P. Allen  
W. Johnson, Denver Reg. Mgr.  
U.S. EPA - Region VI

Table 2.

Statistical Results For Round 2 Study of Waste Immersion Cleaner & Cold Parts Cleaner 699  
 Using the methods stipulated in SW 846, the number of statistically significant samples was determined to be six. In fact 16 samples were used.

EP Toxicity Testing

Statistical Parameters	Flash Point ( F )	Concentrations in milligrams per liter							
		Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
Mean	150	0.1	0.03	0.127	0.029	0.43	0.01	0.1	0.001
Standard Deviation of Sample	5.1	0.0	0.04	0.176	0.036	0.41	0.00	0.0	0.001
Sample Variance	26.3	0.0	0.00	0.031	0.001	0.17	0.00	0.0	0.000
Standard Error of the Mean	1.1	0.0	0.01	0.039	0.008	0.09	0.00	0.0	0.000
Lower Limit of 90% CI *	148.5	0.1	0.01	0.075	0.018	0.30	0.01	0.1	0.001
Upper Limit of 90% CI	151.6	0.1	0.04	0.179	0.039	0.55	0.01	0.1	0.002
Lower Limit of 95% CI	148.1	0.1	0.01	0.059	0.015	0.27	0.01	0.1	0.001
Upper Limit of 95% CI	152.0	0.1	0.04	0.195	0.043	0.58	0.01	0.1	0.002
EPA Threshold	140	5.0	100.0	1.0	5.0	5.0	0.2	1.0	5.0

All calculations were performed as per SW846 titled "USEPA Test Methods For Evaluating Solid Waste - Volume Two: Field Manual, Physical/Chemical Methods", dated September, 1986.

The upper limit of the CI is compared with the EPA threshold to determine if the sample contains the contaminant of concern at a hazardous level. This contaminant is not considered to be present at a hazardous level if the upper limit of the CI is less than the EPA threshold.

The EPA threshold limits are documented in 40 CFR 261.24.

No threshold limits or deminimus have been established for % halogenates.

\* CI = confidence interval

\*\* When a "less than" value was reported, that value was used for calculation purposes.

SAFETY-KLEEN CORPORATION  
 MATERIAL ACCEPTANCE SPECIFICATION  
 (Tentative)

**DRAFT**

Material: Immersion Cleaner &  
 Cold Parts Cleaner 699  
 Formula 195-80C

S-K Part No. 6861 Page 1 of 1

Original Date October 09, 1989

Revision Date January 24, 1990

Supersedes January 11, 1990

Written by \_\_\_\_\_

Approved by \_\_\_\_\_

SCOPE

The specification covers a single-phase liquid product consisting of aromatic hydrocarbon (A-150), a propylene glycol ether (DPM), a cyclic amine (NMP), an alkanolamine (MEA), oleic acid, water, BHT and dye. The product is designed to clean carburetors and metal parts.

REQUIREMENTS

**DRAFT**

	<u>Typical Values</u>	<u>Control Values</u>	<u>Test Method</u>
Appearance	Clear, medium brown liquid	Comparable to previously approved standards	SK 9914
Flash Point	151°F	145°F Min.	SK 9401
Specific Gravity, 60/60°F	0.952	0.947-0.957	SK 9903
<u>COMPOSITION:</u>			
Monoethanolamine (MEA)	5.198 Wt.%	4.5-6.5 Wt.%	SK 9208
Dipropylene Glycol Methyl Ether (DPM)	10.107 Wt.%	9.0-11.0 Wt.%	SK 9208
N-Methyl-2-Pyrrolidone (NMP)	17.534 Wt.%	15.5-19.5 Wt.%	SK 9208
Aromatic 150	49.984 Wt.%	48.0-52.0 Wt.%	SK 9208
Water	9.575 Wt.%	8.5-10.5 Wt.%	SK 9801
Oleic Acid	7.601 Wt.%	7.6-10.5 Wt.%	SK 9907
BHT	50 ppm*		---
Brown Dye	50 ppm*		---
Chlorinated Solvents	<0.5%	1.0% Max.	SK 9206

\* Certify addition of this material. No testing required.

**CONFIDENTIAL**

*Sent 3-15-90 hwp*

TEXACO  
 INDUSTRIAL HYGIENE, TOXICOLOGY, AND MATERIAL  
 SAFETY DATA SHEET

NOTE: NO REPRESENTATION IS MADE AS TO THE ACCURACY OF THE INFORMATION  
 HEREIN. SEE PAGE 7 FOR CONDITIONS UNDER WHICH DATA ARE FURNISHED.

Trade Name and Synonyms <b>75716 AROMATICS A-150</b>	
Manufacturer's Name <b>Texaco Chemical Company</b>	Emergency Telephone No. <b>(409) 722-8381</b>
Address <b>3040 Post Oak Blvd. P.O. Box 27707 Houston, TX 77056</b>	
Chemical Name and/or Family or Description <b>Aromatic Hydrocarbon</b>	
THIS PRODUCT IS CLASSIFIED AS: <input type="checkbox"/> CARCINOGENIC BY OSHA, IARC, OR NTP <input checked="" type="checkbox"/> NOT CARCINOGENIC	
<b>WARNING STATEMENT:</b> <b>WARNING! CAUSES IRRITATION TO EYES</b> <b>MAY CAUSE IRRITATION TO SKIN</b> <b>COMBUSTIBLE</b>	
<b>OCCUPATIONAL CONTROL PROCEDURES</b>	
Protective Equipment (Type)	
Eyes:	Chemical type goggles must be worn. Do not wear contact lenses.
Skin:	Protective clothing such as uniforms, coveralls or lab coats should be worn. Launder or dry clean when soiled. Gloves resistant to chemicals and petroleum distillates required.
Inhalation:	Supplied air respiratory protection for cleaning large spills or upon entry into tanks, vessels, or other confined spaces.
Ventilation:	Local exhaust ventilation recommended
Permissible Concentrations:	
Air:	None established
<b>EMERGENCY AND FIRST AID PROCEDURES</b>	
First Aid	
Eyes:	Flush thoroughly with water for at least fifteen minutes. Get medical attention.
Skin:	Wash exposed areas with soap and water.
Ingestion:	Do NOT induce vomiting. Aspiration may cause chemical pneumonia.
Inhalation:	Should symptoms noted under physiological effects occur, remove to fresh air. If not breathing, apply artificial respiration.
Other Instructions:	None.



**ENVIRONMENTAL PROTECTION**

Code No. **75716**

**Waste Disposal Method:**  
Under RCRA, it is the responsibility of the user of products to determine, at the time of disposal, whether product meets RCRA criteria for hazardous waste. This is because product uses, transformations, mixture, processes, etc. may render the resulting material hazardous. (See Remarks for Waste Classification.)

**Procedures in Case of Breakage or Leakage:** (Transportation Spills Call CHEMTREC (800) 424-9300). Avoid contact with eyes. Contain spill if possible. Wipe up or absorb on suitable material and shovel up.

**Remarks:** Waste Classification: Product has been evaluated for RCRA characteristics and does not meet criteria of a hazardous waste if discarded in its purchased form.

**PRECAUTIONS**

**WARNING!** CAUSES IRRITATION TO EYES  
MAY CAUSE IRRITATION TO SKIN  
COMBUSTIBLE

Avoid contact with eyes and prolonged contact with skin.  
Keep away from heat and flame.  
Use only in well-ventilated locations.  
Avoid prolonged breathing of mist or vapor.  
Keep head away from container when opening or dispensing.  
Wash thoroughly after handling.

**Requirements for Transportation, Handling and Storage:**  
Store away from heat and open flame. Placard required only when material is contained in packaging or container that exceeds 110 gallons, or in tank car or tank truck. Transport, handle, and store in accordance with OSHA Regulation 1910.106 and applicable DOT regulations.

DOT Proper Shipping Name: See additional comments  
DOT Hazard Class (if applicable): Combustible liquid UN 1255 RQ

**CHEMICAL AND PHYSICAL PROPERTIES**

Boiling Point (°F) 355-415 Vapor Pressure < 5mm @ 100 F (mmHg)  
Specific Gravity 0.9100 (H<sub>2</sub>O=1) Vapor Density 4.0 (Air=1)  
Appearance and Odor water white, aromatic odor  
pH of undiluted product N.A. Solubility insol.  
Percent Volatile by Volume 100 Evaporation 0.01 ( )=1  
Viscosity N.D. Other -

Hazardous Polymerizations \_\_\_\_\_ Occur X Do not occur  
The Material Reacts Violently With: (If others is checked below, see additional comments on page 6 for further details)  
Air \_\_\_\_\_ Water \_\_\_\_\_ Heat \_\_\_\_\_ Strong Oxidizers \_\_\_\_\_ Others \_\_\_\_\_ None of These X



**PRODUCT SHIPPING LABEL**

Code  
No. 75716

75716 AROMATICS A-150

**WARNING! CAUSES IRRITATION TO EYES  
MAY CAUSE IRRITATION TO SKIN  
COMBUSTIBLE**

Avoid contact with eyes and prolonged contact with skin.  
Keep away from heat and flame.  
Use only in well-ventilated locations.  
Avoid prolonged breathing of mist or vapor.  
Keep head away from container when opening or dispensing.  
Wash thoroughly after handling.

In case of contact, immediately flush eyes with plenty of  
water for at least 15 minutes.  
Wash skin with soap and plenty of water.  
If swallowed, DO NOT induce vomiting.  
Call a doctor immediately.

In case of fire use water spray, foam, dry chemical or CO2.

<u>Chemical/Common Name</u>	<u>CAS No.</u>	<u>Range in %</u>
*Naphthalene	91203	4.00 - 10.99
Heavy aromatic solvent petroleum naphtha	64742945	80.00 - 94.99

\*Hazardous according to OSHA (1910.1200) or one or more state Right-To-Know lists.

HMIS

Health	: 2	Reactivity	: 0
Flammability:	2	Special	: -

DOT Proper Shipping Name: See additional comments  
DOT Hazardous Class : Combustible liquid UN 1255 RO

**CAUTION:** Misuse of empty containers can be hazardous. Empty containers can be hazardous if used to store toxic, flammable, or reactive materials. Cutting or welding of empty containers might cause fire, explosion or toxic fumes from residues. Do not pressurize or expose to open flame or heat. Keep container closed and drum bungs in place.

HEALTH EMERGENCY TELEPHONE: (914) 831-3400 (EXT. 204)

**Texaco**  
2000 Westchester Avenue  
White Plains, New York 10650

**For Additional Information Concerning:**  
Fuels/Lubricants/Antifreezes  
call (914) 831-3400 (EXT.204)  
Chemicals  
call (512) 459-8543  
Transportation Spills  
call CHEMTREC (800) 424-9300



**CHEMICALS THAT WOULD BE REGULATED, WITH THRESHOLDS,  
AS A RESULT OF REVISED RCRA TOXICITY TEST PROPOSED BY EPA  
(Issued June 6, 1986)**

<u>HWNO</u>	<u>Contaminants</u>	<u>CASNO</u>	<u>Regulatory Level (mg/l)</u>
D018	Acrylonitrile	107-13-1	5.0
D004	Arsenic	7440-38-2	5.0
D005	Barium	7440-39-3	100
D019	Benzene	71-43-2	0.07
D020	Bis(2-chloroethyl) ether	111-44-4	0.05
D006	Cadmium	7440-43-9	1.0
D021	Carbon disulfide	75-15-0	14.4
D022	Carbon tetrachloride	56-23-5	0.07
D023	Chlordane	57-74-9	0.03
D024	Chlorobenzene	108-90-7	1.4
D025	Chloroform	67-66-3	0.07
D007	Chromium	1333-82-0	5.0
D026	o-Cresol	95-48-7	10.0
D027	m-Cresol	108-39-4	10.0
D028	p-Cresol	106-44-5	10.0
D016	2,4-D	94-75-7	1.4
D029	1,2-Dichlorobenzene	95-50-1	4.3
D030	1,4-Dichlorobenzene	106-46-7	10.8
D031	1,2-Dichloroethane	107-06-2	0.40
D032	1,1-Dichloroethylene	75-35-4	0.1
D033	2,4-Dinitrotoluene	121-14-2	0.13
D012	Endrin	72-20-8	0.003
D034	Heptachlor (and its hydroxide)	76-44-2	0.001
D035	Hexachlorobenzene	118-74-1	0.13
D036	Hexachlorobutadiene	87-68-3	0.72
D037	Hexachloroethane	67-72-1	4.3
D038	Isobutanol	78-83-1	36
D008	Lead	7439-92-1	5.0
D013	Lindane	58-89-9	0.06
D009	Mercury	7439-97-6	0.2
D014	Methoxychlor	72-43-5	1.4
D039	Methylene chloride	75-09-2	8.6
D040	Methyl ethyl ketone	78-93-3	7.2
D041	Nitrobenzene	98-95-3	0.13
D042	Pentachlorophenol	87-86-5	3.6
D043	Phenol	108-95-2	14.4
D044	Pyridine	110-86-1	5.0
D010	Selenium	7782-49-2	1.0
D011	Silver	7440-22-4	5.0
D045	1,1,1,2-Tetrachloroethane	630-20-6	10.0
D046	1,1,2,2-Tetrachloroethane	79-34-5	1.3
D047	Tetrachloroethylene	127-18-4	0.1
D048	2,3,4,6-Tetrachlorophenol	58-90-2	1.5
D049	Toluene	108-88-3	14.4
D015	Toxaphene	8001-35-2	0.07
D050	1,1,1-Trichloroethane	71-55-6	30
D051	1,1,2-Trichloroethane	79-00-5	1.2
D052	Trichloroethylene	79-01-6	0.07
D053	2,4,5-Trichlorophenol	95-95-4	5.8
D054	2,4,6-Trichlorophenol	88-06-2	0.30
D017	2,4,5-TP (Silvex)	93-76-5	0.14
D055	Vinyl chloride	75-01-4	0.05