

9444.1986(15)

AUG 4 1986

Mr. J. W. McAdams  
Manager, Environmental Services  
Mobil Chemical Company  
P.O. Box 26683  
Richmond, VA 23261

Dear Mr. McAdams:

I am writing in response to your request for a written determination of whether the "pre-coat" waste that you generate as part of the process is a listed hazardous waste. I have reviewed the information that you have submitted in your June 10, 1986, letter and conclude that the use of 2-ethoxyethanol in your polypropylene extruding process does not constitute use as a solvent.

As you have stated in your letter, the spent solvents listings do not cover manufacturing process wastes that are contaminated with solvents when they are used as reactants or ingredients in the formulation of commercial chemical products. This is because the chemicals are not being used as solvents. I am satisfied that you have provided sufficient evidence that 2-ethoxyethanol is an ingredient of the pre-coat formulation. Thus, this pre-coat waste contain 2-ethoxyethanol is not a listed waste.

Although the subject waste is not a listed waste, 2-ethoxyethanol is known to be teratogenic in animals by oral, inhalation, and dermal routes, and causes adverse reproductive effects in animals. The concentration of 2-ethoxyethanol in your waste (1 to 5%) is many times greater than the health-based values for 2-ethoxyethanol. Furthermore, the Agency has listed still bottoms from the recovery of spent 2-ethoxyethanol because it contains similar levels of the subject solvent (1 to 10%). Thus, this pre-coat waste may pose a substantial threat to human health and the environment, if improperly disposed and we suggest that you manage it accordingly.

Sincerely,

Matthew A. Straus  
Chief

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