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June 20, 1990

TGG: JCL: ERT: M14: AJO: BF

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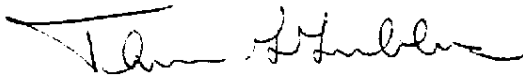
VISTA

Mr. Mike McCluskey  
Chemron  
P. O. Box 2799  
Paso Robles, CA 93446

Dear Mike:

As we discussed, I've enclosed information regarding the SARA 313 definition of glycol ethers. The attached letter was an EPA response to questions asked by the counsel for the soap and detergent association. Please call me at 713-588-3445 if you have further questions.

Sincerely,



Thomas G. Grumbles, C.I.H.  
Manager, Environmental Affairs

dlj

Attachment

VVV 000013205



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

file  
6/29

JUN 16 1989

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Mr. Alan S. Ward  
Baker and Hostetler  
Washington Square  
Suite 1100  
1050 Connecticut Avenue  
Washington, DC 20036

Dear Mr. Ward:

This letter is in response to your recent inquiry regarding a clarification of the glycol ether category under section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 with respect to alkyl ethoxylates, alkyl phenol ethoxylates and alkyl ethoxy sulfates.

There appear to be two separate issues stated in your letter. The first is to clarify the glycol ether category under section 313 to determine whether certain chemicals are subject to annual release reporting. The second requests that a modification to the category be made. }

The general structure for glycol ethers, as defined under section 313 is as follows:



Where  $n = 1, 2, \text{ or } 3$

$R$  = an alkyl or aryl group

$R'$  =  $R$ ,  $H$  or groups which, when removed, yield glycol ethers with the following structure:



Polymers are excluded from this category.

The substances which you are referring to have the following general structural components with regard to the above structure:

$R = C_{8-18}$  alkyl or alkyl phenyl;  $R' = H$ , or  $SO_3H$ ;  
 $n$  usually averages greater than 3.

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Both the R and R' groups for these components satisfy the definition of glycol ethers as described under section 313. However, the degree of ethoxylation (or the value of n) is greater than three. It is widely recognized that these materials have a range associated with the degree of ethoxylation such that for an average value of n, there may be substantial quantities of chemicals where the value of n is both higher and lower than the average. For section 313 reporting purposes, these substances are considered mixtures. In any mixture, a facility should, to the best of their ability, determine if any section 313 chemicals are contained in that mixture and consider only the fraction of reportable chemicals in determining reporting thresholds and calculating releases. In other words, facilities which manufacture, process, or otherwise use the ethoxylate mixture described above should consider the fraction of the chemicals where "n" is equal to three or less for reporting and release threshold determinations. This fraction of the mixture meets the definition of a glycol ether as described.

As we have discussed, modifications to list of reportable chemicals under section 313 can only take place through Agency rulemaking procedures. This requires proposing a rule in the Federal Register, receiving public comment, and then publishing a final rule. To date, the list of chemicals under section 313 has been modified by petitions to add or delete chemicals to the list and through an Agency initiated proposal to add chemicals to the list.

We would be happy to meet with you to discuss the options for requesting a modification to the glycol ether category under section 313. As you know, Bob Israel of my staff is the section 313 Petitions Coordinator. You should contact him to pursue this matter further.

Sincerely,

  
Susan B. Hazen  
Deputy Director  
Economics and Technology  
Division

cc: Charles Elkins  
Bob Israel

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