

TO: Mike Hayes-LCCP

TGG: JCL: ~~MMG~~: AJO: RF

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FROM: T. G. Grumbles

DATE: May 2, 1989

SUBJ: SARA 313 REPORTING - ALCOHOL ETHOXYLATES

VISTA

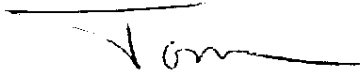
Interoffice
Communication

Attached is correspondence from SDA regarding a recent opinion that certain alcohol ethoxylates meet the Glycol Ether definition for SARA 313 reporting.

Please review and comment on the following:

1. Plant impact of reporting those ethoxylates affected.
2. Any feel for expected emissions, disposal included.
3. Any suggested additions to the arguments list.

I need your input by Friday so I can call SDA with our input. There will be an administrative burden in terms of 313 supplier notifications and MSDS revisions.


T. G. Grumbles

dlj

Attachment

cc: W. L. McClain, M. M. Goodreau, J. A. DeBernardi
J. Friend, C. Taylor-LCCP

VVV 000010422

The Soap and Detergent Association

April 28, 1989

TO: THE SDA RISK ASSESSMENT SUBCOMMITTEE

RE: Glycol Ethers

You should have seen the enclosed Environmental Legislation Report on glycol ethers by now. The next step for SDA is to meet with EPA staff on the matter sometime during the week of May 15, 1989 to review in depth the reasons why the one, two and three-mole ethoxylate content of alcohol and alkylphenol ethoxylates are not subject to the reporting requirement of SARA § 313. An outline of the arguments that could be presented is enclosed.

Please let me know by May 10, 1989 what modifications or additions need to be made to the list of arguments. Please provide me with documentation in support of the arguments. I will need assistance during the proposed meeting with EPA from one or two toxicologists. By May 10, please let me know who you recommend for this job.

Very truly yours,

Kathy & Boomer

Keith A. Booman, Ph.D.
Technical Director

Enc.

VVV 000010423

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ENVIRONMENTAL LEGISLATION REPORT

Editor: Mary P. Kilcoyne

ER-78

April 24, 1989

A L E R T

I M P O R T A N T N O T I C E

FEDERAL LEVEL

SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA)

Emergency Planning and Community Right-to-Know Act (EPCRA)

Section 313 - Title III - Release Reporting Requirements

GLYCOL ETHERS

Annual reporting of glycol ethers is required under SARA § 313. Glycol ethers are defined as $R-(OCH_2CH_2)_n-OR$ and $R-(OCH_2CH_2)_n-OH$, where R is alkyl or aryl (not further specified) and n is 1, 2 or 3. The definition specifically excludes polymers.

A telephone contact with an EPA official indicates that EPA staff believes that alcohol ethoxylates come within this definition of glycol ethers and should be reported.

The chemical industry does not use the term "glycol ether" in referring to alcohol ethoxylates and related surfactants. The uses of glycol ethers and alcohol ethoxylates (and related surfactants) are distinguishably different. Alcohol ethoxylates are more commonly considered polymers for which reporting is not required. Moreover, alcohol ethoxylates do not have the toxicological characteristics that lead to the reporting requirements for glycol ethers. Nevertheless, reporting of the one, two and three-mole ethoxylate content of alcohol ethoxylates and related nonionic surfactants will be required under EPA staff's interpretation.

The Chemical Manufacturers Association on glycol ethers will be reviewing this matter on Wednesday, April 26, 1989.

SDA will report any further developments in future Environmental Legislation Reports.

VVV 000010424

April 27, 1989

GLYCOL ETHERS:

POSSIBLE REASONS FOR NOT REPORTING ALCOHOL
AND ALKYLPHENOL ETHOXYLATES UNDER SARA § 313

- 1) Alcohol and alkylphenol ethoxylates are polymers and are specifically excluded from reporting by regulation.
- 2) Alcohol and alkyl phenol ethoxylates do not have the toxicological characteristics (reproductive toxicity) that motivated the listing of glycol ethers.
- 3) Alcohol and alkylphenol ethoxylates have significantly different uses and consequently significantly different human exposure.
- 4) Reporting alcohol and alkylphenol ethoxylates as glycol ethers will confound terminology in common use in industry. Because of distinctly different structure, properties and use, "glycol ether" and "alcohol ethoxylate" or "alkylphenol ethoxylate" have never been considered synonymous, and it is inconceivable that they ever would.
- 5) Reporting alcohol ethoxylates and alkylphenol ethoxylates as glycol ethers will confound the resulting compiled information. It will provide misleading conclusions concerning glycol ether exposure which could not be used for guiding future action, as Congress intended.

VVV 000010425