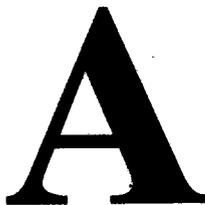


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401 "M" STREET, S.W.
WASHINGTON, DC 20460-0001

file:wesco\tscareponse7.898

BY: Registered Mail: Return Receipt Requested

DICHLOROACETONE MIXTURE

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August 10, 1998

Dear Coordinator of Section 8(e) Reports:

Enclosed you will find two copies of a response to your request for additional information, dated July 20, 1998. This letter will (1) provide you with revised contact information regarding the Section 8(e) report and (2) provide the Agency with an update as to the status of efforts to develop an alternative treatment process.

Revised Contact Information

The Section 8(e) report was filed on October 15, 1997 by Winfield Environmental, LLP. The assets of Winfield Environmental LLP were acquired by World Environmental Services Co. LLP (WESCO) which has its headquarters at

114 fourteenth St. Ste B&C
Ramona, CA 92065

(760) 789 6496 (phone)
(760) 789 5103 (FAX)

8EHQ-97-14046
899800002818

The president of WESCO is John J. Chahine, who can be reached at the above address.

WESCO is submitting this letter to the EPA and is asserting a business confidentiality claim covering part of the information contained in the reports. One copy of the letter is contained in a separate sealed envelope, clearly marked "TO BE OPENED ONLY BY THE OTS DOCUMENT CONTROL OFFICER".

All information which is to be protected in the complete letter is marked by a

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double underline. This information is deleted in the public version of the report. In addition, the complete letter carries the warning "This Document Contains Confidential Business Information."

Status of Efforts to Develop an Alternative Treatment Process

WESCO has determined that the cause of the problem was excess _____ and has successfully modified the treatment process to eliminate the generation of the lachrymatory agents. This has been confirmed by employee industrial hygiene monitoring. In order to eliminate the lachrymatory agent, WESCO developed a procedure which generates the _____ in a separate tank and delivers the _____ solution to the treatment system via a metering pump. The entire system is fully enclosed and operates under a slight negative pressure. All exhaust is passed through a high efficiency particulate filter and a carbon bed filter.

In order to further reduce potential employee over-exposure to the chemicals used to generate the _____ are now added via weighed packages directly to the water in the separate tank. The packages dissolve and the mixer in the tank produces a homogeneous solution. The entire process is efficient and results in a significant improvement in the operational safety of the equipment.

I have enclosed a copy of descriptive material on the process change.

WESCO believes that it has successfully resolved the problem addressed in the original Section 8(e) report. Therefore, unless additional evidence to the contrary is developed, WESCO does not plan to further modify this portion of the process. WESCO considers this issue closed.

I am a consultant retained by WESCO to assist with regulatory matters. Please feel free to contact either me or John Chahine, if you have questions.

Thank you for your cooperation in protecting this information.

Sincerely yours;



Neal Langerman, Ph.D.

Encl: Descriptive Material
cc: John Chahine, WESCO

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WESCO CHEMICALS

The *DRY MIX-50* series of chlorine dioxide solution systems, combine proprietary chemical products and state of the art solution systems to produce high purity chlorine dioxide solution for use in your process. The source chemicals DM-A and DM-B, are combined using a solution module specifically design for thorough mixing of the chemicals.

DRY MIX-50

High p
Dioxid

DESIGN FEATURES

The *DRY MIX-50* is capable of producing 50 gallons of 99.99% pure chlorine dioxide by using a unique internal blending system to ensure consistent mixing in the shortest time. The unit needs only to be connected to a water supply of at least 20 psig and to a power supply of 120VAC. Once activated the tank fills with water up to a pre-determined level. Once DM-A and DM-B are added via the wide mouth top opening, the lid is secured and a timed sequence of operation then ensures that the internal blender mixes the chemical and water together. Indicator lights indicate system operation and tank levels.



DESIGN CHARACTERISTICS

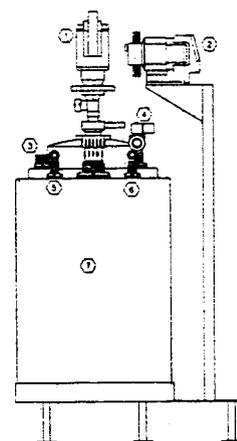
Power 120 VAC Water Supply 20 psig 1" connection.

OPTIONS

The unit is shown with a positive displacement dosing pump, this can be operated manually or ties into a control signal (4-20mA or 0-5V) from the customers process.

CHEMICAL INFORMATION

- Chlorine Dioxide is one of the most powerful micro-biocides and virucides available.
- Effectiveness, measured in the terms of microbial kill ratios, exceeds $4\log_{10}$. More than four powers of 10 kill ratios. Challenge viruses are not detectable following treatment.
- Chlorine Dioxide is safe and widely used for disinfecting in many industries such as drinking water plants, food processing, sanitation and wastewater treatment facilities.
- Chlorine Dioxide breaks down during the process with ultimate break down product being "Common Salt".
- After treatment with chlorine dioxide, the resultant non-hazardous medical waste can be disposed of in a municipal landfill for solid waste.



LEGEND

- | | |
|--------------------|------|
| 1. Mixing pump | 6. H |
| 2. Dosing pump | 7. S |
| 3. Air Vent | 8. V |
| 4. Water Solenoid | 9. D |
| 5. Low level float | |