

9433.1986(19)

DETECTION LIMIT REQUIREMENTS AND INFORMATION ON APPENDIX  
VII COMPOUNDS FOR A DELISTING PETITION

9 DEC 1986

John B. Hagar  
Chemist  
Stone Industrial Division  
J.L. Clark Manufacturing Co.  
51st Avenue & Cree Lane  
College Park, Maryland 20740

Re: Delisting Petition #582

Dear Mr. Hagar:

I have completed the review of the confidential business information submitted by you in support of the delisting petition that J.L. Clark Manufacturing Co. has on file here at the Agency. My concern is focused primarily on the detection limits provided for the organic constituents of the still bottom solids. These limits are expressed in units of percent by weight, and as such are too rough to allow a precise evaluation of actual waste concentrations (that is, if these rough percentages were used as inputs to the Agency's organic leaching model and VHS groundwater model, several resultant compliance-point values would be too high to consider delisting). Finer detection limits for these compound (i.e., parts per million) must be produced in order to evaluate the organic content of the waste.

Also, inspection of the material safety data sheets has indicated the potential presence of several other toxic Appendix VIII constituents in the waste stream. These compounds must also be evaluated in the waste in a manner similar to that needed for the re-evaluation of the previously tested solvents. A list of these constituents is given below.

Phthalic acid esters  
Methylene chloride  
Toluene  
Aniline

Tolylene diisocyanate

The Agency would like to receive further clarification about the ingredients of several other compounds mentioned in the material safety data sheets. These include fluorocarbon resins, orasol dyes, and aliphatic ketones and esters. If such information is proprietary, the Agency will make arrangements to have this information kept confidential.

In order to ensure the timely review of your petition, this information should be forwarded to the Agency as soon as possible. If you have questions, please call me at (202) 382-4783.

Sincerely,

Scott J. Maid  
Environmental Protection Specialist  
Permits and State Programs Division