	T Por	t of Seatt	ENVRONMENTAL JUN 06	
NGINEERING DEPARTM	MENT	÷.		
.0. BOX 68727 BATTLE, WA 98168				
HUNE: (206) 431-44			· · · · · · · · · · · · · · · · · · ·	
	TRANSMIT	TAL RECO	RD	
ro: Peggy McCl	oskry	DATE:	June 4, 1997	· · · · ·
Alaska Airlin	Des	JOB:		
Scattle, WA	98168-0900	LOCATION:	STIA	
We are encl	osing	•		
	-			•
We are mai	ling under separate cover.	•		
No. of:	Dwg. No.	· · I	Description:	
				•
				•
				· · ·
	For Approval		Approved as N	
	For Approval Approved		Resubmit for A	proval
	For Approval Approved Not Approved			proval
	Approved		Resubmit for A	proval
REMARKS: Fin	Approved	co Hoccust Safev	Resubmit for A	proval
REMARKS: Fin	Approved Not Approved	co Hoccust Safer	Resubmit for A	proval
	Approved Not Approved		Resubmit for A	proval
REMARKS: Fin	Approved Not Approved		Resubmit for A Other: (see rer wing MPIV 1957 Green	proval
COPY TO:	Approved Not Approved		Resubmit for A Other: (see rer wing MPIV 1957 Green	proval
	Approved Not Approved		Resubmit for A Other: (see rer wing MPIV 1957 Green ery Truly yours,	proval
COPY TO:	Approved Not Approved		Resubmit for A Other: (see rer wing MPIV 1957 Green ery Truly yours,	proval
COPY TO:	Approved Not Approved		Resubmit for A Other: (see rer wing MPIV 1957 Green ery Truly yours,	proval
COPY TO:	Approved Not Approved		Resubmit for A Other: (see rer wing MPIV 1957 Green ery Truly yours,	proval

-



BIO RESEARCH LABORATORIES, INC.

2897 152nd Avenue N.E. Redmond, WA 98052-5514 (206) 869-4224 FAX: (206) 869-4231

LABORATORY REPORT

ACUTE ORAL RAT TOXICITY TEST

FOR

MultiChem Analytical Services

Performed by:

BIO RESEARCH LABORATORIES, INC.

Laboratory Ref. Number: 70282 Client Sample Code: Green Safewing MP IV

Th. Study Director

Warren C. Ladiges, DVM

5-21

Date

President & Scientific Director

5/21/97

John J. Majnarich, Ph.D.

Date

John J. Majnanch, Pill

May 21, 1997

Our letters, reports and documentation are for the exclusive use of the client to whom these are addressed. The name, insignia, seals, reports, test results or staff of or from BIO RESEARCH LABORATORIES, INC. are not to be used in advertising or other manner without our prior written approval. WE WARRANT ONLY THAT ANALYSES AND SERVICES ARE PERFORMED IN GOOD FAITH AND IN ACCOR-DANCE WITH ACCEPTIND ESTABLISHED PROCEDURES OF SCIENCE OR THE TRADE.

TABLE OF CONTENTS

I.	INTR	DDUCTION	1
П.	METH	OD AND MATERIALS	1
	A.	Apparatus:	1
		Test organisms:	
		Dosing:	
	D.	Test Duration:	2
	E	Sample Test Substance:	2
	F.	Observation of Animals:	2
	G.	Gross Necropsy:	3
Ш		JLTS	
		Body Weight: Table I: Mean Weekly Body Weight	
		Cageside Observation:	
	D.	Gross Necropsy: Table 2. Raw Data Sheet - Control (0 mg/kg) Table 2. Raw Data Sheet - Control (0 mg/kg)	5
		Table 3. Raw Data Sheet - Sample #70282 (Green Safewing MP IV) - 5000 mg/kg	. 6
Γ	7. DIS	CUSSION AND CONCLUSIONS	. 7
۰V	PRO	FESSIONAL STAFF	. 8

I. INTRODUCTION

Bio Research Laboratories, Inc. (BRL) conducted an acute oral rat toxicity test on the sample presented by MultiChem Analytical Services on April 23, 1997. The purpose of this test was to determine the relative biological risk of potentially hazardous waste to humans and animals.

According to the "Washington State Hazardous Waste Regulation" (WAC 173-303), hazardous waste is classified as dangerous waste or extremely hazardous waste. The Department of Ecology of Washington State uses acute oral rat toxicity tests whenever a generator has not or cannot adequately characterize the toxicity of waste. The toxicity test results determine whether a waste is classified as dangerous waste or extremely hazardous waste.

According to the established safety rules of BRL every sample is suspected to be a hazardous waste; therefore, handled with extreme care.

IL METHOD AND MATERIALS

BRL performed an acute oral rat toxicity test by following the procedures and methods explained in Biological Testing Methods DOE 80-12.

A. Apparatus:

BRL's facilities include an area for holding rats. During testing the rats were shielded from any disturbances, and the facility was well ventilated and free of fumes. There was a 12-hour light and 12-hour dark photoperiod. The rat room temperature was maintained at 23°C \pm 1°C and recorded daily.

B. Test organisms:

Ten male and ten female albino rate weighing 180-227 grams were used. The rate were placed in two groups of ten. The rate were then tagged and housed inside individual stainless steel cages (7"x7"x15"). The rate were held in quarantine for seven days before starting the test. The rate were observed for signs of illness during the quarantine period in accordance with the "Animal Illness Evaluation" standard operating procedures (SOP). Rate were purchased from B&K Universal, in Kent, WA.

Food was withheld from the rats the night prior to sample material dosing; otherwise, the rats were fed and watered ad libitum.

1

Dosing: C.

"Dose" is defined as the amount of test substances administered. This is expressed as weight of the test substance in grams or milligrams per unit weight of the test animal. All rats were dosed by gavage with 5000 mg of the sample material per 1000 grams of body weight. All of the animals received the same concentration and approximate volume of the dosing solution. The volume did not exceed 5 mL per rat.

Test Duration: D.

The test began on May 6, 1997 and ended on May 20, 1997. The rats were observed for 14 days for mortality and clinical pharmacological or toxicological signs.

Sample Test Substance: E.

An evaluation of the integrity of the test samples was made upon receipt as to packaging deficiency, proper weight of sample for testing, possible mishandling during shipping, or any other visible defects. Any deficiencies were noted and used in the final interpretation of the data.

Date of Delivery: April 23, 1997

Physical & Chemical Characteristics: Green viscous liquid

Client Reference Code: Green Safewing MP IV

Vehicle: Water was used as a suitable vehicle. The test substance was then administered in a single dose by gavage.

Observation of Animals: F.

3

Observations were made for any toxicity effect immediately after dosing at one and four hours and daily thereafter for a period of 14 days. From cageside the rats were carefully observed daily for the following:

- The skin and fur. 1.
- Eyes and mucous membranes. 2
- Respiratory system. 3.
- Circulatory system. 4.
- Autonomic and central nervous system. 5.
- Somatomotor activity and behavior pattern. 6.
- Tumor, convulsions, salivation, diarrhea, lethargy, and coma. 7.

The individual weight of the animals was determined immediately before the test substance was administered, weekly, and at death. At termination of the test all of the surviving rats were weighed and sacrificed.

Gross Necropsy:

G.

A.

Gross necropsy was performed on rats that died during the test, and on the rats that were secrificed at termination. The gross necropsy included examinations of:

1. The external surface of the body.

2. The thoracic and abdominal cavities and their contents.

III. <u>RESULTS</u>

Body Weight:

The mean weekly body weight for the rats dosed 0 mg/kg (control), and 5000 mg/kg are shown in the following table:

Sample/Dosage	Me	an Body WL (gr	· · · · · · · · · · · · · · · · · · ·	
	day 0 (5/6/97)	day 7 (5/14/97)	day 14 (5/20/97)	14 Day WL Gain (g/raf)
Central, male (5) 0 mg/kg	218.6	302.0	335	116.4
Control, female (5) 0 ms/kg	200.2	245.0	258.6	58.4
Sample \$70282, maic (5) 5000 mg/kg	221.6	302.0	328.6	107.0
Sample \$76282, female (5) 5000 mg/kg	191.2	236.8	244.4	53.2

Table I: Mean Weekly Body Weight

Number in parentheses () is the number of animals results are based on.

III. RESULTS (Cont.)

B. Cageside Observation:

All of the rats appeared healthy and ate normally.

3

C. Mortality:

There were no mortalities.

D. Gross Necropsy:

All the animals appeared normal and healthy. There were no signs of typical toxicity effects. All the organs examined on necropsy appeared normal. Specifically the organs examined macroscopically were the liver, spleen, kidneys, adrenals, bladder, ovaries (females), testes (males), heart, lungs, and thymus gland.

PUCJYTICAL 202, BIO REBEARCH LABOR	BEGINNING TIME COATE	5/4/97 ENDING TIME PATE	Sprague Dewley Rets posserere	DOSE DESERVATIONS AND DATES CON	14 44172 136 139 136 130 130 130 130 130 131 135 134 131 138 1320 1 NECCOOS	IN RELIVEN UN	<u> </u>	11111111111111111111111111111111111111	 <th>1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1</th><th></th><th></th><th></th><th></th><th></th><th><u>] 3 M. W. J. 3 M. X. 57 57 57 57 57 57 57 57 57 57 57 57 57 </u></th>	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1						<u>] 3 M. W. J. 3 M. X. 57 57 57 57 57 57 57 57 57 57 57 57 57 </u>
9	TAL	12	IT ORDANISM JOI EQUE		0	5 m 213a 29.5a 320a	4 M 12054 131 Call 3454	A M AJAC AJACA A	A NO DA ASKA DO C N. A	A M DIA TOPAL 351 A		1 L 1 Q S 1 5 3 1 5 4 4				
	Multi Chem Brightical Sus.	Anelytical Sus.	Anelytical Sus. ec	Anciptical Sus. ec Nu 197 e Dawley Rats	Anclytical 242 BIO REBEARCH LABORATORIEB BIMPION (C) C David 242 BEGINNING THE PARE 9:30 CM 5/4/ 1 DOSO 100 RUE MATE 9:40 CM 5/4/ C David Rate 9:40 CM 5/4/ POSAGE LEVEL COD Mg /49 C David Rate 0085 RVATIONS AND DATES [COM	Anclytical 242. BIO REBEARCH LABORATORIEB Sample & CANTICI2 CC ANALYST	PACILYTICAL 242. BIO REBEARCH LABORATORUEB BIMPION (CA) CC ANALYST JAN W.L. ANALYST ANALYST JAN W.L. ANALYST ANALYST JAN W.L. ANALYST ANALYST JAN M.L. ALAPPE EVENTIONS AND DATES CON A ANALYST JAN	Pricipitical Subserventures samples Controls C ANALYST ANALYS	Pricipated Subservent LABORATORES Semple & CATTELS C ANALYST J.J.M. W.L. ANALYST ANALYST J.J.M. W.L. ANALYST ANALYST BEOINNING THE ANTE 9: JOCH J. LU/97 ENDING THE ANTE 9: JOCH J./J. 20/97 CULLEY RATE DOSAGE LEVEL COUNTY KG MANTES DOSE OBSERVATIONS AND DATES COMMENTS A ATTER 20 20 0055574 20 20 00 / Kg A ATTER 20 20 005574 20 20 00 / Kg A ATTER 20 20 005574 20 20 00 / Kg A ATTER 20 20 20 005574 20 20 00 / Kg A ATTER 20 20 20 005574 20 20 00 / Kg A ATTER 20 20 20 005574 20 20 00 / Kg A ATTER 20 20 20 00 20 20 00 / Kg A ATTER 20 20 20 20 00 / Kg A ATTER 20 20 20 00 20 20 00 / Kg A ATTER 20 20 20 00 20 20 00 / Kg A ATTER 20 20 20 20 00 20 20 00 / Kg A ATTER 20 20 20 20 20 20 20 / Kg A ATTER 20 20 20 20 20 20 20 / Kg A ATTER 20 20 20 20 20 20 20 / Kg A ATTER 20 20 20 20 20 20 20 20 / Kg A ATTER 20 20 20 20 20 20 20 20 / Kg A ATTER 20 20 20 20 20 20 20 20 20 20 20 20 20	Prilytical 242, BIO REBEARCH LABORATORIEB BIMPIO & CATTICI2 C ANALYST J.J.M. W.L. ANALYST ANALYST J.J.M. W.L. ANALYST ANALYST J.J.M. W.L. BEGINNING THE PARE 9: 30 and 1. V.L.G.P. BEGINNING THE RATE 9: 40 and 1. V.L.G.P. BEGINNING THE RATE 9: 40 and 1. V.L.G.P. REDING THE RATE 9: 400 and 1. V.L.G.P.P. REDING THE RATE 9: 400 and 1. V.L.G.P.P.P. REDING THE RATE 9: 400 and 1. V.L.G.P.P.P.P. REDING THE RATE 9: 400 and 1. V.L.G.P.P.P.P. REDING 1. V.L.G.P.P.P.P. REDING 1. V.L.G.P.P.P. REDING 1. V.L.G.P.P.P.P. REDING 1. V.L.G.P.P.P. REDING 1. V.L.G.P.P. REDING 1. V.L.G.P.P. REDING 1. V.L.G.P.P. REDING 1. V.L.G.P.P. REDING 1. V.L.G.P.P. RE	Anzlytical 212. BIO REBEARCH LABORATORUEB Sample # CONTICUED CC ANALYST ANALYST J.J.M. M.L. ANALYST ANALYST J.J.M. M.L. ANALYST ANALYST J.J.M. M.L. BEGINNING THE PARE 9:30 COM J.G. J.J.M. M.L. BEGINNING THE PARE 9:30 COM J.G. COULEY Rate of the M. M. M.L. COULEY Rate of the M. M. M.L. DOBE ATTRACTIONS AND DATES COMMENTS A 21 M CLUE CC CLUE COULD NOT AND DATES COMMENTS A 21 M CLUE CC CLUE CC CLUE NOT	Prolytical Sus Bio REBEARCH LABORATORUES Sample & CONTROLS C ANALYST J.J.M. W.L.L. ANALYST ANALYST J.J.J.M. W.L.L. ANALYST BEGINNING THE ROATE 9: 30 and 10/497 BEGINNING THE ROATE 9: 30 and 10/497 C DOULEY Rate BODING THE ROATE 9: 30 and 10/49 C DOULEY Rate 10/201/10/10/10/10/201/201	Dr. Ivt Ic2 Justimetrical Display Float Control 2 C AVALYST BIO REGEARCH LABORATORIES Sample # CONTROL2 C AVALYST AVALYST Justimetrical C AVALYST Justimetrical Justimetrical AU AVALYST Justimetrical Justimetrical AU AVALYST Justimetrical Justimetrical AU AP BEGINNING THAE ROME AVALYST AU AP BOURD THAE ROME AVALYST POLUE Reginner AP AP AU C C CO AU C C C AU C C	Drightical Subsectionationes samples Control Subsection C AVALYST BIO REGEARCH LABORATORIES Samples CONTROLS C AVALYST AVALYST J.J.M. M.L. C AVALYST J.J.M. M.L. BEQINVING THAE RATE J.J.M. M.L. LU/GP BEQINVING THAE RATE J.J.M. M.L. LU/GP ENDING THAE RATE J.J.M. M.L. LU/GP Record The RATE J.J.M. M.L. LU/GP Record The RATE J.O.O.M.G.GP Lu/GP Record The RATE J.O.O.M.GP Lu/GP Record The RATE J.O.O.M.GP<	Drightical Subsection reserved LABORATORIES Sample # CONTROLS CC ANALYST J.J. M. W. L. AVALYST J.J. M. W. L. AVALYST J.J. M. W. L. BEGINNING THE FONTE J.J. M. W. L. CC J.J. M. W. L. BEGINNING THE FONTE J.J. M. W. L. CLUCK Reconstruction of the form of t	Prilytical Sus, BIO REBEARCH LABORATORIEB SIMPLIE CONTROLS ANALYST J.J. M. H. L. ANALYST J.J. M. M. L. ANALYST BEGINNING THE ANTE J.J.J. M. M. L. BEGINNING THE ANTE J.J. M. M. L. BEGINNING THE ANTE J.J.J. M. M. L. BEGINNING THE ANTE J.J. M. M. M. L. B.J. M. C.

ORALRAT.XLS

•

Table 31 Ray Date Sheet Data Bheet for acute oral hat freeding tert	BIO REBEARCH LAB	ANALYBT J.J.M., W.L.	BEGINNING THE DATE 9:15 am 5/4/97	ENDING TIME MATE 9:30 200. 5/30/97
Tal DATA BHEET FOR /	NOUSTRY MULTI CHEM ANALYTICAL SUS.	TOXICANT GIFEEN SEFEWING MP IV	COLLECTOR Driven Sender	PATE RAMPLE COLLECTED 4/ みみ/97

1.1.1

Ę

ENDING TIME /DATE

DATE BAMPLE COLLECTED

b	COMMENTS	Necropsy	Normal Uganz	-	=	F	E	=	2	=		=	J.J.M.
	Ħ	3	7	Ś	7	Ĺ	ć	5	17	2	2	2	х
5000mg/kg		J.	1	2	2	7	7	12	17	17	1	3	\mathbf{X}
8		<u>7</u>	ن	3	ذ	ذ	2	د ا)	Ĺ	Ś	5	ĸ
,X	9	273	7	7	7	1	L	7	5	5	s	12	X
	OBSERVATIONS AND DATES	4hu 14 12 12 12 12 12 12 12 12 12 12 12 12 12	7	>	12	2	ذ	i	ذ	Ŀ	د	7	K
	00	GY.	7	7	5)	:	۲	د	7	ļ,		X
DOSAGE LEVEL	N	7/1	١	7.	ć			7	ذ	17	1	7	X
Ē	NSNS NC	325	7	7	Þ	7	ŗ	1	17	1	N	17	ズ
DOBAGE LEVEL	ĬĔ	Я.	· · ·	2	1	7	1			17		>	ズ
A de	RV	7	ŗ,	7	17						1	<u>)</u>	図
	BSE	\mathbb{R}	``	1	5				_	<u> `</u>	<u>ر ا</u>	1	K
	P	7	>	2	17	-	<u>}</u>	-		1	<u>د </u>	<u> </u> }	团
1 H		170	7	2	Ŀ	<u>}</u>	<u>د ا</u>	-	-	1	1	Ż	X
X	ł	5	7	17	7	Ĺ	12	1			_	7	因
		ŧ	7	1	17	1	17	1	1	1	1	7	
Dawley Rots	Dose		7.1 m/		March C		500					1 m	MT.C
		14	3400	1.2.4	1121		127		きず		きずい		SM MC
progu	Weight	1	N.S.	5991	ILE IC							大学	TW/
		0	2134		<u>5-01</u>				- ARP	1212		-XAP	J.M.K
TEBT ORDANISM DOLOGIAL -	RATW		Led 5. IN					W TAN					Inilials

ORALRAT.XLB

IV. DISCUSSION AND CONCLUSIONS

The purpose of this acute oral toxicity test was to provide information on rat health hazards likely to arise from a single oral exposure. Data from an acute study serves as a basis for classification, labeling, and packaging. Also, data is evaluated to determine whether the median lethal dose (LD₅₀) was below or above the administered dose.

"LD₅₀ oral (median lethal dose)" is a statistically derived single dose of a substance that can be expected to cause death in 50 percent of the animals when administered by the oral route. The LD₅₀ value is expressed in terms of weight of the test substance (g, mg) per unit weight of the test animal (e.g., mg/kg).

According to the Washington State Hazardous Waste Regulation (WAC 173-303) and Washington State Department of Ecology (DOE) "Acute Oral Rat Toxicity Test" (DOE 80-12, revised June 1991), a waste substance can be classified as an extremely bazardous waste (i.e., $LD_{50} \leq 100 \text{ mg/kg}$) or a dangerous waste (i.e., $LD_{50} \leq 5000 \text{ mg/kg}$). The death of two or less test animals per dose will be statistical evidence that the LD_{50} is greater than the standard at the 95 percent confidence level.

BRL Sample #70282; Green Safewing MP IV

In conclusion, with no mortalities associated with toxicity at the 5000 mg/kg dosea, this sample is <u>not</u> considered to be a dangerous waste. The average weight gain over the two week period was 116.4g for the control males versus 107g for the test males per rat. The average control male gained 11.4g more than the test male. The control females gained a total of 58.4g versus the test females which gained a total of 53.2g per rat over the same two week period. The average control female gained 5.2g more than the test female. The total weight gains were comparable in both the test and the control groups.

7

PROFESSIONAL STAFF

¥.

Ę

2

John J. Majnarich, Ph.D., President & Scientific Director

F. Sadri, Ph.D., Director of Research

Warren C. Ladiges, DVM; Director of Veterinary Services

Wanda R. Scaman, M.S., Microbiologist

Chris V. Rathe, Vice President of Marketing



BIO RESEARCH LABORATORIES, INC. 2897 152nd Avenue N.E. Redmond, WA 98052-5514 (206) 869-4224 FAX: (206) 869-1231

LABORATORY REPORT

HAZARDOUS WASTE CHARACTERIZATION

FOR

MultiChem Analytical Services

Performed by:

BIO RESEARCH LABORATORIES, INC.

2897 152nd Avenue NE Redmond, WA 98052

<u>BRL #</u> 70281 <u>Client Code</u> Green Safewing MP IV

May 3, 1997 Study Director Date Sylvia R. COOD 513197 President & Scientific Director Date Ph.D. Iohn

Our letters, reports and documentation are for the exclusive use of the client to whom these are addressed. The name, insignia, scale, reports, test results or staff of or from BLO RESEARCH LABORATORIES, INC. are not to be used in advertising or other manner without our pror written approval. WE WARRANT ONLY THAT ANALYSES AND SERVICES ARE PERFORMED IN GOOD FAITH AND IN ACCOR-DANCE WITH ACCEPTED ESTABLISHED PROCEDURES OF SCIENCE OR THE TRADE.

۰. ۱

. . .

TABLE OF CONTENTS

•		<u>n</u>	
	L.	Introduction	1
	П.	Source and Conditions of Organisms	1
	Ш.	Facility and Equipment	
		A. Holding Facilities	2
	•.	B. Holding Chambers	2
		C. Dilution Water 1. Adjusting Dilution Water Hardness	2 2
	IV.	Sample Test Material	3
	· v.	Test Procedure	
		A. Control Group	3
		B. Treated Group	3
	VI.	Test Methods and Conditions	
		A. Table I - Summary of acute rainbow trout test conditions	4
	VII.	Results	
		Table II: Acute rainbow trout toxicity test data - Green Safewing MP IV	5
		A. Testing of Green Safewing MP IV, at 100 mg/L - (BRL# 70281)	6
	VIII.	Discussion and Conclusions	7
	v .	Professional Staff	8

.

÷ .

STATIC ACUTE FISH TOXICITY TEST

I. INTRODUCTION

Bio Research Laboratories, Inc. (BRL) carefully performed a Hazardous Waste Characterization of the test sample material presented by MultiChem Analytical Services in accordance with the requirements of the Washington State Hazardous Waste Regulation (WAC 173-303). BRL followed the procedure issued by the Washington State Department of Ecology "Biological Testing Methods: Part A. Static Acute Fish Toxicity Test" (DOE 80-12, revised August, 1996). This test method is strictly a rangefinding test and does not define the actual median lethal concentration (LC₅₀). The LC₅₀ is defined as "the concentration of substance that kills fifty percent of the organisms being tested within 96 hours".

II. SOURCE AND CONDITIONS OF ORGANISMS

Rainbow Trout (Oncorhynchus mykiss) were used as test organisms. The fish were obtained from Nisqually Trout Farm. Ten fish were selected at random. The average weight and standard length of each of the selected fish was measured. The standard length is defined as the distance between the tip of the snout to the end of the caudal peduncle. These particular fish had an average weight of 0.84 g, which gives the ratio of flesh to water of 0.44 g/L. The length ranged from 35 to 54 mm, which gives a long to short ratio of 1:1.

When the fish were brought into BRL's facility, they were quarantined for a minimum of seven days, and appeared to be disease free. During this period, the fish were held at a stable temperature $(16^{\circ}C \pm 2^{\circ}C)$. There was constant water quality in an acruted flow-through system with a flow rate of approximately 30 liters per hour. During the holding period the fish were observed daily for signs of disease, stress, injury, hemorrhaging, and external parasite.

III. FACILITY AND EOUIPMENT

A. Holding Facilities

BRL's facilities include an area for holding and acclimating fish while providing a constant temperature of $15^{\circ}-16^{\circ}$ C using carbon filtered tap water. The air used for acration is free of oil and fumes. The test organisms were shielded from any disturbances. The facility is well ventilated and free of fumes. There is a 16-hour light and 8-hour dark photoperiod. Special care is taken to guard against contamination of the fish holding tanks.

B. Holding Chambers

The test chambers are located in a special room with the temperature remaining constant at $12^{\circ}C \pm 1^{\circ}C$. These test chambers are made from glass ($11^{\circ}x21^{\circ}x10^{\circ}$), which exceeds the DOE required dimensions. Before using, test chambers are cleaned thoroughly. A standard cleaning procedure is followed: Detergent or acetone is used to remove organic compounds; 5% concentration of nitric acid is used to remove metals and bases; and 200 mg hypochlorite/L is used for disinfection. Finally, the test chambers are rinsed with dilution water before the start of the test.

C. Dilution Water

The dilution water used in this investigation was filtered through a one micron pre-filter, two large carbon beds and a one micron post-filter. A fresh sample of dilution water was routinely tested for residual chlorine. Hardness, alkalinity, and specific conductance were also routinely tested by certified EPA methodology. The dilution water in the test chambers was intensively aerated by air stones prior to introducing the sample test material.

1. Adjusting Dilution Water Hardness

The hardness and alkalinity of the dilution water were adjusted to 80-100 mg/L as CaCO₃ and 60-70 mg/L as CaCO₃, respectively, by adding the following solutions:

- 1. 6 mL of KCI stock solution (8 g/L) per tank.
- 2. 7 mL of MgSO4 Anhydrous stock solution (120 g/L) per tank.
- 3. 14 mL of NaHCO3 stock solution (96 g/L) per tank.
- 4. 280-300 mL of CaSO4. 2H2O stock solution (10 g/G) per tank.

IV. SAMPLE TEST MATERIAL

An evaluation of the integrity of the test sample was made upon receipt to detect packaging deficiency, proper volume of sample for testing, and possible mishandling during shipping or any other visible defects. Any deficiencies were noted and used in the final interpretation of data.

Date of Collection:April 22, 1997Date of Delivery:April 23, 1997Accepted by:Sylvia R. CooperPhysical & Chemical characteristics of sample:Green viscous liquid

V. TEST PROCEDURE

The fish were not fed during and 48 hours prior to testing. All test chambers were inspected for basic water chemistry, temperature, and mortality at time 0, 4, 18, and 24 hour periods and every 24 hours thereafter. It was extremely important that procedures outlined were used to determine whether test organisms were dead, immobilized, or otherwise affected.

A. Control Group

Thirty (30) representative fish were placed in three replicate test chambers with 10 fish per chamber. These chambers were used as control and they were free of the sample test material.

B. Treated Group

The sample test material was added to the dilution water in the test chambers at 100 mg/L. Thirty (30) representative fish were placed in three replicate test chambers with 10 fish per chamber for each exposure level within 30 minutes after the test sample was added to the dilution water.

VI. TEST METHODS AND CONDITIONS

Client: MultiChem Analyti		ab. Ref. No. hate:	<u>711281</u> 04/28/97 - 05/02/97
Test Protocol:	Biological Testim Toxicity Test. D	<u>e Methods: Pa</u> OE 80-12 & V	nt A. Static Acane Fish WAC 173-303-110(3).
Test Material:	Green Safewing	MP IV	~
Test Organism:	Oncorhynchus my	kiss (Rainbow	trout)
Number/Container:	Ten		
Volume/Container:	19 L		
Test Concentrations:	100 mg/L and 0%	control	
Replicates:	Three		· · ·
Reference Toxicant:	Sodium Chloride	(NaCl)	
Test Duration:	96 hours		
Control Dilution:	Moderately hard s	synthetic fresh	water
Test Chambers:	10-gallon glass a	quariums	•
Lighting:	Fluorescent bulbs	(50-100 foot	candles)
Photoperiod:	16 hours light; 8 h	ours dark	
Temperature:	12°C±1°C	•	
Chemical Data:	24 hours: Specifi	c conductivity	essured at initiation and every are measured at test initiation alkalinity is measured at te
Effect Messured:	Montality	÷	· · ·
Test Acceptability:	Control mortality	less than 10%	

Bio Research Laboratories, Inc.

May 3, 1997

4

She
Dada
Teat
Toxicity
Trout
Acute
Static
Table II.

ų

-

					•					
S	ductivity (siS)	1		X	82	2	R	R]	
Lof 1 2 PM 2 PM	(jul)	•	202	92	82	8	8	22		Shartest 35 mg
		2	27	11	51	51	2	51		linitest
Page Start Time End Time Staff			11	11	5	51	2	5		•
Page Start ' Staff	E		1	11	YL.	71	Y1	Y.		
			2	51	Y1	М	Y.L	. 17		ł
04/28/97-05/02/97 Rainbow Trout iod hard synih weier 191/100 tank		e	N	YI.	51	ž	3.5	71		Longout <u>51 pun</u> Ratho of Book to wear <u>0,44 all</u> .
Test Dates 04/28/97-05/02/97 Test Organismus Rainbow Trout Dilution Media Mod hard srnth water Volume/Container 191/100 tank		8	5.6	М	2	3	X	٨	·•.	
V28/9 Nation Dath Dath 1/191		#	2	16	0.01	5.6	2	00		
	Disminul Onyge (mg/L)		1	101	[0]	2	a 01	901		
Media Conta		2	I.G.	50t	36	101	3	103	-	9
Test Dates Test Organisms Dilution Media Volume/Contain		e	i Ti	MI	<u>ERL</u>	11.7	11	971	100 mm/s	41.4 ms por chanter
Å Å Å Å	I of the		•	0	•	0	Þ	0	4	Mean Leagth <u>11,1 mm</u> Number of arguments per chamber <u>10</u>
991		8	-	•	•	•	•	•		
Nervice Nervice	Ę	2	•	•	•		•	•		Mom Leagth Number of an
Green Safewing MP IV MultiChem Analytical Services 12°C ± 1°C	lumo Miv Mortality		0	•	•	•	0	0		
Safewing M em Analylic 70281 2°C ± 1°C		R	0	0	0	•	0	0	96.0	Ą
Di Saf		•	0	•	•	•	0	•	<u>द</u> ि	اليانا محد
Green S MultiCha	275		я	2	8	9	2	9		UMA 1:1
No.	j	Y	•		•	8 -	8.	8 v		
Sample Source Lab. Raf. No. Temperature	Grang		Contra	Control		19204	INTRI	INCOL	This Hindow (ag), w (2003) This Allallady (ag), w (2003)	Sangia Descriptina Green visco Ar senga Veigia <u>DIM a</u> Ruita (Angridari) <u>11</u> Comonat

VIL RESULTS

•

Testing of Sample Material 70281 (Green Safewing MP IV) at 100 mg/L

• • •

The chemical and physical data of treated (100 mg/L) and control test chambers are shown in Table II. There was 0 % mortality or <u>0 out of 30</u> mortalities at 100 mg/L group and no deaths for the control group. The sample material at 100 mg/L had no significant effects on the pH, total hardness, total alkalinity, and conductivity of dilution water (Table II).

III. DISCUSSION AND CONCLUSIONS

The results of this study clearly indicate that the sample material had only a slight effect on the conductivity, pH, total hardness, and total alkalinity of the dilution water as the concentration of the material were increased to 100 mg/L (Table II).

The sample material did not effect oxygen saturation of the dilution water when the concentration was increased to 100 mg/L (Table II). There was nothing unusual noted about the test conducted. There were no deficiencies noted upon receipt of the sample.

According to Washington State Hazardous Waste Regulation (WAC 173-303-110(3)), to determine if a waste is Dangerous Waste (DW), a person must first establish the toxicity range of a waste by means of the 100 mg/L acute static fish test or the 5000 mg/kg oral rat test. To determine if a waste is Extremely Hazardous Waste (EHW), a person must establish the toxicity range of a waste by means of the fish bioassay at 10 mg/L or the rat bioassay at 50 mg/kg.

For a waste material to be designated a dangerous waste (DW), greater than ten cumulative deaths out of 30 test organisms must occur within 96 hours at a concentration of 100 mg/L. This waste is said to have an LC_{50} less than 100 mg/L at 95 percent confidence level.

In conclusion:

<u>Sample #70281 (Green Safewing MP IV)</u> – with zero mortalities at 100 mg/L concentration, the tested sample is said to have an LC₅₆ of greater than 100 mg/L and <u>is not</u> considered to be a dangerous waste.

7

PROFESSIONAL STAFF

8

John J Majnarich, Ph.D., President & Scientific Director

F. Sadri, M.S., Ph.D., Director of Research

Warren C. Ladiges, DVM; Director of Veterinary Services

Wanda R. Scaman, M.S., Microbiologist

and (1997) 1.000

۳,

Chris V. Rathe, Vice President and General Manager

NI DI ANG & ALAONA AIK		אינייבי דיי החפר שאיוו וכשא אינייבי דיי החפר שאיוו וכשא
NI DI AN & URA AIR		
	Ta Aliality Concels Co	
- Wales		
Prage Stort Tim JC (End Tim	251 45 25 45 45 45 45 45 45 45 45 45 45 45 45	
the transferred		
- <u>57</u>	Ulant University of the second University of the second se	
rates rganianus on Modia (<u>Mud.</u>		
Test Date Test Organismu Dibtion Modia Volumo/Contal		
HI ST		
	Other Care Ray La Carear - - - Consol - <td></td>	
T VIAN		
Trovel Tex		B
Stailo Acuie 1 Sample 6 Source 7 Lub. Ref. No. Tenycralate	Une Com by Control of	



ARCO Chemical Company S801 West Chester Pike Newtown Square, PA 19073 Telephone 610 359 2284 Fax 610 359 7207

> Anchew B. Lewis Senior Bales Representative Aircraft Deicers

March 27, 1997

Alaska Airlines PO Box 68900 Seattle, WA 98168-0900

Auention : Peggy McCluskey

Dear Peggy;

The following is the environmental information per 3.1.1 of SAE AMS 1428A for Hoschat Safewing MP IV 1957 Green. The information contained herein is as was presented to ARCO Chemical Company by the manufacturer of the material, Hoechst AG.

 BOD,
 370mg/g

 COD
 \$30mg/g

Biodegradability after 3 days >95%

Aquatic Texicity LC₂₀ (Fathcad Minnow) -1400mg/l

100

If you have any other questions or requirements please call me at (610) 359-2284.

Yours truly, ARCO Chamical Company A.B.Lewis, P.Eng.



SENT BY AAG & ALASKA AIRLINES ; 8-25-57 ; 12:34 ; WEST WING-مدادف المعادية المتعرين المتحدة المتحدة

RECEIVES

IN THE UNITED STATES DISTRICT COURT FOR THE 2 35 PH 197 DISTRICT OF COLUMBIA N. Silter. . . i 'r **a** U.S. ZALL

NATURAL RESOURCES DEFENSE COUNCIL. INC. ; FUBLIC CITIZES, INC. ,

Plaintiffs,

CAROL M. BROWNER, ADKINISTRATOR, U.S. ERVIRONMENTAL PROTECTION AGENCY,

Defendant,

and.

٧.

AMERICAN FOREST & PAPER ASSOCIATION : et al.

Intervence-Defendants.

Civil No. 89-2980 (RCL)

DEFINDINT'S UNOPPOSED NOTION TO NODITY CONSERT DECREE

On October 30, 1989, Matural Resources Defense Council, Inc. ("KRDC") and Public Citizen, Inc. (collectively "Plaintiffs") brought this action against the United States Environmental Protection Agency ("IPA"), alleging that IPA had failed to issue a plan for establishing sffluent guidelines for various industry categories, as required by section 304 (m) of the Clean Water Act ("CHA"), 33 U.B.C. § 1314(m). Under the terms of the Consent Decree entered on January 31, 1992 in this case, ZPA was required to propose and take final regulatory action with respect to effluent guidelines for eleven specified industry categories; to complete eleven studies aimed at selecting additional guidelines; to start, propose and take final action on eight other unspecified industry categories; and to publish effluent

guidelines plans in the <u>Federal Register</u>. To date, TPA has completed four releastings the seven studies, and has proposed four additional rules.

ATTAL FRA SHE IDA DIBU

Since 1997, ZPA has requested, and this Court has granted, Several unopposed extensions of deadlines in the Decree.' However, in early 1996, ZPA concluded that the timeframes set forth in the Decree are based on rulemaking schedules and budget estimates that have turned out to be sumewhat unrealistic. For example, due to EPA's budgetary and staffing limitations and thanges to the regulatory process (s.g., emendments to the Paperwork Reduction Act), the time EPA currently needs to complete a guidaline has grown from five years — as contemplated by the original Decree — to seven years. As a result, EPA initiated negotiations with KEDC, on behalf of Plaintiffs, for a

Aps December 8, 1994 Gräere (extending deadlines for completing Metal Finishing study to April 1896, for proposing guidelines on Pesticide Formulating and Packaging ("FIP") category to March 31, 1994, and for proposing and taking final action on: Waste Treatment (Phase I) category to December 15, 1994 and September 15, 1996; Waste Treatment (Phase II) category to March 1997 and March 1999; Pharmaceutical Manufacturing category to Pebruary 1995 and August 1996; and Metals Products and Machinery (Phase I) category to March 1995 and September 1996); July 8, 1995 Order (extending deadline for taking final action on PTP category to March 1996); Earch 6, 1996 Grier (extending deadline for taking final action on PTP category to July 1996); June 3, 1996 Grier (extending deadlines for taking final action on: Constal oil and Gas category to October 1996; and FTP category to September 1996); July 16, 1996 Order (extending deadlines for proposing guidelines on Industrial Laundries and Transportation Equipment Cleaning categories, and for taking final action on Centralized Maste Treatment, Matals Products and Machinery (Phase I) and Pharmaceutical Manufacturing categories until March 31, 1997); January 6, 1997 Order (temporarily staying deadlines for completing a study of an unspecified category, and for starting rulemaking action on another unspecified category until January 31, 1997).

- 2 -

AR 024817

E

4. 40/ 01 PRI 10: 22 FAL 202 168 0180

אייראער השלה האל יבר דרי האלה השלה האל

wid-course re-examination of the obligations in the Decree. Those negotistions have resulted in the following proposed modifications to the Decree, which Plaintiffs and Intervenors American Forest & Paper Association, Chemical Manufacturers Association and National Association of Metal Finishers do not oppose.

Proposed Modifications To The Decree

By this motion, EFA respectfully requests this Court to modify the Consent Decres entered in this case as follows:

A. Add new WEIRLAS clause to page 3 of Decree prior to penultimate WHERLAS clause, to read as follows:

REFREAS, EPA and plaintiffs have agreed to additional provisions contained in a Settlement Agreement, dated January 31, 1997;²

³ CONCURRENT with the filing of this motion, EPA and MEDC, on Plaintiffs' behalf, have executed a Settlement Agreement that, inter alia, details the Agency's current intent to propose a joint Clean Air Act/Clean Water Act rule for the Pharmaceutical Manufacturing category by April, 1998, and describes the contents of three upcoming studies referenced in paragraph 3 of the Decree. Because the instant case Was brought under the CMA, it was necessary to memorialize EPA's intentions under the CAA outside of the Decree. Prior to the filing of this motion, Plaintiffs and Intervenors were provided copies of the Settlement Agreement, which is attached for informational purposes at brhibit A.

SENI BY AND & ALASKA AIRLINES , 5-25-57 , 12:55 ; RESI RINUT

Θ

3. Replace the table in paragraph 2 of the Decree with the following table (current deadlines in "[]"; proposed changes in bold):

Point Source Category Proposal

Final Action

1.	Pesticide Manufacturing		JULY, 1983
2.	Pesticide Formulating & Packaging	Narch, 1994	September, 1996
3.	Cestralised Tasts Treatment	December 15, 1994	angust 15, 1999 [vas Karoh, 1997]
۹.	Netal Products & Machinery - Phase 1 (to be combined with Phase 2)	Xarch, 1995	December, 2001 [yas March, 1997]
5.	Pharmaceutical Manufacturing	Pebruary, 1995	April, 1998 [vas March, 1997]
	Organic Chemicals, Plastics & Synthetic Fibers Response to CMA V. EPA, 870 F.2d 177, reh'g granted in part, 885 F.2d 253 (Sth Cir. 1989)	(published December, 1991)	
7.	Constal 011 & Gas	January, 1995	October, 1996

ē

الدريانا المناجية المحرو والتو

C. Replace the table in paragraph 3 of the Decree with the Sollowing table (current deadlines in "[]"; proposed changes in bold):

Point Source Category Start

Complete

1.	Petroleum Refining	1992	1933
2.	Netal Finishing	1992	April, 1994
3.	Textiles	2953	2994
4.	Inorgenic Chesicals	1993	1994
5.	Iron and Steel	1994	1995
6.	Steam Electric	1994	1995
7.	Photographic Processisy	1995	1996
8.	Chemical Forsulators and Fackagors	1995	April, 1997 [vas Jan. 31, 1997]
۶.	Peoflats	1997 [V28 1996]	1998 [Vas 1997]
18.	Urban Storester	1987 [Vas 1996]	1998 [vas 1997]
11.	Lisport De-icing	1998 [Vas 1996]	1999 [was 1997]

D. Replace the table in paragraph 4 of the Decree with the following table (current deadlines in "[]"; proposed Changes in bold):

Paint Source Category Proposal Final Action

Landfills and	November, 1987	November, 1999
Incinerators	[Was March, 1997]	[was Karch, 1999]
Industrial Laundries	September, 1997 [vas March, 1997]	June, 1999 [Was 1998]
Transportation	JESURTY, 1998	February, 2000
Equipment Cleaning	[Vas March, 1997]	[vas 1998]
Notel Products and Nachinery - Combined Phase 1 and 2 Relevaning	October, 2000 [Vas 1997]	December, 2682 [Vas 1999]

2. Replace the table in paragraph 5 of the Decree With the following table (current deadlines in "[]"; new changes in bold): Start Action Proposal Final Action Point Source

			ويتقابل والمحد والأواف المتحد والمحد والمحد
Iron and Steel	1996	1998	2000
Nev or Revised Rule #6	1937 [Was Jan. 31, 1997]	1988	2000
New or Revised Rule \$7	1957	1997	2001
New or Revised Rule #5	1997	1999	2001
New or Revised Rule #9	1998	2000	2002
New or Revised Rule #10	1998	2000	2002
New or Revised Rule #11	1999	2001	2003 -
Nev or Rovisod Rule #12	1999	2001	2003

E

We ser al rai 19.60 PAL 202 103 BLUE BELERURANIAN

سادية الالبان

7. Add new paragraph 6 as follows, and remumber the

following paragraphs in the Decree accordingly:

EPA will send to all parties in June and 6. December of each year, beginning in June, Ca-1997, a report on the statue of all rulesskings ongoing under this Decroe. This report will include a discussion of the progress on each study and rule since the previous report, any delays in the schedule of milestones for such study or rule (for rules, "milestones" as identified as discrete steps in the EPA model effluent guideline schedule or other charts with similar level of detail), the causes of any such delays, whether EPA has taken corrective action with regard to any such delay, and the prejected impact of any such delay on the overall study or rulesating scheduls, including proposal and completion dates. The first such report after the start date of a study referenced in paragraph 3 above will include a schedule of ailestones for that study. Nothing in this paragraph alters the obligations of the parties as set forth below regarding modification of this Decree.

G. Paragraph 18 (formerly, paragraph 17) of the Decree is modified to add a new sentence at the end as follows:

> LPA further agrees that plaintiffs are entitled to reasonable attornays' fees and costs accrued during the negotistion of the 1997 modifications to this Consent Decres. The parties will attempt to reach agreement as to the appropriate amount of the recovery. If they are unable to do so, plaintiffs will file an application with the Court for the recovery of fees and costs relating to this renegotiation.

CONCLUSION

BEIERUSERU LAMUNU

For the reasons set forth above, EPA respectfully requests this Court to grant the Agency's unopposed motion to modify the Consent Decrema.

Respectfully submitted,

LOIS J. SCHIFFER Assistant Attorney General Environment & Matural Res. Division

للمراجعة المراسيين

 (\cdot)

KINE AND COM 17

U.S. Department of Justice Environmental Defense Section P.O. Box 23586 Washington, D.C. 20026-3986 (202) 514-2664

NAKDOLPH L. HILL U.S. Environmental Protection Agency Office of General Counsel 401 N Street, S.W. (2355) Washington, D.C. 20460 (202) 260-7629

DATED: January 31, 1897

DPR

THITON

• † •

SENT BY: AAG & ALASKA AIRLINES ; 8-25-57 ; 12:39 ;

RECEIVED

IN THE DEITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA N. FLATER 1.11 U.S. CIT

EXTURAL RESOURCES DEFENSE COUNCIL, INC. ; FUBLIC CITIZEN, INC.,

Plaintiffs,

CAROL N. BROWNER, ADMINISTRATOR, U.S. DEVIRONNEETAL PROTECTION ACENCY,

Defendant,

and

Ę

۷. :

ANTRICAN FOREST & PAPER ASSOCIATION; et il.

Intervenor-Defendants.

civil No. 29-2980 (RCL)

DEFENDANT'S UNOPPOSED NOTION TO NODIFY CONSERT DECREE

On October 30, 1989, Estural Resources Defense Council, Inc. ("NRDC") and Public Citizen, Inc. (collectively "Plaintiffs") brought this action against the United States Environmental Protection Agency ("EFA"), alleging that EFA had failed to issue a plan for establishing sffluent guidelines for various industry categories, as required by section 304 (3) of the Clean Water Act ("CHA"), 33 U.S.C. 5 1314 (M). Under the terms of the Consent Decree entered on January 31, 1992 in this case, EPA was required to propose and take Iinal regulatory action with respect to effluent guidelines for eleven specified industry categories; to complete eleven studies aimed at selecting additional guidelines; to start, propose and take final action on eight other unspecified industry categories; and to publish effluent

guidelines plans in the Pederal Resister. To date, TPA has completed four releastings and seven studies, and has proposed four additional rules.

Since 1997, EPA has requested, and this court has granted, several unopposed extensions of deadlines in the Decres." However, in early 1996, TPA concluded that the timeframes set forth in the Decree are based on rulemaking schedules and budget estimates that have turned out to be scmewhat unrealistic. For example, due to IPA's budgetary and staffing limitations and changes to the regulatory process (a.g., exendments to the Paperwork Reduction Act), the time BPA currently needs to complete a guideline has grown from five years -- as contemplated by the original Decree -- to seven years. As a result, IPA initiated negotiations with MRDC, on Dehalf of Plaintiffs, for a

Ecs December 8, 1994 Orders (extending deadlines for completing Matal Finishing study to April 1994, for proposing guidelines on Pesticide Formulating and Packaging ("PFP") category to March 31, 1994, and for proposing and taking final action on: Waste Treatment (Phase I) category to December 15, 1954 and September 15, 1986; Waste Treatment (Phase II) category to March 1997 and March 1999; Pharmaceutical Manufacturing category to Pebruary 1995 and August 1996; and Metals Products and Machinery (Phase I) category to March 1995 and September 1996); July 5, 1895 Order (extending deadline for taking final action on PYP category to March 1996); March 6, 1996 Grear (extending deadline for taking final action on PFP category to July 1996); June 3, 1996 Order (extending deadlines for taking final action on: Coastal bil and Gas category to October 1996; and PTP category to September 1896); July 16, 1996 Order (extending deadlines for proposing guidelines on Industrial Laundries and Transportation Equipment Cleaning categories, and for taking final action on Centralized Maste Treatment, Metals Products and Machinery (Phase I) and Pharmacoutical Manufacturing externation workly Month 21 years a second content. categories until March 31, 1997); Jasuary 6, 1997 Order (temporarily staying duadlines for completing a study of an unspecified category, and for starting rulemaking action on Enother unspecified category until January 31, 1997).

- 2 -

Ş

1

AR 024826

Sid-course re-examination of the obligations in the Decree. Those negotistions have resulted in the following proposed Bodifications to the Decree, which Plaintiffs and Intervenors American Forest & Paper Association, Chemical Manufacturers Association and Mational Association of Metal Finishers do not oppose.

Proposed Modifications To The Decree

By this motion, EFA respectfully requests this Court to modify the Consent Decres entered in this case as follows:

A. Add new WHEREAS clause to page 3 of Decree prior to penultimate WHEREAS clause, to read as follows:

KREREAS, EPA and plaintiffs have agreed to additional provisions contained in a Settlement Agreement, dated January 31, 1887;³

³ Concurrent with the filing of this motion, EPA and MEDC, on Plaintiffs' behalf, have executed a Settlement Agreement that, inter alia, details the Agency's current intent to propose a joint Clean Air Act/Clean Water Act rule for the Pharmacoutical Manufacturing category by April, 1998, and describes the contents Manufacturing studies referenced in paragraph 3 of the of three upcowing studies referenced in paragraph 3 of the Decree. Because the instant case was brought under the CNA, it was necessary to memorialize EPA's intentions under the CNA was necessary to memorialize EPA's intentions under the CNA stantiffs and Intervenors were provided copies of the Settlement Plaintiffs and Intervenors were provided copies of the Settlement Agreement, which is attached for informational purposes at byhibit A.

- 3 -

8

B. Replace the table in paragraph 2 of the Decree with the following table (current deadlines in "[]"; proposed changes in

bald):

Paint Source Category Proposal

Final Action

			1000
1.	Perticida Namufasturing	March, 1982	ענעד, 1993
2.	Pasticide Pormulating & Packaging	Erch, 1994	September, 1996
3.	CERTIFIES TESTS	December 15, 1994	August 18, 1995 [was March, 1997]
4.		March, 1995	December, 2002 [Was March, 1997]
5.	Fharmaceutical Manufacturing	Pabruary, 1995	April, 1998 [Vas March, 1997]
6	Crganic Chemicals, Plastics & Synthetic Fibers Response to CKA V. IPA, 870 F.2d 177, reh'g granted in part, 585 F.2d 253 (5th Cir. 1985)	(published December, 1991)	
7	. Coastal Cil 4 Gas	January, 1995	October, 1996

C. Replace the table in paragraph 3 of the Decree with the following table (current deadlines in "[]"; proposed changes in

beld):

-

Point Source Category Start

Complete

1.	Petroleum	1992	1993
2.	Netal Finishing	1993	April, 1994
3.		1953	1994
4.	Inorganic Chemicals	1993	1994
5.	Iron and Steel	1994	1995
6.	Steam Electric	1994	1995
7.	Photographic Processing	1995	1396
8.	Chemisel Fermulators and Packagers	1995	April, 1997 [vas Jan. 31, 1987]
3.	Peodlets	1997 [V25 1996]	1998 [Vas 1997]
10	. Trbas Storwater	1997 [Vas 1996]	1998 [W25 1997]
11	. Lirpart De-ising		1999 [VAR 1997]
		1	

D. Replace the table in paragraph 4 of the Decree with the Following table (current deadlines in "[]"; proposed changes in bald):

Point Source Category Proposal

Final Action

Landfills and	November, 1987	Xovenber, 1995
Incinerators	[vas Xarch, 1997]	(Was Karch, 1995)
Industrial Laundries	September, 1997 [vas March, 1997]	June, 1999 [Vas 1998]
Transportation	JERNERY, 1998	Pedruszy, 2000
Equipment Classing	[Vas Karch, 1997]	[vas 1998]
Netal Products 234 Nachinery - Combined These 1 234 2 Rulemaking	October, 2988 [vas 1997]	December, 2002 [Vas 1939]

E. Replace the table in paragraph 5 of the Decree with the following table (current deadlines in "[]"; new changes in bold):

Point Source

start Action Proposal

Final Action

Irsz and steel	1996	1998	2000
New or Revised Rule \$6	1997]	1998	2000
New or Revised Rule #7	1997	1999	2001
New or Revised Rule #8	1397	1999	2001
New or Revised Rule #9	1998	2000	2002
New or Revised Rule #10	1998	2000	2002
New or Revised Rule #11	1999	2001	2053 -
New or Revised Rule #12	1999	2001	2003

- 6 -

- 3

Add new paragraph 6 as follows, and renumber the 7.

following paragraphs in the Decree accordingly:

EPA will send to all parties in June and December of each year, beginning in June, 0d 1997, a report on the status of all This This shings angoing under this Dearse. report will include a discussion of the progress on each study and rule since the previous report, any delays in the schedule of milestones for such study or rule (for rules, "milestones" as identified as discrete steps in the EPA model effluent guideline schedule or other charts with similar level of detail), the causes of any such delays, whether EPA has taken corrective action with regard to any such delay, and the prejected impact of any such delay on the overall study or rulemaking scheduls, including proposal and completion dates. The first such report after the start date of a study referenced in paragraph 3 above will include a schedule of milestones for that study. Nothing in this paragraph alters the obligations of the parties as set forth below regarding modification of this Decree.

Paragraph 18 (formerly, paragraph 17) of the Decree is G. modified to add a new sentence at the end as follows:

EPA further agrees that plaintiffs are entitled to reasonable attorneys' fees and costs accrued during the negotistion of the 1997 modifications to this Consent Decree. The parties will strangt to reach agreement as to the appropriate amount of the recovery. If they are unable to do so, plaintiffs will file an application with the Court for the recovery of fees and costs relating to this renegotistion.

-

OCHCLOSICH

For the reasons set forth above, EPA respectfully requests this Court to grant the Agency's unopposed potion to modify the Consent Decree.

Respectfully submitted,

LOIS J. SCHIFTER Assistant Attorney General Invironment & Matural Res. Division

1 THE REAL OF

U.S. Department of Justice Invironmental Defense Section P.C. Box 23986 Washington, D.C. 20026-3986 (202) 514-2666

RANDOLPH L. MILL U.S. Environmental Protaction Agency Office of General Counsel 401 N Street, S.W. (2355) Washington, D.C. 20460 (202) 260-7629

EXTED: January 31, 1997

AR 024831

WORKING COF

Bioremediation of Ethylene Glycol

The nation wide estimate for use of deicing products in aircraft deicing situations is 11.5 million gallons/yr (D'Itri 1992). The active and predominant components of these deicing products are ethylene glycol and propylene glycol. The environmental effects from ethylene and propylene glycol contamination in storm water runoff from airport deicing activities are a major concern of the "Clean Water Act" regulators. Non point source runoff of glycols from deicing activities needs to be controlled. One feasible alternative is retention and bioremediation before release to the receiving waters.

Although ethylene and propylene glycol are not acutely toxic in the concentrations that are typically found in runoff or receiving waters they are highly, rapidly, biodegradable. The biodegradation is so rapid that it depletes the dissolved oxygen levels and thus threatens aquatic life. It has been determined that at 20°C ethylene glycol degrades within 4 days. At 4°C degradation is markedly slower however almost 100% degradation occurs by the 14th day (Evans and David, 1974). Eutrophication and malodorous vapors result from the degradation and cause environmental concern. Biodegradation studies of ethylene glycol have been conducted (however it appears none have been done recently) using river water samples and various control temperatures. However, no particular species has been isolated. I believe this is because a wide variety of microorganism are capable of glycol degradation.

Ethylene glycol oxidation can occur both aerobically and anaerobically, however aerobic degradation appears to occur much more rapidly (O_2 , being the electron acceptor of choice). Anaerobic degradation occurs in at least one situation where SO_4 or SO_3 serve as the electron acceptor resulting H_2S formation.

Aerobic oxidation of Ethylene Glycol $(CH_2OH)_2$

 $(CH_2OH)_2$ serves as the electron donor according to the following reaction

 $(CH_{2}OH)_{2} + 2H_{2}O \Rightarrow 2CO_{2} + 10H^{+} + 10e^{-1}$

With O_2 as the electron acceptor the overall energy reaction would be written as below

 $(CH_2OH)_2 + 2\frac{1}{2}O_2 \implies 2CO_2 + 2\frac{1}{2}H_2O$

The oxidation demand for $(CH_2OH)_2$ can be calculated as follows

 $\frac{2.5\text{moleO}_2}{1\text{mole}(CH_2OH)_2} = 1.28\text{g OD/g (CH_2OH)_2}$ $\frac{1}{1\text{mole}(CH_2OH)_2} = 1.28\text{g OD/g (CH_2OH)_2}$

The above calculation provides the chemical oxidation demand of ethylene glycol. The biochemical demand is considered to be 0.4 to 0.7g/g (Transport Canada, 1985; FAA 1990) Applications of ethylene glycol can very from 10 gallons per application to 1,000 gallons per application with average daily uses being near 3,000 gallons throughout the deicing season. Converting this average to grams yields a rough daily average of 1.47×10^6 grams of ethylene glycol discharging in the storm water runoff. Due to the rapidity of degradation the BOD and COD levels in the receiving waters will shoot up to 8.82×10^5 and 1.88×10^6 respectively as the runoff enters and bacterial degradation starts.

One particularly interesting thing from a paper written by Evans and David in, 1974 showed that degradation occurred more rapidity in the samples (batch type set-up) containing some of the river sediment. The samples that were strictly river water (low TSS, fewer bacteria) had degradation curves with a lag period at the beginning progressing to a more rapid degradation after the first few days. Whereas the samples containing sediment (a higher TSS - thus more bacteria) produced a zero order curve with no lag or change in the degradation rate. (see graph below). A higher initial concentration of bacteria in the system resulted in a more rapid degradation of the substrate (glycol) and a zero order curve that was only dependent on the rate constant not substrate concentration.

Biodegradation of ethylene glycol occurs readily. Ethylene glycol must be an excellent (high energy yielding) electron donor to be used by the microorganisms so rapidly. This factor in itself causes most of the ethylene glycol environmental concerns in the form of depleted dissolved oxygen for the rest of aquatic life. Fish kills have been reported as a result of deicing runoff into receiving waters. Over growth of the bacteria degrading the ethylene glycol and the fumes (H₂S) released during anaerobic degradation are also concerns resulting from contamination from airport deicing runoff.

B wire Arwarek Vol. K. pp. 97 to 100 Pergamon Press 1974 Printed in Great Britam.

BIODEGRADATION OF MONO-, DI- AND TRIETHYLENE GLYCOLS IN RIVER WATERS UNDER CONTROLLED LABORATORY CONDITIONS

W. H. EVANS and E. J. DAVID

Laboratory of the Government Chemist, Cornwall House, London, SE1 9NQ, England

(Received 14 June 1973)

Abstract—The biodegradation of mono- di- and triethylene glycols has been evaluated in river waters under controlled laboratory conditions. A recently developed method for the direct monitoring of these glycols at low concentrations indicates that they degrade according to the bacterial state and temperature of the river water. Monoethylene glycol degrades completely at 20°C within 3 days; at normal winter river temperatures not exceeding 8°C, monoethylene glycol is degraded partially or completely within 7 days depending on the river. Di- and triethylene glycols will be removed partially or completely within 7 days at 20°C, but for winter conditions of river flow and temperature, degradation will be minimal within this period.

INTRODUCTION

Deicing agents, containing glycols often mixed with a volatile alcohol such as isopropanol, are being increasingly used for removal of frost and ice from aircraft and airfield runways. Airfield drainage may subsequently contaminate surface waters, abstracted for potable purposes or ingested by field or domestic animals, with undesirable levels of these glycols. Additionally, these glycols may be harmful to aquatic life. The biochemical oxygen demand of the glycols may reduce the dissolved oxygen concentration of natural waters. The latter, however, is not considered serious at the levels likely to be encountered in surface waters. Oral ingestion of both mono- and diethylene glycol has a toxic action on the kidneys and central nervous system, but lethal doses to domestic animals are high with an LD₅₀ in the order of 10 ml kg⁻¹; triethylene glycol is considered to be non-toxic and a mild bacteriocide (Browning, 1965). The chronic toxicity of mono- and diethylene glycols to small mammals has been investigated. The most recent evidence (Plugin, 1968) suggests that a dose of 0-05 mg kg⁻¹ (equivalent to 1 mg l⁻¹ of ingested water) had no long term effects and it was recommended that the maximum permissible concentration of these glycols in water supplies should be- mg ----

The biodegradation of these glycols has not been monitored in the past because of the absence of suitable methods for their determination. An indirect measure of their degradation by assessment of the Biochemical Oxygen Demand (BOD) has been reported (Hatfield, 1957). This estimation employed acclimatized bacteria

W.J. 3/2-4

in settled domestic sewage with levels of 300-500 mg l^{-1} of each glycol. While the monethylene glycol gave an immediate oxygen demand the other glycols gave none, possibly because of the toxic effects on microorganisms of the high levels of each glycol employed. Aircraft run-offs would be considerably diluted in surface water and assessment of the biodegradation in the range l-10mg l^{-1} would be desirable. A direct method for the monitoring of these glycols at low concentrations in river waters has been recently developed (Evans and Dennis, 1973), and this provides a suitable means for assessment of the biodegradation of these glycols in river waters for a range of temperature.

EXPERIMENTAL ·

Method of analysis

01

The method employed for monitoring glycol levels (Evans and Dennis, 1973) is based on the oxidation of the glycols with acidified permanganate to the corresponding aldehydes and reaction of these aldehydes with 3-methylbenzothiazolone hydrazone hydrochloride to give green cationic chromogens measured at 630 nm. This method gives a linear response for the range 0-6 mg 1=1 of Each glycol, employing 5 ml standard solutions. Typical optical density response for each glycol in 10 ml of final solution, is: monoethylene glycol 0-130 mg⁻¹ 1⁻¹; diethylene glycol 0-053 mg⁻¹ 1^{-1} ; triethylene glycol 0-059 mg⁻¹ 1⁻¹. Recovery of each glycol added to river waters, in the range 1-5 mg 1⁻¹, averaged 100-5 per cent with a precision of 7 per cent River sample blank readings, to compensate for natural

gories

н

3

ΞS

rite to

W. H. EVANS and E. J. DAVID

interferences, were monitored concurrently enabling added concentrations of glycols to be determined at levels above 0.2 mg l^{-1} .

Biodegradation experiments

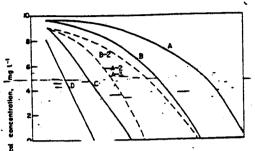
Freshly collected river waters; designated A, B, C and .D, of varying composition from different topographic origins were employed for the biodegradation of the three glycols. River A was a major watercourse with a relatively constant slow flow rate and a constant river sample blank with an optical density of 0-090. River B wasa major tributary with a wide flow variation running through agricultural land; sample blank, 0-118-0-160. River C was a fast running river of moderate hardness originating as an upland stream; sample blank, 0-037. River D was a slow flowing river passing through agricultural land; sample blank, 0-112. A sample B-2 of river water B, abstracted during flood conditions, and a sample A-2 of river water A, to which was added bottom mud to give suspended solids at a level of 200-300 mg 1⁻¹, were used to simulate the worst winter river conditions likely to be encountered. Concurrently, this biodegradation was also monitored in the presence of air but absence of airflow, which might simulate natural conditions more closely, for river samples A-2 and B-2 and these are designated A-3 and B-3.

For each of the glycols a series of 500-ml volumes of each river sample was prepared containing 0, 2 and 10 mg 1⁻¹ added glycols. These were allowed to stand in water baths at temperatures of 8 ± 0.5 °C and 20 ± 0.5°C. A steady stream of moist air was passed over each solution in the series, a blank flask with deionized water being interposed between each series of flasks at different temperatures. Aliquots (5 ml) for glycol levels. below 5 mg 1⁻¹ and 2 ml aliquots for levels above 5 mg 1^{-1} were withdrawn from each flask after 1, 4, 7, 11 and 14 days and the glycol content determined. After 14 days the volume of solution remaining was measured and allowance made to the glycol content for evaporation or condensation. This follows the procedure adopted for a similar investigation of the biodegradation of urea (Evans et al., 1973).

The degradation of isopropanol was not considered, since in our experience this deicing component is seldom encountered in airfield run-offs at temperatures >0 C, because of its volatility, and would not be expected in receiving surface waters.

RESULTS

The results of the biodegradation experiments are shown in Figs. 1-4.



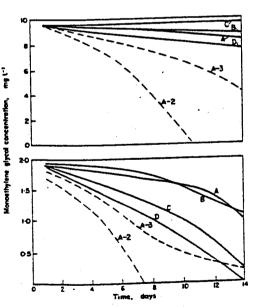
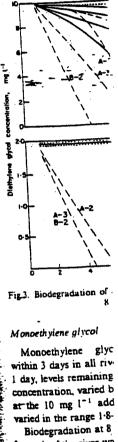


Fig.2. Biodegradation of monoethylene glycol at 4 C in river water A. a major watercourse: river water B. a major tributary; river water C. a fast running river originating as an upland stream; river water D. a slow flowing river running through agricultural land; in samples A-2 and A-3, of river A with added bottom mud, and with and without aeration respectively; in samples B-2 and B-3 of river B. abstracted for flood conditions, with and without aeration respectively.



for each of the river wa tion in rivers A and B w. increased thereafter, irr glycol degraded in rive after 11 days and break more rapid at the high A-2, with added botto with high suspended senhanced rate compai no difference between the glycol in river wat presence of air but ab

The degradation o shown in Fig. 2, and bacterial activity as glycol degraded in ri $0.2 \text{ mg} 1^{-1}$ daily irrest of breakdown in rive siderably, no glycol r presence of air only at concurrently, retarde

AR 024835

Biodegradation of mono-, di- and triethylene glycols

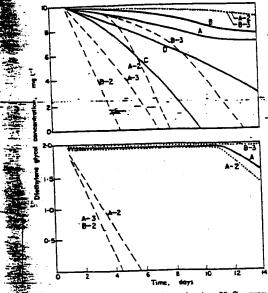


Fig.3. Biodegradation of dicthylene glycol at 20 C

Monoethylene glycol

4

Monoethylene glycol biodegraded completely within 3 days in all river waters tested at 20°C. After 1 day, levels remaining, at the 2 mg l^{-1} added glycol concentration, varied between 0 and 1.8 mg l^{-1} , while the 10 mg l^{-1} added glycol concentration levels and 1.8 mg l^{-1} .

Biodegradation at 8°C was complete within 14 days becar of the river waters A-D (Fig. 1). The degradation in rivers A and B was gradual for the first 7 days but increased thereafter, irrespective of the concentration of glycol degraded in rivers A-D at a rate not exceeding after 11 days and breakdown was essentially linear and more rapid at the higher concentration. In river water A-2, with added bottom solids, and river water B-2, with high suspended solids, degradation occurred at an enhanced rate compared to rivers A and B. There was no difference between the breakdown characteristics of the glycol in river water when aerated, A-2, and in the presence of air but absence of aeration, A-3.

The degradation of monoethylene glycol at 4° C is shown in Fig. 2, and clearly indicates the reduction of bacterial activity as the temperature is lowered. The glycol degraded in rivers A-D at a rate not exceeding 0-2 mg 1⁻¹ daily irrespective of concentration. The rate of breakdown in river water A-2 was increased considerably, no glycol remaining after 7-10 days, but the presence of air only and absence of aeration, monitored concurrently, retarded this increased breakdown rate.

Di- and triethylene glycols

Variation in the biodegradation off diethylene glycol in river waters is illustrated in Fig. 3. Degradation, at at 20°C, was slow in river waters A and B, more rapid in river water D and complete in river water C within 10 days. The rate of breakdown in rivers C and D was the reverse of that found for monoethylene glycol. Sample's of river water's with high suspended solids – A-2 and B-2, indicated that breakdown was virtually complete within 7 days, irrespective of the concentration of glycol present. A-3 and B-3, monitored concurrently in the presence of air but absence of aeration, showed a more rapid breakdown for A-3 while B-3 was retarded. At 8°C, diethylene glycol did not degrade in river water samples A-2 and B-3 within 11 days, and only slightly within 14 days.

Biodegradation of triethylene glycol (Fig. 4) was also dependent on the origins of the rivers. Thus degradation in river water A was variable at the levels tested, but in river waters B and C breakdown was at an apparent constant daily rate of 0-15 and 0-3-0-4 mg l^{-1} respectively. For river samples A-2 and B-2 breakdown was complete within 7-11 days and this rate was increased slightly for A-3 and B-3. At 8°C. in contrast to diethylene glycol, slight degradation of triethylene glycol occurred at a daily rate of 0-1 mg l^{-1} for river water samples A-2 and B-3.

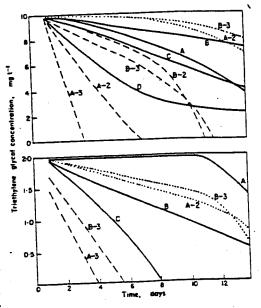


Fig. 4. Biodegradation of triethylenc glycol at 20 C



100

Uncaun alale Universit

W. H. EVANS and E. J. DAVID

CONCLUSIONS

While monoethylene glycol biodegrades completely within 3 days at temperatures of 20°C, at lower temperatures bacterial activity is reduced. The variation in the rate of degradation at these lower temperatures suggests breakdown is dependent on the microorganisms available and their population in individual Browning E. (1965) Toxicity of Industrial Organic Salvents rivers. At winterriver temperatures (< 8°C) the evidence indicates monoethylene glycol may be degraded partially or completely within 7 days. The rates of biodegradation of diethylene glycol at 20°C are essentially similar to that of triethylene glycol. These rates are also dependent on the origin of the rivers with partial breakdown probable within 7 days, although total removal under certain conditions cannot be excluded. At lower temperatures (< 8°C) degradation is minimal for both glycols within 7 days.

Acknowledgement-This paper is published by permission of the Government Chemist.

REFERENCES

Elsevier. Amsterdam.

- Hatfield R. (1957) Biological oxidation of some organic compounds. Ind. Engng Chem. 49 (2), 192-196.
- Evans W. H. and Dennis A. (1973) Spectrophotometric determination of low levels of mono-, di- and triethylene glycols in surface water. Analyst 98, 782-791.
- Evans W. H., David E. J. and Patterson S. J. (1973) Biodegradation of urea in river waters under controlled laboratory conditions. Water Research 7, 975-985.
- Plugin V. P. (1968) Hygienic standards for ethylene and diethylene glycols in water supplies. Gig. Sanit. 33 (3). 16-22

Wali W Univ

Nu ma. anc to j Her Ξÿ effetror Bor upo cani-N vity paci. tror com bina the ! wate L-Cy fluer the exan

ISOLATION AND CHARACTERIZATION OF MICROTOX -ACTIVE COMPONENTS FROM AIRCRAFT DE-ICING/ANTI-ICING FLUIDS

Devon A. Cancilla^{*1}, Anke Holtkamp¹, Lucca Matassa², Xingchun Fang¹ ¹National Laboratory for Environmental Testing, National Water Research Institute, 867 Lakeshore Road, Box 5050, Burlington, Ontario L7N 4A6 Canada ²NovaMann Testing Laboratories, 5540 McAdam Road, Mississauga, Ontario L4Z 1P2 Canada

CORRESPONDENCE TO:

DEVON A. CANCILLA

NATIONAL LABORATORY FOR ENVIRONMENTAL TESTING

NATIONAL WATER RESEARCH INSTITUTE

867 LAKESHORE ROAD, BOX 5050

BURLINGTON, ONTARIO L7N 4A6

PHONE: 9050336-6262 FAX: 905-336-6404 E-MAIL: DEVON.CANCILLA@CCIW.CA

3962 WORDS

ISOLATION AND CHARACTERIZATION OF MICROTOX[™]-ACTIVE COMPONENTS FROM AIRCRAFT DE-ICING/ANTI-ICING FLUIDS

Devon A. Cancilla^{*1}, Anke Holtkamp¹, Lucca Matassa², Xingchun Fang¹ ¹National Laboratory for Environmental Testing, National Water Research Institute, 867 Lakeshore Road, Box 5050, Burlington, Ontario L7N 4A6 Canada ²NovaMann Testing Laboratories, 5540 McAdam Road, Mississauga, Ontario L4Z 1P2

Canada

ABSTRACT

The primary goal of this project was to isolate and identify individual components from 1 aircraft de-icing/anti-icing fluids (ADAF's) through a toxicity-based bioassay analysis. A - 2 Microtox[™] bioassay-driven subfractionation scheme was used to isolate a number of 3 active fractions from ADAF's. Active fractions were identified using multiple spectral 4 techniques, including nuclear magnetic resonance, gas chromatography-mass 5 spectrometry, liquid chromatography-mass spectrometry and ultraviolet characterization. 6 The primary Microtox-active fraction was shown to be a mixture of benzotriazole and 7 tolyltriazoles, which are used as corrosion inhibitors in ADAF formulations. Spectral and 8 toxicity confirmation were demonstrated through the use of commercially available 9 standards. 10

11 Kewords: De-icing fluids, Anti-icing fluids, benzotriazole, tolyltriazole, toxicity

INTRODUCTION

1

Aircraft de-icing/anti-icing fluids (ADAF's) are used annually world-wide in 2 considerable quantities to remove and prevent accumulation of snow, ice, and frost from 3 aircraft. In Canada, it has been estimated that 8 million litres of ADAF's are used in a 4 typical year [1]. At some airports, the amounts used and released into the environment are 5 of such quantities that they must be reported under the Canadian National Pollution 6 Release Inventory (NPRI). For example, Pearson International airport, near Toronto, 7 reported environmental release of 464.9 tonnes of ethylene glycol in 1993, presumably as 8 the result of deicing activities [2]. Because ADAF's contain between 50 and 90 percent 9 ethylene, propylene or combinations of these or other glycols, Canadian Water Quality 10 Guidelines for the management of storm water runoff from airports stipulate a 100 ppm 11 (mg/L) level of total glycols as the allowable limit [3]. The primary justification for the 12 establishment of this level is the increased biochemical oxygen demand (BOD) associated 13 with high levels of glycols in water [4]. 14

Recently, concern has shifted from the environmental effects of glycols to the 15 possible environmental effects of other components found in ADAF fluids [5]. This concern 16 has resulted from toxicological studies of complete ADAF fluids rather than the individual 17 glycols [6,7]. Additional concerns have been raised in studies which have focused on the 18 measurement of the effects of ADAF's in airport runoff during deicing events [8]. 19 Chemicals, other than glycols, make up between 10 and 20 percent of de-icing/anti-icing 20 fluids. These chemicals include wetting agents, corrosion inhibitors, surfactants, thickeners 21 and other agents used to meet performance criteria established to ensure adequate de-22 icing/anti-icing of aircraft [4]. Unfortunately, the exact formulations of the ADAF's currently 23

in use are proprietary, making it difficult to relate environmental effects to the presence of specific chemical agents found in ADAF's. Because ADAF's have been found to have significant activity when measured by Microtox assays and, because of the difficulty in obtaining chemical compositions of the specific ADAF's in use, it was decided to undertake a Microtox-directed isolation to identify the potentially toxic components present in deicing/anti-icing fluids. This paper describes the isolation and identification of a number of Microtox-active components found in de-icing/anti-icing fluids.

MATERIALS AND METHODS

9 Reagents

8

Milli Q[™] (Bedford, MA) deionized water was used for all aqueous solutions. 10 Acetonitrile, ethyl acetate, acetone and diethyl ether were all analytical grade (BDH, 11 Toronto, Ont., Canada) and were used as received. Silica gel (100-200 mesh) was 12 purchased from Rose Scientific (Calgary, Alb). Microtox bioassay reagents were from 13 Microbics Corporation (Carlsbad, CA) and included: Microtox reagent (freeze-dried bacteria 14 in vials and dilution water), Microtox osmotic adjusting solution (MOAS; 22% sodium 15 chloride solution) and Microtox reagent diluent. 1H-benzotriazole, 5-methyl-1H-16 benzotriazole and 5,6-dimethyl-1H-benzotriazole hydrate were purchased from Aldrich 17 Chemical Company (Milwaukee, WI) and used as received. 18

19 ADAF's

Initial studies were undertaken on approximately 20 mL each of Type I and Type II
fluids which had been used during the 1993/1994 deicing season. Subsequent studies
were conducted on Type I and Type II ADAF's used in the 1994/1995 deicing season and
were obtained from one of two major Canadian based airlines operating from Pearson

AR 024842

International airport. Approximately eight litres each of Type I and Type II was provided.
 In both cases, Type I was a viscous clear orange fluid while Type II was a viscous clear
 pink fluid. The fluids were stored at 4 °C until used.

4 Apparatus

GC-MS: Gas chromatographic analyses were performed on a Hewlett-Packard Model 5 5890 Series II gas chromatograph interfaced with a Hewlett-Packard Model 5790 mass 6 selective detector. The column was a 30 m DB-5 capillary column (J&W Scientific) with a 7 0.25 mm inner diameter and a 0.25 µm film thickness. Ultra high purity (99.999%) helium 8 was used as the carrier gas with the head pressure set at 7 psi. The injector was set at 9 250 °C and was run in the splitless mode with a delay of 0.7 minutes. The temperature 10 program was 80 °C for two minutes then 5 °C/min to 280 °C. Full scan electron impact 11 spectra were obtained scanning between 50 and 500 amu. 12

LC-MS and LC-MS/MS: LC-MS/MS studies were conducted at NovaMann International 13 using a SpectraPhysics P200 liquid chromatographic pumping system interfaced with a 14 Sciex API III-plus MS/MS system. The mobile phase was (70:30) acetonitrile/0.5mM 15 ammonium acetate with 0.6% acetic acid at a flow rate of 250 µL/minute and an injection 16 volume of 20 µL. The column was a Waters Bondapak TM reverse phase (3.9 mm x 300 17 mm) with a 10 µm particle size. Both a heated nebulizer and ionspray interface were used 18 with nebulizer pressure at 97 psi and nebulizer heater at 55 °C. Samples were analyzed 19 in both the positive and negative ion modes. Samples were also derivatized with BSTFA 20 (N,O-bis(trimethylsilyl)-trifluoroacetamide), a derivatizing agent used to detect the presence 21 of oxygen or nitrogen containing groups through the formation of the O-Si(CH₃)₃ or N-22

AR 024843

1 Si(CH₃)₃ derivatives.

21

2	NMR: ¹ H Nuclear Magnetic Resonance studies were conducted at the McMaster
3	University Nuclear Magnetic Resonance Facility using a Bruker DRX-500 spectrometer.
4	All samples were dissolved in CDCl ₃ containing 1 % tetramethylsilane (TMS).
5	LC-Photodiode Array: A Waters 600E multisolvent delivery system and controller
6	equipped with a Waters 990 photodiode array detector and Waters 715 Autosampler was
7	used. For the preparative scale analysis, a Waters µBondpak™ reverse-phase column
8	(300 mm x 3.9 mm i.d., 10 μm particle size) and 15 μL injection volume was used with a
9	flow rate of 0.25 mL/min (70:30 acetonitrile:water). For the analytical scale analysis, a
10	Biophase ODS column (250 mm x 4.6mm i.d., 5 μ m particle size) with a flow rate of 1.0
11	mL/min (80:20 acetonitrile:water).
12	Microtox. Microtox analysis was conducted following the Basic Test Method recommended
13	by Microbics Corporation and described elsewhere [9].
14	Elemental analysis: Elemental analysis of both Type I and Type II were conducted following
15	the procedures described elsewhere [10]
16	Preparative-Scale ADAF Liquid Chromatographic Separation and Bioassay Testing
17	Because of the small amounts of ADAF obtained during the 93/94 deicing season,
18	(approximately 20 mL each of Type I and Type II) initial separations were undertaken using
19	preparative scale high performance liquid chromatography (HPLC) followed by photodiode
20	array detection. Initially, five major chromatographic peaks were observed over the 20

minute analysis time. The total analysis time was divided into eight major divisions varying

7

in length from one to five minutes each. An automated sample collector was used to collect 1 Fifteen microlitre aliquots were injected with each fractions from each division. 2 chromatographic run for a total of 3 mL (approximately 3 g) of the Type I solution. 3 Individual fractions were reanalyzed and fractions showing similar chromatographic 4 response pooled. The pooled fractions were then concentrated under nitrogen, and re-5 dissolved in 0.5 mL methanol. 100 microlitres of each was then taken and diluted into 5 6 mL of water and analyzed using the Basic Microtox Test Method, with the gamma values 7 (Γ) being used to compare relative toxicity. Of the eight fractions collected, fractions 2 and 8 7 were shown to have significant Microtox activity relative to pure Type I ADAF (Table 1). 9 Samples of the active fractions were submitted for nuclear magnetic resonance and liquid 10 chromatography-mass spectrometric analysis. Both NMR and LC-MS analysis showed 11 the fractions to contain multiple components although there was insufficient quantity for 12 complete analysis. 13

14

Large-Scale ADAF Chromatographic Separation and Bioassay Testing

Approximately eight litres of both Type I and Type II ADAF fluids in use during the 15 94/95 deicing season were obtained for analysis. LC analysis of the mixtures showed 16 similar chromatographic patterns to those obtained from ADAF's used during the 93/94 17 season. The initial fractionation scheme was developed using 10 mL of either Type I or 18 Type II ADAF, with chromatographic retention times from the previous years study used 19 as an aid to target the toxic fractions. Once it was determined that the scheme could be 20 used to chromatographically match the Microtox active fractions from the previous years 21 studies, the scheme was scaled up to one litre ADAF (Figure 1). The ADAF was 22 acidified to a pH of 1 with a 6 M sulphuric acid solution and extracted three times with 500 23

1 mL ethyl acetate. Both the water and ethyl acetate fractions are further extracted according 2 ' to the scheme in Figure 1 to produce 5 separate fractions (I-V). The ethyl acetate fraction 3 was extracted with water to remove dissolved ethylene or other glycols. Each of these 4 fractions was then analyzed by HPLC and Microtox, with fraction I chromatographically 5 matching that of fraction 7 in Table 1. Fraction I also generated the most toxic response 6 for Type I ADAF (Table 2). Fraction I was then applied to a silica gel column (300 mm x 7 24 mm, 100-200 mesh) and eluted with a gradient from 100% n-hexane to 50:50 diethyl 8 ether:n-hexane. Fractions were again collected and analyzed by HPLC. The fraction 9 eluting at 40% diethyl ether in hexane was shown to match the major HPLC peak from the 10 previous studies. Analysis by LC with photodiode array detection showed this fraction to 11 be relatively pure. The sample was characterized further by proton NMR, LC-MS/MS, GC-12 MS, and LC-photodiode array analysis.

13

14

Chemical characterization

RESULTS

15 Data from each spectral analysis is presented in Table 3. LC-MS/MS, GC-MS, and 16 NMR showed the collected fraction to contain a mixture of isomers. GC-MS analysis 17 showed the presence of three major components, two of the components (63 and 33% by 18 area) having base peaks of ion mass-to-charge ratio (m/z) of 133 with the other 19. component (6% by area) containing a (m/z) 119 base peak. The base peaks for each 20 component were determined to be the molecular ions through MS/MS analyses providing 21 evidence that the molecules contained one or three nitrogen atoms. The spectrum of each 22 peak showed similar fragmentation patterns with major ions appearing at (m/z) 104, 77.

AR 024846

78, and 52 for the compounds with the base-peak of 133 and (m/z) 91, 64 and 52 for the 1 compound with the base peak at 119. Proton NMR analysis provided evidence of a 2 substituted aromatic compound by the presence of multiple signals between 7.8 and 7.1 3 ppm. Ultraviolet analyses showed an absorbance at 280 nm, characteristic of an azo type 4 compound having at least 2 nitrogen atoms. As two nitrogen atoms would generate an 5 even molecular weight by MS, the molecule must contain three nitrogen atoms giving it the 6 molecular formula of C₇H₇N₃ (mw 133) and C₈H₅N₃ (mw 119). The identity of two of the 7 compounds were confirmed as 1H-benzotriazole (6% of the area by GC-MS) and 5-methyl-8 1H-benzotriazole (33 % of the area by GC-MS) through the analysis of authentic standard 9 material (Figure 2). The third compound (63% of the area by GC-MS) is tentatively 10 identified as an isomer of the 5-methyl-1H-benzotriazole, with the most probable isomer 11 having the methyl group substituted at one of the other positions on the aromatic ring rather 12 than the 1-methyl benzotriazole isomer. This conclusion is supported by the compounds 13 reaction with BSTFA and the formation of the subsequent m/z 205 derivative identified by 14 MS. If the methyl group were bound to the N group, BSTFA would not have formed the 15 It should be noted that benzotriazoles containing methyl groups on the derivative. 16 aromatic ring are known as tolyttriazoles (Figure 2). HPLC analysis of Type II ADAF also 17 18 confirmed the presence of benzotriazole and tolyltriazoles.

19

DISCUSSION

20 Canadian Water Quality Guidelines for the release of aircraft de-icing/anti-icing fluids 21 into the aquatic environment have stipulated a 100 ppm total glycol limit [3]. This limit was 22 assumed to be adequate for the protection of aquatic species under the Federal Fisheries

Act [11] and was based on the toxicity of glycols to specific aquatic organisms. Recent studies have raised issues relating to the potential toxicity of ADAF's independent of the glycol concentration [6-8]. Studies on actual ADAF's as well as airport runoff collected after deicing events have shown significant levels of toxicity [6-8].

5 The National Laboratory for Environmental Testing (NLET) has undertaken a 6 bioassay-driven isolation and characterization of ADAF's using Microtox[™] testing to identify 7 potentially toxic components. Results from this work have shown that a class of corrosion 8 inhibitors, identified as benzotriazole and tolyltriazoles, are the major Microtox-active 9 constituents. Confirmation of the active components was accomplished through multi-10 spectral analyses and comparison with standard material. The identification of lesser 11 Microtox-active fractions is still underway.

12 Benzotriazoles are commonly used as corrosion inhibitors and have found use in a 13 number of applications such as with automobile antifreeze mixtures. Previous studies on 14 the toxicity of benzotriazoles have shown that 1H-benzotriazole has a hazard rating of 15 level 3 (HR3), the highest hazard rating assigned (LD_{50} <400mg/kg) [12]. Other work has 16 shown benzotriazole to be a moderately toxic material [13,14]. Recommendations of a 0.1 17 . mg/L value as the maximum permissible concentration of benzotriazole in water reservoirs 18 have been proposed [15]. Studies on the exposure of workers through workplace air 19 recommended a maximum permissible concentration of 10 mg/m³ [16]. Microtox analysis 20 of the mono and dimethyl substituted benzotriazoles, both of which have been shown to be present in ADAF's, showed increasing toxicity with increasing methylation (Table 4). 21

22

The presence of benzotriazoles as well as other potentially toxic constituents in

11

ADAF's suggests that the management of airport runoff and disposal of collected ADAF's 1 be reevaluated to include possible environmental effects of additives. As azo compounds 2 are known to biotransform under anaerobic conditions, conditions which develop from the 3 biodegradation of glycols, into compounds with greater toxicity [17], studies should be 4 conducted on the fate and effects of these materials in aquatic systems. These studies 5 need to address issues related to the analyses of these compounds in both sediments and 6 water. An additional question to be addressed is that of occupational exposure to ADAF's. 7 Requirements vary as to the level of protective clothing, including respirators, which 8 personnel involved in deicing are required to wear. As such, efforts should be made to 9 evaluate worker exposure to ADAF's. 10

The presence of a variety of metals in ADAF's (Table 5) may also pose significant 11 environmental impacts although the present study has not shown any correlation between 12 metals and toxicity. It has been estimated that approximately 3785 litres of ADAF are used 13 to deice a typical large passenger jet [4]. Depending on the flight activity at a particular 14 airport and the efficiency with which the ADAF's are collected after use, this could equate 15 to significant amounts of ADAF being released into the environment. As such, effects of 16 metals and other constituent components from the use of ADAF's should also be 17 addressed in future studies on the environmental effects of ADAF's. 18

19 The National Laboratory for Environmental Testing is currently working to determine 20 the concentrations of benzotriazoles present in airport runoff and in sediments exposed to 21 runoff from de-icing/anti-icing events.

Acknowledgements - The authors wish to thank R. C. J. Sampson for his support and technical expertise during the project; James Maguire of Environment Canada for critical comments on the manuscript; Klaus Kaiser of Environment Canada for initial Microtox
 analysis; Dale Cameron of Environment Canada for obtaining samples of ADAF's; Don
 Hughes and Brian Sayer of McMaster University for NMR analysis.

1

REFERENCES

2	1.	McDonald, D. D., I. D. Cuthbert and P. M. Outridge. 1992. Canadian
3		environmental quality guidelines for three glycols used in aircraft de-icing/anti-icing
4		fluids: Ethylene glycol; diethylene glycol; and propylene glycol. Eco-Health Branch,
5		Environment Canada, Ottawa, Ontario, Canada.
6	2.	Environment Canada. 1993. National Pollution Release Inventory, Eco-Health
7		Branch, Ottawa, Ontario, Canada
8	3.	Environment Canada (Conservation and Protection) and Transport Canada
9		(Airports Group), 1992. Proceedings: Aircraft de-icing and the Environment, July
10		6-9, Montreal, Quebec, Canada.
11	4.	Mericas, D. and Wagoner, B. 1994. Balancing safety and the environment. Water
12		Envir. & Tech. 12:38-43.
13	5.	Hartwell, S. L, Jordahl, D. M., Evans, J. E., May, E. B. 1995. Toxicity of aircraft de-
14		icer and anti-icer solutions to aquatic organisms. Environ. Toxicol. Chem. 14:1375-
15		1386.
16	6.	Pillard, D. A. 1995. Comparative toxicity of fromulated glycol deicers and pure
17		ethylene and propylene glycol to Ceriodaphnia dubia and Pimephales promelas.
18		Environ. Toxicol Chem. 14:311-315.
19	7.	Fisher J. D., Knott, M., Turley, S. D, Turley, B. S., Yonkos, L. T. and Ziegler, G.
20		P. 1995. The acute whole effluent toxicity of storm water from an international
21		airport. Environ. Toxicol. Chem. 14:1103-1111.

1	8.	Microbics. 1995. Microtox Acute Toxicity Basic Test Procedures. Carlsbad, CA.
2	9.	Environment Canada. 1995. Manual of Analytical Methods: Trace Metals, National
3		Laboratory for Environmental Testing, National Water Research Institute, Burlington,
4		Ontario, Canada
5	10.	Government of Canada, 1994. Canadian Water Quality Guidelines: Updates
6		(March 1994), Appendix XVI, Ottawa.
7	11.	Government of Canada, 1991. Fisheries Act, R. S., c. F14, s. 1., Ottawa.
8	12.	Sax, N. I. and Lewis, R. J., 1987. Hazardous Chemicals Desk Reference. Van
9		Nostrand Reinhold Company, New York, New York.
10	13.	Paustovskaya, V. V. 1990. Major results of experimental study of toxicology of
11		inhibitors of atmospheric corrosion of metals. Gig. Tr. Prof. Zabol. 3:7-10.
12	14.	Paustovskaya, V. V., Torbin, V. R., Korclenko, T. K., Okhota, I. N. Didenko, M.
13	·	N., Sdanovich, I. E. 1981. Long-term effects of metal corrosion inhibitors. Vrach.
14		<i>Delo</i> . 11:100-103.
15	15.	Kondratyuk, V. A., Pisiko, G. T., Pastushenko, T. V., Sergeta, V. N. Gunko, L.
16		M., Fira, L. S., Pereima, V. Golka, N. V. and Gnatyuk M. S. 1981. Experimental
17		data on the hygenic standarization of benzotriazole in water bodies. Gig. Sanit.
18		11:70-71.
19	16.	Okhota, I. N. 1981. Establishment of the maximum permissible concentration of
20		benzotriazole, and inhibitor of atmospheric corrosion of metals, in workplace air. Gig.
21	¢	Tr. Prof. Zabol. 8:43-44.
22	17.	Voyksner, R. D., Straub, R. and Keever, J. T. 1993. Determination of aromatic

15

1		amines originating from azo dyes by chemical reduction combined with liquid
2		chromatography/mass spectrometry. Environ. Sci. Technol. 27:1665-1672.
3	18.	Weber, E. J. and Wolfe. N. L. 1987. Kinetic studies of the reduction of aromatic azo
4		compounds in anaerobic sediment/water systems. Environ. Toxic. Chem. 6:911-
5	•	919.
6	19.	Baughman G. L. and Weber. E. J. 1994. Transformation of dyes and related
7		compounds in anoxic sediment: Kinetics and products. Environ. Sci. Tech. 28:267-
8		276.
9	20.	Maguire J. R. and Tkacz R. J. 1991. Occurrence of dyes in the Yamaska river.

10 Water Poll. Res. J. Canada. 26:145-161.

AR 024853

1		List of Tables		
2	Table 1.	Microtox gamma (I) values for liquid chromatographic fractions of Type I		
3		aircraft de-icing fluid.		
4	Table 2.	Microtox gamma values of the liquid/liquid extracts of Type I aircraft de-		
5		icing/anti-icing fluids (see Figure 2 for extraction scheme).		
6	Table 3 a.	GC-MS Data of Microtox-active fraction from Type I ADAF.		
7	Table 3 b.	LC-UV Data of Microtox-active fraction from Type I ADAF.		
8	Table 4.	Microtox EC50 values for benzotriazole standards and isolated		
9	,	benzotriazoles from Type I ADAF.		
10	Table 5.	Trace metal analysis of Type I and Type II ADAF.		

2	aircraft de-icing fluid.				
3	Fraction	5 min Γ(5,15 °C)	15 min Γ(15,15 ℃)		
4	1	0.059	0.058		
5	2	0.322	0.295		
6	3	0.134	0.184		
7	4	0.136	0.164		
8	5	0.012	-0.030		
9	6	0.154	0.108		
10	7	0.248	0.220		
11	8	0.069	0.027		
12	Type I ADAF	0.305	0.233		

Microtox gamma (Γ) values for liquid chromatographic fractions of Type I Table 1,

1:

1

2	icing/anti-icing fluids (see Figure 2 for extraction scheme).				
3	Extract	5 min Γ(5,15 ℃)	15 min T(15,15 °C)		
4	1	>999	**	-	
5	H .	0.919	0.933		
6	111	0.493	0.483		
7	IV	-0.018	-0.052	_	
8	V	0.158	0.124	-	
9	Type I ADAF	4.689	6.089		
10	Phenoi Standard (45mg/L)	2.948	3.131		

Table 2. Microtox gamma values of the liquid/liquid extracts of Type I aircraft deicing/anti-icing fluids (see Figure 2 for extraction scheme).

12 *** 0 transmission of light.

1

		Retention Time(min)	lon Mass(abudunance)
FI		16.64	119(100), 91 (90),64(84), 63(68),
		• . •	52(24)
		18.45	133(73), 104(100), 78(38), 77(41),
	÷	•	52(22), 51(30)
		19.41	133(61), 104(100), 78(32), 77(43),
		•	52(18), 51(24
1H-be	nzotriazole	16.64	119(100), 91(80), 64(90), 63(68),
	•	•	52(32)
5-meth	nyl-1H-benzotriazole	19.41	133(58), 104(100), 78(35),77(43),
	-		52(24), 51(29)
5,6-dir	nethyl-1H-	22.75	147(54), 132(21), 119(27), 118(100),
	triazole		104(27), 91(60), 77(14), 65(23),
			52(15)

GC-MS Data of Microtox-active fraction from Type I ADAF. Table 3 a

Table 3 b. LC-UV Data of Microtox-active fraction from Type I ADAF. 7

. 1		Retention time(min.)	UV λmax.(nm)*
8	Fl	6.94	208, 270, 290
		11.49	208, 270, 290
		12.25	208, 270, 290
9	1H-benzotriazole	RT=6.94	208, 270, 290
10.	5-methyl-1H-	12.25	208, 270, 290
11	benzotriazole		
12	5,6-dimethyl-1H-	22.42min	208, 270, 290
13	benzotriazole		

*: mobile phase is 20% acetonitrile in water. 14

1 2	Table 4. Microtox EC50 values for benzotriazole standards and isolated benzotriazoles from Type I ADAF.				
3	Compound	N	EC50 (5 min) Mean <u>+</u> S.D. (mg/L)	EC50 (15 min) Mean <u>+</u> S.D. (mg/L)	
4	1H-benzotriazole*	3	41.13 ± 4.63	41.65 <u>+</u> 11.01	
5	5-methyl-1H benzotriazole*	3	5.69 <u>+</u> 1.19	5.91 <u>+</u> 1.11	
6	5,6-dimethyl-1H-benzotriazole	3	0.72 ± 0.28	0.80 <u>+</u> 0.33	
7 8	Isolated Fraction from ADAF (Type I)	3.	11.08 <u>+</u> 0.49	12.39 <u>+</u> 2.25	
9	Phenol Standard	6	21.83 <u>+</u> 3.98	20. 59 <u>+</u> 6.20	

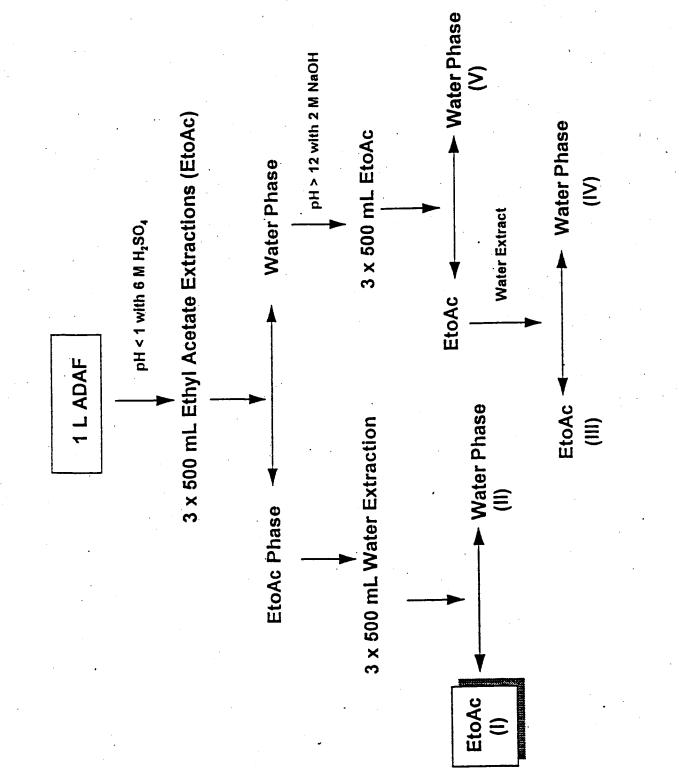
Microtox EC50 values for benzotriazole standards and isolated benzotriazoles from Type I ADAF. Table 4.

* Identified in Type I ADAF and Type II ADAF. 10

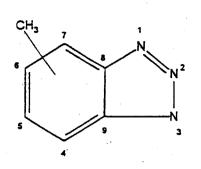
ELEMENT	tal analysis of Type I and Type II Al TYPE I (mg/L)	TYPE II (mg/L) 0.46 0.042 ND 1.2 ND 0.024 0.006 0.084 12.498 221.6 0.036 1.2 0.262	
Al	ND		
Ва	ND		
Ве	ND		
Ca	3.4		
Cd	1.5		
Со	- 0,018		
Cr	0.016		
Cu	0.552		
Fe	39.078		
К	42.8		
Li	0.018		
Mg	1.0		
Mn	0.478		
Мо	0.01	ND	
Ма	141.2	85.0 0.034 ND	
Ni	ND		
РЪ	9.836		
Sr	0.02	0.01	
V	ND	ND	
Zn	5.272	3.272	

1 List of Figures

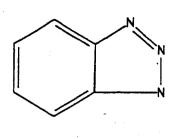
- 2 Figure 1. Isolation sequence showing fractions I-V used for Microtox analysis.
- 3 Figure 2. Stuctures of benzotriazole (I) and tylyltriazole (II).



AR 024861







BENZOTRIAZOLE (I)

PURITY PLUS









DDW PROPYLENE GLYCOL USp

ABLE

	PAGE	• •	PAGE
The Plus in Purity Plus	3-4	Applications in Pharmaceuticals	16-17
Advantages of Dow Propylene Glycol USP	5	Safe Handling and Storage	18
Applications in the Food Industry	6-11	Hazards and First Aid	19
• Flavor Solutions and Emulsions	6-7	Regulatory Status	20
• Flavor Extractor or Processing Aid	8	Dow Product Stewardship	20
• Humectancy and Rehydration	· 8 ·		
• Food Color Solvent	. 8	LIST OF TABLES	
Antioxidant Solvent	8	Table 1 Solubility of Flavoring Materials in	
Plasticizer and Softening Agent	· 9	Propylene Glycol Water Mixtures	7
Nutritional Value	9	Table 2 Humectant Values of Propylene	8
• Animal Feed	9		0
• Packaging and Inks	10	Table 3 Solubility of Pharmaceuticals in Propylene Glycol USP	17
• Heat-Transfer Medium	10-11	Table 4 General Properties and Specifications	21
• Equipment Cleaner	, 11	Table 5 Physical Properties Data	22
Applications in Cosmetics	12-15		
• Antiperspirants and Deodorants	12	;	
Skin Care Products	14		. •
Hair Care Products	15		

THE PLUS IN PURITY PLUS

quality and desired performance in foods, beverages, cosmetics, pharmaceuticals and a variety of other low-toxicity applications. The added PLUS, however, comes from knowing that it's backed by Dow — so you can be assured of outstanding quality and unsurpassed reliability.

THE DDW COMMITMENT. At Dow, we are committed to the propylene glycol business. Since we first began manufacturing propylene glycol in 1948, propylene glycol has always been one of our key strategic businesses and therefore we are dedicated to maintaining our position as the leading global producer.

GLOBAL SUPPLIER. Today Dow is the world's leading propylene glycol producer with an annual global capacity in excess of 700 million pounds. With two of the manufacturing sites in the United States and multiple distribution centers, you can be confident in knowing that Dow can deliver product when you need it, where you need it.

KEEPING COSTS LOW. Being the leading producer means we are a cost-effective supplier. Our propylene glycol production is fully integrated into other company businesses, which allows Dow to successfully maintain our position as a low-cost producer.

CUSTOMER SATISFACTION. At Dow, customer satisfaction goes beyond offering our customers an outstanding product. We also provide them access to a wide variety of resources and reference materials. For example, our Sales, Technical Service & Development (TS&D), Research & Development and Quality Assurance groups all provide continuous customer support. As part of our commitment to Responsible Care,[®] Dow provides vital health and safety information through presentations, literature, up-to-date Material Safety Data Sheets and formulation information.

PREDUCT QUALITY. At Dow, we employ rigorous quality control procedures — the best in the business. In order to maintain United States Pharmacopeia (USP) grade status, Dow adheres to the Good Manufacturing Practices guidelines that govern every aspect of production and shipment of U.S. Food and Drug Administration (FDA) regulated products. And to make sure that product integrity is maintained at the distributor level, Dow offers ongoing white room drumming support, including start-up assistance and thorough white room inspections.

® Registered Service Mark.

A VERSATILE INTERMEDIATE. Propylene Glycol USP is an excellent solvent for many waterinsoluble organic chemicals. It is a clear, colorless, slightly viscous liquid which is completely miscible in water. Because Propylene Glycol USP displays so many different properties, it has become the product of choice for cosmetic, food and pharmaceutical industries. Some of its more common applications include:

- An important solvent for aromatics in the flavor concentrate industry.
- A wetting agent for natural gums.
- A solvent in elixirs and pharmaceutical preparations containing some water-soluble ingredients.
- A coupling agent in the formulation of sunscreen lotions, sharpoos, shaving creams and other similar products.
- A low temperature heat-transfer medium in brewing and dairy cooling systems and in other refrigeration equipment having cooling coils which are in direct contact with beverages.
- in aqueous solution, it displays excellent antifreeze properties.
- A humectant in tobacco.
- A foam stabilizer in shaving creams.
- A solvent for printing inks.
- A solvent and coupling agent in many other applications.

At Dow, we are committed to providing our customers with nothing less than the best. Quality and purity are assured in every shipment of Propylene Glycol USP. And our dedication to product stewardship helps ensure safe and responsible use of this product.

USP is completely miscible with water and many organic materials such as alcohols, esters, ethers, aldehydes, as well as many natural vegetable and animal fats and oils. This property is very beneficial in solubilizing and stabilizing products for cosmetics and foods.

XCELLENT SOLVENT ACTION. Propylene Glycol

AR 024867

c 0

DEW TEXICITY. The low toxicity of Propylene Glycol USP is unique among the glycols and is what permits it to be used as a direct additive in foods and drugs.

MEETS U.S. FOOD AND DRUG ADMINISTRATION STANDARDS. To maintain USP grade status, Dow Propylene Glycol USP is manufactured to the specifications of the U.S. FDA and thus is approved as a multiple purpose substance for direct addition to a number of foods and as a pharmaceutical aid in drug formulations.

HUMEETANT ACTION. Propylene Glycol USP has the ability to obtain and hold water in a product. It is one of the most effective materials approved for foods as a humectant, and is superior to other compounds such as sorbitol and mannitol in its ability to hold water.

PLASTICIZING AND SOFTENING. Propylene Glycol USP can plasticize or soften a material. This is possible because of its moderate viscosity, wetting properties, low volatility and compatibility with many compounds.

TARTE. Dow Propylene Glycol USP is odorless, colorless and has the characteristic taste of pure propylene glycol. These properties enhance its use in products because it can perform its intended function without impacting other features of the product.

desirable feature in formulation of products to meet low VOC regulations.

AVAILABILITY. The Dow Chemical Company produces Propylene Glycol USP in worldscale plants in Freeport, Texas and Plaquemine, Louisiana. Dow terminals are located across North America.

DUALITY CONTROL. Dow Propylene Glycol USP is manufactured using modern computer controlled plants. Statistical Quality Control (SQC) and Statistical Process Control (SPC) methods are used to ensure that product quality consistency is always maintained.

L ropylene glycol is one of four polyhydric alcohols often found in

foods. Compared to the other three (glycerine, sorbitol and mannitol), propylene glycol is preferred when low viscosity, high hygroscopicity, good oil solvency or complete miscibility with water is desired. It does not contribute to product sweetness as do the other alcohols.

Polyhydric alcohols are used in foods to help retain the original quality of the food or to modify the original quality or texture of the product. Propylene glycol can be effective in acting as a III crystallization modifier, III humectant, III softening agent, III solvent, III viscosity agent, III rehydration aid or III dietary agent.

DIRECT FOOD ADDITIVES

FLAVOR SOLUTIONS AND EMULSIONS. The efficacy of Propylene Glycol USP as a solvent for flavoring materials is shown in Table 1. A close look at this table reveals that the only important class of raw materials not sufficiently soluble in Propylene Glycol USP for the practical preparation of flavor solutions is the citrus oils. However, by using edible wetting agents, colloidal suspensions of these oils may be prepared which, for all practical purposes, are the same as solutions. This is an example of where propylene glycol serves as a coupling agent to enhance the stability of a system. It is common for flavor concentrates to contain 15-30% propylene glycol, and the U.S. FDA allows up to 97% propylene glycol in this application.



1

SOLUBILITY OF FLAVORING MATERIALS IN

PROPYLENE GLYCOL WATER MIXTURES AT 77°F (25°C)

_	Percentage Propylene Glycol					
Flavoring	100%	80%	60%	40%	20%	
			id Ounces per U.S.			
Alcohol C-10		•	priversion: value x 7.8			
Alcohol C-12			0.52	0.07	0.03	
Aidehvde C-16		1.29	0.16	<0.03	<0.03	
Alivi Butvrate	45.37	2.89	0.10	0.06	0.05	
Allvi Caproate		10.35	2.32	0.95	0.50	
Amvi Acetate	20.87	3.00	- 0.49	0.06	0.04	
Anyi Butvrate	18.25			2.33	1.99	
Iso Amvi Formate		3.07	. 0.63	0.25	0.08	
Amyl Valerianate		8.34	7.20	2.60	2.55	
Anethol	12.04	2.50	0.42	0.12	0.07	
Benzaldehvde	7.04	0.89	0.34	0.05 .	<0.03	
Benzyl Acetate EEC		29.84	6.09	2.32	1.00	
Benzyl Propionate		10.75	2.55	0.53	0.35	
		5.30	1.02	0.31	0.14	
Cinnamic Aldehyde (99-100% pure)	`	2.24	0.39	0.07	0.03	
Diacetvi (100%)		0.45	0,30	0.15	0.06	
					26.79	
Ethyl Butyrate		17.08	4.76	0.43	0.11	
Ethyl Acetate			-	19.03	12.79	
Ethyl Cinnamate	22.96	3.99	0.59	0.10	0.04	
Ethyl Formate					30.01	
Ethyl Oxyhydrate (Conc. special coloriess)				-	4.46	
Ethyl Valerate	38.30	11.10	3.51	1.06	1.04	
Eucalyptol	35.70	7.16	2.52	0.58	0.43	
Eugenol USP			49.2	0.16	0.06	
Maitol	5.89	5.28	4.28	3.14	2.27	
Methyl Anthranilate	·		4.14	0.57	0.45	
Methyl Cyclopentenoione	24.07	23.00	18.86	10.83	6.02	
Methyl Salicylate	24.50	4.79	1.14	0.34	0.22	
Nutrneg Oil	0.73	0.446	0.25	0.21	0.14	
Ocotea Cymbarum	11.58	1.46	0.25	< 0.03	<0.03	
Oil Anise, Star ISP	3.81	0.80	0.26	0.06	0.03	
Oil Bay	1.24	0.23	0.07	0.03	<0.03	
Oil Bay (Terpeneless)		4.36	0.17	0.06	0.03	
Oil Caraway	3.59	0.71	0.06	0.04	0.04	
Oil Cassia		4.06	1.01	0.89	0.25	
Oil Cassis (Terpeneless)		6.75	1.15	0.13	0.07	
Oil Cloves		1.53	0.38	0.25	0.12	
Oil Cloves (Terpeneless)		2.88	0.04-	0.05	0.04	
Oil Dill Weed	1.71	0.06	0.04	<0.03	< 0.03	
Oil Ginger	<0.03					
Oil Lemon	1.25	0.78	0.47	0.28	0.05	
Oil Lime (Distilled)	2.34	0.23	0.24	0.03	<0.03	
Oil Mace (Distilled) (50 Called)	1.605	0.42	0.07	0.04	0.03	
Oil Peppermint	-	0.40	0.06	0.03	<0.03	
Oil Peppermint (Terpeneless)	-	0.73	0.07	0.04	0.04	
Oil Petitorain (Terpeneless)	-	0.98	0.17	0.06	0.03	
Oil Pimento Leaf		1,24	0.21	0.08	0.04	
Oil Sage (Spanish)	2.42	0.28	0.14	0.06	0.03	
Oil Sassafras	2.50	1.56	0.25	0.15	0.10	
Oil Spearmint, (N.F. XV)	1.07	0.06	0.05	0.03	0.03	
Oil Thyme, White (High Test)	•	1.35	0.31	0.10	<0.03	
Oil Wormseed (American Chenopodium)	13.46	1.07	0.16	0.06	0.04	
Oleo Resin Celery	0.15	0.05	<0.03	<0.03	<0.03	
Oleo Resin Ginger	Immisc.	0.00				
Oleo Resin Pepper	immisc.	····-				
Orange Oil	0.20	0.21	0.13	0.09	0.05	
Phenethyi Aicohol			<u>0.15</u>	30.80	4.10	
Phenethyl Formate	26.20	4.47	0.71	0.18	0.04	
Phenethyl Propionate	26.20			0.42	0.04	
		8.55	1.21	U.42	<u></u>	

. . .

FLAVOR EXTRACTOR OR PROCESSING ALD. Propylene glycol is used as a solvent in the extraction of vanilla flavor from vanilla beans and coffee flavor from roasted coffee. In addition, the high solubilizing power of this glycol permits it to be utilized in the extraction of many other natural flavoring materials. It is also used to extract fat from coccoa powder.

HUMEETANEY AND REHYDRATION. Propylene glycol is the best choice of the polyhydric alcohols for providing moisture balance or humectancy. It is particularly effective for low moisture foods and is widely used in processed fruits and vegetables such as shredded coconut and in the bakery industry for packaged pastries. Table 2 gives the equilibrium values for water-propylene glycol solutions at various relative humidities. This information can be used to estimate the humectancy value of propylene glycol in a product.

TABLE 2

OF PROPYLENE GLYCOLT

HUMECTANT VALUES

Tempe of A		Relative Humidities								
°C	•F	10%	20%	30%	40%	50%	60%	70%	80%	9Ó%
-6.7	20	96.8	91.4	90.0	84,6	77	73. ¹	68	55	40
4.4	40	97.0	92.3	90.2	85.2	78	74	68	55	40
15.6	60	97.1	92.9	90.4	85.8	80	74	68	55	40
26.7	80	97.1	93.5	90.5	86.3	81	75'	68	55	40
37.8	100	97.2	93.9	90.6	86.6	82	75	68	55	40
48.9	120	97.2	94.3	90.7	86.7	83	76	68	55	40

Values are given as percent by weight glycol in water solutions that will be in equilibrium with air of various temperatures and humidities.

Rehydration of dried foods is sometimes improved if a polyhydric alcohol has been used during the dehydration process. This avoids denaturalization of the protein and may reduce tendency of food cell structures to collapse.

FOOD COLOR SOLVENT. Propylene glycol is an excellent, widely used solvent for many edible" food dyes. Its advantages over other solvents used for this purpose include lower volatility and improved resistance to light.

ANTIEXIDANT SELVENT. Butylated hydroxyanisole (BHA), butylated hydroxytoluene (BHT), and propyl gallate are food antioxidants which are sold dissolved in propylene glycol. These antioxidants find use in a wide variety of both human and animal foods.

PLASTICIZER AND SOFTENING AGENT. In manufacturing the cork seals and crowns used with food and beverage products, it is necessary to incorporate a plasticizer to keep the cork pliable and in proper condition to seal the container. Since the food product will be in contact with the cork, a nontoxic plasticizer is required. Propylene glycol is also used in semi-dry foods, such as packaged cookies, as a softening agent to provide a better "mouth feel."

NUTRITIONAL VALUE. Since propylene glycol is often used in foods, its nutritional value is sometimes required for proper food labeling. Propylene glycol provides caloric value only as a food product. The value that should be used for calculating food label nutritional information is 570 kilogram calories (large Calories) per 100 grams.

ANIMAL FEED. Dow offers SIRLENE" feed grade propylene glycol as the glycol of choice for use in pet and cattle food. SIRLENE is a special trademarked brand of propylene glycol which meets the U.S. FDA 21CFR Part 582.1666 for use as an animal feed. In this application propylene glycol provides humectancy for moist and semi-moist products and is an excellent solvent and stabilizer for molasses-based liquid cattle feeds designed to reduce livestock stress during transport and to enhance weight gain in feedlots.¹

Propylene glycol has been shown to be a very effective treatment for the control of ketosis in cattle² and SIRLENE is approved by the U.S. FDA for treatment of ketosis.

Trademark of The Dow Chemical Company

PACKAGING AND INKS. Many food products are, of necessity, in relatively intimate contact with printed materials such as paper, doth, etc. Standard printing inks based upon petroleum solvents and relatively odorous materials are not U.S. FDA approved in food package applications since they impart undesirable odor and taste to the food. Propylene glycol is an excellent solvent for highspeed inks which are approved for indirect food contact.

> HEAT-TRANSFER MEDIUM. The food industry makes wide use of propylene glycol as a heat-transfer fluid in the brewing of beer, the processing of milk and the production of ice cream and other liquids. It is also the fluid often chosen for cooling food storage facilities and grocery store display cases.

In the brewing industry, propylene glycol is utilized to cool the tanks in which fermentation takes place and for the refrigeration of bulk yeast storage tanks.

Cooling is accomplished by circulating a 30% aqueous propylene glycol solution through cooling coils on the tank.

Propylene glycol offers a number of advantages over refrigerants such as chilled water or calcium chloride brine. Because of the extremely low toxicity of the glycol, there is less risk that the product will be unusable if contamination has occurred through small leaks in the system. In the brewing of beer the presence of 0.25 to 0.50% propylene glycol has no effect on taste, and there is no significant effect on fermentation until the percentage of glycol reaches at least 5%. A 30% concentration of glycol permits coolant temperatures down to about 10°F (-12.2°C); in contrast, chilled water permits temperatures no lower than 34°F (1.1°C). For applications requiring even lower temperatures, a 50% concentration of propylene glycol can be used which can be operated at -28°F (-33°C). Propylene glycol also provides some lubrication for the automatic controls of the cooling system. Addition of dipotassium phosphate at a concentration of 1% provides a buffering action to help maintain a neutral pH and reduce corrosion.

Immersion freezing is a fast, efficient process for the quick freezing of poultry and other foods. Dow Propylene Glycol USP has a United States Department of Agriculture P1 listing for this application. Immersion freezing has noteworthy advantages over conventional freezing in that the freezing cycle time is greatly decreased. Freezer space requirements are reduced and plant flexibility is improved. The final color of poultry may be varied from white or flesh-colored to mahogany by adjusting the temperature of the freezing bath. In freezing poultry, the birds are sealed in a closely adhering air and water-tight bag before immersion in the freezing liquor. This tight package prevents skin blotching during freezing, dehydration after freezing and contamination of the product with the liquor.

For any heat transfer system, the propylene glycol solution may gradually become contaminated with glycol oxidation products, food particles, or various impurities from other sources. Periodic examination for low pH, excessive odor or discoloration will help determine when the solution is spent and must be replaced.

EQUIPMENT CLEANER. Propylene glycol can be used to prevent contamination of food processing equipment during periods of idleness. When cleaning processing tanks, pipelines, valves, etc., it is often impossible to remove the last traces of food materials. Unless preventative measures are taken, these food materials can subsequently spoil and contaminate future production.

After normal cleaning, a final rinse with propylene glycol will aid in preventing spoilage of residual traces of food because of its natural antimicrobial properties. Before the equipment is placed in service, the residual glycol can be removed easily by flushing with water. softening agent, viscosity modifier and humectant in many types of cosmetics. It has been reported to be used in over 4,000 cosmetic products. It is an excellent solvent for many dyes and fragrances and helps to disperse ingredients. Water-in-oil emulsion stabilities can often be improved with the addition of propylene glycol as a co-emulsifier. The Cosmetic Ingredient Review Committee³ has approved the use of propylene glycol at a concentration of up to 50% in cosmetic products.

Several general formulations for various types of cosmetic products which contain propylene glycol are presented herein. These are, however, only examples and the cosmetic formulator should refer to other sources such as Flick's Cosmetic and Toiletry Formulations⁴ for additional formulation information or to textbooks such as Williams and Schmitt's⁵ that discuss in detail the science of cosmetics.

ANTIPERSPIRANTS AND DEDDERANTS. Roll-on and stick antiperspirant/deodorants now dominate this market and the current trend is toward clear gel products. Propylene glycol has replaced ethyl alcohol in many formulations because of the requirement for lower volatility, no odor, formulation stability and improved viscous properties.

CLEAR ANTIPERSPIRANT STICK	
Hexylene glycol	20.0%
Propylene carbonate	8.0
C ₁₂₋₁₅ alcohols benzoate	5.0
Dipropylene glycol	34.0
Dibenzaldehyde monosorbitol acetal	3.0
Aluminum chlorohydroxide	15.0
Propylene glycol	15.0



ow Propylene Glycol USP is used as a carrier, emollient,

SKIN CARE PRODUCTS. Skin care products include hand and body moisturizers, facial moisturizers, suncare products and cleansers. Propylene glycol can be used in mild skin cleansers as a solvent and stabilizer for the surfactants.

In a typical oil-in-water (O/W) emulsion hand cream, propylene glycol helps to stabilize the emulsion and also acts to hydrate skin and relieve dryness. Anti-aging products containing collagen are designed to rejuvinate the dermis layer of the skin. The ability of propylene glycol to penetrate skin is thought to assist in making products that contain collagen more effective.

Protection from both UV-A and UV-B radiation is recognized today as equally important in preventing skin damage from the sun. The sunscreen formulation chemist will find that propylene glycol is a good solvent and co-emulsifier for many of the UV absorbers now available as shown in the example.

MILD SKIN CLEANSER ⁷ Lysine laurate Lysine myristate Lauric acid Propylene glycol Water	10.0% 10.0 3.0 5.0 Balance
DIL-IN-WATER HAND LOTION	
Ameriate P	0.5%
Giyceryl monostearate	2.0
Stearic acid	3.0
Triethanolamine	1.0
Propylene glycol	5.0
Water	Balance
Collagen Cream ⁴ Cremophor A 11 Luvitol EHO	3.0% 5.0
Paraffin oil	5.0
Cetyl/stearyl alcohol	7.0 3.0
Propylene glycol	5.0
Collagen CLR Water	Balance
water	Delence
SUNSCREEN ⁸	
Tocopheryl isostearate Stearic acid Stearyl alcohol Glyceryl monostearate Fragrance Propylene glycol Glycerin Potassium hydroxide Water	8.0% 10.0 4.0 72.0 1.0 10.0 4.0 0.4 Balance



HAIR CARE PRODUCTS. Propylene glycol is found in many hair care products including shampoos, conditioners, thickeners, and styling gels. Solvency and stabilization are the most important roles that propylene glycol fulfills in these products. Propylene glycol is often added to the water phase for emulsion products as an aid to forming a stable final product.

DIL-FREE CLEAR HAIR RINSE	
Celquat SC-240	0.6%
Natrosol 250 HHR	0.8
Propylene glycol	3.0
dl-Panthenol	0.2
Germali 115	0.2
Methyl paraben	0.1
Water	Balance
LEAVE-ON CONDITIONER ⁵	
Cetyltrimethylammonium chloride	0.2%
Lactamide-MEA	1.2
Panthenol	1.2
Propylene glycol	2.0
Bromonitropropanediol	0.05
Water	Balance



must be solubilized in a base ingredient for effective use of the product. Because of its affinity for both hydrophilic and hydrophobic compounds and its proven safety, Propylene Glycol USP is a very effective formulation base for oral, topical and injection drug products. In addition to its solvency, Propylene Glycol USP also serves as an emollient and humectant, which are desirable features that aid in application and appearance of topical products.

in the preparation of a pharmaceutical the active ingredients

Table 3 illustrates the scope of the solubilizing properties of Propylene Glycol USP and is helpful in formulating new drug products.

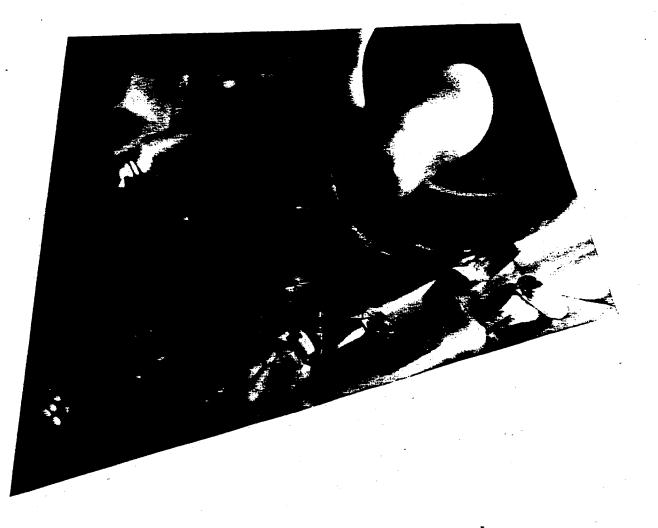


TABLE 3

SOLUBILITY OF PHARMACEUTICALS IN PROFYLENE GLYCOL USP ---Temperature 25°F (-4°C)

Material		Percent Solubility
Drugs and Medic	inals .	•
Acetanilid	e	2.09
Acetarson	e	0.52
Acethoph	enetidine	2.10
Alion		4.37
Antipyrine	•	>55.00
Caffeine		0.77
Chiorai Hy	drate	>89.00
Ethyl Carb	amate	>57.00
Glycine		<0.45
Hexameth	ylenetetramine	11.22
o-Hydroxy	benzyl Alcohol	44.10
Paraldehy	de	. 69 *
Pepsin		<0.08
Phenobar	bital (Luminal Sodium)	>49.00
Resorcino	ł	55.70
	ismuth Thioglycolate	9.40
Sodium la	dobismuthite	6.00
Sulfadiazi		0.30
Sulfanilarr		7.25
Sulfapyric	line	0.50
Sulfathiaz		1.71
Terpin Hy	drate	18.20
~ Urea		22.20
Local Anesthetic	5	
Benzocai	ne	12.20
Benzyl Al	cohol	
Diothane		5.00
Salicyl Ald	cohol (Saligenin)	4.00
Antiseptics		
Camphor		9.80
Calcium S	Sulfocarbolate	>30.00*
Chlorothy	mol	70.00
Hexyleso	rcinol	>80.00*
Menthol		>50.00
Merthiola	ite	>29.00

Materia	Percent Solubility
Antiseptics, con't	•
Metaphen	<0.27
Saiol	10.50
Thymol	>50.00
Trichloro-tert-butanol	>60.00
Zinc Sulfocarbolate	>39.00
Vitamins and Hormones	
α Estradiol (mg per cc)	0.50
Ascorbic Acid	8.16
Calcium Pantothenate	2.04
Nicotinic Acid	0.88
Pyridoxine Hydrochloride	2.73
Riboflavin	<0.006
Thiamine Hydrochloride	5.14
Vitamin A (12% in oil)	insol.
Organic Substances	
Acacia Gum	<0.16
Calcium Glycerosphosphate	<0.07
Cetyle Alcohol	0.23
Pectin	insol.
Phenothiazine (Purified)	<1.15
Sodium Citrate	0.23
Tannic Acid	>45.20
Inorganic Substances	
Arsenious Acid	insol.
Cupric Oxide	insol.
Ferric Oxide	insol.
*Viscosity of solutions prevented further additions	of solid.
> = greater than.	

insol. - not soluble.

< = less than.

SAFE HANDLING AND STORAGE

unusual problems, since this material has a pour point of less than -71°F (-57°C), is noncorrosive, has a flash point of 220°F (104°C) and poses no significant hazard to human or animal health or the environment.

The preferred material of construction for storing propylene glycol is stainless steel; however, epoxy or phenolic resin linings in carbon steel are acceptable. Unlined carbon steel tanks are a source of color and iron contamination and should be avoided to maintain the quality of the propylene glycol.

Propylene glycol will deteriorate slightly in air at ordinary temperatures (this effect is noticed principally in the odor and taste); consequently, an inert gas, preferably dry nitrogen, should be used in the vapor space of the tank to eliminate oxygen. Since propylene glycol is very hydroscopic, the use of dry nitrogen will also prevent the accumulation of water in the tank.

For ease of pumping it is recommended that propylene glycol be stored above 35°F (2°C). If internal heating coils or external electrical heaters are used to maintain pumpability, caution should be taken to ensure that the glycol is not being subjected to high metal surface temperatures (above 275°F [135°C]). Maximum suggested steam pressure is desuperheated 30 PSIG.

The recommended shelf life for bulk or factory packed drums of propylene glycal is twelve months under normal warehouse or bulk storage tank conditions. The quality of stored propylene glycal can be checked by monitoring acidity, color and odor. Good Manufacturing Practices must be followed to maintain USP status.

Additional information to assist in design-

ing a bulk storage tank for propylene glycol is available in the Dow publication, A Guide To Glycols.

FOR

CHEMICAL EMERGENCY (Spill, Leak, Fire, Exposure or Accident)

in the U.S., Call: CHEMTREC

1-800-424-9300

in Canada, Call: CANUTEC 1-613-996-6666

single dose LD50 for laboratory rats ranges from 19,800 to 33,700 mg/kg. Chronic oral toxicity is also very low. Studies have shown that rats are unaffected when fed 10% propylene glycol in drinking water for 140 days. Because of its low chronic oral toxicity, propylene glycol is generally recognized as safe (GRAS) by the U.S. FDA for use in foods and pharmaceuticals when manufactured and used in accordance with U.S. FDA requirements. Historical data demonstrates that humans, like animals, are unaffected by low dosages of propylene glycol.

ropylene glycol is very low in single dose acute oral toxicity. The

Prolonged contact is essentially nonirritating to skin. Repeated exposure may cause flaking and softening of skin. A single prolonged exposure is not likely to result in the material being absorbed through skin in harmful amounts. It may be absorbed in potentially harmful amounts when applied in large quantities to severe burns (second or third degree) over large areas of the body as part of a cream or other topical application.

At room temperatures, inhalation of propylene glycol vapors is not likely because of its very low vapor pressure. Exposure to mists or artificial fogs may be initiating to the upper respiratory tract and should be avoided. Although the U.S. EPA has established no required exposure guideline for propylene glycol in the workplace, the American Industrial Hygiene Association recommends a maximum eight-hour-time-weighted average for total vapor and aerosol of 50 ppm.

EGUL'ATORY STATU

Le ropylene Glycol USP meets the requirements of the Food Chemicals Codex and can, therefore, be used for direct as well as indirect food additive applications. Food grade propylene glycol is considered to be generally recognized as safe (GRAS) as a multiple purpose food substance under U.S. 21 CFR 184.1666. Because of this GRAS status, Propylene Glycol USP may be used for indirect food applications which allow additives generally recognized as safe. In addition, a number of standardized foods allow for the use of optional ingredients which are "safe and suitable." Propylene Glycol USP will qualify where the use is suitable. These standardized foods are described in sections 133.128 (cottage cheese), 133.131 (low fat cottage cheese), 135.110 (ice cream and frozen custard), 135.120 (ice milk), 135.130 (mellorine), 135.140 (sherbets), 135.160 (water ices), 169.175 (vanilla extract), 169.176 (concentrated vanilla extract), 169.177 (vanilla flavoring), 169.178 (concentrated vanilla flavoring), 169.180 (vanilla-vanillan extract) and 169.181 (vanilla-vanillan flavoring). Propylene Glycol USP is also generally recognized as safe in animal feeds as a general purpose food additive (582.1666) and as an emulsifying agent (582.4666). The regulations should be consulted for full details.

The antimicrobial properties of propylene glycol have been reported numerous times.^{9,10} Since antimicrobials may be regulated as pesticides, obtain guidance from the appropriate governing agencies (such as the Environmental Protection Agency [EPA] in the U.S.) before commercializing any product containing propylene glycol as an active pesticidal ingredient. In regard to use as an animal feed preservative, it should be noted that in 1993 Dow discontinued registration of SIRLENE* food grade propylene glycol under the U.S. Federal Insecticide, Fungicide, Rodenticide Act (FIFRA).

DOW AND PRODUCT STEWARDSHIP

Given for the proper handling and use of Dow Propylene Given USP is not something Dow surrenders at the customer's gate. The product stewardship philosophy of The Dow Chemical Company states that Dow has "a fundamental concern for all who make, distribute and use (our) products, and for the environment in which we live." To that end, The Dow Chemical Company subscribes to Responsible Care^a codes that were created to inform our customers on how to operate more safely, remain responsible to government regulations and minimize the liability associated with the products purchased. Dow encourages its customers to review their applications for Dow products from the standpoint of human health and environmental concern and to help ensure that Dow products are not used in ways other than as intended or tested.

Technical Service and Development (TS&D) assistance for Dow customers on stewardship matters is available, together with materials on the proper handling of propylene glycol. Material Safety Data Sheets are also available.

Trademark of The Dow Chemical Company
 Service Mark of The Chemical Manufacturers Associate

PROPERTIES

Formula	CH3-CHOH-CH2OH
Molecular Weight	76.1
Boiling Point, 760 mm Hg	369.3°F (187.4°C)
Freezing Point	Supercools
Specific Gravity	· ·
68/68"F (20/20°C)	1.038
77/39°F (25/4°C)	1.033
140/39°F(60/4°C)	1.007
Pounds per Gallon, 77°F (25°C)	8.62
Refractive Index, 77°F (25°C)	1.431
Viscosity Centipoise	
77°F (25°C)	48.6
140°F (60°C)	8.42
Specific Heat, cal/gm/°C, 77°F (25°C)	0.60
Vapor Pressure, mm Hg, 77°F (25°C)	0.13
Surface Tension, dynes/cm., 77°F (25°C)	36
Flash Point, Seta Flash	220°F (104°C)

These properties are laboratory results typical of the product, and should not be confused with specifications as shown below.

SPECIFICATIONS

*Specific Gravity, 68/68°F (20/20°C)		1
*Specific Gravity, 77/77°F (25/25°C)		1
*Distillation Range, 760 mm Hg, IBP-DP	:	3
Acidity (as acetic acid), Maximum		2
Chlorides, Maximum		1
Sulfates	;	C
Heavy Metals (as Pb), Maximum		5
Arsenic (as As ₂ O ₃), Maximum		1
Iron, Maximum		୍ (
Solubility, 77°F (25°C)		Ņ
		ā
Assay (as C3H8O2), by Weight, Minimum		ç
Water, Maximum		0
Ash (sulfated), Maximum		C
APHA color, Maximum		1
Odor		F

Odor Taste Suspended Matter Organic Volatile Impurities Residual Propylene Oxide, Maximum

All values by U.S.P. XXII methods of analysis

"Not a specification requirement.

1.0376-1.0389 1.0352-1.0364 367-372°F (186-189°C) 20 ppm 1 ppm Conforms 5 ppm 1 ppm 0.3 ppm Miscible in all proportions with water, acetone and chioroform 99.5% 0.2% 0.005% 10 Practically odoriess Slight characteristic Substantially free Conforms 5 ppm



1 14.1 1000 2.1

5

T N

0 0

TES

1 U.S. Patent 4,600.586. "Livestock Feed Lot Adaptation Composition and Method," July 15, 1986. 2 "Detection, Occurrence, and Prophylactic Treatment of Borderline Ketosis with Propylene Glycol Feeding," Journal of Dairy Science, Vol XLVII, No. 10,

3 "Final Report on Safety Assessment of Propylene Glycol," Expert Panel of Cosmetic Ingredient Review, The Cosmetic Ingredient Review, The Cosmetic, Tolling, and Empirical Assessment of Propylene Glycol, "Expert Panel of Cosmetic Ingredient Review, The Cosmetic Ingredient Review, The Cosmetic, Ingredient, Review, Ingredient, Review, Ingredient, Review, Ingredient, Review, Ingredient, Review, Ingredient, Review, Ingr

Toiletty, and Fragrance Association, Washington, DC, 1993.

F

4 Ernest W. Flick, Cosmetic and Toiletry Formulations, Second Edition, Noyes Publications, 1989. 5 D. F. Williams, W.H. Schmitt, Chemistry and Technology of the Cosmetics and Toiletries Industry, Blackie Academic & Professional, New York, 1992.

6 EP 404,533, Procter and Gamble Co. (Dec. 1990).

7 JP 01,238,521, Lion Corp. Ajinomoto Co. Inc. (Sept. 1989).

9 * A Study of the Inhibitory Concentrations of Glycenn-Sorbitol and Propylene Glycol-Sorbitol Combinations on the Growth of Microorganisms,* Journal of American Pharmaceutical Association, Vol XLVI, No. 4, p. 217-218.

10 "Activity of Propylene Glycol on Bacteria: Influence on Growth Rate in a Liquid Medium," Arch. Hyg. Bakteriol 147, p. 189-200, 1963.

ERITYUEL FEILE 1.1.1.1.1.1.1.1

firesents of Parker Scherk Conder 2

Filling and Chang

Der Prinse

Ð., 15

Đź. 5-

Gerge MD HID Withon State .; Left of the state

٩,

ELL COMPANY LENGTH