49892

ORIGINAL (Red)

April 11, 1988

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: Mail Code 3HW12

Attn: Suzanne Billings:

This is to confirm our phone conversation of April 4, 1988.

E. F. Houghton & Company owns and occupies two buildings in the Valley Forge Corporate Center. One of these buildings is an office building and the other is a research laboratory.

As you would surmise, our research laboratory uses hundreds of chemicals many of which are considered to be hazardous by OSHA definition. Since we deal largely with oils and solvents, we are especially careful not to release these to the aquifer. Spent solvents and oils are collected separately in drums and are taken from the premises by a licensed transporter. Water soluble materials are released as permitted to the sewer.

We do not use trichloroethene, or trans-1,2-dichloroethene. Small amounts of 1,1,1-trichloroethane are used in this facility to degrease test panels for rust preventive tests. The spent solvent is handled as described above.

At the conclusion of our conversation, you indicated that our phone conversation constituted an initial response to your letter of March 31, 1988 and that you were extending the starting date to April 22, 1988 by which time you will have consulted your superior about the nature of the response you expect from us.

Very truly yours,

Ellis Abrams

Ellis Abrams
Technical Consultant

EA/jh

AR200627

ORIGINAL
(Red)

HOUGHTON

April 18, 1988

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
841 Chestnut Building
Philadelphia, PA 19107

RE: Mail Code 3HW12

ATTENTION: Suzanne Billings

In our conversation of April 11, 1988, you outlined those items which you would like us to address.

We attach a list of hazardous chemicals which are ordinarily present in our laboratory for research purposes or for sample preparation. With only a few exceptions, we store these chemicals, where applicable, in 5 gallon cans. This list of chemicals is essentially the list we prepared for our response for Section 311 (SARA) information.

Waste handling. Each individual laboratory has 5 gallon waste containers for three categories of waste: (1) hazardous waste solvents with a flash point of 140°F or less, (2) hazardous waste containing barium compounds in oil, and (3) nonhazardous waste consisting of a wide variety of soluble oils, hydraulic fluids, metal cutting, metal drawing compounds and competitive samples which mirror our general fields of activity.

Hazardous waste 1 is stored in drums in our solvent room until collected by our waste hauler. Hazardous waste 2 is also stored in the solvent room until picked up by the waste hauler. Waste 3 is collected and stored in an above ground 2,000 gallon tank. Periodically, this material is collected by the waste hauler for disposal.

On our laboratory site are two underground oil separators. These separators handle different parts of our laboratory. The influent to these tanks consists of aqueous waste other than sewage. The effluent discharges to the sewer lines which lead to the Lower Providence Township sewage plant. The accumulated oil in the separators is pumped out on an as needed basis by a waste hauler.

I trust this provides you with the information you require for your survey. Please let us know if we can be of further assistance.

Very truly yours,

Ellis Abrams

Ellis Abrams
Technical Consultant

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Enclosures

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LIST OF HAZARDOUS MATERIALS USED BY E. F. HOUGHTON & CO.

Chemical Name	CAS No.	HAZARD CATEGORY 1 Immediate (Acute) Health Hazard	2 Delayed (Chronic) Health Hazard	3 Fire Hazard	4 Sudden Release of Pressure	5 Reactive Hazard
Caustic Soda Solution	1310-73-2	X				
Diethanolamine	111-42-2	X				
Ethylene Glycol	107-21-1		X			
Caustic Potash Solution	1310-58-3	X				
Potassium Nitrate	7757-79-1	X		X		
Barium Chloride	10361-37-2	X				
Sodium Nitrite	7632-00-0	X		X		
Sodium Nitrate	7631-99-4	X		X		
Hydrogen Peroxide	7722-84-1	X		X		
Turpentine	8006-64-2	X		X		
Sulfuric Acid	7664-93-9	X				
Toluene	108-88-3	X		X		
Sodium Ortho Phenyl Phenate	132-27-4	X				
Xylene	1330-20-7	X		X		
Oxalic Acid	144-62-7	X				

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Chemical Name	CAS No.	HAZARD CATEGORY 1 Immediate (Acute) Health Hazard	2 Delayed (Chronic) Health Hazard	3 Fire Hazard	4 Sudden Release of Pressure	5 Reactive Hazard
Ammonia Solution	1336-2-6	X				
Formalin	50-00-0	X	X	X		
Diethylene Glycol	111-46-6		X			
Caustic Soda	1310-73-2	X				
Sodium Bisulfite	7681-57-4	X				
Stoddard Solvent	64742-48-9	X		X		
Sodium Dichromate	10588-01-9	X		X		
Monoethanolamine	141-43-5	X				
Hexylene Glycol	107-41-5	X				
Isobutyl Alcohol	73-83-1			X		
Ethylene Diamine	107-15-3	X		X		
Diethylene Triamine	111-40-0	X				
Diethyl Sulfate	64-67-5	X				
Methyl Ethyl Ketone	78-93-3	X		X		
Monoisopropanolamine	78-96-6	X				
Sodium Bisulfate	7681-38-1	X				

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Chemical Name	CAS No.	HAZARD CATEGORY 1 Immediate (Acute) Health Hazard	2 Delayed (Chronic) Health Hazard	3 Fire Hazard	4 Sudden Release of Pressure	5 Reactive Hazard
Maleic Anhydride	108-31-6	X				
Phthalic Anhydride	643-79-8	X				
Sodium Mercaptobenzothiazole	2492-26-4	X				
Ammonium Persulfate	7727-50-0	X		X		
Cinnamaldehyde	104-55-2	X		X		
Air Blown Asphalt Cutback	64741-83-9 (solvent)	X		X		
Petroleum Distillate	8008-20-6	X		X		
Flake Paraformaldehyde	30525-89-4	X		X		
Petroleum Distillate	64742-88-7	X		X		
Acrylic Acid	79-10-7	X		X		
Caprylic Acid	124-07-2	X				
Methoxy-propylamine	5332-73-0	X		X		
N-tallow-1,3 diaminopropane	61791-55-7	X				
Toluene Sulfonic Acid	104-15-4	X				
Phosphoric Acid	7664-38-2	X				
Sodium Nitrite Solution	7632-00-0	X		X		
1,1,1-trichloroethane	71-55-6	X				

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Chemical Name	CAS No.	HAZARD CATEGORY 1 Immediate (Acute) Health Hazard	2 Delayed (Chronic) Health Hazard	3 Fire Hazard	4 Sudden Release of Pressure	5 Reactive Hazard
Isopropyl Alcohol	67-63-0	X		X		
Solvent Cutback Rust Preventive	8052-41-3 (solvent)	X		X		
Pelargonic Acid	112-0-50	X				
Petroleum Distillate	64742-52-5	X		X		
Dodecyl Benzene Sulfonic Acid	27176-87-0	X				
Mixture - Isopropyl Amino Ethanols	109-56-8 and 121-93-7	X		X		
Petroleum Distillate	8052-41-3	X		X		
Petroluem Distillate	64742-94-5	X		X		
Epichlorohydrin	106-89-8	X	X	X		
Gluconic Acid Solution	526-94-4	X				
Bioban P-1487 Pesticide	2224-44-4 and 1854-23-5	X				
Phosphorus Pentoxide	1314-56-3	X				X
Sulfamic Acid	5329-14-6	X				
Petroleum Distillate	61789-43-3	X		X		
Liquid Detergent (alkoxylated linear alcohol)	52232-09-4 37311-02-7 37251-67-5	X				

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Chemical Name	CAS No.	HAZARD CATEGORY 1 Immediate (Acute) Health Hazard	2 Delayed (Chronic) Health Hazard	3 Fire Hazard	4 Sudden Release of Pressure	5 Reactive Hazard
Petroleum Distillate	64741-86-2	X		X		
Calcium Sulfonate in Stoddard Solvent	8052-41-3 (solvent)	X		X		
Dimethyl Hydrogenated Tallow Amine	61788-62-3	X				
Asphalt, Solvent Cutback	8052-41-3 (solvent)	X		X		
Potassium Hydroxide	1310-58-3	X				
Alpha C_{16} Olefin Epoxide	7320-37-8			X		
Solvent Mixture	103-65-1 104-51-8 538-68-1 496-11-7	X		X		
Solvent	64742-54-7	X		X		
Diethylethanolamine	100-37-8	X		X		
Sodium Nitrate	7631-99-4	X		X		
Dipropylene Glycol Monomethyl Ether	34590-94-8	X				
n-Butoxy Propanol	5131-66-8	X		X		
Polyacrylate-Mineral Spirits Mixture	8032-32-4 (solvent)	X		X		

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Chemical Name	CAS No.	HAZARD CATEGORY 1 Immediate (Acute) Health Hazard	2 Delayed (Chronic) Health Hazard	3 Fire Hazard	4 Sudden Release of Pressure	5 Reactive Hazard
Sodium Bifluoride	1333-83-1	X				
Sebacic Acid	111-20-6		X			
Triethanolamine	102-71-6	X				
Polyphosphoric Acids, 2-Butoxyethyl Esters	68514-82-9	X				
Methyl Ethanolamine	109-83-1	X		X		
Amino-2-Methyl-2-Propanol-1	124-68-5	X		X		
Kathon Microbiocide	26172-55-4 and 2682-20-4	X				
Glutaraldehyde Solution	111-30-8	X				
Zinc Dialkyl Dithiophosphate	26566-95-0	X				
Dimethyl Amino-2-Propanol	108-16-7	X		X		
Nonylphenoxypoly (ethyleneoxy)-Ethanol	9016-45-9	X				
Carboxylated, short chain Paraffinic Ethoxylate	67990-18-5	X				
Polyoxyethylene Nonyl Phenyl Ether Phosphate	51811-79-1	X				
Mixture - 4,4-Dimethyl Oxazolidine and 4-Ethyl Oxazolidine	7747-35-5 (96%)	X		X		

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Chemical Name	CAS No.	HAZARD CATEGORY 1 Immediate (Acute) Health Hazard	2 Delayed (Chronic) Health Hazard	3 Fire Hazard	4 Sudden Release of Pressure	5 Reactive Hazard
Phosphonate Sequestrant	2809-21-4	X				
Polyalkylene Amine	9046-10-0	X				
Polydimethylsiloxanediol	70131-67-8			X		
Mineral Oils	We use some 30 different mineral oils. CAS Nos. are available.		X			