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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 05 1989

Ms. Sonya E. Shashoua
Supervising Environmental Specialist
Bureau of Hazardous Waste Regulation and Classification
New Jersey Department of Environmental Protection
CN-028, 401 East State Street
Trenton, New Jersey 08625-0028

Dear Ms. Shashoua:

This is in response to your letter of May 25, 1989, in which you asked several questions related to specific waste codes under 40 CFR 261.33(e) and (f). As you requested, this office will clarify the points you have raised so your own hazardous waste lists are consistent with the technical corrections to §261.33 the EPA published on April 22, 1988 (53 FR 13382). We will answer your questions in the order you raised them.

1. The chemical name "3-(alpha-Acetonylbenzyl)-4-hydroxycoumarin" (P001, CAS #81-81-2) was dropped from 40 CFR 261.33(e) while the name "Warfarin" was retained. What was the reason for this deletion?

Warfarin is the common name for this substance, and the name in the 9th Collective Index (CI) of Chemical Abstracts was changed.

2. There were two chemicals on 40 CFR 261.33(f) with the number U126; Glycidylaldehyde (CAS #765-34-4) and 1-propanol, 2,3-epoxy (CAS #556-52-5). After July 1, 1986 the latter chemical was dropped from 40 CFR 261.33(f). Why wasn't it retained with a different "U" number?

Glycidylaldehyde appears to be correct and 1-propanol 2,3-epoxy was added as an incorrect synonym in 1981. When the Agency again addresses the issue of making technical corrections to §261.33, we will review the old support data to confirm the correct entry.

3. Can you verify that the Chemical Abstracts Service (CAS) number for U136 Cacodylic Acid is 75-60-5? The Source I am using as a double check lists the number as 75-50-6.

You may verify our CAS number for cacodylic acid by checking the CAS Registry, the EPA CAS Register, or the Registry of Toxic Effects of Chemical Substances (RTECS) published by-2-

the National Institute for Occupational Safety and Health (NIOSH).

4. What is the correct name and CAS number for U036: Chlordane, technical (CAS #12789-03-6) or Chlordane, alpha and gamma isomers (CAS #57-74-9)?

Chlordane, alpha and gamma isomers (CAS #57-74-9) are the commercial products associated with the 9th CI name; Chlordane, technical (CAS #12789-03-6) is associated with the 8th CI name. Since no commercial grade of chlordane is a pure compound, any formulation in which chlordane is the sole active ingredient is probably regulated under §261.33.

5. What are the correct listings for creosote and coal tar? I have found:

U051 Creosote -
U051 Creosote CAS # 8021-39-4 (40 CFR - July 1, 1987 edition)
Appendix VIII Coal tar creosote CAS # 8007-45-2
Appendix VIII Creosote No CAS # U051
Appendix VIII Coal tar creosote CAS #8001-58-9 (40 CFR, July 1, 1987 edition)

Creosote, U051, with no CAS Number is correct since the Agency wants to include all forms of creosote under the listing. See enclosure for more details.

6. What is the source for the CAS numbers for "nitrogen mustard" and Nitrogen mustard N-oxide?" These compounds are not listed in the reference book I have.

The CAS Registry and RTECS are both sources for the CAS numbers for these substances.

7 The listing for U161 "Pentanol, 4-methyl" appears to be in error. The name "2-Pentanone, 4-methyl" has the CAS #108-10-1 and would agree with the other two entries for U161: "Methyl isobutyl ketone" and "4-Methyl-2-pentanone" both having the CAS #108-10-1. Could you please clarify this listing?

You are correct in the statement that 4-Methyl pentanol is an incorrect name for &161. Methyl isobutyl ketone and 2-Pentanone, 4-methyl (CAS #108-10-1) are bother correct names for U161.

Thank you for your inquiry. Many times the Government Printing Office makes typographical errors and omissions when it publishes our regulations in the Federal Register and the Code of Federal Regulations. Such mistakes cause many people to send in inquiries about the accuracy of our listings and force us to publish technical corrections to the listings from time to time.

You may also be interested in checking the accuracy of the CAS

numbers used in §261.33 and Appendix VIII by contacting the Chemical Abstracts Service (a part of the American Chemical Society) in Columbus, Ohio at (614) 447-3600.

Sincerely,

Original Document signed

Ron Josephson
Environmental Engineer
Listing Section

Enclosure

cc: George Meyer, EPA Region II (2AWM-HWC)