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Ser 1811JC/00526

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Mr. Mark Malinowski  
Department of Health Services  
State of California  
Toxic Substances Control Division  
Region 2  
700 Heinz Avenue, Bldg. F, Suite 200  
Berkeley, CA 94710

Dear Mr. Malinowski:

Your letter of October 16, 1990 approved the Navy's Final Work Plan for the Removal Action at Tank S-505 at Naval Station, Treasure Island, Hunters Point Annex (HPA). As discussed in our meeting of November 7, 1990, the Navy has recently obtained additional information on an alternative solvent to kerosene for decontamination of Tank S-505.

Discussions between the Navy, our consultant, Harding Lawson Associates' (HLA) engineering staff and contractors experienced in PCB decontamination, have resulted in the proposal of Penetone Power Cleaner 155 as an alternative solvent to kerosene for the decontamination procedures. Penetone is a nonflammable cleaner expected to be safer to manage at the work site, and is anticipated to be approximately as cost effective. The spent Penetone mixture, if approved, will be disposed of with other PCB containing liquids from the site (i.e. by incineration at an EPA-permitted disposal facility). A Material Safety Data Sheet (MSDS) and manufacturer's information on the solvent is attached as enclosure (1) for your review.

Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Julie Carver, Code 1811JC, (415) 244-2551). We propose a simple addendum by letter to the existing approved final work plan should Department of Health Services concur with this alternative solvent. Environmental Protection Agency approval has already been granted via a phone call with Chuck Flippo on November 5, 1990.

Sincerely,

original signed by:

MICHAEL A. MIGUEL  
Head, Environmental Restoration Branch

Encl:

(1) Material Safety Data Sheet

Copy to:

Regional Water Quality Control Board (Attn: Steve Ritchie)  
Bay Area Air Quality Management District (Attn: Scott Lutz)  
U.S. Environmental Protection Agency (Attn: Chuck Flippo)  
California Dept. of Fish & Game (Attn: Mike Rugg)  
U.S. Fish & Wildlife Service (Attn: Steve Schwarzback)

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Copy to: (continued)

National Oceanic & Atmospheric Administration (Attn: Chip Demarest)  
Hunters Point Technical Review Committee Public Member (Attn: Rev. Arelious Walker)  
City and County of San Francisco (Attn: David Wells)  
San Francisco District Attorney (Attn: Steve Castleman)

Blind copy to: (w/o encl) 09C9, 202, 09A2A.20  
181, 1811, 1811RC, 1811RP  
Harding Lawson Associates (Attn: Mary Lucas)

(w/ encl) Admin. Record, 1811JC  
COMNAVBASE S.F.  
PWC S.F. BAY (Code 420)  
COMNAVSEASYSKOM (Attn: Robert Milner)  
OIC Treasure Island, HPA  
NAVSTA Treasure Island  
PRC (Attn: Gary Welshans)

Writer: Julie Carver, 1811JC, x2557  
Typist: B. Palmer, 8 Nov 90, Wkpln FinalTank S-505  
File: HP/DOHS

# penetone



## POWER CLEANER 155

**POWER PACKED CLEANER DESIGNED FOR PCB CLEANUP**

**ECONOMICAL.....DILUTES WITH WATER ■ NONFLAMMABLE ■  
BIODEGRADABLE ■ EASY TO USE ■ SAFE ON MOST SURFACES**

### Description:

**POWER CLEANER 155 is a highly concentrated, low foaming, liquid alkaline cleaner formulated for fast penetration and removal of polychlorinated biphenyl contaminants from a wide variety of surfaces.**

### Features & Benefits:

■ **HIGHLY CONCENTRATED**

**POWER CLEANER 155 is economical to use. When diluted with 5 to 7 parts of water, it provides outstanding cleanup at costs far less than commonly used solvents.**

■ **DIVERSIFIED APPLICATIONS**

**POWER CLEANER 155 can be applied manually, through power scrubbers, power sprayers and steam cleaners. Its versatility makes it the "all-around" cleaner.**

■ **SAFER TO USE THAN SOLVENTS**

**POWER CLEANER 155 contains no solvents..It has no flash or fire point and is completely biodegradable.**

■ **RAPID SOIL PENETRATION -  
FREE RINSING**

**POWER CLEANER 155 rapidly attacks soils, holds them in suspension and then rinses freely, leaving no dull streaks.**

■ **WIDE VARIETY OF SURFACE  
APPLICATIONS**

**POWER CLEANER 155 when used as directed is safe to use on the following surfaces:**

- |          |          |           |
|----------|----------|-----------|
| aluminum | chromium | magnesium |
| asphalt  | concrete | nickel    |
| brass    | copper   | plastic   |
| bronze   | Iron     | rubber    |
| ceramic  | lead     | steel     |

# POWER CLEANER 155

## POWER PACKED CLEANER FOR PCB CONTAMINANTS

### Methods of Use:

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For general cleanup applications, POWER CLEANER 155 is usually diluted with 5 to 7 parts of water. Apply to the contaminated surface, agitate the cleaner and the contamination, and then pick up both the cleaner and the contamination by the use of an absorbent or adsorbent material. Dispose in an approved manner.

For power scrubbing, POWER CLEANER 155 is normally used at a concentration of 1 to 4 ounces per gallon of water, depending on the soil encountered. Be sure to dispose of all contamination and cleaner in an approved method.

POWER CLEANER 155 is an economical cleaner for use in other areas where PCB contamination is not encountered.

### Dilution Rate (per gallon of water)

<i>Wax Stripping</i>	1-4 ounces
<i>All Purpose Cleaning</i>	1-2 ounces
<i>Windows</i>	¼-½ ounce
<i>Painted Walls</i>	½-1 ounce
<i>Garage Floors</i>	2-4 ounces
<i>Steam Cleaning</i>	2-4 ounces
<i>Pressure Washing</i>	2-6 ounces
<i>Engine Shampoo</i>	3-8 ounces

### Typical Characteristics:

Appearance	- Colorless liquid
Solubility	- Excellent in water at all proportions
Weight per Gallon	- 9.75 lbs.
pH - 10% solution	- 12.0
Specific Gravity @ 20° C	- 1.170
Flash Point (COC)	- None
Fire Point (COC)	- None
Rinsability	- Free rinsing...leaves no film deposit
Foaming Tendency	- Low foaming

### Precautionary Note:

As with all alkaline cleaners, continuous or repeated contact with skin should be avoided. In case of eye contact, flush immediately with copious amounts of water. Do not take internally.

# MATERIAL SAFETY DATA SHEET

(Confidential Formula - Information not to be disclosed to other than recipient and other regulatory agencies.)

EMERGENCY TEL. NO. (201) 587-3000

DATE October 9, 1989

## SECTION I. PRODUCT IDENTIFICATION

TRADE NAME	POWER CLEANER 155
FORMULA	Water, aryl sulfonate, phosphates, EDTA-type chelate, silicates, alkylaryl polyether, phosphate ester.
CHEMICAL FAMILY	Liquid Alkaline Cleaner

## SECTION II. HAZARDOUS INGREDIENTS

COMPONENT OR MATERIAL CHEMICAL NAMES	CAS NO.	OSHA PEL	ACGIH TLV
NONE			

## SECTION III. PHYSICAL DATA

BOILING POINT (°F)	VAPOR PRESSURE, mm Hg @ 20°C (68°F)
Approximately 212	Approximately 15
EVAPORATION RATE (ETHER=1)	VAPOR DENSITY (AIR=1) @ 60-80°F
Equal to water	Equal to water
SOLUBILITY IN H <sub>2</sub> O, % by wt @ 20°C (68°F)	% VOLATILES by VOL. @ 70°F
Complete	Approximately 78
SPECIFIC GRAVITY H <sub>2</sub> O=1 @ 75°F	PH
1.140	12.6 (as received)
APPEARANCE & ODOR	
Clear liquid; virtually odorless	

## SECTION IV. FIRE AND EXPLOSION DATA

FLASH POINT (Method Used)	FLAMMABLE EXPLOSIVE LIMITS	UPPER	LOWER
None (COC) (TCC)		Not applicable	Not applicable
EXTINGUISHING MEDIA			
Not applicable.			
SPECIAL FIRE FIGHTING PROCEDURES			
Cool drums with water.			
UNUSUAL FIRE & EXPLOSION HAZARDS			
None known			

## SECTION V. EMERGENCY AND FIRST AID PROCEDURES

EYES
Flush with water for 15 minutes. Consult physician.
SKIN
Flush with water for several minutes. If irritation persists, consult physician.
INHALATION
Not applicable.

**SECTION VI—HEALTH HAZARD DATA**

ROUTE(S) OF ENTRY:	Eyes	INHALATION	SKIN	XX	INGESTION
HEALTH HAZARDS (ACUTE AND CHRONIC) SKIN: May irritate. EYES: May irritate or burn. CHRONIC: None known.					
CARCINOGENICITY:	NTP	N.A.	IARC MONOGRAPHS	N.A.	OSHA REGULATED N.A.
SIGNS AND SYMPTOMS OF EXPOSURE Dryness or irritation to skin on prolonged contact. Will cause irritation and possible burns to eyes on contact only.					
MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE Cuts, abrasions, dermatitis					
EMERGENCY AND FIRST AID PROCEDURES SEE SECTION V.					

**SECTION VII. REACTIVITY DATA**

CONDITIONS CONTRIBUTING TO INSTABILITY Product is stable.
INCOMPATIBILITY Strong acids
HAZARDOUS DECOMPOSITION PRODUCTS None known.
CONDITIONS CONTRIBUTING TO POLYMERIZATION Will not occur.

**SECTION VIII. SPILL OR LEAK PROCEDURES**

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED Flush away with water or use absorbents to sweep up.
NEUTRALIZING CHEMICALS Weak acids, e.g., diluted vinegar.
WASTE DISPOSAL METHOD Dispose of in accordance with local, state and federal EPA regulations.

**SECTION IX. VENTILATION AND PERSONAL PROTECTIVE EQUIPMENT**

VENTILATION REQUIREMENTS Natural ventilation is normally sufficient.	
SPECIAL PERSONAL PROTECTIVE EQUIPMENT	RESPIRATORY None needed under normal use conditions.
	EYE Splashproof goggles.
	GLOVES Rubber
	OTHER CLOTHING & EQUIPMENT Rubber boots, rubber apron, eye wash and safety shower.

**SECTION X. SPECIAL PRECAUTIONS INCLUDING STORAGE**

PRECAUTIONS TO BE TAKEN IN HANDLING & STORAGE (Always refer to label directions when using.) Keep from freezing. If product does freeze, thaw and roll container. Product will revert to normal consistency.
D.O.T. SHIPPING CLASSIFICATION Liquid Cleaning Compound, N.O.S.