

ARCHIVE: Archived due to the 2009 rule revision. Refer to VA30001.09.001 for the updated document.

TITLE: Propylene Glycol Under the Voluntary Action Program

DATE EFFECTIVE: January 2003

HISTORY: Update of VA30001.99.001 - Archived TDC document no longer provides current guidance.

KEYWORDS: Propylene glycol, 1,2-propanediol, hazardous substance, listed hazardous waste, F- and K-wastes

RULE/ AUTHORITY: OAC 3745-300-01(A)(21), 3745-300-04 and 3745-300-07(D)

QUESTION: Is propylene glycol considered a hazardous substance under the Voluntary Action Program?

ANSWER: No, propylene glycol (used in antifreeze) does not meet the definition of a hazardous substance under Ohio Administrative Code (OAC) 3745-300-01(A)(21), and as a result propylene glycol need not be analyzed by a certified laboratory in a voluntary action conducted under Ohio Revised Code (ORC) Chapter 3746 and OAC Chapter 3745-300. [Note: ethylene glycol, which is also used in antifreeze, is a hazardous substance and may need to be addressed under the VAP in accordance with OAC Chapter 3745-300.]

A "voluntary action", pursuant to OAC 3745-300-01, means in part "a series of measures that may be undertaken to identify and address potential sources of contamination of property by hazardous substances or petroleum and to establish that the property complies with applicable standards." Propylene glycol (CASRN 57-55-6; 1,2-propanediol) is not listed as a hazardous substance in 40 CFR 302.4 nor is it a petroleum or an identified component of any hazardous substance or petroleum. As provided in OAC 3745-300-07(D), analysis by a certified laboratory is required in a voluntary action for any hazardous substance, petroleum, or analytes which are a constituent of a hazardous substance or petroleum (e.g. sulfates as a constituent of lead sulfate). Laboratories may be certified under OAC 3745-300-04 to produce certified data for hazardous substances, petroleum, or analytes which are a constituent of a hazardous substance or petroleum. Because propylene glycol (CASRN 57-55-6;

1,2-propanediol) is not listed as a hazardous substance in 40 CFR 302.4 nor an identified constituent of a hazardous substance, laboratories would not be certified for its analysis under the VAP.

The Merck Index describes propylene glycol as a nontoxic antifreeze. However, USEPA/OSWER's Superfund Office has published provisional chronic and subchronic Reference Dose (RfD) values for propylene glycol in the 1997 edition of "HEAST", and USEPA Regions III and IX have published risk-based cleanup numbers based on the HEAST chronic RfD. Even though USEPA has published cleanup values, cleanup does not fall within the scope of the VAP because it is not a hazardous substance.

SUMMARY:

Propylene glycol is **not** considered a hazardous substance, nor is it an identified constituent of a hazardous substance. Propylene glycol does not fall within the scope of the VAP and therefore, analysis under the VAP is not required.

**OHIO EPA
CONTACT:**

For any questions concerning this issue, please contact the Voluntary Action Program (VAP) central office at (614) 644-2924.