

**New York State Department of Environmental Conservation**  
**Division of Solid and Hazardous Materials**  
**Bureau of Hazardous Waste Management, Room 448**  
50 Wolf Road, Albany, New York 12233-7251  
**Phone:** (518) 457-9257 • **FAX:** (518) 485-8769  
**Website:** www.dec.state.ny.us



April 26, 2000

Mr. E.T. Simoneau  
Application Development Scientist  
General Electric Company  
G.E. Silicones  
260 Hudson River Road  
Waterford, NY 12188

Dear Mr. Simoneau:

This is in response to your April 17, 2000 letter concerning a siloxane-based dry cleaning solvent, designated SB 32. The responsibility of this office would be limited to determining when dry cleaning waste containing SB 32 would be hazardous waste. This response, therefore, is limited in scope to that issue.

Based on the formulation, there is nothing to indicate that SB 32 would be a hazardous waste by itself, if spent or discarded. However, as with other supposedly non-hazardous substitutes for perchloroethylene, dry cleaning waste containing SB 32 can be hazardous waste under the following circumstances:

- If the dry cleaning wastes exhibited one or more hazardous waste characteristics due to the items being dry cleaned or chemicals those items might be contaminated with, or
- Listed products, such as perchloroethylene, are used as spot removers, followed by application of SB 32. The entire dry cleaning waste would then become a listed hazardous waste by the mixture rule.

As you will note, neither of the above possibilities relates to the physical or chemical properties or composition of the SB 32. Both relate to other contaminants that might be present in the dry cleaning wastes. The same possibilities exist with all "non-hazardous" dry cleaning formulations.



Mr. E.T. Simoneau

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If there are any questions concerning the above, please contact the undersigned at (518) 485-8988.

Sincerely,

A handwritten signature in cursive script that reads "Lawrence J. Nadler".

Lawrence J. Nadler, P.E.

Chief

Technical Determination Section

Bureau of Hazardous Waste Management

Division of Solid & Hazardous Materials

cc: S. Mohr-EFC