



VIRGINIA POWER

May 11, 1995

Ms. Jennifer Zoeller
Environmental Engineer, Senior
Department of Environmental Quality
4900 Cox Road
Glen Allen, Virginia 23060

Dear Ms. Zoeller:

This is in response to your telephone conversations with Mr. Earnest H. Greene of Virginia Power's Air Quality Department concerning the use of methylene chloride in the paint shop of the Surry Power Station. Pursuant to your request we have gathered specific information regarding the actual application process of methylene chloride and Epco-Tek 2000. The result of our investigation and subsequent calculations indicate that the emissions from the methylene chloride application project are below the exemption level in Section 120-05-0301 D.1.(c) of the Virginia State Air Pollution Control Board Regulations, Standard of Performance for Toxic Pollutants. Therefore, Virginia Power is requesting confirmation that the painting operation is exempt from the toxics regulation.

On June 15, 1995, Nuclear Site Services at Surry Power Station is planning to begin painting the Unit 1 high level trash racks on-site with an antifoulant coating system called Epco-Tek 2000. This copper-based epoxy resin is 100% solids, solvent free and toxin free. However, because of the dense formulation of Epco-Tek 2000 it is necessary to thin it with methylene chloride for most applications.

According to preparation and application instructions, up to 1½ quarts of methylene chloride should be mixed with each gallon of Epco-Tek 2000 (assuming an ambient temperature of 70 °F) in order to achieve the desired uniform consistency and to establish a proper spray pattern. The instructions also recommend mixing the coating and the thinner in one gallon batches.

The entire coating project consists of sixteen (16) racks and sixteen (16) beams. Each rack will require no more than seven (7) gallons of Epco-Tek 2000 and each beam will require no more than one (1) gallon, therefore, the entire trash rack restoration project will require approximately one-hundred and twenty-eight (128) gallons of Epco-Tek 2000. In accordance with the preparation instructions for Epco-Tek 2000, station personnel will mix up to

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forty-eight (48) fluid ounces of methylene chloride with each gallon of epoxy coating. The entire project will require approximately six thousand one hundred and forty-four (6144) fluid ounces or forty-eight (48) gallons of methylene chloride.

According to Virginia Power employees involved in this process, only one (1) rack or no more than seven (7) beams will be coated at any one time. Each rack and each beam will receive 4 coats of Epco-Tek 2000, with at least a 10 minute drying period between coats.

Our conclusion that the methylene chloride emissions from this proposed project will be below the exemption level is based on the attached information and calculations. Once you have completed your review of this information, please contact me in writing, with your decision.

Thank you for your expeditious review of this matter. If you have any questions or concerns regarding this one time coating project, please do not hesitate to contact me at (804) 273-3023.

Very truly yours,



A. W. Hadder
Manager
Air Quality

cc: U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Surry Power Station
Units 1 and 2
Docket Nos. 50-280 and 50-281
License Nos. DPR-32 and DPR-37

Surry Power Station
Methylene Chloride Usage
Calculations

Preparation Instructions:

- 1½ gallons or 48 fluid ounces of methylene chloride per gallon of Epco-Tek 2000 (see attached information)
- 48 gallons or 6,144 ounces of methylene chloride for the entire project

Project Information:

- 16 racks
- 7 gallons of Epco-Tek 2000 per rack
- 16 beams
- 1 gallon of Epco-Tek 2000 per beam
- 128 gallons of Epco-Tek 2000 for the entire project

Regulatory Exemption Level:

For toxic pollutants with only a TLV-TWA, the following exemption formula applies, provided that the potential to emit does not exceed 22.8 pounds per hour or 100 tons per year:

Exempt Emission Rates (pounds per hour)

$TLV-TWA (mg/m^3) \times 0.066$

$174 \times 0.066 = 11.48$ pounds per hour

Application process:

- Epco-Tek 2000 (E-T) & Methylene Chloride (MC)
- 7 gals/4 coats = 1.75 gals/coat
- Maximum application rate of E-T = 1.75 gals/hr
- At least 10 minutes drying time between each coat
- 1.75 gals of E-T/hr X 48 fluid oz. of MC/gal of E-T = 84 fluid oz MC/hr
- 84 fluid oz of MC/128 fluid oz per gal = 0.656 gals of MC/hr
- Specific gravity of MC @ 25°C = 1.31 (see MSDS, attached)
- Density of water @ 25°C = 0.99707 gm/ml
- 1.31 X 0.99707 gm/ml = 1.306 gm/ml of MC
- Conversion factor for gm/ml to lbs/gal = 8.345
- Density of MC = 1.306 gm/ml X 8.345 = 10.9 lbs/gal
- 10.9 lbs of MC X 0.656 hr of MC = 7.15 lbs/hr
- Maximum emission rate of MC = 7.15 lbs/hr

100% Solids Solvent Free Toxin Free, Foul Free Epoxy Coating

Recommended Use

- For protection of surface against marine growth in seawater service
 - Ship hulls, props, bow thrusters, support struts
 - Barges, floats, off shore platforms
 - Marine structures
-

Features

Two component epoxy systems, cures to a dry hard finish.
Releases no toxins or heavy materials to environment.
After three years testing in saltwater, does not support Macro-Fouling.
Provides protection against abrasion from suspended solids, and maintains corrosion resistance.

Specifications

Pot Life.....	.2 hrs. @ 77° F. 25° C.	Dry time.....	12.0 hrs. @ 77° F. 25° C.
Recommended film thickness	8-12 mils	Ratio by weight.....	
Flexural strength.....	psi	Tensile strength.....	psi
Tensile shear 1/2".....	psi	Coverage sq. ft./gal @ 10mil DFT	160 T.A.Jones
Packaging ...	1 Gal. kits 9-14-94 T.A.Jones		
Thinner ...	Methylene Chloride 9-14-94 T.A. Jones		

Note:

Epcotek 2000 is a developmental product. After three years of field test, Epcotek 2000 has not supported any Macro-Fouling in Salt water ranging between 72°- 86° F. Independent laboratory testing proves Epcotek 2000 to exceed Federal "Clean Water Act" guidelines for discharge.

Epcotek 2000 Product Specifications and toxicity results have been submitted to the Environmental Protection Agency.

IMPORTANT: This information is believed to be accurate, and is offered for consideration and investigation. Under no circumstances shall the manufacturer be liable for incidental or other damages from alleged negligence or any other theory arising out of the use of handling of this material.



**SUPPLEMENTAL STATE LABEL INFORMATION FOR
SECTION 24(C) REGISTRATION
FOR
EPCO-TEK 2000**

**EPA REG. NO. 63569-1
EPA SLN NO. VA -**

FOR DISTRIBUTION AND USE ONLY WITHIN VIRGINIA

ALL APPLICABLE DIRECTIONS, RESTRICTIONS, AND PRECAUTIONS ON THE EPA REGISTERED LABEL ARE TO BE FOLLOWED.

THIS LABEL MUST BE IN POSSESSION OF USER AT THE TIME OF APPLICATION.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

PRODUCT DESCRIPTION: EPCO-TEK 2000 is a compound manufactured in the United States that uses a copper laden, epoxy resin as the vehicle for application. It is non-toxic and contains no harmful or corrosive components.

USE RECOMMENDATIONS: EPCO-TEK 2000 is specifically formulated to prevent biofouling of underwater marine and fresh water structures caused by organisms such as mussels, zebra mussels, Asiatic clams, barnacles, and tunicates that heavily encrust uncoated or non-antifouling coated surfaces. It does not delaminate. It is long lasting and creates a very hard, abrasion resistant surface.

PREPARATION AND APPLICATION: Surface preparation for Metals containing Iron: Dry blast to SSPC-SP-5 (white metal). It is necessary to completely remove all visible rust, mill scale, paint and foreign matter by compressed air nozzle blasting, leaving an overall, uniformly gray-white metallic appearance. There must be a minimum anchor profile of 3-4 mils. All traces or accumulation of spent abrasives must be removed by high pressure air or vacuum cleaning. The surface must be checked after blowdown to assure that dust has not settled on the blasted surfaces prior to coating. If dust has re-settled repeat blowdown or vacuum procedure until dust is no longer evident to the eye. If the surface has seen seawater service the surface must be tested for chloride levels utilizing standard test kits. Chloride levels should not exceed 50 micrograms/sq. cm. If levels exceed 50 micrograms/sq. cm. a brush blast after the surface has had time to sweat out the chlorides should be performed. Re-test surface for chlorides. Use of a Sovereign moisture meter is necessary on porous surfaces. A moisture content of 7% or less is recommended prior to coating. Prior to starting with primer coats the surface must be degreased with lacquer or equivalent degreaser. Severely corroded surfaces should be rebuilt using a synthetic metal repair compound.

EPCO-TEK 225 and EPCO-TEK 300 can be applied with conventional airless or HVLP (225 only) equipment. EPCO-TEK 2000 requires application using agitating pressure pot, such as those manufactured by Binks or Graco.

EPCO-TEK 225 Primer: Mix 3 parts by volume of Part A Base to 1 part by volume of Part B Hardener. Apply one light coat immediately after sandblast and cleaning step. It can be sprayed without thinning. One gallon will cover approximately 1600 square feet. Film thickness is critical - if applied too heavily it will cause the EPCO-TEK 300 undercoat to run. It will cure to a tacky surface in 1-2 hours. Use only as an undercoat, it will oxidize if not covered with a finish coat. EPCO-TEK 225 must be covered by subsequent coat within an 8 hour window. It must be overcoated with EPCO-TEK 300 after 1-2 hours.

EPCO-TEK 300 Undercoat: For use on all metal surfaces, except aluminum and titanium, to avoid delamination. Mix Part A Base and Part B Hardener according to container instructions. Thinning using approximately 15% solvent is recommended to start. Do not mix more than can be applied in 15 minutes. Apply EPCO-TEK 300 over EPCO-TEK 225 within the 8 hour window (as soon as the EPCO-TEK 225 becomes tacky). Spray 0.006 inch thick application in one coat. Coverage will be approximately 250 square feet per gallon. Apply EPCO-TEK 2000 over EPCO-TEK 300 when EPCO-TEK 300 becomes tacky (3-4 hours).

0.010" THICK

EPCO-TEK 2000: Coverage 94.2 square feet per gallon @0.017"; 160 square feet per gallon @~~0.10"~~. The heavy (0.017" thick) coating is established to give a finish resistant to severe mechanical abuse. Do not use less than 0.010". The copper contained (71% by weight) settles to the bottom of the Part A package container. Preliminary mixing of Part A container facilitates transfer of the material. An agitator having no burrs or sharp edges is necessary to prevent shaving plastic particles from the container. Mix in 1 gallon batches. Transfer the contents of Part A Base container into to the pressure pot using a metal spatula. Agitate to a uniform consistency and add the Part B Hardener while agitating. Mix to uniform mixture. Add 1-1/3 quarts (use Part B container for measuring) of measured methylene chloride (assuming an ambient temperature of 80 degrees F) and mix to uniform consistency. Note: Uniformity of the mix is very important. If the ambient temperature falls to 70 degrees F, 1-1/2 quarts of methylene chloride will be necessary to establish a proper spray pattern.

A 2 gallon Binks agitating pressure pot combined with a 68PB X 68 nozzle with a 568 needle is recommended for applying EPCO-TEK 2000. A rough finish is obtained, but you will have increased application rates and fewer problems with line and gun clogging. Other nozzle combinations may be used. The gun should be held about 12 inches from the surface to allow the methylene chloride to escape and not be trapped in the surface. Check spray pattern and adjust to obtain a uniform atomization. Run the agitator at about 800 rpm initially cutting back to about 300 rpm as the liquid level drops. Do not beat air into the mixture. The first pass over the EPCO-TEK 300 should be 0.001"-0.002" thick. A second pass should be 0.003" thick. Additional passes should be about 0.004" thick. EPCO-TEK 2000 can be over-passed every 15-20 minutes. A final coating thickness of 18-22 mils is desired. Curing time: EPCO-TEK 2000 must cure for 24 to 48 hours (dependent on ambient conditions) before activation.

ACTIVATION: Note: When EPCO-TEK 2000 cures an epoxy blush forms over the copper particles. This blush must be removed to expose the copper or the material will not be antifoulant. The entire coated surface must be activated; fouling will occur on unactivated surfaces. Lightly sandblast either (wet or dry); Use 40F grit or finer to activate surface or Armex Blast System using Arm & Hammer baking soda; or wet sand with random orbital or by hand with 220 wet/dry sandpaper.

The longer cure time is before activating the easier it will be to successfully activate (EPCO-TEK 2000 will continue to cure for a week @70 degrees F). EPCO-TEK 2000 is formulated for highly moist environments, it will cure under water. It should not be applied to damp surfaces.

MAINTENANCE: Periodic inspections of the EPCO-TEK 2000 installation are necessary no less than once annually, preferably quarterly. If an area of the coating is found to contain marine growth, the surface should be cleaned and reactivated by lightly sanding or otherwise abrading. If an area is found where the coating is missing, repairs can be made by applying the necessary amounts of undercoating and EPCO-TEK 2000 to fill that area. Installation of repair coatings must follow the manufacturer's recommended procedure for EPCO-TEK 2000 application.

NOTICE: Before using this product, read the entire Directions for Use, Spill Information, Storage & Disposal, Precautionary Statements, Specification Statement of Practical Treatment, Environmental Hazards, and Physical and Chemical Hazards appearing on the container label.

CONDITIONS OF SALE AND WARRANTY:

Hi-Tek Chemical Corporation warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. **HI-TEK CHEMICAL MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of Hi-Tek Chemical and Seller. Risks such as ineffectiveness or other unintended consequences resulting from, but not limited to weather conditions, presence of other materials or failure to follow label directions will be assumed by the Buyer or User. **IN NO CASE WILL HI-TEK CHEMICAL OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

Hi-Tek Marine
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MATERIAL SAFETY DATA SHEET

I - IDENTIFICATION		
CHEMICAL NAME	CHEMICAL FORMULA	MOLECULAR WEIGHT
Dichloromethane	CH ₂ Cl ₂	84.94
TRADE NAME	Methylene Chloride, Special Grade, Aerosol Grade, Degreasing Grade	
SYNONYMS	DOT IDENTIFICATION NO.	
Methylene Chloride	UN 1593	

II - PRODUCT AND COMPONENT DATA			
COMPONENT(S) CHEMICAL NAME	CAS REGISTRY NO.	% (Approx)	ACGIH TLV-TWA
* Dichloromethane	75-09-2	> 98	50 ppm
* Propylene oxide	75-56-9		20 ppm
* Denotes chemical subject to reporting requirements of Section 313 of Title III of the 1996 Superfund Amendments and Reauthorization Act (SARA) and 40 CFR Part 372			

III - PHYSICAL DATA	
APPEARANCE AND ODOR Clear, colorless liquid; mildly sweet odor	SPECIFIC GRAVITY 1.31 @ 25/25°C
BOILING POINT 103.1°F (39.5°C)	VAPOR DENSITY IN AIR (Air = 1) 2.9
VAPOR PRESSURE 352 mm Hg @ 20°C	% VOLATILE, BY VOLUME 100
EVAPORATION RATE (ether = 1): 0.7	SOLUBILITY IN WATER 1.32 gm/100 gm @ 25°C

IV - REACTIVITY DATA	
STABILITY Stable	CONDITIONS TO AVOID Avoid contact with open flame, electric arcs, or other hot surfaces which can cause thermal decomposition.
INCOMPATIBILITY (Materials to avoid) Strong alkalis, oxygen, nitrogen peroxide, sodium, potassium, and other oxidizers and reactive metals. Refer to Section VIII for additional information on aluminum.	
HAZARDOUS DECOMPOSITION PRODUCTS Hydrogen chloride, phosgene, chlorine.	
HAZARDOUS POLYMERIZATION Will not occur.	

V - FIRE AND EXPLOSION HAZARD DATA

FLASHPOINT (Method used)

None (TOC)

FLAMMABLE LIMITS IN AIR

12 - 19% (Vol.) @ 100°C

EXTINGUISHING AGENTS

Water fog, dry chemical, foam, carbon dioxide

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Concentrated vapors can be ignited by high intensity ignition source.

Firefighters should wear self-contained positive pressure breathing apparatus due to thermal decomposition products, and avoid skin contact.

VI - TOXICITY AND FIRST AID

EXPOSURE LIMITS (When exposure to this product and other chemicals is concurrent, the exposure limit must be defined in the workplace.)

ACGIH: 50 ppm TWA (8 hr)

OSHA: 500 ppm TWA (8 hr) 1,000 ppm Ceiling (29 CFR 1910.1000)

(Odor threshold approximately 200-300 ppm; causes olfactory fatigue).

Propylene Oxide: ACGIH: 20 ppm TWA (8 hr)

OSHA: 100 ppm (8 hr) TWA

Consumption of alcoholic beverages may increase the potential for development of toxic effects resulting from exposure to this product.

Effects described in this section are believed not to occur if exposures are maintained at or below appropriate TLVs.

Because of the wide variation in individual susceptibility, these exposure limits may not be applicable to all persons and those with medical conditions listed below.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE

Alcoholism, acute and chronic liver and kidney disease, chronic lung disease, anemia, coronary disease or rhythm disorders of the heart.

ACUTE TOXICITY

Primary route(s) of exposure:

Inhalation

Skin Absorption

Ingestion

Inhalation: Major route of potential exposure. Methylene chloride depresses the central nervous system. Concentrations between 900-1,000 ppm may cause dizziness. Nausea, headache, and vomiting can occur at concentrations above 2,000 ppm. At 7,000 ppm, numbness and tingling in arms and legs and rapid heartbeat have occurred. Loss of consciousness and death have occurred at levels above 9,000 ppm, if exposure is prolonged.

Carboxyhemoglobin levels can be elevated in persons exposed to methylene chloride and can cause a substantial stress on the cardiovascular system. This elevation can be additive to the increase caused by smoking and other carbon monoxide sources.

Skin: Liquid methylene chloride is painful and irritating if confined to skin by gloves, clothing, etc. Prolonged or repeated contact may cause irritation, defatting of skin, and dermatitis. Absorption through intact skin is possible if contact with liquid is prolonged.

Propylene oxide as a pure substance, has caused allergic reaction if repeated contact occurs.

Eyes: Liquid may cause temporary irritation with temporary corneal injury. Vapors may irritate eyes.

Ingestion: Single dose toxicity low to moderate. If vomiting occurs, methylene chloride can be aspirated into lungs, which can cause chemical pneumonia and systemic affects.

FIRST AID

Inhalation: Remove to fresh air. If breathing has stopped, administer artificial respiration. Call a physician.

Skin: Remove contaminated clothing and shoes. Wash exposed area thoroughly with soap and water for at least 15 minutes. Wash contaminated clothing before reuse.

Eyes: Flush eyes immediately with water for at least 15 minutes. If irritation persists, call a physician.

Ingestion: Do not induce vomiting. Contact physician or emergency medical facility immediately.

NOTE TO PHYSICIAN: Adrenalin should never be given to person overexposed to methylene chloride.

CHRONIC TOXICITY The finding of chronic toxic effects in laboratory animals may indicate toxicity to humans. Overexposure should be avoided, failure to do so could result in injury, illness or even death. Chronic overexposures to methylene chloride have caused liver and kidney toxic effects in experimental animals.

Carcinogenicity: Methylene chloride has been evaluated for possible cancer causing effects in laboratory animals. Inhalation studies at concentrations of 2,000, and 4,000 ppm increased the incidence of malignant liver and lung tumors in mice. Three inhalation studies of rats have shown increased incidence of benign mammary gland tumors in female rats at concentrations of 500 ppm and above and increases in benign mammary gland tumors in males at concentrations of 1,500 ppm and above. Rats exposed to 50 and 200 ppm via inhalation showed no increased incidence of tumors. Mice and rats exposed by ingestion at levels up to 250 mg/kg/day lifetime and hamsters exposed via inhalation to concentrations up to 3,500 ppm lifetime did not show an increased incidence of tumors.

Propylene oxide has caused increased incidence of nasal tumors in rats exposed by inhalation, forestomach tumors in rats exposed by gavage (forced-fed in oil) and injection site tumors when injected under the skin of rats.

The International Agency for Research on Cancer (IARC) has concluded that there is sufficient evidence for the carcinogenicity of methylene chloride to experimental animals, and inadequate evidence for the carcinogenicity of methylene chloride to humans, resulting in a classification as a 2B animal carcinogen. The NTP has identified methylene chloride as an animal carcinogen, but it is not on the OSHA or NTP lists as of September 30, 1988. Propylene oxide has been identified as an animal carcinogen by IARC and NTP, but is not on the OSHA list.

Epidemiology studies of 751 humans chronically exposed to methylene chloride, in the workplace of which 252 were exposed for a minimum of 20 years did not demonstrate any increase in deaths caused by cancer or cardiac problems. A second study of 2,227 workers confirmed these results.

Reproductive Toxicity: Reproductive toxicity tests have been conducted to evaluate the potential adverse effects methylene chloride may have on reproduction and offspring of laboratory animals. The results indicate that methylene chloride does not cause birth defects in laboratory animals.

VII - PERSONAL PROTECTION AND CONTROLS

RESPIRATORY PROTECTION

Where vapor concentration exceeds or is likely to exceed 50 ppm methylene chloride, an approved full face respirator with organic vapor canister is acceptable. Approved self-contained breathing apparatus or air line respirator, with full facepiece, is required for methylene chloride concentrations above 1,000 ppm and for spills and/or emergencies. Follow any applicable respirator use standards and regulations.

VENTILATION

Do not use in closed or confined space. Open doors and/or windows. Use ventilation to maintain exposure levels of methylene chloride below 50 ppm (TWA).

SKIN PROTECTION

Wear solvent-resistant gloves such as Viton, polyvinyl alcohol, or equivalent. Solvent-resistant boots, apron, headgear and/or face shield should be worn where splashing is possible.

EYE PROTECTION

Wear safety glasses. Contact lenses should not be worn. Chemical goggles and/or face shields should be worn where splashing is possible.

HYGIENE

Avoid contact with skin and avoid breathing vapors. Do not eat, drink, or smoke in work area. Wash hands prior to eating, drinking, or using restroom.

OTHER CONTROL MEASURES

To determine exposure level(s), monitoring should be performed regularly. Safety shower and eyewash station should be available.

NOTE: Protective equipment and clothing should be selected, used, and maintained according to applicable standards and regulations. For further information, contact the clothing or equipment manufacturer or the Vulcan Chemicals Technical Service department.

VIII - STORAGE AND HANDLING PRECAUTIONS

Follow protective controls set forth in Section VII when handling this product.

Store labeled sealed containers in a cool, dry, well-ventilated area out of sunlight. Prevent water or moist air from entering storage tanks or containers. Do not cut or weld on empty or full drums. Aluminum equipment should not be used for storage and/or transfer. Contact with aluminum parts in a pressurizable fluid system may cause violent reactions. Consult equipment supplier for further information. Vapors are heavier than air and will collect in low areas. Do not enter confined spaces such as tanks or pits without following proper entry procedures such as ASTM D-4276. Do not remove or deface label. Do not reuse drum without recycling or reconditioning in accordance with any applicable federal, state or local laws.

IX - SPILL, LEAK AND DISPOSAL PRACTICES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Evacuate the area, ventilate, and avoid breathing vapors. Dike area to contain spill. Clean up area (wear protective equipment - refer to Section VII) by mopping or with absorbent material and place in closed containers for disposal. Avoid contamination of ground and surface waters. Do not flush to sewer.

If spill occurs indoors, turn off heating and/or air conditioning systems, to prevent vapors from contaminating entire building.

WASTE DISPOSAL METHOD

Recovered liquids may be sent to a licensed reclaimer or incineration facility. Contaminated material must be disposed of in a permitted waste management facility. Consult federal, state, or local disposal authorities for approved procedures.

X - TRANSPORTATION

DOT HAZARD CLASSIFICATION

None by land or water transportation when containers are less than 1000 lbs each. ORM-A when containers are more than 1000 lbs each or when transported by air in any size container.

PLACARD REQUIRED

None

LABEL REQUIRED

Label as required by OSHA Hazard Communication Standard, and any applicable state and local regulations. Use Harmful label when transported by air.

For any other information contact:

HIT-tek
CHEMICAL CORPORATION

106 Taft Avenue
Hempstead, New York 11550

NOTICE: Vulcan Chemicals believes that the information contained on this Material Safety Data Sheet is accurate. The suggested procedures are based on experience as of the date of publication. They are not necessarily all-inclusive nor fully adequate in every circumstance. Also, the suggestions should not be construed with nor followed in violation of applicable laws, regulation, rules or insurance requirements.

NO WARRANTY, EXPRESS OR IMPLIED, OF MERCHANTABILITY, FITNESS OR OTHERWISE IS MADE.