O-601225 L55-92(07-15)-LP 8F.120 Binois Power Company 500 South 2: th Street P.O. Box 511 Decarus IL 62525 505

LLINOIS POWER

July 15, 1992

Mr. Timothy R. Kluge, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency
Springfield, IL 62794-9276

Mr. Kluge:

# Clinton Power Station Request to Modify NPDES Permit IL0036919

Illinois Power (IP) is requesting herein that the station's NPDES be modified as follows:

### Outfall 002: Discharge Flume

- (1) Add to the contributory waste stream listing, an entry authorizing the discharge of impounded stormwater and small spill volumes from the external sodium hypochlorite storage area to the waters of the screenhouse intake bay. Station personnel estimate 1,275 gallons of chlorinated water would be discharged per occasion. These discharges occur intermittently, approximately six times a year. Currently, the rain waters are sampled and analyzed for total residual chlorine prior to being pumped to the storm drains.
- (2) Change the approximate flow value for the (1) main condenser cooling water to 510 million gallons per day and the (2) station service water to 86.4 million gallons per day. These are measured values from plant performance testing and replace the original submitted design conditions.
- (3) Special condition no. 6 limits the time that chlorine may be discharged from the unit's main cooling condenser water system to two hours per day.

  Throughout this period, instantaneous total residual chlorine (TRC) concentrations in the discharge to Clinton Lake may not exceed 0.2 mg/l. IP is requesting herein that the terms and conditions of this special condition be modified as well as the outfall effluent

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TRC limitations to reflect both intermittent and continuous chlorination. Clinton Power Station personnel anticipate a need to implement continuous chlorination of the condenser cooling water system to reduce micro and macro biological fouling of system equipment. IP also requests special condition no. 6 be modified to authorize the continuous chlorination of the station service water system. IP is concerned about macro biological fouling of the piping and equipment of this system as well. Add a special condition which would authorize chemical (5) treatment of the station service water for microbial corrosion control. The chemical treatment would be similar to the treatment currently authorized at outfall 007 (Safe Shutdown Service Water System) in that sodium hypochlorite, sodium bromide (BULAB 6040), sodium bisulfite (BULAB 9602), and dimethylamide (BULAB 8007) would be used and the treatments would be performed at least once-weekly for periods of approximately 24 hours. Unlike the treatment authorized at outfall 007, however, the chemically treated service water system effluent is not directly discharged to waters of the State of Illinois but rather to the seal well of the discharge flume. Consequently, IP believes no TRO or DMAD effluent limitations should be applied to the service water discharge to the seal well. During normal operation with three main condenser cooling water pumps and two station service water pumps operating the mixing ratio of condenser cooling water to service water flow is approximately 14 to 1. With two main condenser cooling water pumps operating, the mixing ratio is approximately 10 to 1. When no condenser circulating water pumps are in service (such as during a refueling) the 3.1 mile discharge contains millions of gallons of waters in which the service water discharge would be mixed. Outfall 002(a): Sewage Treatment Plant Effluent (6) Add, to the contributory waste stream listing, one or more entries (as the Agency may deem appropriate) authorizing the discharge of: (a) small batch volumes of two corrosion inhibitor waste solutions drained from equipment as a result of periodic maintenance: NALCOOL (manufactured by the Nalco Company) which is used in the Diesel Generator (DG) cooling system at a maximum concentration of 35,000 ppm ( a 3.5% solution), and -2-

CORRSHIELD (manufactured by Betz Laboratories) which is used at a maximum concentration of 250 ppm in the Plant Chilled Water (WO), Turbine Component Cooling Water (WT), Control Room HVAC (VC), Drywell Cooling (VP), and Service Building Cooling (VS) systems; and (b) chlorinated service water, also resulting from the periodic maintenance and draining of the Fire Protection (FP) and Component Cooling (CC) water equipment systems; and (c) nonhazardous laboratory dry chemicals and chemical solutions. NALCOOL is an aqueous solution of sodium borates, silicates, nitrates, nitrites, and mercaptobenzothiazole. The solution has a specific gravity of 1.13, a pH ranging from 11.5 to 11.8, and is completely soluble in water. Specific information relative to its regulatory control is identified on the attached Material Safety Data Sheets (MSDS) (Attachment 1): CORRSHIELD is an aqueous solution of sodium nitrate and sodium molybdate. The solution has a specific gravity of 1.2, a pH of approximately 12.8, and is also completely soluble in water. Specific information relative to its regulatory control is identified on the attached MSDS sheets (Attachment 2). The corrosion inhibitor solutions are drained from the above systems of the station and are currently being collected in barrels and shipped offsite as non-regulated material for disposal. Intermittent draining of the systems should result in less than 3,000 gallons per year of NALCOOL and less than 1,500 gallons per year of CORRSHIELD. These would be discharged to the building sanitary sewer at a controlled rate so as not to upset the sewage treatment plant. Both solutions are amenable to biological treatment. The maintenance of equipment in the FP and a small portion of the CC systems of the station also results in the intermittent generation of approximately 14,000 gallons of wastewater per year which consists only of chlorinated service waters. These wastewaters have historically been discharged to the Radwaste Treatment System (outfall 002(b)) or sampled and discharged to outfall 005. Station operating personnel wish to discharge FF water to the sewage treatment plant because it is only chlorinated lake water and puts an unnecessary burden on the station's radwaste treatment -3system.

These intermittent corrosion inhibitor and chlorinated service water discharges would not adversely impact or jeopardize the ability of the sewage treatment to comply with the effluent NPDES permit limitations applicable to its discharge.

The dry chemicals and chemical solutions which station personnel wish to periodically discharge to the sewage treatment plant would be those typically found in an analytical laboratory and which (a) should not interfere with or pass through the sewage treatment plant untreated and which (b) are not listed as hazardous wastes. This might include inorganic, nonmetallic salts or elements, and organic acids.

### Outfall 002(b): Radwaste Treatment System Effluent

(7) Add, to the contributory waste stream listing, one or more entries (as the Agency deems necessary) authorizing the discharge of (a) unused laboratory chemicals and/or solutions, and (b) batch volumes of waste sodium pentaborate, NALCOOL, and CORRSHIELD solutions to the radwaste treatment system. Station operating personnel would also like to discharge pH-adjusted demineralizer regenerant wastes to the radwaste treatment system. Please keep in mind that the radwaste treatment system consists of filtration, activated carbon adsorption, ion exchange, and mechanical evaporation equipment for treating radioactive wastewaters for reuse as reactor makeup water. Residues from the treatment system are offsite disposed in NRC, DOE, and USEPA-approved facilities.

The dry chemicals and chemical solutions which station personnel wish to periodically discharge to the radwaste system would be those typically found in an analytical laboratory but which, if discharged to another outfall (such as the sewage treatment plant) may interfere or otherwise pass untreated through the outfall. Some of these might also be listed hazardous substances or, as wastes, listed hazardous wastes. However, section 721.103(a)(2)(D)(v) of the Waste Disposal regulations of the IPCB exempt laboratory wastewaters from classification as a hazardous waste provided that the average annual flow does not exceed one percent of the total wastewater flow to the treatment facility. The annual volume of aqueous laboratory wastes which would be discharged to the radwaste system is estimated to be 50,000 gallons per year. This figure includes the demineralized water used to rinse sinks. The design influent flow rate to the radwaste treatment system is approximately 72,000

gallons per day. Station management personnel believe the equipment of the radwaste treatment system is more than adequate for properly treating these laboratory wastewaters.

The batch volumes of sodium pentaborate (1,600 gallons per year), NALCOOL (100 gallons per year), and CORRSHIELD (600 gallons per year) solutions resulting from intermittent discharges are due to maintenance and testing of the station. These solutions are currently being discharged either to the radwaste treatment system after sampling or barreled for disposal as previously described for outfall 002(a).

Pretreated (i.e. pH-adjusted) wastewaters resulting from the regeneration of the station's demineralizer systems are currently being discharged to outfall 003. In order to provide greater operating flexibility, IP requests that station personnel be permitted to discharge these wastewaters to the radwaste system to provide a disposal path in the event these wastewaters were to become radiologically contaminated. The rate of intermittent discharge is estimated to be an average of 175 gpd.

### Outfall 003: Water Treatment System Wastes

(8) Add, to the contributory waste stream listing, one or more entries authorizing the discharge of (a) small batch volumes of waste NALCOOL and CORRSHIELD solutions from station systems which drain to this outfall and (b) chlorinated service waters resulting from the periodic maintenance of equipment in those systems.

The NALCOOL and CORRSHIELD solutions are drained from equipment in the DG, WO, WT, VC, VP and VS systems of the station during maintenance activities. They are currently being disposed by discharging to the radwaste treatment system after sampling or barreled as described in outfall 002(a). Station personnel wish to discharge these solutions to the clarification, filtration, and pH adjustment facilities at this outfall because these nonradioactive waters create an unnecessary burden on the radwaste systems. During maintenance, the volume of these solutions that would be discharged to this outfall is estimated to be 3,000 gallons per discharge. These discharges are expected to occur twice each year for a total discharge of 6,000 gallons per year.

### Outfall 004: Transformer Area Oil-Water Separator

(9) Add, a special condition that would authorize the temporary treatment of diesel generator area oil-water

separator wastewaters (outfall 005) in the transformer area oil-water separator when the outfall 005 separator is out of service for maintenance. Station operating personnel believe this maintenance-related diversion may occur once-per-year. During periods of such diversion, influent flows from the diesel generator area would not be expected to exceed 750 gpm. The transformer area separator was designed to treat an instantaneous peak influent flow rate of 800 gpm.

(10) Add to the contributory waste stream listing one or more entries authorizing the discharge of system cooling waters and maintenance-related intermittently chlorinated service waters.

System cooling waters are waters that are used to cocl the DG, WO, WT, VC, VP and VS systems. These waters contain NALCOOL and CORRSHIELD. These waters are currently being discharged to the radwaste treatment system or barreled and shipped off-site as non-hazardous waste. The normal discharge flow rate is 50 gpd. Station personnel wish to discharge these cooling waters to the oil-water separation facilities at this outfall so as to reduce the burden on the Radwaste Treatment Systems and/or to reduce the difficulties associated with barreling and handling a nonhazard us waste.

# Outfall 005: Diesel Generator Area Oil-Water Separator

- (11) Add, a special condition that would authorize the temporary treatment of transformer area oil-water separator wastewaters (outfall 004) to the diesel generator area oil-water separator when the outfall 005 separator is out of service for maintenance. Station operating personnel believe this maintenance-related diversion may occur once-per-year. During periods of such diversion, influent flows from the transformer area would not normally be expected to exceed 500 gpm. The separator was designed to treat an instantaneous peak influent flow rate of 750 gpm.
- (12) Add to the contributory waste stream listing one or more entries authorizing the discharge of system cooling waters and maintenance-related intermittently chlorinated service waters.

System cooling waters are waters that are used to cool the DG, WO, WT, VC, VP and VS systems. These waters contain NALCOOL and CORRSHIELD. These waters are currently being discharged to the radwaste treatment system or barreled and shipped off-site as non-hazardous waste. The normal discharge flow rate is 50 gpd. Station personnel wish to discharge these

cooling waters to the oil-water separation facilities at this outfall so as to reduce the burden on the Radwaste Treatment Systems and/or to reduce the difficulties associated with barreling and handling a nonhazardous waste.

### Outfall 006: Intake Screen Backwash and Screenhouse Sump Discharges

(13) Add to the contributory waste stream listing, an entry authorizing the discharge of chlorinated warming line waters to the Ultimate Heat Sink (UHS). When lake water temperatures at the screenhouse decrease to 45°F, ation personnel divert approximately 98,000 gpm of condenser cooling water flow to the area immediately (<70 feet) in front of the screenhouse. The purpose of routing this water to the area in front of the screenhouse is to prevent freezing. These warming like waters contain chlorine at the same concentration and or the same duration as the conjenser cooling water flow (outfall 002).

### Outfall 007: Safe Shutdown Service Water System

- (14) Add a special condition which would reflect the continuous discharge of total residual chlorine from this outfall. IP notified the Agency on December 20, 1991, that it was about to initiate routine chlorination of this system to control microbial corrosion.
- (15) Add a special condition which would permanently authorize chemical treatment of the Safe Shutdown (SX) service water system as the Agency originally authorized on June 22, 1990. However, IP is requesting herein that the conditions of this permanent authorization be based upon the experience station operating personnel have gained from the three treatment cycles which have been performed through February of this year.

The first treatment cycle occurred during the period from October 2, 1990 through October 11, 1990. The results of that treatment cycle were transmitted to the Agency on February 22, 1991. The next treatment cycle was performed on three isolated days, those being May 29, 1991; August 7, 1991; and August 13, 1991. The results of those treatments will be transmitted by July 31. The third treatment cycle occurred during the period from February 14 through February 26 of this year. The results of those treatments will also be transmitted by July 31.

The following specific changes to the June 22, 1990

Agency authorization are requested:

(a) Increase the allowable discharge concentration of dimethylamide (BULAB 8007; the penetrant used to carry the bromine and chlorine through the MIC encrusted tubercle to the underlying microorganisms) to 3.0 mg/l. The current authorization allows only one mg/l of the penetrant in the final composite discharge to the UHS.

Buckman Laboratories and station management personnel believe the chemical conditioning program would be much more effective if injection dosage rates could be increased. Injection dosage rates are currently controlled so that after immediate mixing in the UHS with waters from the untreated system, the concentration of DMAD in the mixture will not exceed 1.0 mg/l. Therefore, when divisions 1 or 2 are being treated the maximum injection dosage rate is 2.0 mg/l.

IP is requesting the Agency consider increasing the allowable DMAD discharge concentration after mixing to 3.0 mg/l. IP bases its request upon the acute toxicity data developed by Buckman Laboratories for the BULAB 8007 chemical presented herein as Attachment 3. The cumulative mortality of fathead minnow exposed to varying concentrations of the penetrant for exposures ranging from 24 to 96 hours are tabulated. The exposure period of relevance to the chemical cleaning of the SX system is 24 hours as the discharge from the treatment of the SX would never exceed this duration at any time. For this expr sure duration and at an exposure concentration of 3.2 mg/l five of 20 specimens perished. Therefore, 3.2 mg/l would be the 24-hr LC 25 value. IP believes the selection of such an acute concentration value is not unreasonable or environmentally irresponsible because, in reality, any fish present in the immediate zone of mixing in the UHS could move away.

- (b) Remove the requirement that effluent DMAD (BULAB 8007) concentrations be monitored with a gas chromatograph. IP will assure compliance with the effluent limitation by regulating the injection dosage. This can be done accurately and reliably based upon the earlier treatment applications.
- (c) Allow suspension of the TRO discharge monitoring requirement after several "no detectable" TRO

concentrations are measured and it is known that constant steady state conditions will parsist throughout the remainder of the treatment cycle.

Eliminate the requirement that two circulating

- (d) Eliminate the requirement that two circulating water pumps be in service when a chemical treatment of the SX system is being performed. The effect of this requirement is to preclude the treatment of these systems during prolonged station outages such as a refueling.
- (e) Eliminate the requirement that both no. 1 and no. 2 shutdown service water (sx) divisions be in service when either one of these divisions is being treated. Similarly, the requirement that either division 1 or division 2 be in service when division 3 is being treated should also be eliminated.

Station personnel are requesting this modification simply because it is not always necessary to have two divisions of the SX system in service to satisfy Nuclear Regulatory Commission (NRC) requirements. Operating a division when it is not necessary for safety related reasons is burdensome.

IP recognizes that the implication of requesting this modification is that it cannot take advantage of the immediate mixing afforded by the discharge from the second system to the UHS. The injection dosage of the BULAB 8007 would therefore be currently limited to 1.0 mg/l (based upon the June 22, 1990 authorization) if the second division were not in service. If the Agency would authorize a discharge concentration of 3.0 mg/l (as requested in no. 1 above), the corresponding injection dosage would then be 3.0 mg/l.

However, IP would like to be able to take advantage of the mixing afforded by the discharge from the second system to the UHS if the second system must be operated for safety related reasons. Therefore if a second system must be operated, IP personnel would like the authority to increase the injection dosage rate of the BULAB 8007 chemical recognizing the mixing afforded by the untreated discharge and the authorized discharge concentration.

(f) Eliminate the requirement that treatment program frequencies, durations, monitoring data and environmental assessments be reported for each treatment application within six months. Such a reporting requirement would be very burdensome considering IP is requesting authorization to chemically treat the SX system at least once-monthly. IP would prefer to simply report on our monthly TIMP the chemical injection dosage and duration data, as well as the instantaneous maximum TRC concentration measured in the SX system discharge to the lake during the monthly treatment application. (g) IP also wishes to notify the Agency of changes in the chemical injection and monitoring points for the SX system treatment program. The exact locations of these points are shown on the enclosed four figures. Please feel free to call me at 424-6833 if you have guestions about this permit modification request you would like to discuss. Sincerely, ILLINOIS POWER COMPANY Brit J. Muchall Brett J. Marshall Supervisor-Water Pollution Control KLUGEPRM. TLD: cam -10-



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PRODUCT

NALCOOL 2000 COOLING TREATMEN

Emergency Telephone Number
Medical (312) 920-1510 (24 hours,\*

#### SECTION 1 PRODUCT IDENTIFICATION

TRADE NAME: NALCOOL 2000 COOLING TREATMENT

DESCRIPTION: An aqueous solution of borates, silicates, nitrates,

mitrites and mercaptobenzothiazole

NEFA 704M/EMIS RATING: 2/2 HEALTH 0/0 FLAMMABILITY 0/0 REACTIVITY 0 OTHER

O-Insignificant 1-Slight 2-Moderate 3-High 4-Extreme

SECTION 2 HAZARDOUS INGREDIENTS

Our hazard evaluation has identified the following chemical ingredient(s) as hazardous under OSFA's Hazard Communication Rule, 29 CFR 1910.1200. Comput Section 14 for the nature of the hazard(s).

INCEDIAT(S)	CAS #	APPROX. %	
Sodium nitrite	7632-00-0	1-5	
Sodium mercaptobenzothiazole	2492-26-4	1-5	
Sodium tetraborate	1330-43-4	1-5	

#### SECTION 3 PRECAUTIONARY LABEL INFORMATION

WARNING: Harmful or fatal if swallowed in large doses. Contains sodium nitrite. Causes blood system disorders when swallowed. Do not take internally. May cause irritation to skin and eyes. Avoid contact with eyes, and prolonged or repeated contact with skin.

Empty containers may contain residual product. Do not reuse container unless properly reconditioned.

#### SECTION 4 FIRST AID INFORMATION

EYES:

Flush with water for 15 minutes. Call a physician.

SKIN:

Flush with water for 15 minutes.

INCESTION:

Induce vaniting. Give water. Call a physician at once.

NOTE TO PEYSICIAN: No specific antidote is known. Based on the individual reactions of the patient, the physician's judgment should be used to control symptoms and clinical condition.

CANTION: If unconscious, having trouble breathing or in convulsions, do not induce vomiting or give water.

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# MAIERIAL SAFETY DATA SHEET

PRODUCT

NALCOOL 2000 COOLING TREATMEN

Emergency Telephone Number Me : (312) 920-1510 (24 hours)"

### SECTION 5 HEALTH EFFECTS INFORMATION

PRIMARY RUNE(S) OF EXPLOSIVE: Eye, Skin

EYE CONTACT: Can cause transient irritation.

SKIN COMPACT: Can cause transient irritation.

INESTION: Can cause kinney damage. Can be harmful or fatal.

SYMPTOMS OF EXPOSURE: Sodium nitrite. Causes formation of methaemoglobizaemia leading to cyarosis and nossible death if ingested. Repeated ingestion of small amounts causes blood pressure to drup, rapid pulse, headaches and visual disturbances. Causes central nervous system effects (eg. headaches, trancis, diresiness and curvulsions).

AGGRAVATION OF EXISTING CONDITIONS: Sodium mitrite. Pregrant women are perticularly sensitive to methaemoglobinaemia.

# SECTION 6 TOXICOLOGY INFORMATION

ADDR TOXICITY STUDIES: Acute toxicity studies have not been conducted on this product, but easte studies have been conducted on a similar product. The results are shown below.

ACUTE ORAL TOXICITY (ALRINO RATS): LD50 = 3,362 mg/kg

PRIMARY SKIN IRRITATION TEST (ALBINO RABBITS): SKIN IRRUMATION INDEX IRATZE PARTING: 0.5/8.0 Minital irritation

PRIMARY EYE DERIVATION TEST (ALBINO RABBITS): EYE IRRITATION INDEX DRAINS RATING: 15.7/110.0

CIRCHIC TOXICITY RESULTS: Scalium nitrite. Experimental animal studies have shown reproductive effects in the offspring of the treated parents. These effects are non-transmissible. Recterial assay mutation studies have been positive. Tumorigenic data is equivocal.

Sodium mercaptobenzotriazole. Chronic feeding laboratory animal study of 120 pm in the diet showed no effects.

# SECTION 7 PHYSICAL AND CHEMICAL PROPERTIES

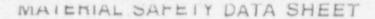
COLOR: Ped FORM: Liquid
SOLUBILITY IN WATER: Completely
SPECIFIC GRAVITY: 1.13 @ 60 Degrees F
ph (NEAT) = 11.5 - 11.8 PR (NEAT) = 11.5 - 11.8

BOILING FOINT: 212 Degrees F @ 760 mm Eg

ASTM D-1298 ASIM E-70 ASIM D-86

ODOR: None

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PRODUCT

NALCOOL 2000 COOLING THEATMENT

Emergency Telephone Number Medical (312) 920-1510 (24 hours)

SECTION 7 PHYSICAL AND CHEMICAL PROPERTIES

( CONTINUED )

FLASE POINT:

None

NOTE: These physical properties are typical values for this product.

SECTION 8 FIRE AND EXPLOSION INFORMATION

FLASE POINT: None

EMITAGUISHING MEDIA: Not applicable

UNUSUAL FIRE AND EXPLOSION EASARD: May evolve NOx under fire conditions.

SECTION 9 REACTIVITY INFORMATION

INCOMPATIBILITY: N-nitrosamires, many are cancer causing agents to laboratory animals, may be formed when certain amires are mixed with nitrous acid, organic or inorganic nitrites or atmospheres with high nitrous oxide concentrations.

Avoid contact with strung acids (eg. sulfuric, phosphoric, nitrie, hydrochloric, chrunic, sulfonic) which can generate heat, splattering or boiling and the release of toxic funes.

THERMAL DECOMPOSITION PRODUCTS: In the event of combustion CO, CO2, NOX may be formed. Do not breathe smake or funes. Wear suitable protective equipment.

SECTION 10 PERSONAL PROTECTION EQUIPMENT

RESPIRATORY PROTECTION: Respiratory protection is not normally needed since the volatility and toxicity are low.

For large spills, entry into large tanks, vessels or enclosed small spaces with inadequate ventilation, a pressure-demand, self-contained breathing apparatus is recommended.

VENITIATION: General ventilation is recommended.

PROTECTIVE EQUIPMENT: Use impermeable gloves and chemical splash goggles (ANSI Z 87.1 requirement) and selection of gloves, goggles, shoes, etc.) when attaching feeding equipment or doing maintenance.

If clothing is contaminated, remove clothing and thoroughly wash the

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### MAIERIAL SAFETY DATA SHEET

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PRODUCT

NALCOOL 2000 COOLING TREATMENT

Emergency Telephone Number Medical (312) 920-1510 (24 hours)\*

SECTION 10 PERSONAL PROTECTION EQUIPMENT

( CONTINUED )

affected area. Laurder contaminated clothing before rause.

SECTION 11 SPILL AND DISPOSAL INFORMATION

IN CASE OF TRANSPORTATION ACCIDENTS, CALL THE FOLLOWING 24-HOUR TELEPHONE NUMBER (312-920-1510)

SPILL CONTROL AND RECUVERY:

Small liquid spills: Contain with absorbent material, such as clay, soil or any compercially available absorbent. Shovel reclaimed liquid and absorbent into recovery or salvage drums for disposal. Refer to CERCIA in Section 14.

Large liquid upills: Dike to prevent further movement and replaim into recovery or salvage drums or tank truck for disposal. Refer to CERCIA in Section 14.

DISPOSAL: If this product becomes a waste, it does not meet the criteria of a hazardous waste as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261, since it does not have the characteristics of Subpart C, (i.e. DOO1 through DO17) nor is it listed under Subpart D.

As a non-hazardous liquid wasta, it should be solidified before disposal to a sanitary landfill. Can be desp-well injected in accordance with local, state and federal regulations.

SECTION 12 ENVIRONMENTAL INFORMATION

If released into the environment, see CERCIA in Section 14.

SECTION 13 TRANSPORTATION INFORLYTION

DOT FROPER SHIPPING NAME/HAZARD CODE - HAZARDOUS SUBSTANCE, LIQUID, N.O.S. CFM-E NA 9188

CONTAINS - SODIUM NITRITE

SECTION 14 REGULATORY INFORMATION

The following regulations apply to this product.

PROTEDAT. PERTITATIONS:

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### MATERIAL SAFETY DATA SHEET

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NALCOOL 2000 COOLING TREATMENT

Emergency Telephone Number Medical (312) 920-1510 (24 hours)\*

#### SECTION 14 REGULATORY INFORMATION

( CONTINUED )

OSEA'S HAZAFD COMMINICATION RULE, 29 CFR 1910.1200: Based on our hazard evaluation, the following ingredients in this product are hazardous and the reasons are shown below.

Sodium nitrite - Chronic human effects (refer to Section 6) Sodium nervaptobenzothiazole - Sensitizer

Sodium tetraborate = 'DWA 1 mg/m3 ACGTE/THV

CEFCIA, 40 CFR 117, 302: This product contains sodium mitrite, a Reportable Quantity (RQ) substance and if 2,000 pounds of product are released, it requires notification to the NATIONAL RESPONSE CENTER, WASHINGTON, D. C. (1-800-424-8802).

SARA/SUPERFUND AMENUMENTS AND REAUTHORIZATION ACT OF 1986 (TIME III) - SECTIONS 302, 311, 312 AND 313:

SECUTION 302 - EXTREMETY EAZARDOUS SUBSTANCES (40 CFR 355): This product does not cuntain impredients listed in Appendix A and B as an Extremely Eazardous Substance.

SECTIONS 311 and 312 - MATERIAL SAFETY DATA SEEET REQUIREMENTS (40 CFR 370):

Our hazard evaluation has found this product to be hazardous. The product should be reported under the following EPA hazard categories:

XX Immediate (acute) health hazard XX Delayed (chronic) health hazard

- Fire hazard
- Swiden release of pressure bazard
- Reactive hazard

Under Section 311, submitted of MSDS's or a list of product rames to the local energency planning commission, state emergency response commission and local fire department is required after October 17, 1987 if you have:

- 10,000 pairds or more of a hazardous substance, or
- 500 pairs or the threshold planning quantity, whichever is less, of an extremely hazardous substance.

After October 17, 1989, MSIS(s), or a list of product names for

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### MATERIAL SAFETY DATA SHEET

PRODUCT

NAICHOL 2000 COOLING TREATMENT

Emergency Telephone Number Medical (312) 920-1510 (24 hours)\*

#### SECTION 14 REGULATORY INFORMATION

( CONTINUED )

all hazardous substances between zero (0) and 10,000 pounds, not previously reported, must be submitted.

SECTION 313 - HIST OF TOXIC CHEMICALS (40 CFR 372): This product does not contain ingredients (at a level of 1% or greater) on the List of Toxic Chemicals.

TOXIC SUBSTRICES CONTROL ACT (TSCA):
The chemical ingredients in this product are on the 8(b) Inventory List
(40 CFR 710).

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RESOURCE CHASERVATION AND RECOVERY ACT (RCRA), 40 CFR 261 SUBPART C & D: If this product becomes a waste, it does not meet the criteria of a hazardous waste.

FEDERAL WATER POLICETON CONTROL ACT, CLEAN WATER ACT, 40 CFR 401.15 (formerly Sec. 307), 40 CFR 116 (formerly Sec. 311):
This product contains the following ingredient(s) covered by the Clean Water Act:

Sodium nitrita - Section 311

CLEAN AIR ACT, 40 CFR 60, Section 111, 40 CFR 61, Section 112: This product does not con min ingredients covered by the Clean Air Act.

STATE REGULATIONS:

CALIFORNIA PROPOSITION 65: This product complies with the MSIS and labeling requirements of the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).

MICHIGAN CRITICAL MATERIALS: This product does not contain ingredients listed on the Michigan Critical Materials Register.

STATE RIGHT TO RNCW LAWS: The following state(s) identify the ingredient(s) shown below as bazardous:

Massachusetts, New Jersey - Sodium nitrate California, Illinois - Sodium nitrite

Regulated in those states using the TLV for sodium tetraborate as a

PACE 5 OF 8

BETZ LABORATORIES, INC. 4636 SOMERTON ROAD, TREVOSE, PA. 19047 BETZ MATERIAL SAFETY DATA SHEET 24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

RODUCT : CORR-SHIELD 736

(PAGE 1 OF 3) EFFECTIVE DATE 12-13-89 PRINTED: 15-Dec-1989

REVISIONS TO SECTIONS: APPENDIX

RODUC! APPLICATION : WATER-BASED CORROSION INHIBITOR. FORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC RODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD IS ISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE ID CHRONIC HAZARDS OF THIS FORMULATION.

SODIUM NITRITE\*\*\*; CAS#7632-00-0; OXIDIZER; POTENTIAL BLOOD TOXIN; TOXIC(ORAL INGESTION) ; PEL: NONE ; TLV : NONE .

SODIUM MOLYBDATE \*\*\* (MOLYBDIC ACID, DISODIUM SALT); CAS #7631-95-0; POSSIBLE RESPIRATORY IRRITANT; PEL: 5MG/M3 (AS MO); TLV: 5MG/M3 (AS MO).

---SECTION Z-----TYPICAL PHYSICAL DATA--

: AS IS (APPROX.) 12.8 ODOR: MILD POR PRESSURE (mmHG): ND SC cps70F: 4.2 AP.RATE: <1 ETHER=1 YSICAL STATE: LIQUID

..PT.(DEG.F): >200 SETA(CC) SP.GR.(70F)OR DENSITY: 1.184 VAPOR DENSITY (AIR=1): ND &SOLUBILITY (WATER): 100 APPEARANCE: YELLOW FREEZE POINT (DEG.F): 14

---SECTION 3------REACTIVITY DATA-

ABLE. MAY REACT WITH STRONG OXIDIZERS. DO NOT CONTAMINATE. BETZ TANK EAN-OUT CATEGORY 'B'

L.MAI DE COMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

BETZ MATERIAL SAFETY DATA SHEET (PAGE 2 OF 3) RODUCT: CORR-SHIELD 736 ----SECTION 4------HEALTH MAZARD EFFECTS---TUTE SKIN EFFECTS \*\*\* PRIMARY ROUTE OF EXPOSURE SLIGHTLY IRRITATING TO THE SKIN CUTE EYE EFFECTS \*\*\* SEVERE IRRITANT TO THE EYES CUTE RESPIRATORY EFFECTS \*\*\* MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT HRONIC EFFECTS OF OVEREXPOSURE \*\*\* PROLONGED OR REPEATED EXPOSURES MAY CAUSE BLOOD CELL DAMAGE OR IMPAIR BLOOD CELL FUNCTION. EDICAL CONDITIONS AGGRAVATED \*\*\* NOT KNOWN YMPTOMS OF EXPOSURE \*\*\* MAY CAUSE REDUESS OR ITCHING OF SKIN. RECAUTIONARY STATEMENT BASED ON TESTING RESULTS \*\*\* MAY BE TOXIC I" ORALLY INGESTED. ---SECTION 5------FIRST AID INSTRUCTIONS-----KIN CONTACT \*\*\* REMOVE CONTAMINATED CLOTHING. WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR W 'ER FOR 15 MINUTES YE CONTACT \*\*\* IMMEDIATELY FLUSH F 25 WITH WATER FOR 15 MINUTES. IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT NHALATION EXPOSURE \*\*\* REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR. APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY ESTION\*\*\* DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM DO NOT INDUCE VOMITING. IMMED. CONTACT PHYSICIAN. DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER ---SECTION 6-----SPILL, DISPOSAL AND FIRE INSTRUCTIONS-----PILL INSTRUCTIONS \*\*\* VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT, CONTAIN AND ABSORB ON ABSORBENT MATERIAL. PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL, OR AN CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.

FLUSH AREA WITH WATER. WET AREA MAY BE SLIPPERY. SPREAD SAND/GRIT.

ISPOSAL INSTRUCTIONS \*\*\* WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS) -

INCINERATE OR BURY IN APPROVED LANDFILL

IRE EXTINGUISHING INSTRUCTIONS \*\*\* FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TY . PROPER FIRE EXTINGUISHING MEDIA: FLOOD WITH WATER. USE OF CO2 OR FOAM MAY NOT BE EFFECTIVE.

BETZ MATERIAL SAFETY DATA SHEET (PAGE 1 OF 3) RODUCT: CORR-SHIELD 736 -SECTION 7------SPECIAL PROTECTIVE EQUIPMENT-----A PROTECTIVE EQUIPMENT IN ACCORDANCE WITH 29CFR SECTION 1910.132-134. USE PIRATORS WITHIN USE LIMITATIONS OR ELSE USE SUPPLIED AIR RESPIRATORS. NTILATION PROTECTION\*\*\*

ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
COMMENDED PESPIRATORY PROTECTION\*\*\* IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH DUST/MIST FILTERS. COMMINDED SKIN PROTECTION \*\*\* RUBBER GLOVES WASH OFF AFTER EACH USE REPLACE AS NECESSARY COMMENDED EYE PROTECTION \*\*\* SPLASH PROOF CHEMICAL GOGGLES ---SECTION 8-----STORAGE AND HANDLING PRECAUTIONS-----ORAGE INSTRUCTIONS \*\*\* KEEP DRUMS & PAILS CLOSED WHEN NOT IN USE. DO NOT FREEZE. IF FROZEN, THAW AND MIX COMPLETELY PRIOR TO USE NDLING INSTRUCTIONS \*\*\* CONTAINS AN OXIDIZER. ? "OID ALL CONTACT WITH REDUCING AGENTS, OILS, GREASES, ORGANICS AND ACIDS. DO NOT ALLOW TO DRY. IS MSDS COMPLIES WITH THE OSHA HAZARD COMMUNICATION STANDARD ROLD M. HERSH (ENVIRONMENTAL INFORMATION COORDINATOR) APPENDIX: REGULATORY INFORMATION F CONTENT OF THIS APPENDIX REPRESENTS INFORMATION KNOWN TO BETZ ON THE TIVE DATE OF THIS MSDS. THIS INFORMATION IS BELIEVED TO BE ACCURATE. \* CHANGES IN REGULATIONS WILL RESULT IN UPDATED VERSIONS OF THIS DOCUMENT. .TSCA: ALL COMPONENTS OF THIS PRODUCT ARE LISTED IN THE TSCA INVENTORY .REPORTABLE QUANTITY(RQ) FOR UNDILUTED PRODUCT: 1 GALLONS DUE TO SODIUM NITRITE .RCRA: IF THIS PRODUCT IS DISCARDED AS A WASTE, THE RCRA HAZARDOUS WASTE

ENTIFICATION NUMBER IS: DO02=CORROSIVE (PH)

.DOT HAZARD/UN#/ER GUIDE# IS: ORM-E(WHEN CONTAINER > RQ) NA9188/#31

.THIS PRODUCT CONTAINS THESE CHEMICALS KNOWN TO THE STATE OF CALIFORNIA TO USE CANCER OR REPRODUCTIVE TOXICITY: NONE PRESENT IN SIGNIFICANT AMOUNTS

.SARA SECTION 302 CHEMICALS: NONE PRESENT IN SIGNIFICANT AMOUNTS

.SARA SECTION 313 CHEMICALS: NONE PRESENT IN SIGNIFICANT AMOUNTS

.SARA SECTION 312 HAZARD CLASS: IMMEDIATE(ACUTE) AND DELAYED(CHRONIC)

.MICHIGAN CRITICAL MATERIALS: NONE PRESENT IN SIGNIFICANT AMOUNTS

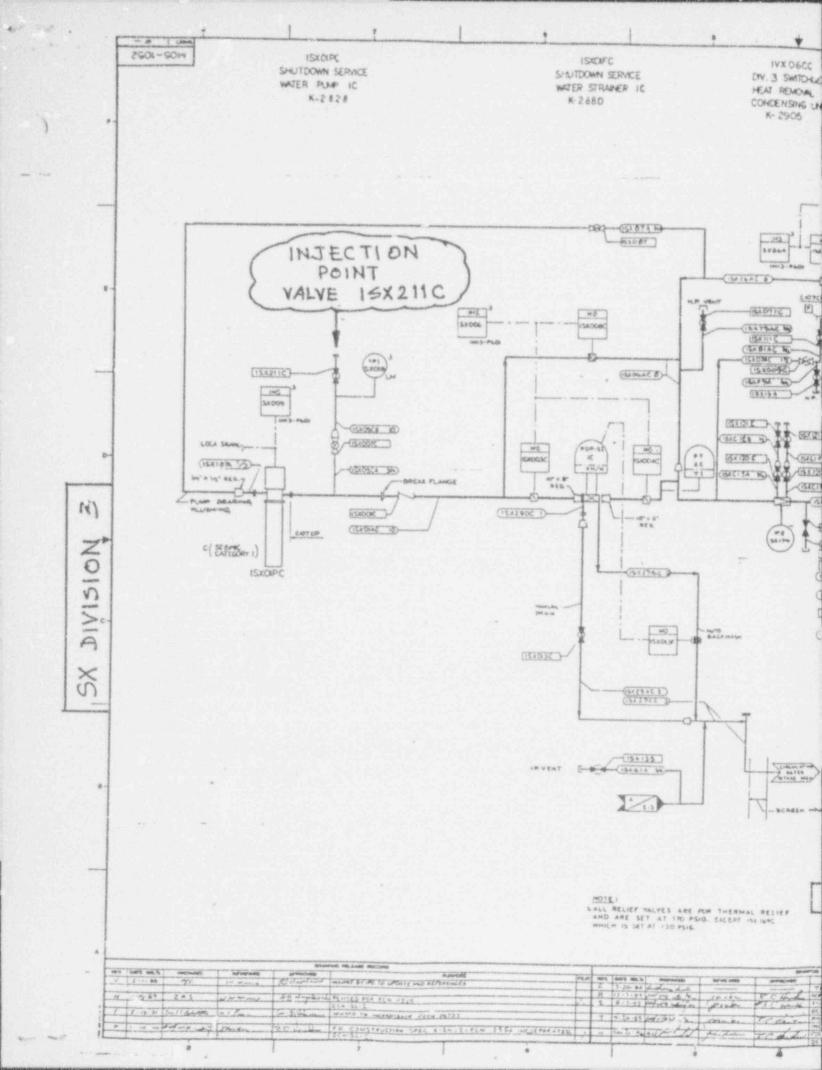
PA/HMIS: HEALTH - 2; FIRE - 1; REACTIVITY - 0; SPECIAL - ALK; PE - B

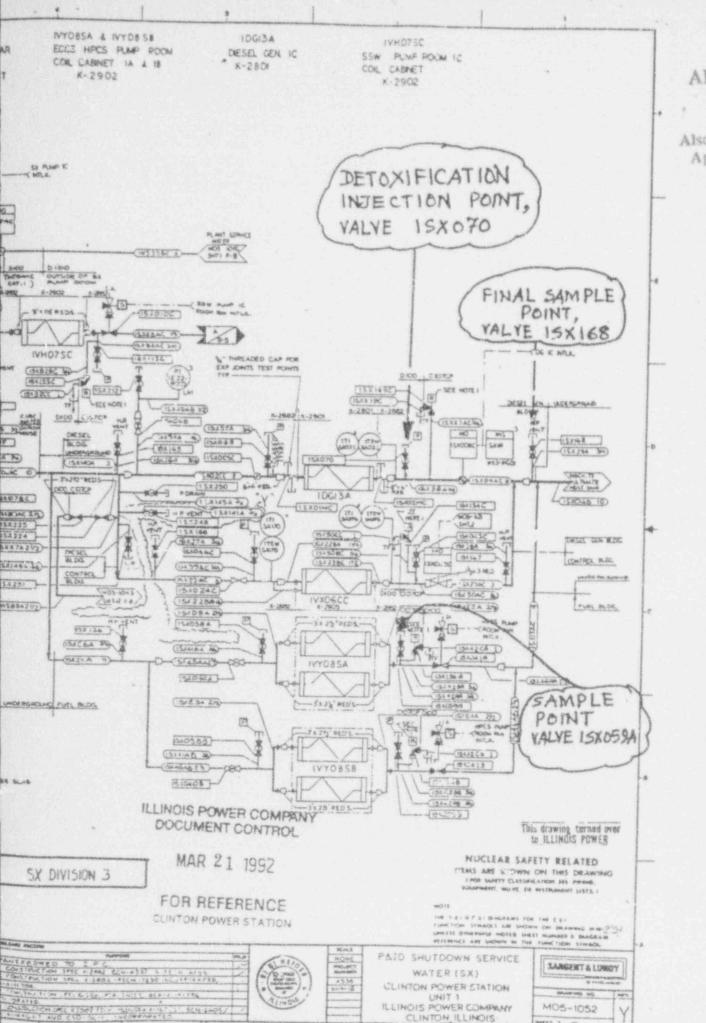
# Acute Toxicity of Bulab 8007 to Fathead Minnows

Concentration	Cumulative Mortality					
(ppm)	N	24 H	48 H	72 H	96 H	
Control	20	0	0	0	1	
0.32	20	0	0	0	0	
0.56	20	0	0	0	0	
1.0	20	0	0	3	0	
1.8	20	1	1	2	2	
3.2	20	5	6	6	6	
5.6	20	6	9	10	10	
10.0	20	20				
LC50		N/A	4.7	4.4	4.4	
95% Lower Limit 95% Upper Limit			5.7 3.9	5.5 3.6	5.5 3.6	

Calculation Method: Probit analysis using 1.8, 3.2 5.6 and 10.0 ppm

The LC50 at 24 hours was not calculated for this study. However, based on the data and reviewing how the other LC50's were calculated it appears the 21 hour LC50 would be approximately 5.7 ppm.





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