

W. M. KECK OBSERVATORY
Maunakea, Island of Hawai'i

June 4, 2018

Hawaii State Department of Health
Hazard Evaluation and Emergency Response Office
Attn: EPCRA Data Manager
2385 Waimano Home Road
Pearl City, Hawaii 96782

Re: HAZARDOUS SUBSTANCE RELEASE WRITTEN NOTIFICATION,
INCIDENT CASE NO. 20180604-1530

EPCRA Data Manager:

I am contacting you on behalf of the W. M. Keck Observatory (WMKO) to report a release of hydraulic oil at our summit facility on Maunakea, Island of Hawaii. Based on our investigation to date, WMKO is experiencing seepage of Hydraulic Oil from the Hydrostatic Bearing System (HBS) at the rate of approximately 0.25 gallons per month. Some portion of that seeped hydraulic oil has been released into ground below the facility. The duration of the release is yet unknown. Pursuant to the Hawaii Environmental Response Law (HRS 128D) and applicable administrative regulations, the owner/operator of a facility that releases a hazardous substance to the environment above the reportable quantity is subject to state notification requirements. The criteria specified in Appendix 2-D of the Hawaii Technical Guidance Manual for a reportable quantity is any amount of oil released to the environment which is less than 25-gallons, but which is not contained. Based on initial release information hydraulic oil has migrated to the top 1-inch of soil underlying the building foundation.

WMKO provides the attached written notification of a release for your records (Attachment III and IV). WMKO has retained Masa Fujioka and Associates, an environmental consulting and engineering firm, to ascertain the full nature and extent of the release. We will provide timely updates to the department as we obtain additional information from our investigation.

The condition was identified during work on a separate and unrelated technical project during which WMKO removed architectural components, including drywall, insulation, and studs from the Azimuth Pier supporting the Keck I telescope (see Attachment I for facility drawings). Upon removing these superficial components, WMKO discovered an oily residue coating portions of the underlying concrete wall. Upon further investigation, WMKO determined that the HBS, upon which the

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Maunakea, Island of Hawai'i

telescope sits, has been slowly seeping hydraulic oil for an indeterminate amount of time (see Attachment II for photographs of the subject area), at an estimated rate of 0.25 gallons per month. Based on limited visual inspections a small portion of the oil seepage migrated to approximately 1-inch below the concrete slab on grade through an isolation gap between the Pier structure and surrounding dome floor.

To mitigate further oil seepage, WMKO cleaned and degreased affected concrete surfaces and placed oil absorbent mats on the Pier structure to catch any additional drips and contain the hydraulic oil within the facility. Engineering efforts are also underway to eliminate further seepage from the HBS system.

If you have any questions or require additional information, please contact Mr. Rich Matsuda, WMKO Operations Manager, at (808)881-3856, or myself at the footer address.

Sincerely,

Mrs. Erin Petrosian
Environmental, Health & Safety Officer
W. M. Keck Observatory
epetrosian@keck.hawaii.edu

ATTACHMENTS:

- I. Facility Drawings
- II. Photographs
- III. Hawaii Hazardous Substance Written Follow-Up Notification Form
- IV. Safety Data Sheet- Mobile® SHC 525 Hydraulic oil

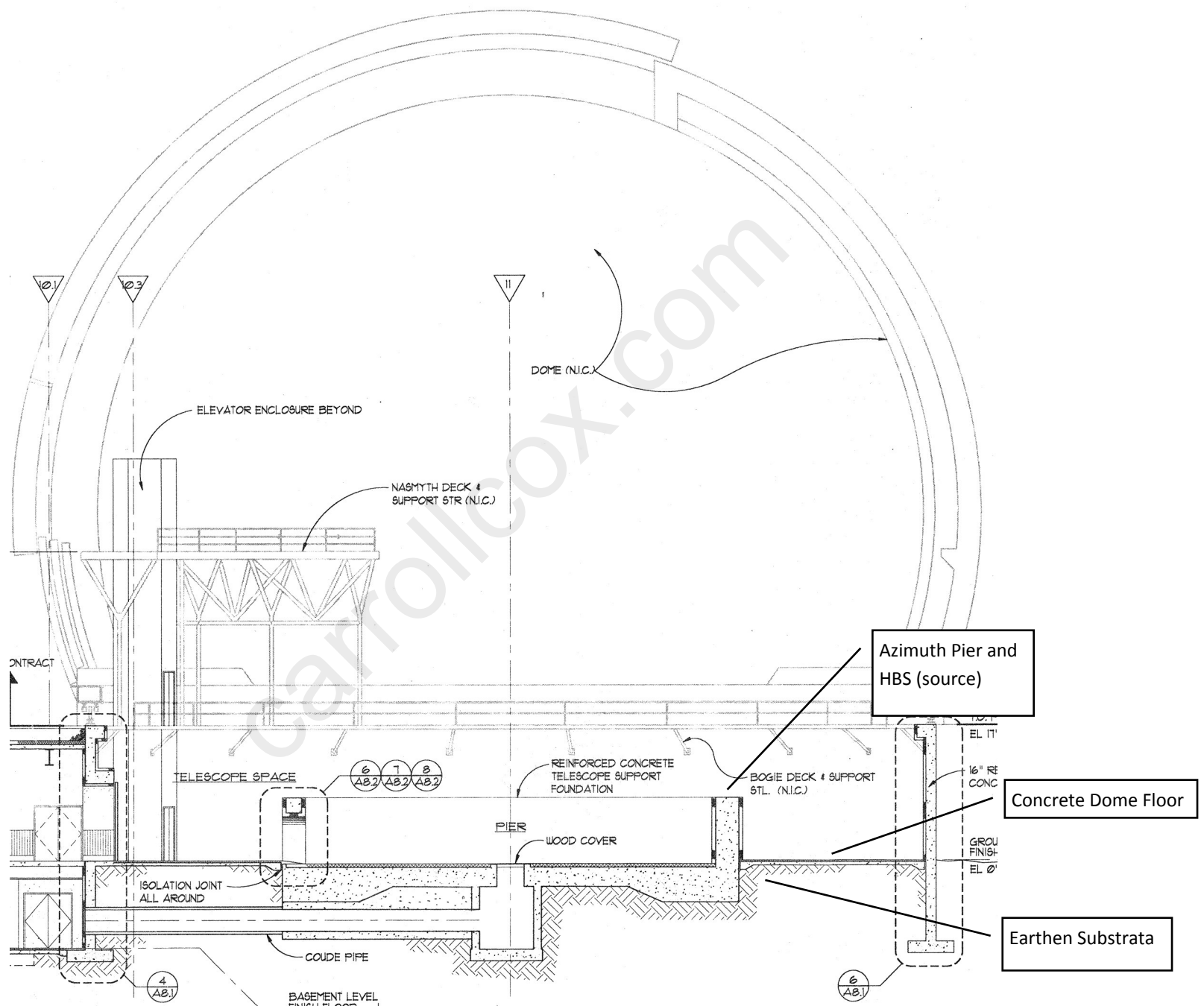


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ATTACHMENT I.
FACILITY DRAWINGS

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ATTACHMENT II.
PHOTOGRAPHS

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Photograph #1– Hydrostatic Bearing System– source of seepage



Photograph #2– Evidence of oil on concrete Pier after removing drywall.



Photograph #3– Absorbent material placed at bottom of pier to capture seepage



Photographs #4– Absorbent material placed on wall of pier to capture seepage



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ATTACHMENT III.

HAZARDOUS SUBSTANCE WRITTEN FOLLOWUP NOTIFICATION

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Interim Final

Hawaii Hazardous Substance Written Follow-Up Notification Form

PLEASE PROVIDE THE FOLLOWING INFORMATION

Incident Case No.: _____

Contact Information

Caller's Information

Name: _____

Address: _____

City: _____ State _____ Zip _____

Telephone number: _____

Owner's Information

Name: _____

Title: _____

Company: _____

Address: _____

City: _____ State _____ Zip _____

Telephone number: _____

Operator's Information

Name: _____

Title: _____

Company: _____

Address: _____

City: _____ State _____ Zip _____

Telephone number: _____

Name of a contact person at the facility or vessel where the release has occurred: _____

Telephone number: _____

Interim Final

Hazardous Substance Released:

Name (trade and chemical) of the hazardous substance which has been released: _____

Chemical Abstract Service (CAS) Number (if applicable): _____

Approximate quantity of the hazardous substance released: _____

Incident Information

Location of the release: _____

A brief description of the release: _____

Media into which the release occurred or is likely to occur (Indicate all those that apply):

☐ Air ☐ Soil ☐ Groundwater ☐ Concrete ☐ Asphalt ☐ Stream ☐ Ocean ☐ Other

Cause of the release: _____

Date of the release: _____

Time of the release: _____

Duration of the release: _____

Date: _____

Time that the person in charge of the facility or vessel where the release occurred obtained knowledge of the release: _____

Source of the release: _____

Response Information

Response measures taken thus far: _____

Interim Final

Any appropriate information relating to the ability of the owner or operator of the facility or vessel where the release has occurred to pay for or perform any proposed or required response actions: _____

WMKO is a 501(c)(3), non-profit organization. The organization has full control over financial decisions and is able to fund any response actions, as necessary.

The names of other federal, state, or local government agencies that have been notified of the release: _____

Local Emergency Planning Commission, Hawaii County Fire Department, Office of Mauna Kea Management, University of Hawaii, DLNR

Health Information

Known or anticipated acute health risks: See attached Safety Data Sheet

Known or anticipated chronic health risks: See attached Safety Data Sheet

Advice regarding medical attention necessary for exposed individuals: See attached Safety Data Sheet

Potential impacts to public health or welfare: See attached Safety Data Sheet

Potential impacts to the environment: See attached Safety Data Sheet

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and believe the submitted info is true, accurate, and complete."

Signature: Richard H. Matsuda

Date: June 4, 2018

Printed Name: Richard H. Matsuda

Title: Chief of Operations

Company: W.M. Keck Observatory



W. M. KECK OBSERVATORY
Maunakea, Island of Hawai'i

ATTACHMENT IV.

SAFETY DATA SHEET- MOBILE® SHC 525

Headquarters: 65-1120 Mamalahoa Highway, Kamuela, HI 96743
Phone 808-881-3895 • FAX 808-885-4464

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Product Name: MOBIL SHC 525
Revision Date: 21 Dec 2016
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SAFETY DATA SHEET

SECTION 1 PRODUCT AND COMPANY IDENTIFICATION

PRODUCT

Product Name: MOBIL SHC 525
Product Description: Synthetic Base Stocks and Additives
Product Code: 201560100530, 402871, 603076-00, 971063
Intended Use: Hydraulic fluid

COMPANY IDENTIFICATION

Supplier: EXXON MOBIL CORPORATION
22777 Springwoods Village Parkway
Spring, TX 77253 USA
24 Hour Health Emergency 609-737-4411
Transportation Emergency Phone 800-424-9300 or 703-527-3887 CHEMTREC
Product Technical Information 800-662-4525
MSDS Internet Address www.exxon.com, www.mobil.com

SECTION 2 HAZARDS IDENTIFICATION

This material is hazardous according to regulatory guidelines (see (M)SDS Section 15).

CLASSIFICATION:

Reproductive toxicant (fertility): Category 2.

LABEL:

Pictogram:



Signal Word: Warning

Hazard Statements:

H361: Suspected of damaging fertility.

Precautionary Statements:

P201: Obtain special instructions before use. P202: Do not handle until all safety precautions have been read and understood. P280: Wear protective gloves and clothing. P308 + P313: IF exposed or concerned: Get medical advice/ attention. P405: Store locked up. P501: Dispose of contents and container in accordance with local regulations.

Contains: TRICRESYL PHOSPHATE

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Other hazard information:

HAZARD NOT OTHERWISE CLASSIFIED (HNOC): None as defined under 29 CFR 1910.1200.

PHYSICAL / CHEMICAL HAZARDS

No significant hazards.

HEALTH HAZARDS

High-pressure injection under skin may cause serious damage. Excessive exposure may result in eye, skin, or respiratory irritation.

ENVIRONMENTAL HAZARDS

No significant hazards.

NFPA Hazard ID:	Health: 0	Flammability: 1	Reactivity: 0
HMIS Hazard ID:	Health: 0*	Flammability: 1	Reactivity: 0

NOTE: This material should not be used for any other purpose than the intended use in Section 1 without expert advice. Health studies have shown that chemical exposure may cause potential human health risks which may vary from person to person.

SECTION 3 COMPOSITION / INFORMATION ON INGREDIENTS

This material is defined as a mixture.

Hazardous Substance(s) or Complex Substance(s) required for disclosure

Name	CAS#	Concentration*	GHS Hazard Codes
2,6-DI-TERT-BUTYL-P-CRESOL	128-37-0	0.1 - < 1%	H400(M factor 1), H410(M factor 1)
CALCIUM ALKYLNAPHTHALENESULFONATE/CARBOXYLATE	57855-77-3	0.1 - < 1%	H315, H319(2A), H317
DITRIDECYL ADIPATE	16958-92-2	20 - < 30%	None
PHENOL, DIMETHYL-, PHOSPHATE (3:1)	25155-23-1	< 0.1%	H360(1B)(F), H373, H400(M factor 10), H410(M factor 1)
TRICRESYL PHOSPHATE	1330-78-5	0.1 - < 1%	H361(F), H400(M factor 1), H410(M factor 1)
TRIPHENYL PHOSPHOROTHIONATE	597-82-0	0.1 - < 1%	H361(D), H361(F), H413

* All concentrations are percent by weight unless material is a gas. Gas concentrations are in percent by volume.

As per paragraph (i) of 29 CFR 1910.1200, formulation is considered a trade secret and specific chemical identity and exact percentage (concentration) of composition may have been withheld. Specific chemical identity and exact percentage composition will be provided to health professionals, employees, or designated representatives in accordance with applicable provisions of paragraph (i).

SECTION 4 FIRST AID MEASURES

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INHALATION

Remove from further exposure. For those providing assistance, avoid exposure to yourself or others. Use adequate respiratory protection. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or use mouth-to-mouth resuscitation.

SKIN CONTACT

Wash contact areas with soap and water. Remove contaminated clothing. Launder contaminated clothing before reuse. If product is injected into or under the skin, or into any part of the body, regardless of the appearance of the wound or its size, the individual should be evaluated immediately by a physician as a surgical emergency. Even though initial symptoms from high pressure injection may be minimal or absent, early surgical treatment within the first few hours may significantly reduce the ultimate extent of injury.

EYE CONTACT

Flush thoroughly with water. If irritation occurs, get medical assistance.

INGESTION

First aid is normally not required. Seek medical attention if discomfort occurs.

SECTION 5 FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA

Appropriate Extinguishing Media: Use water fog, foam, dry chemical or carbon dioxide (CO₂) to extinguish flames.

Inappropriate Extinguishing Media: Straight Streams of Water

FIRE FIGHTING

Fire Fighting Instructions: Evacuate area. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply. Firefighters should use standard protective equipment and in enclosed spaces, self-contained breathing apparatus (SCBA). Use water spray to cool fire exposed surfaces and to protect personnel.

Hazardous Combustion Products: Aldehydes, Incomplete combustion products, Oxides of carbon, Smoke, Fume, Sulfur oxides

FLAMMABILITY PROPERTIES

Flash Point [Method]: >204°C (399°F) [ASTM D-92]

Flammable Limits (Approximate volume % in air): LEL: 0.9 UEL: 7.0

Autoignition Temperature: N/D

SECTION 6 ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES

In the event of a spill or accidental release, notify relevant authorities in accordance with all applicable regulations. US regulations require reporting releases of this material to the environment which exceed the

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applicable reportable quantity or oil spills which could reach any waterway including intermittent dry creeks. The National Response Center can be reached at (800)424-8802.

PROTECTIVE MEASURES

Avoid contact with spilled material. See Section 5 for fire fighting information. See the Hazard Identification Section for Significant Hazards. See Section 4 for First Aid Advice. See Section 8 for advice on the minimum requirements for personal protective equipment. Additional protective measures may be necessary, depending on the specific circumstances and/or the expert judgment of the emergency responders.

SPILL MANAGEMENT

Land Spill: Stop leak if you can do it without risk. Recover by pumping or with suitable absorbent.

Water Spill: Stop leak if you can do it without risk. Confine the spill immediately with booms. Warn other shipping. Remove from the surface by skimming or with suitable absorbents. Seek the advice of a specialist before using dispersants.

Water spill and land spill recommendations are based on the most likely spill scenario for this material; however, geographic conditions, wind, temperature, (and in the case of a water spill) wave and current direction and speed may greatly influence the appropriate action to be taken. For this reason, local experts should be consulted. Note: Local regulations may prescribe or limit action to be taken.

ENVIRONMENTAL PRECAUTIONS

Large Spills: Dike far ahead of liquid spill for later recovery and disposal. Prevent entry into waterways, sewers, basements or confined areas.

SECTION 7

HANDLING AND STORAGE

HANDLING

Avoid all personal contact. Prevent small spills and leakage to avoid slip hazard. Material can accumulate static charges which may cause an electrical spark (ignition source). When the material is handled in bulk, an electrical spark could ignite any flammable vapors from liquids or residues that may be present (e.g., during switch-loading operations). Use proper bonding and/or ground procedures. However, bonding and grounds may not eliminate the hazard from static accumulation. Consult local applicable standards for guidance. Additional references include American Petroleum Institute 2003 (Protection Against Ignitions Arising out of Static, Lightning and Stray Currents) or National Fire Protection Agency 77 (Recommended Practice on Static Electricity) or CENELEC CLC/TR 50404 (Electrostatics - Code of practice for the avoidance of hazards due to static electricity).

Static Accumulator: This material is a static accumulator.

STORAGE

The type of container used to store the material may affect static accumulation and dissipation. Do not store in open or unlabelled containers.

SECTION 8

EXPOSURE CONTROLS / PERSONAL PROTECTION

EXPOSURE LIMIT VALUES

Exposure limits/standards (Note: Exposure limits are not additive)

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Substance Name	Form	Limit / Standard			NOTE	Source
2,6-DI-TERT-BUTYL-P-CRESOL	Inhalable fraction and vapor	TWA	2 mg/m ³		N/A	ACGIH
DITRIDECYL ADIPATE		TWA	5 mg/m ³		N/A	ExxonMobil

Exposure limits/standards for materials that can be formed when handling this product: When mists/aerosols can occur the following are recommended: 5 mg/m³ - ACGIH TLV (inhalable fraction), 5 mg/m³ - OSHA PEL.

NOTE: Limits/standards shown for guidance only. Follow applicable regulations.

No biological limits allocated.

ENGINEERING CONTROLS

The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Control measures to consider:

No special requirements under ordinary conditions of use and with adequate ventilation.

PERSONAL PROTECTION

Personal protective equipment selections vary based on potential exposure conditions such as applications, handling practices, concentration and ventilation. Information on the selection of protective equipment for use with this material, as provided below, is based upon intended, normal usage.

Respiratory Protection: If engineering controls do not maintain airborne contaminant concentrations at a level which is adequate to protect worker health, an approved respirator may be appropriate. Respirator selection, use, and maintenance must be in accordance with regulatory requirements, if applicable. Types of respirators to be considered for this material include:

No special requirements under ordinary conditions of use and with adequate ventilation.

For high airborne concentrations, use an approved supplied-air respirator, operated in positive pressure mode. Supplied air respirators with an escape bottle may be appropriate when oxygen levels are inadequate, gas/vapor warning properties are poor, or if air purifying filter capacity/rating may be exceeded.

Hand Protection: Any specific glove information provided is based on published literature and glove manufacturer data. Glove suitability and breakthrough time will differ depending on the specific use conditions. Contact the glove manufacturer for specific advice on glove selection and breakthrough times for your use conditions. Inspect and replace worn or damaged gloves. The types of gloves to be considered for this material include:

Chemical resistant gloves are recommended.

Eye Protection: If contact is likely, safety glasses with side shields are recommended.

Skin and Body Protection: Any specific clothing information provided is based on published literature or manufacturer data. The types of clothing to be considered for this material include:

Chemical/oil resistant clothing is recommended.

Specific Hygiene Measures: Always observe good personal hygiene measures, such as washing after

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handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Discard contaminated clothing and footwear that cannot be cleaned. Practice good housekeeping.

ENVIRONMENTAL CONTROLS

Comply with applicable environmental regulations limiting discharge to air, water and soil. Protect the environment by applying appropriate control measures to prevent or limit emissions.

SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

Note: Physical and chemical properties are provided for safety, health and environmental considerations only and may not fully represent product specifications. Contact the Supplier for additional information.

GENERAL INFORMATION

Physical State: Liquid
Color: Amber
Odor: Characteristic
Odor Threshold: N/D

IMPORTANT HEALTH, SAFETY, AND ENVIRONMENTAL INFORMATION

Relative Density (at 15 °C): 0.85
Flammability (Solid, Gas): N/A
Flash Point [Method]: >204°C (399°F) [ASTM D-92]
Flammable Limits (Approximate volume % in air): LEL: 0.9 UEL: 7.0
Autoignition Temperature: N/D
Boiling Point / Range: > 316°C (600°F)
Decomposition Temperature: N/D
Vapor Density (Air = 1): > 2 at 101 kPa
Vapor Pressure: < 0.013 kPa (0.1 mm Hg) at 20 °C
Evaporation Rate (n-butyl acetate = 1): N/D
pH: N/A
Log Pow (n-Octanol/Water Partition Coefficient): > 3.5
Solubility in Water: Negligible
Viscosity: 46 cSt (46 mm²/sec) at 40 °C
Oxidizing Properties: See Hazards Identification Section.

OTHER INFORMATION

Freezing Point: N/D
Melting Point: N/A
Pour Point: -48°C (-54°F)

SECTION 10 STABILITY AND REACTIVITY

REACTIVITY: See sub-sections below.

STABILITY: Material is stable under normal conditions.

CONDITIONS TO AVOID: Excessive heat. High energy sources of ignition.

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MATERIALS TO AVOID: Strong oxidizers

HAZARDOUS DECOMPOSITION PRODUCTS: Material does not decompose at ambient temperatures.

POSSIBILITY OF HAZARDOUS REACTIONS: Hazardous polymerization will not occur.

SECTION 11	TOXICOLOGICAL INFORMATION
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INFORMATION ON TOXICOLOGICAL EFFECTS

Hazard Class	Conclusion / Remarks
Inhalation	
Acute Toxicity: No end point data for material.	Minimally Toxic. Based on assessment of the components.
Irritation: No end point data for material.	Negligible hazard at ambient/normal handling temperatures.
Ingestion	
Acute Toxicity: No end point data for material.	Minimally Toxic. Based on assessment of the components.
Skin	
Acute Toxicity: No end point data for material.	Minimally Toxic. Based on assessment of the components.
Skin Corrosion/Irritation: No end point data for material.	Negligible irritation to skin at ambient temperatures. Based on assessment of the components.
Eye	
Serious Eye Damage/Irritation: No end point data for material.	May cause mild, short-lasting discomfort to eyes. Based on assessment of the components.
Sensitization	
Respiratory Sensitization: No end point data for material.	Not expected to be a respiratory sensitizer.
Skin Sensitization: No end point data for material.	Not expected to be a skin sensitizer. Based on assessment of the components.
Aspiration: Data available.	Not expected to be an aspiration hazard. Based on physico-chemical properties of the material.
Germ Cell Mutagenicity: No end point data for material.	Not expected to be a germ cell mutagen. Based on assessment of the components.
Carcinogenicity: No end point data for material.	Not expected to cause cancer. Based on assessment of the components.
Reproductive Toxicity: No end point data for material.	Contains a substance that may be a reproductive toxicant. Based on assessment of the components.
Lactation: No end point data for material.	Not expected to cause harm to breast-fed children.
Specific Target Organ Toxicity (STOT)	
Single Exposure: No end point data for material.	Not expected to cause organ damage from a single exposure.
Repeated Exposure: No end point data for material.	Not expected to cause organ damage from prolonged or repeated exposure. Based on assessment of the components.

TOXICITY FOR SUBSTANCES

NAME	ACUTE TOXICITY
2,6-DI-TERT-BUTYL-P-CRESOL	Oral Lethality: LD50 0.89 g/kg (Rat)

OTHER INFORMATION

For the product itself:

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Component concentrations in this formulation would not be expected to cause skin sensitization, based on tests of the components or similar formulations.

Contains:

Synthetic base oils: Not expected to cause significant health effects under conditions of normal use, based on laboratory studies with the same or similar materials. Not mutagenic or genotoxic. Not sensitizing in test animals and humans.

Technical grade TCP (tricresylphosphate) may contain various aryl ortho-phosphate esters which after ingestion of high doses has been reported to cause cholinesterase inhibition and delayed neurotoxic effects, in both animals and humans, as well as reproductive effects in animals. These effects are predominately attributed to certain isomeric forms (ie. ortho isomers) and current grades of TCP in this ExxonMobil product have very low levels of the ortho-isomers. Neurotoxicity testing in hens, and reproductive toxicity tests in rodents of products with up to 3% TCP were without effect. Aryl thiophosphate: Effects on the liver, adrenals, thyroid, blood and reproductive organs were seen in rats after repeated oral gavage at high doses. In a reproduction/developmental toxicity screening study, repeated oral gavage of rats with the aryl thiophosphate at high doses that produced maternal toxicity resulted in litter loss, decreased number of implantation sites and decreased number of live pups. However, when the aryl thiophosphate was tested in a subsequent, identical reproduction/developmental screening study in rats at a concentration higher than in this lubricant product, there were no reproductive/developmental effects or maternal toxicity. Tricresyl phosphate (TCP). TCP (<9% ortho isomer) administered to rats by oral gavage in a one-generation reproduction/developmental toxicology study adversely affected both males and females. TCP-treated male rats had decreased sperm concentration and motility, abnormal sperm morphology and adverse histologic changes in the testes and epididymides. Adverse histologic changes were also observed in the ovaries of TCP-treated female rats. The percent of sperm-positive females littering was significantly reduced in the TCP-treatment groups with only one of twenty females in the high dose group delivering young. Developmental parameters were unaffected by TCP exposure. Impaired fertility and decreased sperm motility following TCP treatment have also been reported in a reproduction toxicity study in mice.

The following ingredients are cited on the lists below: None.

--REGULATORY LISTS SEARCHED--

1 = NTP CARC

3 = IARC 1

5 = IARC 2B

2 = NTP SUS

4 = IARC 2A

6 = OSHA CARC

SECTION 12

ECOLOGICAL INFORMATION

The information given is based on data available for the material, the components of the material, and similar materials.

ECOTOXICITY

Material -- Not expected to be harmful to aquatic organisms.

MOBILITY

Base oil component -- Low solubility and floats and is expected to migrate from water to the land. Expected to partition to sediment and wastewater solids.

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SECTION 13

DISPOSAL CONSIDERATIONS

Disposal recommendations based on material as supplied. Disposal must be in accordance with current applicable laws and regulations, and material characteristics at time of disposal.

DISPOSAL RECOMMENDATIONS

Product is suitable for burning in an enclosed controlled burner for fuel value or disposal by supervised incineration at very high temperatures to prevent formation of undesirable combustion products. Protect the environment. Dispose of used oil at designated sites. Minimize skin contact. Do not mix used oils with solvents, brake fluids or coolants.

REGULATORY DISPOSAL INFORMATION

RCRA Information: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D), nor is it formulated to contain materials which are listed as hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

Empty Container Warning Empty Container Warning (where applicable): Empty containers may contain residue and can be dangerous. Do not attempt to refill or clean containers without proper instructions. Empty drums should be completely drained and safely stored until appropriately reconditioned or disposed. Empty containers should be taken for recycling, recovery, or disposal through suitably qualified or licensed contractor and in accordance with governmental regulations. DO NOT PRESSURISE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND, OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION. THEY MAY EXPLODE AND CAUSE INJURY OR DEATH.

SECTION 14

TRANSPORT INFORMATION

LAND (DOT): Not Regulated for Land Transport

LAND (TDG): Not Regulated for Land Transport

SEA (IMDG): Not Regulated for Sea Transport according to IMDG-Code

Marine Pollutant: No

AIR (IATA): Not Regulated for Air Transport

SECTION 15

REGULATORY INFORMATION

OSHA HAZARD COMMUNICATION STANDARD: This material is considered hazardous in accordance with OSHA HazCom 2012, 29 CFR 1910.1200.

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Listed or exempt from listing/notification on the following chemical inventories: AICS, DSL, IECSC, KECI, PICCS, TSCA

Special Cases:

Inventory	Status
ENCS	Restrictions Apply

SARA 302: No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302

SARA (311/312) REPORTABLE HAZARD CATEGORIES: Delayed Health.

SARA (313) TOXIC RELEASE INVENTORY: This material contains no chemicals subject to the supplier notification requirements of the SARA 313 Toxic Release Program.

The following ingredients are cited on the lists below: None.

--REGULATORY LISTS SEARCHED--

1 = ACGIH ALL	6 = TSCA 5a2	11 = CA P65 REPRO	16 = MN RTK
2 = ACGIH A1	7 = TSCA 5e	12 = CA RTK	17 = NJ RTK
3 = ACGIH A2	8 = TSCA 6	13 = IL RTK	18 = PA RTK
4 = OSHA Z	9 = TSCA 12b	14 = LA RTK	19 = RI RTK
5 = TSCA 4	10 = CA P65 CARC	15 = MI 293	

Code key: CARC=Carcinogen; REPRO=Reproductive

SECTION 16	OTHER INFORMATION
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N/D = Not determined, N/A = Not applicable

KEY TO THE H-CODES CONTAINED IN SECTION 3 OF THIS DOCUMENT (for information only):

H315: Causes skin irritation; Skin Corr/Irritation, Cat 2

H317: May cause allergic skin reaction; Skin Sensitization, Cat 1

H319(2A): Causes serious eye irritation; Serious Eye Damage/Irr, Cat 2A

H360(1B)(F): May damage fertility; Repro Tox, Cat 1B (Fertility)

H361(D): Suspected of damaging the unborn child; Repro Tox, Cat 2 (Develop)

H361(F): Suspected of damaging fertility; Repro Tox, Cat 2 (Fertility)

H373: May cause damage to organs through prolonged or repeated exposure; Target Organ, Repeated, Cat 2

H400: Very toxic to aquatic life; Acute Env Tox, Cat 1

H410: Very toxic to aquatic life with long lasting effects; Chronic Env Tox, Cat 1

H413: May cause long lasting harmful effects to aquatic life; Chronic Env Tox, Cat 4

THIS SAFETY DATA SHEET CONTAINS THE FOLLOWING REVISIONS:

Composition: Component Table information was modified.

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Section 16: HCode Key information was modified.

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