From:

Victoria Marquis Petracca

Sent:

Thursday, May 16, 2019 2:55 PM

To:

Michael Antonellis; Michael Hanson - FPD

Cc:

Debra Dennis:

Subject:

Absence of Secondary Emergency Access and Egress

Attachments:

2018_Annual_TierIIReport_BestwayofNewEnglandInc.pdf; ACQ-2 Safety Data Sheet.PDF;

Aqueous Preservative Emulsion Safety Data Sheet.pdf

Importance:

High

Dear Chief Hanson and ZBA Members,

As we approach the last scheduled hearing on May 30, abutters and other residents are extremely concerned that the issue of secondary access and egress has not been fully addressed in the Goodridge Brook Estates hearings. Information presented about hazards at the adjacent 18+ acre Bestway of New England wood-treatment plant bring added significance to this issue. I respectfully urge the Fire Chief and ZBA to strongly consider requiring secondary access for both the single-family development and apartment complex, per the rationale below and attached documents.

EPCRA

Please find attached Bestway's 2018 Tier II Emergency and Hazardous Chemical Inventory filed with US EPA. This is a regulatory requirement for large chemical users under the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986, a United States federal law concerned with emergency response preparedness. In addition to EPCRA, Bestway's large volume of chemicals and pressure-treated lumber operation trigger a variety of other federal compliance requirements, including the National Pollutant Discharge Elimination Systems Permit (NPDES), an Air Quality permit, and toxic waste disposal legislation. All of these requirements mean that in the event of an accident, the consequences present a severe public health and safety risk. These known, considerable environmental health hazards are an enormous red flag for any proposed, adjacent residential development, and especially subsidized affordable housing. As yesterday's press article on Bestway's waste oil violation demonstrates, mistakes are made and unintended accidents occur: www.telegram.com/news/20190514/bestway-fined-9k-for-waste-oil-violation-in-lancaster. Given Bestway's vast chemical reserves, inviting a high density population next door is problematic.

Please note that Lancaster is a documented Environmental Justice Community. This means that residential pockets of our population meet the Environmental Justice thresholds, specifically in the areas of low income and minorities. This is provided to you in a second communication today received from the Lancaster Town Administrator. Affordable housing must be fully vetted for public health and safety risks, particularly in an Environmental Justice community.

The Issues Matrix submitted by residents in February includes US HUD's specific policy memos with quantifiable benchmark tests. As part of approval decisions for proposed affordable housing near industrial uses, HUD uses these benchmarks as part of its financial subsidy decision-making. Goodridge is not a HUD-subsidized project, but the public health risks indicated by HUD are identical – noise, dust, air particulate, flammables and explosives, etc. There is every reason to professionally and thoroughly evaluate the risks of high-density affordable housing next to Bestway with a qualified hazardous materials engineering firm. This is the essence of the appeal I made during the public comment period at the April 26, 2019 ZBA hearing.

A sampling of relevant Safety Data Sheets (SDSs) is also attached from chemicals currently used and stored on-site. These SDSs and the others for the site all warn of the grave risks from exposure. Bestway's 2017 report is also available, if interested, as evidence that the chemicals used on site evolve from year to year, but remain extremely toxic.

A 2018 article published after coastal flooding warned residents to never-burn-pressure-treated-lumber The article outlines the many reasons why smoke from pressure treated lumber is extremely toxic, and the chemicals themselves are reduced to a more lethal concentrate in the smoke ash. Should a fire erupt on the Bestway site, it will be difficult to contain toxic smoke ash from chemically treated lumber, as well as the plume arising from raw chemicals and other toxic flammable materials.

EPCRA and Secondary Emergency Access

ZBA members and residents have asked about secondary emergency access for this proposal, both for the apartment complex and the single family homes. At the March ZBA meeting, Chief Hanson kindly reminded us that the State Fire Marshall's office was reviewing the project, but unfortunately there has been no report received as of today with just one public hearing left. There is no definitive comment on this crucial public safety topic, which calls into question the project's physical lay-out.

Eagle Ridge, which has fewer overall units, larger lots and setbacks, and wider streets – has secondary emergency access. Furthermore, Eagle Ridge is not adjacent to an EPRCA facility. If Eagle Ridge was required to provide secondary, emergency access, than the proposed Goodridge Estates next door clearly should as well – both for the apartment complex and the 56 houses, a total of 152 new housing units with 378 bedrooms. If an evacuation is ordered, it is critical to provide ample egress to residents and emergency personnel. The very name of EPCRA includes "Emergency Preparedness."

In summary, as we approach the final hearing, the proposed plans still do not have emergency secondary access, neither for the apartment complex, nor the single-family homes. This lack of emergency preparedness in the largest residential development ever proposed in Lancaster, adjacent to an EPCRA facility with other EPA involvement, needs to be addressed immediately with just one hearing left.

Thank you, Victoria Petracca

Tier II Emergency and Hazardous Chemical Inventory Facility Name: Bestway of New England, Inc. Facility ID: 10987
Reporting Period From January 1, 2018 to December 31, 2018
☑ Annual □ Update □ Revised ☑ Facility Information has change

F104 . 17.	acinity identification			Outpot Date Date		
	40097			Owner/Operator Details		
Facility Name: Maximum Occupants:		Lat/Long:	42.4401/-71.7121	Name: Bestway Enterpris Address: 3877 Luker Road	Bestway Enterprises, Inc. 3877 Luker Road	
Physical Location:	840 Sterling Road, S. Lancaster, MA 01561	Nature of Business:	Wood Preservation	Cortland, NY 1 Phone: 607-591-9463	Cortland, NY 13045, United States 607-591-9463 Email: b	es bochs@bestwavlumber.com
County:	Worcester County	NAICS Code:	321114	Parent Company Details		
riie Department. Phone:	978-368-7667	SIC Code: Dun and Brad No:	2491		Bestway Enterprises, Inc.	
🗹 Manned 🔲 Unmanned	anned	EIN ID(Tax Number):		Durt and brad No: Address: NY Univ	NY United States	
Email:		FTE	14		Email:	bochs@bestwavlumber.com
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ject to Emergency	Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)?	CFR part 355)?		Name: Connor Burke	urke	
ject to Section 112	Subject to Section 112r of Clean Air Act (CAA)?		2 :		ns Sr. Advisor	
RMP Facility ID:			res 🖈 No	Phone: 607-345-8944 Email: connor@hestv	moo requilities	24 Hr.Phone: 697-345-8944
ect to EPCRA Se	Subject to EPCRA Section 313 (Toxic Release Inventory - TRI)?		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		comagnation con	
TRI Facility ID:	01561BSTWYSTERL		2			
Mailing Address						
Company Name:	Bestway Enterprises, Inc			acimy Emergency Flanning Coordinator	g coordinator	
Attention:	BENJAMIN OCHS			Nome.		
Street Address 1: Street Address 2:	3877 Luker Road			Title:		
CLAUDIESS Z.	-			hone:	č	24 U. Dhome.
City:	Cortland 43045			Email:	\$ 7	Hr.Phone:
Country:	United States	Phone: 607-591-9463				
Emergency Contacts						
Name	Title		Phone	24 Hr.Phone	T E	
Benjamin Ochs		Compliance Officer	607-591-9463	607-591-9463	and de	
Michael Nuzzolilo		General Manager	978-368-7667	336 EEE 0070	BOCIIS(@DE	pocis@pestwayiumper.com
				7100 000	HINDIAGING	inchaein@bestwayiumber.com
fication: I certify unity of those individual	Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one thro inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate and complete.	camined and am familiar with th n, I believe that the submitted in	e information submitted in nformation is true, accurate	familiar with the information submitted in pages one through 7, and that based on my he submitted information is true, accurate and complete.	at based on my	Optional Attachments Site Plan
Nome and affect that	llarice Officer		:01:47 AM 607-591-9463	9463 Benjamin Ochs	chs	☐ Site Coordinate Abbreviations
e ariu oliiciai me (real le al la culicial title of owner/operator of authorized representative	ive Date Signed	Telephone	Telephone Number Signature		Other Safeguard measures

Tier II Emergency and Hazardous Chemical Inventory Facility Name: Bestway of New England, Inc. Facility ID: 10987 Reporting Period From January 1, 2018 to December 31, 2018

Chemical Description		Physical Hazards	zards		Hea	Health Hazards	
Chemical ID: Check if Chemical Information is changed from the last submission: CAS #: Trade Secret: Chemical Name: CHEMICAL Secret: CHEMICAL Secret: CHEMICAL Secret: CHEMICAL Secret: CHEMICAL Secret: CHEMICAL Secret: ACQ-C2 EHS: CHEMICAL Secret: ACQ-C3 EHS: ACG-C4 EHS:	Combustible dust Corrosive to metal Corrosive to metal Explosive Gas under pressure Hazard Not Otherwise Classified (HNOC) In contact with water emits flammable gas Organic peroxide Oxidizer (liquid, solid or gas) Pyrophoric gas Self-heating Self-reactive	dust netal asses, aerosols sssure therwise Class vater emits fl ide d, solid or gas) tuid or solid) s	Combustible dust Corrosive to metal Explosive Flammable (gases, aerosols, liquids, or solids) Gas under pressure Hazard Not Otherwise Classified (HNOC) In contact with water emits flammable gas Organic peroxide Oxidizer (liquid, solid or gas) Pyrophoric (flquid or solid) Pyrophoric gas Self-heating	Acute (Aspirat Carcin Carcin Hazar M Repro M Respir M Seriou Simple M Skin o	Acute toxicity (any route of exposure) Aspiration hazard Carcinogenicity Germ cell mutagenicity Hazard Not Otherwise Classified (HN Reproductive toxicity Respiratory or skin sensitization Serious eye damage or eye irritation Simple asphyxiant Skin corrosion or irritation Skin corrosion or irritation Skin corrosion or irritation Skecific target organ toxicity (single oexposure)	Acute toxicity (any route of exposure) Aspiration hazard Carcinogenicity Germ cell mutagenicity Hazard Not Otherwise Classified (HNOC) Reproductive toxicity Respiratory or skin sensitization Serious eye damage or eye irritation Simple asphyxiant Skin corrosion or irritation Skin corrosion or irritation Skin corrosion or irritation Specific target organ toxicity (single or repeated exposure)	
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Max Daily Amt (lbs): 61000	Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)	
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Avg Daily Amt Code: 07							
Max Amt in Largest Container (lbs): 61000 No of days onsite: 365							
	SHIPM	SHIPMENT DETAILS					
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y Count:	Maximum Shipment Quantity at	at		Carrier Address:	ress:		
	ime:			Carrier Phone:	ne:		
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Route	Routes of Travel:						

Tier II Emergency and Hazardous Chemical Inventory
Facility Name: Bestway of New England, Inc. Facility ID: 10987
Reporting Period From January 1, 2018 to December 31, 2018
Chemical Description

Chemical Description		Physical Havarde	Sanda		1		
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Trade Secret:	☐ Explosive			Car	☐ Carcinogenicity		
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EHS: Contains FHS: Contains FH	☐ Gas under pressure	essure		□ Haz	ard Not Otherwise	☐ Hazard Not Otherwise Classified (HNOC)	
_	Hazard Not Otherwise Classified (HNOC)	therwise Class	ified (HNOC)	□ Reg	☐ Reproductive toxicity		
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SDS/	U Organic peroxide	ide		⊠ Seri	☑ Serious eye damage or eye irritation	or eye irritation	
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	☐ Pyrophoric gas	·		Spe	cific target organ to	Specific target organ toxicity (single or repeated	
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	☐ Self-reactive						
Inventory			Storage	Storage Codes & Location	cation		
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Quantity: Routes of Travel	ravel.			Phone:			

Tier II Emergency and Hazardous Chemical Inventory Facility Name: Bestway of New England, Inc. Facility ID: 10987 Reporting Period From January 1, 2018 to December 31, 2018

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s flammable gas as) Storage Code Temperature Stemperature Flant temperature		☐ Explosive ✓ Flammable (gases, aerosols, liquids, or solids) ☐ Gas under pressure	☐ Carcinogenicity ☐ Germ cell mutagenicity ☐ Hazard Not Otherwise	y • Classified (HNOC)
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Storage Codes & Location Temperature Storage Description [4]Ambient Treatment treatment plant 35 temperature Plant Shop Covered Containment cell. [4]Ambient Kiln On side of kilin, 70 temperature in self containment cell.		☐ Pyrophoric gas ☐ Self-heating ☐ Self-reactive	☑ Specific target organ te exposure)	oxicity (single or repeated
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[4]Ambient Kiln On side of kiln, temperature in self containment cell.		[4]Ambient temperature		_
		[4]Ambient temperature		
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Tier II Emergency and Hazardous Chemical Inventory
Facility Name: Bestway of New England, Inc. Facility ID: 10987
Reporting Period From January 1, 2018 to December 31, 2018
Chemical Description

152350 rical Information is ☑ Ithe last submission: N/A						
N/A		Tiyalcal nazaros	fazards		Ĭ	Health Hazards
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Max Amt in Largest Container (lbs): 61500						
No of days onsite: 365						
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Shipment Frequency Count: Shipment Advanced Shipment Quan Physical State In Transit: Average Annual Shipment Quantity:	Maximum Shipment Quantity at One Time: Average Annual Shipment Quantity:	<i>5</i>		Carrier: Carrier Address; Carrier Phone: Carrier 24 Hr	68.S.: .e. S.:	
Routes of Travel:	ivel:			200		

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Chemical Description		Physical Hazards	zards		Hea	Health Hazards	
Chemical ID: Check if Chemical Information is changed from the last submission: CAS #: Trade Secret: Chemical Name: Chemical Name: Chemical Name: Chemical Mix Contains EHS: Exceeds TPQ: Solid EHS Name: Chemical Added On: Chemical Added On: Check if the chemical is below	□ Combustible dust □ Corrosive to metal □ Explosive □ Flammable (gases, aerosols, liquids, or sol □ Gas under pressure □ Hazard Not Otherwise Classified (HNOC) □ In contact with water emits flammable gas □ Organic peroxide □ Oxidizer (liquid, solid or gas) □ Pyrophoric (giquid or solid) □ Pyrophoric gas □ Self-heating □ Self-reactive	ust ses, aerosols, ssure herwise Classi water emits fit de i, solid or gas)	Combustible dust Corrosive to metal Explosive Flammable (gases, aerosols, liquids, or solids) Gas under pressure Hazard Not Otherwise Classified (HNOC) In contact with water emits flammable gas Organic peroxide Oxidizer (liquid, solid or gas) Pyrophoric gas Self-heating	M Acute t Carcinc Carcin Carcinc Carci	Acute toxicity (any route of exposure) Aspiration hazard Carcinogenicity Germ cell mutagenicity Hazard Not Otherwise Classified (HN Reproductive toxicity) Respiratory or skin sensitization Respiratory or skin sensitization Simple asphyxiant Simple asphyxiant Skin corrosion or irritation Skin corrosion or irritation Specific target organ toxicity (single o exposure)	A Acute toxicity (any route of exposure) Aspiration hazard Carcinogenicity Germ cell mutagenicity Hazard Not Otherwise Classified (HNOC) Reproductive toxicity Respiratory or skin sensitization Serious eye damage or eye irritation Simple asphyxiant Skin corrosion or irritation Skin corrosion or irritation	
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No of days onsite: 75							
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Tier II Emergency and Hazardous Chemical Inventory Facility Name: Bestway of New England, Inc. Facility ID: 10987
Reporting Period From January 1, 2018 to December 31, 2018

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ACQ-C2

SDS ID: 252

* * * Section 1 - IDENTIFICATION* * *

Product Identifier:

ACQ-C2

Recommended Use

Wood preservative / pesticide

Restrictions on Use

None known

Manufactured for:

Viance, LLC 8001-IBM Drive Charlotte, NC 28262

Phone: 704-522-0825 Fax: 704-527-8232

Emergency #: CHEMTREC: (800) 424-9300, 1-703-527-

3887 for U.S. and Canadian shipments ONLY

General Comments

NOTE: Emergency telephone numbers are to be used only in the event of chemical emergencies involving a spill, leak, fire, exposure, or accident involving chemicals. All non-emergency questions should be directed to customer service.

* * * Section 2 - HAZARD(S) IDENTIFICATION* * *

Classification in accordance with 29 CFR 1910.1200.

Hazardous to the Aquatic Environment - Acute Hazard, Category 1

Skin Corrosion / Irritation, Category 1B

Eye Damage / Irritation, Category 2A

Specific Target Organ Toxicity - Repeated Exposure (Oral), Category 2

Specific Target Organ Toxicity - Single Exposure (Respiratory), Category 3

Acute Toxicity - Oral, Category 4

Acute Toxicity - Dermal, Category 4

Acute Toxicity - Inhalation, Category 4

GHS LABEL ELEMENTS

Symbol(s)



Signal Word

DANGER

Hazard Statement(s)

Causes severe skin burns and eye damage.

Causes serious eye irritation.

1 of 10

Issue Date: 04/07/2016 Revision: 2.0

Print Date: 4/12/16



ACQ-C2 SDS ID: 252

Harmful if swallowed.

Harmful if inhaled.

Harmful in contact with skin.

May cause respiratory irritation.

May cause damage to kidneys and/or liver through prolonged or repeated exposure if swallowed.

Very toxic to aquatic life.

Precautionary Statement(s)

Prevention

Do not breathe vapor or mist. Wash thoroughly after handling. Wear protective gloves/clothing and eye/face protection. Get medical advice/attention if you feel unwell. Use only outdoors or in a well-ventilated area. Do not eat, drink or smoke when using this product. Avoid release to the environment. Take-off contaminated clothing and wash it before reuse.

Response

IF ON SKIN: Rinse skin with plenty of soap and water. Take off immediately any contaminated clothing. Wash contaminated clothing before reuse. If skin irritation or rash occurs: Get medical advice/attention.

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists; Get medical advice/attention.

IF INHALED: If inhaled, immediately remove the affected person to fresh air and keep comfortable for breathing. Call a POISON CENTER or doctor/physician if you feel unwell.

IF SWALLOWED: Rinse mouth. Do not induce vomiting. Call a POISON CENTER or doctor/physician if you feel unwell.

Storage

Store locked up.

Disposal

Dispose of in accordance with all applicable federal, state and local regulations.

* * * Section 3 - COMPOSITION / INFORMATION ON INGREDIENTS* * *

CAS	Component	Percent
Not Available	Water and inert ingredients	>65
14215-52-2	Copper Ethanolamine Complex	25-35

Component Related Regulatory Information

This product may be regulated, have exposure limits or other information identified as the following: Ethanolamine (141-43-5), Copper (7440-50-8).

Additional Information

This product is an approved pesticide registered with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). This Safety Data Sheet, as distributed with the pesticide product, is part of the pesticide labeling governed by the Environmental Protection Agency (40 CFR Parts 152-186) and provides information supplemental to the FIFRA required label on product packaging. READ PRODUCT LABEL FOR COMPLETE INFORMATION. This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

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ACQ-C2

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This product is an approved pesticide registered with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Pesticide Registration Number 83997-4.

US Federal Regulations SARA 313: Metallic copper equivalent, 9.0% See Section 15 - Regulatory Information.

* * * Section 4 - FIRST-AID MEASURES* * *

Description of Necessary Measures

Inhalation

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or doctor/physician if you feel unwell.

Skin Contact

IF ON SKIN (or hair): Remove/take off immediately all contaminated clothing. Rinse skin with water/shower. If skin irritation or rash occurs: Get medical advice/attention. Wash contaminated clothing before reuse.

Eye Contact

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists; Get medical advice/attention.

Ingestion

IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. Call a POISON CENTER or doctor/physician if you feel unwell.

* * * Section 5 - FIRE-FIGHTING MEASURES* * *

Suitable Extinguishing Media

Use dry chemical, CO2 or water spray.

Large fires: Use dry chemical, carbon dioxide, alcohol-resistant foam or water spray.

Unsuitable Extinguishing Media

Do not use high-pressure water streams.

Specific Hazards Arising from the Chemical

Negligible fire hazard.

Hazardous Decomposition Products

Toxic gases, carbon dioxide, carbon monoxide, copper compounds, oxides of nitrogen.

Special Protective Equipment and Precautions for Firefighters

Wear full protective fire-fighting gear including self-contained breathing apparatus (SCBA) for protection against possible exposure.

Fire Fighting Measures

Move container from fire area if it can be done without risk. Dike for later disposal. For tank, rail car or tank truck, evacuation radius: 800 meters (1/2 mile). Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. Do not get water inside container. Cool containers with water spray until well after the fire is out. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tanks due to fire. Stay away from the ends of tanks.

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NFPA Ratings: Health: 3 Fire: 0 Reactivity: 0

Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe



* * * Section 6 - ACCIDENTAL RELEASE MEASURES* * *

Personal Precautions, Protective Equipment and Emergency Procedures

Wear personal protective clothing and equipment, see Section 8.

Methods and Materials for Containment and Cleaning Up

Do not touch or walk through spilled material. Stop leak if possible without personal risk. Prevent entry into waterways, sewers, basements, or confined areas. Do not get water inside container. Neutralize spill area with citric acid or other neutralizing agent for basic liquids. Absorb spill with inert material such as polypads, or other suitable absorbent material. Rinse spill area with water and test area with litmus paper. Repeat neutralization until spill area is no longer acidic. Place material in suitable, covered, labeled containers.

* * * Section 7 - HANDLING AND STORAGE* * *

Precautions for Safe Handling

Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Use personal protective equipment as required. Do not breathe vapor or mist. Use only outdoors or in a well-ventilated area. Wear protective gloves/clothing and eye/face protection. Contaminated work clothing should not be allowed out of the workplace. Wash thoroughly after handling. Do not eat, drink, or smoke when using this product. Avoid release to the environment.

Conditions for Safe Storage, including any Incompatibilities

Store locked up. Store away from direct sunlight and any sources of heat. Do not freeze. Do not store this material in open or unlabeled containers. Store in a cool, dry, well-ventilated area. See product label for more information.

Incompatibilities: Strong acids, alkalies and oxidizing agents. Incompatible with water-reactive materials.

* * * Section 8 - EXPOSURE CONTROLS / PERSONAL PROTECTION* * *

Component Exposure Limits

Copper Ethanolamine Complex - (14215-52-2)

ACGIH: 3 ppm TWA (related to Ethanolamine)

6 ppm STEL (related to Ethanolamine)

OSHA: 3 ppm TWA; 6 mg/m3 TWA (related to Ethanolamine)

NIOSH: 3 ppm TWA; 8 mg/m3 TWA (related to Ethanolamine)

6 ppm STEL; 15 mg/m3 STEL (related to Ethanolamine)

Mexico 3 ppm TWA LMPE-PPT; 8 mg/m3 TWA LMPE-PPT (related to Ethanolamine)

6 ppm STEL [LMPE-CT]; 15 mg/m3 STEL [LMPE-CT] (related to Ethanolamine)

Alberta: 6 ppm STEL; 15 mg/m3 STEL (related to Ethanolamine)

3 ppm TWA; 7.5 mg/m3 TWA (related to Ethanolamine)

British Columbia: 6 ppm STEL (related to Ethanolamine)

3 ppm TWA (related to Ethanolamine)

Manitoba: 6 ppm STEL (related to Ethanolamine)

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3 ppm TWA (related to Ethanolamine)

New Brunswick: 6 ppm STEL; 15 mg/m3 STEL (related to Ethanolamine)

3 ppm TWA; 7.5 mg/m3 TWA (related to Ethanolamine)

Newfoundland and 6 ppm STEL (related to Ethanolamine)

Labrador: 3 ppm TWA (related to Ethanolamine) Nova Scotia: 6 ppm STEL (related to Ethanolamine)

3 ppm TWA (related to Ethanolamine)

Nunavut: 6 ppm STEL; 15 mg/m3 STEL (related to Ethanolamine)

3 ppm TWA; 7.5 mg/m3 TWA (related to Ethanolamine)

Ontario: 6 ppm STEL (related to Ethanolamine)

3 ppm TWA (related to Ethanolamine)

Prince Edward Island: 6 ppm STEL (related to Ethanolamine)

3 ppm TWA (related to Ethanolamine)

Quebec: 6 ppm STEV; 15 mg/m3 STEV (related to Ethanolamine)

3 ppm TWAEV; 7.5 mg/m3 TWAEV (related to Ethanolamine) Saskatchewan: 6 ppm STEL (related to Ethanolamine)

3 ppm TWA (related to Ethanolamine)

6 ppm STEL; 12 mg/m3 STEL (related to Ethanolamine) 3 ppm TWA; 6 mg/m3 TWA (related to Ethanolamine)

Appropriate Engineering Controls

Provide local exhaust ventilation system. Ensure compliance with applicable exposure limits.

Individual Protection Measures, such as Personal Protective Equipment **Eyes/Face Protection**

Wear safety glasses with side-shields. An emergency eye wash fountain and quick drench shower in the immediate work area is recommended.

Skin Protection

Wear chemical resistant clothing to prevent skin contact.

Respiratory Protection

If ventilation is not sufficient to effectively prevent buildup of large quantities of dust/vapor or prolonged exposure is possible, appropriate approved NIOSH respiratory protection must be provided. Respirators should be selected by and used under the direction of a trained health and safety professional following the requirements found in OSHA's respirator standard (29 CFR 1901.134) and ANSI's standard for respiratory protection (Z88.2-1992), applicable U.S. regulations, or the Canadian CSA Standard Z94.4-93 and applicable standards of Canadian Provinces. A written respiratory protection program, including provisions for medical certification, training, fittesting, exposure assessments, maintenance, inspection, cleaning, and convenient, sanitary storage, must be implemented.

* * * Section 9 - PHYSICAL AND CHEMICAL PROPERTIES* * *

Physical State: Liquid

Color: blue

Odor: faint ammonia-like odor

pH: 9-11

Boiling Point: Not available Flash Point: Not available Appearance:

blue liquid liquid

Physical Form: Odor Threshold:

Not available **Melting Point:** Not available

Decomposition Temperature:

Not available

Evaporation Rate: Not available

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Flammability (solid, gas): Not applicable

UEL: Not available

Vapor Density (air = 1): >1 (air=1)

Specific Gravity (water = 1): 1.22 (water=1)

Log KOW: Not available

Auto Ignition Temperature: Not available

Volatility: Not available

LEL: Not available

Vapor Pressure: Not available Relative Density: Not available

Water Solubility: Completely soluble

Coeff. Water/Oil Dist: Not available

Viscosity: Not available

* * * Section 10 - STABILITY AND REACTIVITY* * *

Chemical Stability

This is a stable material.

Possibility of Hazardous Reactions

Hazardous polymerization will not occur.

Conditions to Avoid

Avoid extreme heat and contact with incompatible materials.

Incompatible Materials

Strong acids, alkalies and oxidizing agents. Incompatible with water-reactive materials.

Hazardous Decomposition

Toxic gases, carbon dioxide, carbon monoxide, copper compounds, oxides of nitrogen.

* * * Section 11 - TOXICOLOGICAL INFORMATION* * *

Acute Toxicity

No information available for the product.

Inhalation of high concentrations of the ethanolamine in this product have been reported to cause pulmonary, liver, kidney and skin damage in experimental animals. It is also corrosive to the eyes, skin, respiratory system and gastrointestinal tract, and may cause permanent damage to the eyes. It may be absorbed through the skin in harmful amounts and may cause allergic skin reactions. Ethanolamine exposures may cause damage to the nervous system, lungs, liver and kidneys.

Copper may be toxic by ingestion, inhalation, and/or skin exposures. Copper compounds may be severely irritating to the eyes, skin, mucous membranes and gastrointestinal tract. Overexposure to copper may cause anemia, central nervous system depression, and permanent damage to the eyes, kidneys and liver. Death may occur from shock or kidney failure. Copper has been known to cause allergic skin reactions in some individuals.

Component Analysis - LD50/LC50

Copper Ethanolamine Complex - (14215-52-2)

Oral LD50 Rat 1720 mg/kg; Dermal LD50 Rabbit 1 mL/kg; Dermal LD50 Rabbit 1025 mg/kg (related to Ethanolamine)

Information on Likely Routes of Exposure Inhalation

May cause respiratory tract irritation.

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ACQ-C2 SDS ID: 252

Ingestion

May be harmful if swallowed.

Skin Contact

Causes severe skin burns and eye damage.

Eye Contact

Causes serious eye damage

Immediate Effects

Respiratory tract irritation, skin burns, eye burns.

Delayed Effects

Digestive disorders, kidney damage, liver damage, nervous system.

Medical Conditions Aggravated by Exposure

Pre-existing eye, respiratory system and skin conditions. Overexposure can cause damage to liver and kidneys.

Irritation/Corrosivity Data

Respiratory tract irritation, skin burns, eye burns

Respiratory Sensitization

No data available.

Dermal Sensitization

No data available.

Germ Cell Mutagenicity

No data available.

Carcinogenicity

Component Carcinogenicity

No data available.

Reproductive Toxicity

No data available.

Specific Target Organ Toxicity - Single Exposure

Respiratory system

Specific Target Organ Toxicity - Repeated Exposure

Kidneys, liver.

Aspiration Hazard

Not expected to be an aspiration hazard.

* * * Section 12 - ECOLOGICAL INFORMATION* * *

Ecotoxicity

Very toxic to aquatic life

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Component Analysis - Aquatic Toxicity

Copper Ethanolamine Complex - (14215-52-2)

Fish: 96 Hr LC50 Pimephales promelas: 227 mg/L [flow-through]; 96 Hr LC50 Brachydanio

rerio: 3684 mg/L [static]; 96 Hr LC50 Lepomis macrochirus: 300-1000 mg/L [static]; 96 Hr LC50 Oncorhynchus mykiss: 114-196 mg/L [static]; 96 Hr LC50 Oncorhynchus

mykiss: >200 mg/L [flow-through] (related to Ethanolamine)

gae: 72 Hr EC50 Desmodesmus subspicatus: 15 mg/L (related to Ethanolamine)

Invertebrate: 48 Hr EC50 Daphnia magna: 65 mg/L (related to Ethanolamine)

Persistence and Degradability

No information available for the product.

Bioaccumulation Potential

No information available for the product.

Mobility in Soil

No information available for the product.

* * * Section 13 - DISPOSAL CONSIDERATIONS* * *

Disposal Methods

Dispose of in accordance with all applicable federal, state and local regulations.

Disposal of Contaminated Packaging

Component Waste Numbers

The U.S. EPA has not published waste numbers for this product's components.

* * * Section 14 - TRANSPORT INFORMATION* * *

US DOT Information

Shipping Name: Corrosive liquid, basic, organic, n.o.s. (Contains: Alkaline Copper Complex Solution)



Required Label(s): 8

ERG: # 153

Canada Transportation of Dangerous Goods Information

Shipping Name: Corrosive liquid, basic, organic, n.o.s. (Contains: Alkaline Copper Complex Solution)

UN #: UN3267 Hazard Class: 8 Packing Group: III

Required Label(s): 8

C MR OF

International Maritime Dangerous Goods Information

Shipping Name: Corrosive liquid, basic, organic, n.o.s. (Contains: Alkaline Copper Complex Solution)

UN #: UN3267 Hazard Class: 8 Packing Group: III

Required Label(s): 8

EMS: F-A, S-B



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ACQ-C2

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* * * Section 15 - REGULATORY INFORMATION* * *

U.S. Federal Regulations

All components are on the U.S. EPA TSCA Inventory List.

U.S. Federal Regulations

This material contains one or more of the following chemicals required to be identified under SARA Section 302 (40 CFR 355 Appendix A), SARA Section 311/312 (40 CFR 370.21), SARA Section 313 (40 CFR 372.65), and/or CERCLA (40 CFR 302.4).

Copper Ethanolamine Complex - (14215-52-2)

SARA 313: 1.0 % de minimis concentration (related to Copper (Copper Compound))

SARA 311/312: Acute Health Yes Chronic Health Yes Fire No Pressure No Reactive No

Federal Insecticide, Fungicide, and Rodenticide Act

This product is registered with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) under Environmental Protection Agency regulations.

Pesticide Registration Number 83997-4.

Component Marine Pollutants

This material does not contain chemicals required by US DOT to be identified as marine pollutants.

Other state regulations may apply. Check individual state requirements.

U.S. State Regulations

The following components appear on one or more of the following state hazardous substances lists:

Component					0 110101	
	CAS	CA	MA	MN	NJ	PA
Copper Ethanolamine Complex (¹related to: Ethanolamine)	14215-52-2	Yes1	Yes¹	Yes1	Yes1	Yes

Not regulated under California Proposition 65

WHMIS Classification(s)

E: Corrosive

D2: Subdivision A: Very Toxic Materials

D2: Subdivision B: Toxic Materials

Canadian WHMIS Ingredient Disclosure List (IDL)

Components of this material have been checked against the Canadian WHMIS Ingredients Disclosure List. The List is composed of chemicals which must be identified on MSDSs if they are included in products which fall under WHMIS criteria specified in the Controlled Products Regulations and present above the threshold limits listed on the IDI

Copper Ethanolamine Complex - (14215-52-2)

1 % (related to Ethanolamine)

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Component Analysis - Inventory

Component	CAS	US	CA	EU	AU	PH	JP	KR	CN	NZ
Copper Ethanolamine	14215-52-2	No	Yes							
Complex										

* * * Section 16 - OTHER INFORMATION* * *

Summary of Changes

New SDS: 06/13/2012; 3-yr Review: 01/22/2015; Revise Marine Pollutant USDOT designation 10/23/2015; 04/07/2016 – Update to remove Boric Acid.

Key / Legend

ACGIH = American Conference of Governmental Industrial Hygienists; AU = Australia; BOD - Biochemical Oxygen Demand; C - Celsius; CA - Canada; CAS = Chemical Abstracts Service; CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act; CFR = Code of Federal Regulations; CN = China; CPR = Controlled Products Regulations; DOT = Department of Transportation; DSL = Domestic Substances List; EINECS = European Inventory of Existing Commercial Chemical Substances; ELINCS = European List of Notified Chemical Substances; EPA = Environmental Protection Agency; ERG = Emergency Response Guide; EU = European Union; F - Fahrenheit; HEPA = High Efficiency Particulate Air; HMIS = Hazardous Material Information System; HPV - High Production Volume Chemical (EU); IARC = International Agency for Research on Cancer; IATA = International Air Transport Association; ICL - In Commerce List (Canada); IDL - Ingredient Disclosure List; IDLH - Immediately Dangerous to Life and Health; JP = Japan; KR = Korea; LEL - Lower Explosive Limit; MITI = Japan Ministry of International Trade and Industry; mg/Kg = milligrams per Kilogram; mg/L = milligrams per Liter; mg/m³ = milligrams per Cubic Meter; MSHA = Mine Safety and Health Administration; NA = Not Applicable or Not Available; NFPA = National Fire Protection Association; NIOSH = National Institute for Occupational Safety and Health; NJTSR = New Jersey Trade Secret Registry; NTP = National Toxicology Program; NZ = New Zealand; OSHA = Occupational Safety and Health Administration; PH = Philippines; RCRA = Resource Conversation & Recovery Act; SARA = Superfund Amendments and Reauthorization Act; STEL = Short Term Exposure Limit; TDG = Transport Dangerous Goods; TSCA = Toxic Substances Control Act; TWA - Time Weighted Average; UEL - Upper Explosive Limit; US - United States; WHMIS = Workplace Hazardous Materials Information System.

Other Information

Disclaimer: Supplier gives no warranty of merchantability or of fitness for a particular purpose. Any product purchased is sold on the assumption the purchaser will make his own tests to determine the quality and suitability of the product. Supplier expressly disclaims any and all liability for incidental and/or consequential property damage arising out of the use of this product. No information provided shall be deemed to be a recommendation to use any product in conflict with any existing patent rights. Read the Material Safety Data Sheet before handling product.

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EcoLife One Pack Work Solution

SDS ID: VIA-237

* * * Section 1 - IDENTIFICATION* * *

Product Identifier:

Aqueous Preservative Emulsion

Recommended Use

Wood treatment

Restrictions on Use

None known.

Manufactured for:

Phone:

Fax:

Emergency #: CHEMTREC: (800) 424-9300, 1-703-527-3887 for U.S. and Canadian shipments ONLY

General Comments

NOTE: Emergency telephone numbers are to be used only in the event of chemical emergencies involving a spill, leak, fire, exposure, or accident involving chemicals. All non-emergency questions should be directed to customer service.

* * * Section 2 - HAZARD(S) IDENTIFICATION* * *

Classification in accordance with 29 CFR 1910.1200.

Skin sensitizer, Category 1
Serious eye damage/irritation, Category 2B
STOT- Single Exposure, Category 3
Acute toxicity- Inhalation, Category 2
Acute toxicity, Category 4
Hazardous to aquatic life - Acute, Category 2
Hazardous to aquatic life - Chronic, Category 2

GHS LABEL ELEMENTS Symbol(s)







Signal Word

WARNING

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EcoLife One Pack Work Solution

SDS ID: VIA-237

Hazard Statement(s)

Harmful if swallowed.

Causes severe mild skin irritation.

May cause an allergic skin reaction.

Very toxic to aquatic life with long lasting effects.

Precautionary Statement(s)

Prevention

Use only outdoors or in a well-ventilated area. Avoid breathing dust/fume/gas/mist/spray. Wash thoroughly after handling. Do not eat, drink or smoke while using this product. Avoid release into the environment.

Response

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.

IF ON SKIN: Wash with plenty of soap and water.

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.

IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell. Rinse mouth. DO NOT induce vomit.

Storage

Store in a well-ventilated place. Store locked up.

Disposal

Dispose of contents/container in accordance with local/regional/national/international regulations.

* * * Section 3 - COMPOSITION / INFORMATION ON INGREDIENTS* * *

CAS	Component	Percent
7732-18-5	Water	Balance
8001-79-4	Castor oil	0.1-1
8002-74-2	Paraffin waxes and Hydrocarbon waxes	0.1-1
64359-81-5	4,5-Dichloro-2-N-octyl-4-isothiazolin-3-one	<0.15

Component Information/Information on Non-Hazardous Components

This product has been evaluated using criteria specified in 29CFR 1910.1200 (Hazard Communication Standard) and the Canadian Controlled Product Regulations.

* * * Section 4 - FIRST-AID MEASURES* * *

Description of Necessary Measures

Inhalation

IF INHALED: Move person to non-contaminated air. Give artificial respiration if not breathing. If symptoms persist, get medical attention.

Skin Contact

IF ON SKIN (or hair): For skin contact flush with large amounts of water while removing contaminated clothing. If irritation persists, get medical attention. Wash contaminated clothing before reuse.

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Eye Contact

IF IN EYES: Immediately flush eyes with water for at least 15 minutes, while holding eyelids open. If irritation persists get medical attention.

Ingestion

IF SWALLOWED: Ingestion may cause irritation of throat, stomach and gastrointestinal tract. DO NOT induce vomiting. If irritation persists, seek medical attention.

* * * Section 5 - FIRE-FIGHTING MEASURES* * *

Suitable Extinguishing Media

Use Dry chemical, foam, carbon dioxide, water spray.

Unsuitable Extinguishing Media

This product may react with strong oxidizing agents and materials that are not compatible with water.

Specific Hazards Arising from the Chemical

This material may decompose on heating and produce irritating vapors and toxic gases (carbon monoxide, carbon dioxide and sulfur oxides).

Hazardous Decomposition Products

Combustion products include irritating vapors and toxic gases, carbon monoxide, carbon dioxide and sulfur oxides.

Special Protective Equipment and Precautions for Firefighters

Fire fighters should wear full-face, self-contained breathing apparatus and impervious protective clothing. Fire fighters should avoid inhaling any combustion products. Do not point high pressure water stream directly into burning material to avoid spreading. Prevent run-off from firefighting from entering sewers or open waterways.

Fire Fighting Measures

Firefighters should wear full protective clothing including self-contained breathing apparatus.

NFPA Ratings: Health: 1 Fire: 1 Reactivity: 0 Other: 0

Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe



* * * Section 6 - ACCIDENTAL RELEASE MEASURES* * *

Personal Precautions, Protective Equipment and Emergency Procedures

Stop the flow of material, if this is without risk. Floors may become slippery. Wear appropriate protective equipment and NIOSH approved respirator where mists or vapors of unknown concentrations may be generated. Dike the spilled material, where this is possible.

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EcoLife One Pack Work Solution

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Methods and Materials for Containment

Avoid release to the environment. Keep runoff from getting into sewers and waterways

Methods and Materials for Containment and Cleaning Up

Collect spilled material with an inert absorbent such as sand or vermiculite. Place in properly labeled closed container. Wash spill area thoroughly. Use spark-proof tools. Wear appropriate protective equipment during cleanup. Do not flush into sanitary sewer systems, drains or surface water. Keep out of water supplies and sewers.

* * * Section 7 - HANDLING AND STORAGE* * *

Precautions for Safe Handling

Avoid contact with skin and eyes. Avoid breathing vapor or mist. Do not eat, drink or use tobacco products when handling this material. Wash thoroughly after handling. Use only with adequate ventilation.

Conditions for Safe Storage, including any Incompatibilities

Keep the container tightly closed and in a cool, well-ventilated place. Keep away from incompatible materials.

Incompatibilities

This product may react with strong oxidizing agents and materials that are not compatible with water.

* * * Section 8 - EXPOSURE CONTROLS / PERSONAL PROTECTION* * *

Component Exposure Limits

Paraffin waxes and Hydrocarbon waxes (8002-74-2)

ACGIH: 2 mg/m3 TWA (fume)

OSHA (Vacated): 2 mg/m3 TWA

NIOSH: 2 mg/m3 TWA (fume)

Alberta: 2 mg/m3 TWA (fume)

British Columbia: 2 mg/m3 TWA (fume) Manitoba: 2 mg/m3 TWA (fume)

New Brunswick: 2 mg/m3 TWA (fume)

NW Territories: 2 mg/m3 TWA (fume)

6 mg/m3 STEL (fume)

Nova Scotia: 2 mg/m3 TWA (fume)

Nunavut: 2 mg/m3 TWA (fume)

6 mg/m3 STEL (fume) 2 mg/m3 TWA (fume)

Quebec: 2 mg/m3 TWAEV (fume)

Saskatchewan: 2 mg/m3 TWA

Ontario:

4 mg/m3 STEL

Yukon: 2 mg/m3 TWA (fume)

6 mg/m3 STEL (fume)

Appropriate Engineering Controls

Whenever possible, engineering controls should be used to minimize the need for personal protective equipment.

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EcoLife One Pack Work Solution

SDS ID: VIA-237

Individual Protection Measures, such as Personal Protective Equipment **Eyes/Face Protection**

Wear safety glasses; chemical goggles (if splashing is possible).

Skin Protection

Wear chemical resistant clothing to prevent skin contact. Wear chemical resistant apron if splash potential is minimal. If splash potential is great, as during maintenance activities, wear impervious clothing and chemical resistant footwear.

Respiratory Protection

If ventilation is not sufficient to effectively prevent buildup of large quantities of dust or prolonged exposure is possible, appropriate approved NIOSH respiratory protection must be provided. Respirators should be selected by and used under the direction of a trained health and safety professional following the requirements found in OSHA's respirator standard (29 CFR 1901.134) and ANSI's standard for respiratory protection (Z88.2-1992), applicable U.S. regulations, or the Canadian CSA Standard Z94.4-93 and applicable standards of Canadian Provinces. A written respiratory protection program, including provisions for medical certification, training, fittesting, exposure assessments, maintenance, inspection, cleaning, and convenient, sanitary storage, must be implemented.

PPE Pictograms:







Section 9 - Physical & Chemical Properties

Appearance: milky emulsion

Physical State: Liquid

Vapor Pressure: Not available

Boiling Point: 100°C (212°F) approximate Solubility (H2O): Miscible

Flash Point:

Not available

Auto Ignition: Not available

UFL: Not available

Odor: Not available

pH: Not available

Vapor Density: Not available

Melting Point: Not available

Specific Gravity: Not available Flash Point Method:

Not available

LFL: Not available

* * * Section 10 - STABILITY AND REACTIVITY* * *

Chemical Stability

This is a stable material under normal conditions of temperature and pressure.

Possibility of Hazardous Reactions

Does not occur.

Conditions to Avoid

Avoid extreme heat and contact with incompatible materials.

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EcoLife One Pack Work Solution

SDS ID: VIA-237

Incompatible Materials

Avoid strong oxidizing or reducing agents and mercaptans.

Hazardous Decomposition Products

Thermal decomposition may produce toxic vapors/fumes of hydrogen chlorides, nitrogen oxides and sulfur oxides.

* * * Section 11 - TOXICOLOGICAL INFORMATION* * *

Acute Toxicity

This product can be moderately irritating to the skin and mildly irritating to the eyes. Contact skin sensitization, characterized by redness, inflammation, itching and/or burning may result from prolonged or repeated contact with this material.

Component Analysis - LD50/LC50

Oral LD₅₀ (rat) >5000 mg/kg Dermal LD₅₀ (rabbit) > 5000 mg/kg Inhalation LC₅₀ (rat) > 2.0 mg/l

Information on Likely Routes of Exposure

Inhalation

May cause respiratory tract irritation.

Ingestion

May be harmful if swallowed.

Skin Contact

May be harmful in contact with skin.

Eye Contact

Causes eye irritation.

Immediate Effects

No data available.

Delayed Effects

Repeated or prolonged skin contact may result in dermatitis or dermal sensitization. Repeated or prolonged contact may result in conjunctivitis..

Medical Conditions Aggravated by Exposure

No data Available.

Irritation/Corrosivity Data

Respiratory tract irritation, skin irritation, eye irritation

Respiratory Sensitization

No data available.

Dermal Sensitization

May cause an allergic skin reaction

Germ Cell Mutagenicity

No data available for the mixture.

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Issue Date: 11/01/2014 v1.0



EcoLife One Pack Work Solution

SDS ID: VIA-237

Print Date: 1/13/16

Carcinogenicity

Component Carcinogenicity

This product not listed as carcinogens by ACGIH, NIOSH, or IARC.

Reproductive Toxicity

No information available for the product.

Specific Target Organ Toxicity - Single Exposure

No information available for the product.

Specific Target Organ Toxicity - Repeated Exposure

Repeated or prolonged skin contact may result in dermatitis or dermal sensitization. Repeated or prolonged contact may result in conjunctivitis..

Aspiration Hazard

Not expected to be an aspiration hazard.

* * * Section 12 - ECOLOGICAL INFORMATION* * *

Ecotoxicity

Toxic to aquatic organisms. May cause long-term adverse effects in the aquatic environment.

Component Analysis - Aquatic Toxicity

No ecotoxicity data are available for this product's components.

Persistence and Degradability

No information available for the product.

Bioaccumulation Potential

No information available for the product.

Mobility in Soil

No information available for the product.

* * * Section 13 - DISPOSAL CONSIDERATIONS* * *

Disposal Methods

Dispose of waste material according to Local, State, Federal, and Provincial Environmental Regulations. Empty package completely into application equipment. Empty package should be disposed of in an approved landfill or by incineration.

Disposal of Contaminated Packaging

Component Waste Numbers

The U.S. EPA has not published waste numbers for this product's components.

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* * * Section 14 - TRANSPORT INFORMATION* * *

US DOT Information

Shipping Name: This product is not regulated as a hazardous material for transportation.

Canada Transportation of Dangerous Goods Information

Shipping Name: This product is not regulated as a hazardous material for transportation.

* * * Section 15 - REGULATORY INFORMATION* * *

U.S. Federal Regulations

Components of this product have been checked against the non-confidential TSCA inventory by CAS Registry Number. Components not identified on this non-confidential inventory are either exempt from listing (i.e. polymers, hydrates) or are listed on the confidential inventory as declared by the supplier.

U.S. Federal Regulations

None of this product's components are listed under SARA Section 302 (40 CFR 355 Appendix A), SARA Section 313 (40 CFR 372.65), or CERCLA (40 CFR 302.4).

SARA 311/312: Acute Health Yes; Chronic No; Fire No; Pressure No; Reactive No

Federal Insecticide, Fungicide, and Rodenticide Act

The labeling and use requirements of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) are applicable to this product. Additional FIFRA information is as follows:

EPA Registration No.: 83997-9

This material contains the following chemicals present on either the Listing of Pesticide Chemicals (40 CFR 180) or Pesticides Classified for Restricted Use as listed by FIFRA:

Castor oil (8001-79-4)

FIFRA Section number 180.950

Component Marine Pollutants

This material contains one or more of the following chemicals required by US DOT to be identified as marine pollutants.

CAS	Component
64359-81-5	4,5-Dichloro-2-N-octyl-4-isothiazolin-3-one

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U.S. State Regulations

State Regulations

Other state regulations may apply. Check individual state requirements.

Component Analysis - State

Component	CAS	CA	MA	MN	NJ	PA	Di
Paraffin waxes and Hydrocarbon waxes			1417	IALLA	140	PA	KI
Taranin waxes and riyurocarbon waxes	8002-74-2	Yes	Yes	Yes	Yes	Yes	Yes

Canadian WHMIS Ingredient Disclosure List (IDL)

This product has been classified in accordance with the hazard criteria of the CPR and the MSDS contains all of the information required by the CPR

Component Analysis - WHMIS IDL

The following components are identified under the Canadian Hazardous Products Act Ingredient Disclosure List: Castor oil (8001-79-4)

1 %

WHMIS Classification: NA

Component Analysis - Inventory

Component	CAS#	TSC A	DSL	NDS L	EINE	AUS	MITI	PHIL	KOR EA	ELIN	CHIN
Water and Other Non-hazardous Components	7732-18-5	Yes	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes
Paraffin waxes and Hydrocarbon waxes	8002-74-2	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes
Castor oil	8001-79-4	Yes	Yes	No	Yes	Yes	Yes	Yes	Vaa	A1	
4,5-Dichloro-2-N-	64359-81-5	Yes	No	Yes					Yes	No	Yes
octyl-4-isothiazolin- 3-one		165	140	res	Yes	Yes	Yes	Yes	Yes	No	Yes

* * * Section 16 - OTHER INFORMATION* * *

Summary of Changes

New SDS: 11/01/2014

Key / Legend

ACGIH = American Conference of Governmental Industrial Hygienists; AU = Australia; BOD - Biochemical Oxygen Demand; C - Celsius; CA - Canada; CAS = Chemical Abstracts Service; CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act; CFR = Code of Federal Regulations; CN = China;

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CPR = Controlled Products Regulations; DOT = Department of Transportation; DSL = Domestic Substances List; EINECS = European Inventory of Existing Commercial Chemical Substances; ELINCS = European List of Notified Chemical Substances; EPA = Environmental Protection Agency; ERG = Emergency Response Guide; EU = European Union; F - Fahrenheit; HEPA = High Efficiency Particulate Air; HMIS = Hazardous Material Information System; HPV - High Production Volume Chemical (EU); IARC = International Agency for Research on Cancer; IATA = International Air Transport Association; ICL - In Commerce List (Canada); IDL - Ingredient Disclosure List; IDLH - Immediately Dangerous to Life and Health; JP = Japan; KR = Korea; LEL - Lower Explosive Limit; MITI = Japan Ministry of International Trade and Industry; mg/Kg = milligrams per Kilogram; mg/L = milligrams per Liter; mg/m3 = milligrams per Cubic Meter; MSHA = Mine Safety and Health Administration; NA = Not Applicable or Not Available; NFPA = National Fire Protection Association; NIOSH = National Institute for Occupational Safety and Health: NJTSR = New Jersey Trade Secret Registry: NTP = National Toxicology Program; NZ = New Zealand; OSHA = Occupational Safety and Health Administration; PH = Philippines; RCRA = Resource Conversation & Recovery Act; SARA = Superfund Amendments and Reauthorization Act; STEL = Short Term Exposure Limit; TDG = Transport Dangerous Goods; TSCA = Toxic Substances Control Act; TWA - Time Weighted Average; UEL - Upper Explosive Limit; US - United States; WHMIS = Workplace Hazardous Materials Information System.

Other Information

Disclaimer: Supplier gives no warranty of merchantability or of fitness for a particular purpose. Any product purchased is sold on the assumption the purchaser will make his own tests to determine the quality and suitability of the product. Supplier expressly disclaims any and all liability for incidental and/or consequential property damage arising out of the use of this product. No information provided shall be deemed to be a recommendation to use any product in conflict with any existing patent rights. Read the Material Safety Data Sheet before handling product.

End of Sheet VIA237

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