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October 15, 2021

Erin Hobbs
Washington State Department of Ecology
Northwest Regional Office
PO Box 330316
Shoreline, Washington 98133-9716

RE: PROGRESS REPORT, JULY THROUGH SEPTEMBER 2021
REMEDIAL INVESTIGATION MONITORING AND FEASIBILITY STUDY
CAPITAL INDUSTRIES, INC.
5801 3RD AVENUE SOUTH
SEATTLE, WASHINGTON
AGREED ORDER NO. DE 10402
FARALLON PN: 457-008

Dear Erin Hobbs:

Farallon Consulting, L.L.C. (Farallon) has prepared this progress report on behalf of Capital Industries, Inc. (CI) to summarize the activities conducted during the third quarter of 2021, July through September, as part of the ongoing remedial investigation monitoring and feasibility study (FS) being conducted at the CI facility at 5801 3rd Avenue South in Seattle, Washington (herein referred to as the CI Site). This progress report has been prepared in accordance with Agreed Order No. DE 10402 dated April 23, 2014, entered into by potentially liable persons that include CI; Art Brass Plating, Inc.; Blaser Die Casting Co.; and Burlington Environmental, LLC; and by the Washington State Department of Ecology (Ecology) (Agreed Order). CI and the other potentially liable persons listed above are collectively referred to as the West of 4th Group. The West of 4th Group Site under the Agreed Order consists of Site Unit 1 (SU1) and Site Unit 2 (SU2), as depicted on the figure presented in Attachment A. The CI Site is located in SU2.

ACTIVITIES DURING REPORTING PERIOD

Activities completed during this progress reporting period included:

- Conducting a semiannual groundwater monitoring and sampling event in September 2021 for selected SU2 monitoring wells.
- Continuing operation of vapor intrusion mitigation subslab depressurization systems (SSDSs) at the Pacific Food Systems (PFS) North Building at 5815 4th Avenue South and the Natus Medical Facility (Natus) at 5900 1st Avenue South in Seattle, Washington;[1]
- Meeting between Capital Industries, Inc. (represented by Farallon and Landau Associates, Inc. [Landau]) and Ecology regarding historical vapor intrusion work conducted at the Site;

[1] The Natus Medical Facility at 5900 1st Avenue South in Seattle, Washington was previously known as the Olympic Medical Facility.

- Conducting SSDS operation and maintenance activities and influent, indoor air, and outdoor air sampling at the PFS North Building and Natus; and
- Evaluating the analytical results for SSDS influent and indoor air samples collected at the PFS North Building (Attachment B) and Natus (Attachment C) in September 2021.

These activities are summarized in the sections that follow.

GROUNDWATER MONITORING

Groundwater monitoring and sampling were performed on September 7, 8, and 9, 2021 in accordance with the technical memorandum regarding FINAL West of 4th Groundwater Monitoring Program Plan, 2017 through Draft Cleanup Action Plan, W4 Joint Deliverable, Agreed Order No. DE 10402 dated March 21, 2017, from Janet Knox of Pacific Groundwater Group to Ed Jones of Ecology and the email thread regarding West of Fourth Site Unit 2 Updated Groundwater Monitoring Plan dated March 16, 2021 from Paul Bianco of Ecology to Janet Knox of Pacific Groundwater Group. Groundwater elevation data were collected at selected SU2 monitoring wells. Groundwater samples were collected from monitoring wells scheduled for sampling and analyzed for chlorinated volatile organic compounds (CVOCs). Groundwater samples from selected monitoring wells were also analyzed for natural attenuation parameters, including nitrate, ferrous iron, sulfate, total organic carbon, methane, and ethane/ethene. Summary figures and tables will be provided to Ecology and included in the fourth quarter 2021 progress report.

VAPOR INTRUSION MITIGATION

The SSDSs at the PFS North Building and Natus operated continuously during the third quarter of 2021. Landau evaluated the influent and ambient indoor and outdoor air monitoring results from the PFS North Building and Natus in September 2021, which are summarized in Attachments B and C, respectively.

Full analytical and inspection results from the April and September 2021 operations and maintenance events at the PFS North Building and Natus will be summarized in a forthcoming 2021 Annual Vapor Intrusion Mitigation Status Report that will be prepared by Landau following completion of the September 2021 operations and maintenance event. A summary of the most recent semi-annual influent and indoor air sampling results is provided below.

Pacific Food Systems North Building

Indoor and outdoor ambient air samples were collected at the PFS North Building on September 7, 2021 by Landau personnel. Trichloroethene (TCE) was detected at three indoor sample locations at concentrations ranging from 1.02 to 1.84 micrograms per cubic meter (µg/m^3), which exceed the indoor air Inhalation Pathway Interim Measures Action Level (IPIMAL) of 0.39 µg/m^3. No other CVOCs were detected in the indoor air samples collected in September 2021. No CVOCs were detected in the outdoor air sample collected in September 2021.

The SSDS vacuum blower at PFS North Building was inspected during the September 2021 site visit and is operating effectively within normal operating parameters. The current vacuum blower is applying sufficient vacuum beneath the building slab, resulting in ongoing effective depressurization and vapor intrusion mitigation.

An SSDS soil gas influent sample was collected to evaluate CVOC concentrations being extracted from beneath the building slab area. Tetrachloroethylene (PCE) was detected at a concentration of 21.9 µg/m^3, and TCE was detected at a concentration of 33.0 µg/m^3. No other CVOCs were detected in the soil gas influent sample collected in September 2021. PCE and TCE concentrations in SSDS soil gas influent samples have been declining since the SSDS startup with a steady-state rate of removal from approximately 2016 to date, based on available data.

Landau personnel completed an updated chemical inventory at the PFS North Building and identified a product (ZEP 45 penetrating lubricant) containing 30 to 50 percent TCE that is used by PFS. The manufacturer makes several formulations of product under the name ZEP 45; however, Landau was able obtain the applicable Safety Data Sheet (SDS) using the stock keeping unit number on the cans used at the PFS North Building. The SDS is included as Attachment D. The discovery of ZEP 45 containing TCE on the CI Site suggests that it is a likely background indoor air source of TCE.

The analytical results of the air samples collected in September 2021 indicate that TCE persists in indoor air at concentrations similar to prior rounds of monitoring at the PFS North Building. However, pressure measurements indicate the SSDS is maintaining the pressure field across the entire building slab. The consistent detections of TCE in indoor air while the SSDS is properly functioning, the variability of TCE concentrations detected in indoor air samples, and the consistency of TCE concentrations in indoor air samples prior to and during installation and operation of the SSDS suggest that a background source of TCE is responsible for the indoor air concentrations of TCE.

Based on the results of indoor air sampling conducted before and after the installation of the SSDS, the data indicating that the SSDS is maintaining the pressure field across the entire building slab, and the identification of the likely indoor air source of TCE, sub-slab soil gas does not appear to be contributing to the indoor air TCE concentrations at PFS.

Natus Medical Facility

Indoor and outdoor ambient air samples were collected at Natus on September 7, 2021 by Landau personnel. PCE was detected at two indoor air sample locations at concentrations ranging from 0.279 to 0.343 µg/m^3, which are less than the indoor air IPIMAL of 7.5 µg/m^3. No other CVOCs were detected in the indoor air samples collected in September 2021. No CVOCs were detected in the outdoor air sample collected in September 2021.

The SSDS vacuum blower at Natus was inspected during the September 2021 site visit and is operating effectively within normal operating parameters. The current vacuum blower is applying sufficient vacuum beneath the building slab, resulting in ongoing effective depressurization and vapor intrusion mitigation.

An SSDS soil gas influent sample was collected to evaluate CVOC concentrations being extracted from the area beneath the building slab. TCE was detected at a concentration of 1.16 µg/m^3, and PCE was detected at a concentration of 0.155 µg/m^3. No other CVOCs were detected in the soil gas influent sample collected in September 2021. Concentrations of TCE and PCE in SSDS influent samples at Natus have been consistent with a steady-state rate of removal from approximately 2017 to date, based on available data.

During the September 2021 site visit, a concrete floor crack was observed by Landau personnel near SSDS sump No. 3. The impact to the SSDS is minimal; however, the crack and leak will be repaired in accordance with the ongoing operation plan for the SSDS. Landau is in the process of coordinating the repair and sealing of this floor crack.

PUBLIC COMMUNICATIONS

No public communications activities were completed by CI during this period.

ANTICIPATED WORK IN THE NEXT QUARTER

Work anticipated to be performed during the fourth quarter of 2021, October through December, is summarized below.

GROUNDWATER MONITORING

Analytical results from the semiannual groundwater monitoring and sampling event conducted in September 2021 will be used to confirm the stability of the CVOC plumes, monitor ongoing natural attenuation processes to refine potential time frames for achieving cleanup levels, evaluate existing and potential future vapor intrusion risk, and provide data to support preparation of a draft Cleanup Action Plan. The data will be summarized in figures and tables that will be provided to Ecology and included in the fourth quarter 2021 progress report.

VAPOR INTRUSION MITIGATION

SSDS operations will continue at both the PFS North Building and Natus. The results of the inspections, maintenance, and monitoring of the SSDSs will be summarized in the 2021 Annual Vapor Intrusion Mitigation Status Report that will be prepared by Landau during the fourth quarter of 2021.

Additional work is planned to evaluate whether the SSDS systems at the PFS North Building and Natus can be shut down. A work plan for future work at the PFS North Building and Natus will be drafted by Landau and submitted for Ecology review in the fourth quarter of 2021. Results of ongoing investigation and mitigation measures will be summarized in the 2021 Annual Vapor Intrusion Mitigation Status Report.

FEASIBILITY STUDY WORK

CI and the other West of 4th Group members will respond to comments from Ecology on the draft FS Addenda for SU1 and SU2, which were submitted to Ecology for review in January 2021. Comments regarding the SU1 and SU2 draft FS Addenda are anticipated in the fourth quarter of 2021. The FS Addenda for SU2 and SU1 will be finalized and together will comprise the final components of the West of 4th Group FS Report. Upon concurrence from Ecology that the FS requirements have been completed, a draft Cleanup Action Plan will be prepared for SU2.

PUBLIC COMMUNICATIONS

The project website (https://www.farallonconsulting.com/public-access/) will be updated with an electronic copy of this progress report.

The next progress report will summarize activities completed from October through December 2021 and will be submitted on or before January 15, 2022.

CLOSING

Farallon trusts that this quarterly progress report provides sufficient information for Ecology needs. If you have questions regarding this project, please contact either of the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

Amanda Meugniot
Associate Geologist

Jeffrey Kaspar, L.G., L.H.G.
Principal Geologist

Attachments: Attachment A, Site Diagram
Attachment B, Subslab Depressurization System Analytical Results – Pacific Food Systems – North Building
Attachment C, Subslab Depressurization System Analytical Results – Natus Medical Facility
Attachment D – ZEP 45 Safety Data Sheet

cc: Ron Taylor, Capital Industries, Inc.
Donald Verfurth, Gordon Rees Scully Mansukhani, LLP
Thomas Mullen, Gordon Rees Scully Mansukhani, LLP
Kenneth Luther, Chubb Group of Insurance Companies
Alborz Wozniak, Veritas Environmental Consulting, Inc.
Peter J. Mintzer, Selman Breitman LLP
Alex Sage, Allianz Reinsurance America, Inc.
Marshall Zimmerman, The Travelers Companies
Jane E. Kelly, The Travelers Companies
Jennifer Wynkoop, Landau Associates, Inc.

Email with link to electronic copy on project website:

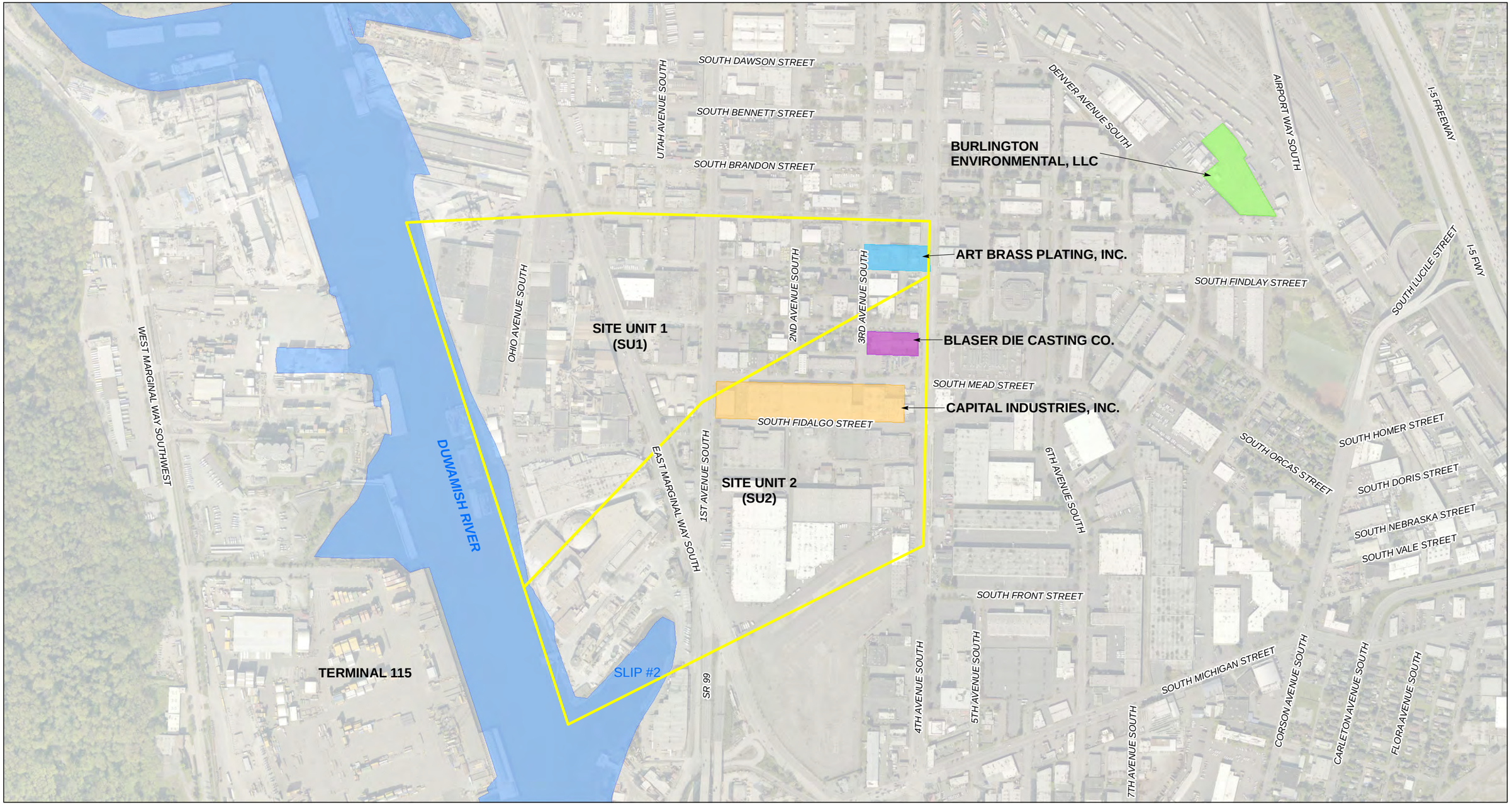
Janet Knox, Pacific Groundwater Group
Dana Cannon, Aspect Consulting
Bill Carroll, Arrow Environmental
Laura Dell'Olio, Clean Earth

AM/JK:ca

ATTACHMENT A
SITE DIAGRAM

PROGRESS REPORT, JULY THROUGH SEPTEMBER 2021
Capital Industries, Inc.
5801 Third Avenue South
Seattle, Washington

Farallon PN: 457-008



LEGEND

- ART BRASS PLATING, INC.
- BLASER DIE CASTING CO.
- CAPITAL INDUSTRIES, INC.
- BURLINGTON ENVIRONMENTAL, LLC
- SITE UNIT BOUNDARY

N

0 250 500

SCALE IN FEET

1. ALL LOCATIONS ARE APPROXIMATE
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 1

SITE VICINITY
WEST OF 4th GROUP SITE UNIT 2
SEATTLE, WASHINGTON

FARALLON PN: 457-008

Drawn By: tperrin | Checked By: AM | Date: 1/11/2021 | Disc Reference:
Document Path: Q:\Projects\457 CapitalIndust\008 PilotStudy\Mapfiles\2020Q3_GW\Figure1_Sitemap.mxd

ATTACHMENT B
SUBSLAB DEPRESSURIZATION SYSTEM ANALYTICAL RESULTS – PACIFIC FOOD SYSTEMS – NORTH BUILDING

PROGRESS REPORT, JULY THROUGH SEPTEMBER 2021
Capital Industries, Inc.
5801 Third Avenue South
Seattle, Washington

Farallon PN: 457-008

Table 1
Summary of Vapor Intrusion Assessment Analytical Results
Pacific Food Systems, Inc. North Building
5815 4th Avenue South
Seattle, Washington

Sample Type	Location	Location Description	Sample Identification	Sample Date	Volatile Organic Compounds (µg/m³; TO-15, TO-15 SIM)					
					PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	1,1-Dichloroethene	Vinyl Chloride
			Commercial Indoor Air IPIMAL - Cancer		22	1.5	N/A	N/A	N/A	0.66
			Commercial Indoor Air IPIMAL - Non-cancer		7.5	0.39		12	39	19
Indoor Air (c)	5815N-IA1	Western side of Pacific Food Systems North Building Shop Area	FAR-36029-022112	2/21/2012	**1.5**	**4.4**	**0.98**	0.67 U	0.067 U	0.043 U
			IA-3-1565-032013	3/20/2013	**1.6**	**7.0**	**1.6**	0.68 U	0.068 U	0.044 U
			IA6-22497-060115	6/1/2015	**0.39**	**2.0**	0.12 U	0.63 U	0.063 U	0.040 U
			IA5-15899-113015	11/30/2015	**0.534**	**0.971**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			IA2-1042616-Warehouse	4/26/2016	**0.61**	**4.68**	0.0793 U	0.0238 U	--	0.217 U
			IA2-083116-Warehouse	8/31/2016	**0.475**	**2.15**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			IA2-010517-Warehouse	1/5/2017	**0.905**	**2.95**	**0.201**	0.0238 U	0.0357 U	0.217 U
			IA-2-033017	3/30/2017	0.339 U	**1.51**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			IA-3-15901-032019	3/20/2019	**1.69 B**	**2.83**	0.0793 U	**0.0974**	0.0357 U	0.217 U
			5815N-IA-1-092619	9/26/2019	**0.770**	**2.82**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA1-031920	3/19/2020	**0.475**	**5.52**	**2.09**	**0.287**	**0.0815**	0.217 U
			5815N-IA1-20200923	9/23/2020	**0.510**	**1.64**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA1-20210426	4/26/2021	**0.424**	**1.33**	0.396 U	0.198 U	0.0397 U	0.0256 U
			5815N-IA1-20210907	9/7/2021	0.678 U	**1.02**	3.96 U	1.98 U	0.397 U	0.256 U
	5815N-IA3	Pacific Food Systems North Building Parts Cleaner Area in Shop	IA-5-13844-042414	4/24/2014	**1.1**	**3.4**	**0.49**	0.65 U	0.065 U	0.042 U
	5815N-IA4		IA-6-33970-050514	5/5/2014	**0.95**	**3.6**	**0.34**	0.65 U	0.065 U	0.042 U
			5815N-IA4-20210907	9/7/2021	0.271 U	**1.84**	1.59 U	0.793 U	0.159 U	0.102 U
	5815N-IA8	Pacific Food Systems North Building Front Office	FAR-25243-022112	2/21/2012	**0.60**	**1.9**	**0.32**	0.68 U	0.068 U	0.044 U
			IA-4-34193-032013	3/20/2013	**0.66**	**2.4**	**0.43**	0.67 U	0.067 U	0.043 U
			IA7-34758-060115	6/1/2015	**1.1**	**1.9**	0.12 U	0.62 U	0.062 U	0.040 U
			IA4-17646-113015	11/30/2015	**0.606**	**0.938**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			IA1-1042616-Office	4/26/2016	**0.475**	**4.84**	0.0793 U	0.0238 U	--	0.217 U
			IA1-083116-Office	8/31/2016	**0.475**	**2.26**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			IA2-010517-Office	1/5/2017	**0.585**	**39.5**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			IA-1-033017	3/30/2017	**0.351**	**3.42**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA-8-092619	9/26/2019	0.339 U	**3.89**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA8-031920	3/19/2020	**0.598**	**1.43**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA8-20200923	9/23/2020	0.339 U	**1.37**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA8-20210426	4/26/2021	**1.85**	**1.40**	0.396 U	0.198 U	0.0397 U	0.0256 U
			5815N-IA8-20210907	9/7/2021	0.271 U	**1.33**	1.59 U	0.793 U	0.159 U	0.102 U
	5815N-IA9	Pacific Food Systems North Building Central Shipping Room Proximate to Door	IA-2-17244-032019	3/20/2019	**702 B,E**	**3.57**	0.0793 U	**0.0615**	0.0357 U	0.217 U
			5815N-IA-9-092619	9/26/2019	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA9-20200923	9/23/2020	0.339 U	**1.54**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-IA9-20210426	4/26/2021	**0.357**	**1.94**	0.396 U	0.198 U	0.0397 U	0.0256 U

Table 1
Summary of Vapor Intrusion Assessment Analytical Results
Pacific Food Systems, Inc. North Building
5815 4th Avenue South
Seattle, Washington

Sample Type	Location	Location Description	Sample Identification	Sample Date	Volatile Organic Compounds (µg/m³; TO-15, TO-15 SIM)					
					PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	1,1-Dichloroethene	Vinyl Chloride
Outdoor Air	5815S-OA1	Outside south of Pacific Food Systems South Building	FAR-5659-022112	2/21/2012	0.22 U	0.17 U	0.13 U	0.64 U	0.064 U	0.041 U
			OA-1-35995-032013	3/20/2013	0.23 U	0.18 U	0.13 U	0.66 U	0.066 U	0.043 U
			5815N-OA1-20210426	4/26/2021	**1.66**	**0.411**	0.396 U	0.198 U	0.0397 U	0.0256 U
			5815N-OA1-20210907	9/7/2021	0.271 U	0.215 U	1.59 U	0.793 U	0.159 U	0.102 U
	5815S-OA2	Outside Pacific Food Systems South Building at southeastern corner on telephone pole	OA-2-34748-040214	4/24/2014	0.21 U	**0.27**	0.12 U	0.61 U	0.061 U	0.039 U
			AA3-96113-060115	6/1/2015	0.21 U	**2.9**	0.12 U	0.61 U	0.061 U	0.039 U
			AA1-042616-UW	4/26/2016	0.339 U	**14.8**	0.0793 U	0.0238 U	--	0.217 U
			OA1-010517-UW	1/5/2017	**0.573**	**4.96**	0.0793 U	0.0238 U	0.0357 U	0.217 U
	5815S-OA3	Outside south of Pacific Food Systems South Building	OA-3-15422-032019	3/20/2019	**2.46 B**	**0.0931**	0.0793 U	**0.0566**	0.0357 U	0.217 U
			5815N-OA-3-092619	9/26/2019	0.339 U	**0.153**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5815N-OA1-20200923	9/23/2020	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
	5815N-OA1	Outside east of Pacific Food Systems buildings on telephone pole	AA1-15423-113015	11/30/2015	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			AA1-083116-DO	8/31/2016	0.339 U	0.0914 U	0.0793 U	0.038 U	0.0357 U	0.217 U
			OA-1-033017	3/30/2017	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.357 U	0.217 U
			5815N-OA1-031920	3/19/2020	0.339 U	0.0914 U	0.0793 U	**0.0311**	0.0357 U	0.217 U
Subslab	5815N-SS1	Western side of Pacific Food Systems North Building Shop Area	5815N-Warehouse1-041311	4/13/2011	**840**	**1,400**	**74**	1.4 U	0.68 U	0.44 U
	5815N-SS2	Central part of Pacific Food Systems North Building Shop Area	5815N-Warehouse2-041311	4/13/2011	**4,200**	**28,000**	42 U	42 U	42 U	27 U
SSDS	SSDS Influent	SSDS Influent Sample Port	SYSTEMINFLUENT-042616	4/26/2016	**170**	**243**	**12.9**	**0.238**	--	0.217 U
			SYSTEM-083116	8/31/2016	**497**	**482**	**23.9**	**0.278**	0.0357 U	0.217 U
			PFS-Influent-010517	1/5/2017	**153**	**266**	**5.95**	**0.211**	0.0357 U	0.217 U
			PFS-Influent-033017	3/30/2017	**138**	**169**	**9.95**	**0.264**	0.0357 U	0.217 U
			PFS-INF-17637-032019	3/20/2019	**148 B,E**	**219**	**3.14**	**0.154**	0.0357 U	0.217 U
			5815N-INFLUENT-092619	9/26/2019	**196**	**232**	**6.07**	**0.331**	0.0357 U	0.217 U
			5815N-INFLUENT-031920	3/19/2020	**98.0**	**87.4**	**2.30**	**0.108**	0.0357 U	0.217 U
			5815N-INFLUENT-20200923	9/23/2020	**94.6**	**168**	**5.57**	**0.216**	0.0357 U	0.217 U
			5815N-INFLUENT-20210426	4/26/2021	**41.4**	**84.7**	**2.29**	0.793 U	0.159 U	0.102 U
			5815N-INFLUENT-20210907	9/7/2021	**21.9**	**33.0**	3.96 U	1.98 U	0.397 U	0.256 U

Notes:

Bold text indicates detected analyte

Green shading indicates detected analyte exceeds IPIMAL

(a) Interim action levels presented from Updated Air and Groundwater IPIMALS/VIRLs for Residential and Commercial Scenarios for the Georgetown Site dated October 19, 2012. Note that only compounds representing a vapor intrusion risk are listed.

(b) IPIMALs are not applicable to soil gas results.

(c) Indoor air concentrations are not normalized to outdoor air concentrations

U = The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit.

B = Analyte detected in the associated Method Blank

E = Value above quantitation range

Acronyms/Abbreviations:

IPIMAL = inhalation pathway interim measure action level

-- = not analyzed

N/A = Not Applicable, used where the constituent of concern will not affect the medium of potential concern due to an incomplete pathway or no pertinent standard exists.

Pacific Food Systems = Pacific Food Systems, Inc.

PCE = tetrachloroethene

SSDS = subslab depressurization system

TCE = trichloroethene

VIRLS = vapor intrusion remediation levels

ATTACHMENT C
SUBSLAB DEPRESSURIZATION SYSTEM ANALYTICAL RESULTS – NATUS MEDICAL FACILITY

PROGRESS REPORT, JULY THROUGH SEPTEMBER 2021
Capital Industries, Inc.
5801 Third Avenue South
Seattle, Washington

Farallon PN: 457-008

Table 1
Summary of Vapor Intrusion Assessment Analytical Results
Natus (Formerly Olympic) Medical Facility
5900 First Avenue South
Seattle, Washington

Sample Type	Location	Location Description	Sample Identification	Sample Date	Volatile Organic Compounds (µg/m^3; TO-15, TO-15 SIM)					
					PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	1,1-Dichloroethene[1]	Vinyl Chloride
			Commercial Indoor Air IPIMAL - Cancer[2]		22	1.5	N/A	N/A	N/A	0.66
			Commercial Indoor Air IPIMAL - Non-cancer[2]		7.5	0.39		12	39	19
Indoor Air (c)	5900-IA1	Building Main Office	IA8-33937-060215	6/2/2015	0.22 U	0.17 U	0.13 U	0.63 U	0.063 U	0.041 U
			NATUS-OFFICE-032118	3/21/2018	**0.882**	**1.11**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-IA1-10945-032019	3/20/2019	**1.49**	**0.238**	0.0793 U	**0.0372**	0.0357 U	0.217 U
			5900-IA-1-092719	9/27/2019	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-IA1-031920	3/19/2020	**0.411**	**0.213**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-IA1-20200923	9/23/2020	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-IA1-20210428	4/28/2021	**0.107**	0.0537 U	0.396 U	0.198 U	0.0397 U	0.0256 U
			5900-IA1-20210907	9/7/2021	**0.279**	0.215 U	1.59 U	0.793 U	0.159 U	0.102 U
	5900-IA2	Building Shipping Office	IA9-34348-060215	6/2/2015	0.21 U	0.17 U	0.12 U	0.62 U	0.062 U	0.040 U
	5900-IA3	Building Warehouse	NATUS-WAREHOUSE-032118	3/21/2018	**0.583**	**25.3**	0.0793 U	**0.102**	**0.117**	**0.261**
			NATUS-5900-IA3-080218	8/2/2018	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-IA3-15893-032019	3/20/2019	**2.18**	**6.08**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-IA3-092619	9/26/2019	**0.666**	**0.605**	0.0793 U	**0.0330**	0.0357 U	0.217 U
			5900-IA3-031920	3/19/2020	**0.734**	**0.176**	0.0793 U	**0.0268**	0.0357 U	0.217 U
			5900-IA3-20200923	9/23/2020	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-IA3-20210428	4/28/2021	**0.195**	0.0537 U	0.396 U	0.198 U	0.0397 U	0.0256 U
			5900-IA3-20210907	9/7/2021	**0.343**	0.215 U	1.59 U	0.793 U	0.159 U	0.102 U
Outdoor Air	5900-OA1	Outside north of the Building on a telephone pole	AA4-34322-060215	6/2/2015	0.21 U	0.16 U	0.12 U	0.61 U	0.061 U	0.039 U
	5900-OA2	Outside south of the Building on west side	NATUS-UPWIND-032118	3/21/2018	**0.600**	**0.430**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			NATUS-5900-OA2-080218	8/2/2018	0.339 U	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-OA2-092619	9/26/2019	**0.368**	**4.27**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-OA2-031920	3/19/2020	**8.83**	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-OA2-20200923	9/23/2020	**3.45**	0.0914 U	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-OA2-20210428	4/28/2021	**0.107**	0.0537 U	0.396 U	0.198 U	0.0397 U	0.0256 U
			5900-OA2-20210907	9/7/2021	0.271 U	0.215 U	0.159 U	0.793 U	0.159 U	0.102 U
	5900-OA3	Ouside west of the Building moved to southwest corner of the Building.	5900-OA3-15421-032019	3/20/2019	**1.36**	0.0914 U	0.0793 U	**0.0416**	0.0357 U	0.217 U

Table 1
Summary of Vapor Intrusion Assessment Analytical Results
Natus (Formerly Olympic) Medical Facility
5900 First Avenue South
Seattle, Washington

Sample Type	Location	Location Description	Sample Identification	Sample Date	Volatile Organic Compounds (µg/m^3; TO-15, TO-15 SIM)					
					PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	1,1-Dichloroethene[1]	Vinyl Chloride
SSDS (b)	SSDS Exhaust Blower Influent	Monitoring port on influent of SSDS exhaust blower	OLY-Influent-010517	1/5/2017	**1.49**	**9.47**	**2.21**	**0.511**	**0.0979**	0.217 U
			NATUS-INFLUENT-032118	3/21/2018	**0.675**	**1.06**	**0.118**	**0.0948**	0.0357 U	0.217 U
			NATUS-INF-15894-032019	3/20/2019	**1.46**	**0.567**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-INFLUENT-092619	9/26/2019	**0.750**	**1.72**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-INFLUENT-031920	3/19/2020	**0.596**	**0.525**	**0.177**	0.0238 U	0.0357 U	0.217 U
			5900-INFLUENT-20200923	9/23/2020	**1.41**	**0.511**	0.0793 U	0.0238 U	0.0357 U	0.217 U
			5900-INFLUENT-20210428	4/28/2021	**0.764**	**0.472**	1.59 U	0.793 U	0.159 U	0.102 U
			5900-INFLUENT-20210907	9/7/2021	**1.55**	**1.16**	3.96 U	1.98 U	0.397 U	0.256 U
	Sump 2	Manometer port	5900-SUMP-2-092619	9/26/2019	0.339 U	**0.154**	0.0793 U	0.0238 U	0.0357 U	0.217 U
	Sump 3	Manometer port	5900-SUMP-3-092619	9/26/2019	0.339 U	**0.108**	0.0793 U	0.0238 U	0.0357 U	0.217 U
	Sump 4	Manometer port	5900-SUMP-4-092619	9/26/2019	**0.372**	**1.38**	0.0793 U	0.0238 U	0.0357 U	0.217 U

Notes:

Bold text indicates detected analyte

Green shading indicates detected analyte exceeds IPIMAL

(a) Interim action levels presented from Updated Air and Groundwater IPIMALS/VIRLs for Residential and Commercial Scenarios for the Georgetown Site dated October 19, 2012. Note that only compounds representing a vapor intrusion risk are listed.

(b) IPIMALs are not applicable to soil gas results.

(c) Indoor air data is not corrected for outdoor air concentrations

U = The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit.

Acronyms/Abbreviations:

IPIMAL = inhalation pathway interim measure action level

µg/m3 = micrograms per cubic meter

N/A = not applicable, used where the constituent of concern will not affect the medium of potential concern due to an incomplete pathway or no pertinent standard exists

PCE = tetrachloroethene

SIM = selected ion monitoring

SSDS = subslab depressurization system

TCE = trichloroethene

VIRLS = vapor intrusion remediation levels

ATTACHMENT D
ZEP 45 SAFETY DATA SHEET

PROGRESS REPORT, JULY THROUGH SEPTEMBER 2021
Capital Industries, Inc.
5801 Third Avenue South
Seattle, Washington

Farallon PN: 457-008

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Material name : A07326 ZEP 45 017401_12CS 20N17

Material number : 000000000000017401

Manufacturer or supplier's details

Company : Zep Inc.

Address : 350 Joe Frank Harris Parkway, SE
Emerson, GA 30137

Telephone : 404-352-1680

Emergency telephone numbers

For SDS Information	:	Compliance Services 1-877-428-9937
For a Medical Emergency	:	877-541-2016 Toll Free - All Calls Recorded
For a Transportation Emergency	:	CHEMTREC: 800-424-9300 - All Calls Recorded. In the District of Columbia 202-483-7616

Recommended use of the chemical and restrictions on use

Recommended use : Lubricant

Note: This product is labeled as a consumer product in accordance with the United States Consumer Product Safety Commission regulations. The warnings presented below in this Safety Data Sheet (SDS) comply with the 2012 OSHA Hazard Communication Standard (GHS - Globally Harmonized System of Classification and Labeling). The requirements for the labeling and warnings of consumer products may differ from those required for GHS based hazard communication.

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	Aerosol containing a compressed gas
Colour	brown
Odour	characteristic

GHS Classification

Gases under pressure : Compressed gas
Skin irritation : Category 2
Eye irritation : Category 2A
Skin sensitisation : Category 1
Carcinogenicity : Category 1B
Specific target organ toxicity - single exposure : Category 3 (Central nervous system)

GHS label elements

Hazard pictograms :

Signal word : Danger

Hazard statements : H280 Contains gas under pressure; may explode if heated.
H315 Causes skin irritation.
H317 May cause an allergic skin reaction.
H319 Causes serious eye irritation.
H336 May cause drowsiness or dizziness.
H350 May cause cancer.

Precautionary statements : **Prevention:**
P201 Obtain special instructions before use.
P202 Do not handle until all safety precautions have been read and understood.
P261 Avoid breathing dust/ fume/ gas/ mist/ vapours/ spray.
P264 Wash skin thoroughly after handling.
P271 Use only outdoors or in a well-ventilated area.
P272 Contaminated work clothing should not be allowed out of the workplace.
P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response:
P302 + P352 IF ON SKIN: Wash with plenty of soap and water.
P304 + P340 + P312 IF INHALED: Remove person to fresh air and keep comfortable for breathing. Call a POISON CENTER/doctor if you feel unwell.
P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
P308 + P313 IF exposed or concerned: Get medical advice/ attention.
P333 + P313 If skin irritation or rash occurs: Get medical advice/ attention.
P337 + P313 If eye irritation persists: Get medical advice/ attention.
P362 Take off contaminated clothing and wash before reuse.
Storage:
P403 Store in a well-ventilated place.
P410 + P403 Protect from sunlight. Store in a well-ventilated place.
Disposal:
P501 Dispose of contents/container in accordance with local regulation.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical name	CAS-No.	Concentration [%]
trichloroethylene	79-01-6	>= 30 - < 50
Distillates (petroleum), hydrotreated heavy naphthenic	64742-52-5	>= 20 - < 30

Distillates (petroleum), straight-run middle	64741-44-2	>= 5 - < 10
2-(2-butoxyethoxy)ethanol	112-34-5	>= 1 - < 5
carbon dioxide	124-38-9	>= 1 - < 5
pentyl acetate	628-63-7	>= 1 - < 5
2-methylbutyl acetate	624-41-9	>= 1 - < 5

The exact percentages of disclosed substances are withheld as trade secrets.

SECTION 4. FIRST AID MEASURES

General advice : Move out of dangerous area.
Show this safety data sheet to the doctor in attendance.
Do not leave the victim unattended.

If inhaled : Consult a physician after significant exposure.
If unconscious, place in recovery position and seek medical advice.

In case of skin contact : If skin irritation persists, call a physician.
If on skin, rinse well with water.
If on clothes, remove clothes.
In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes.

In case of eye contact : In case of contact, immediately flush eyes with plenty of water for at least 15 minutes.
Remove contact lenses.
Protect unharmed eye.
Keep eye wide open while rinsing.
If eye irritation persists, consult a specialist.

If swallowed : Do NOT induce vomiting.
Keep respiratory tract clear.
Do not give milk or alcoholic beverages.
Never give anything by mouth to an unconscious person.
If symptoms persist, call a physician.
Take victim immediately to hospital.

Most important symptoms and effects, both acute and delayed : Effects are immediate and delayed.
Symptoms may include irritation, redness, pain, and rash.
Symptoms may include central nervous system depression, resulting in headache, nausea and/or dizziness.
Chronic effects are delayed and symptoms may not be observed during an exposure.
Causes skin irritation.
Causes serious eye irritation.
Review section 2 of SDS to see all potential hazards.

Notes to physician : Treat symptomatically. Symptoms may be delayed.

SECTION 5. FIREFIGHTING MEASURES

Suitable extinguishing media : Alcohol-resistant foam

Carbon dioxide (CO2)
Dry chemical

Unsuitable extinguishing media	:	High volume water jet
Specific hazards during firefighting	:	Do not allow run-off from fire fighting to enter drains or water courses.
Hazardous combustion products	:	Carbon dioxide (CO2) Carbon monoxide Smoke Chlorine compounds
Specific extinguishing methods	:	Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
Further information	:	Collect contaminated fire extinguishing water separately. This must not be discharged into drains. Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations. For safety reasons in case of fire, cans should be stored separately in closed containments. Use a water spray to cool fully closed containers.
Special protective equipment for firefighters	:	Wear self-contained breathing apparatus for firefighting if necessary.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures	:	Use personal protective equipment. Ensure adequate ventilation. Remove all sources of ignition. Evacuate personnel to safe areas. Beware of vapours accumulating to form explosive concentrations. Vapours can accumulate in low areas.
Environmental precautions	:	Prevent product from entering drains. Prevent further leakage or spillage if safe to do so. If the product contaminates rivers and lakes or drains inform respective authorities.
Methods and materials for containment and cleaning up	:	Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Sweep up or vacuum up spillage and collect in suitable container for disposal.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling	:	Do not breathe vapours or spray mist. Avoid exposure - obtain special instructions before use. Avoid contact with skin and eyes. For personal protection see section 8. Smoking, eating and drinking should be prohibited in the

application area.
Take precautionary measures against static discharges.
Provide sufficient air exchange and/or exhaust in work rooms.
Dispose of rinse water in accordance with local and national regulations.
Persons susceptible to skin sensitisation problems or asthma, allergies, chronic or recurrent respiratory disease should not be employed in any process in which this mixture is being used.
Always replace cap after use.

Conditions for safe storage : BEWARE: Aerosol is pressurized. Keep away from direct sun exposure and temperatures over 50 °C. Do not open by force or throw into fire even after use. Do not spray on flames or red-hot objects.
No smoking.
Keep in a cool, well-ventilated place.
Observe label precautions.
Electrical installations / working materials must comply with the technological safety standards.

Materials to avoid : Oxidizing agents

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
trichloroethylene	79-01-6	TWA	10 ppm	ACGIH
		STEL	25 ppm	ACGIH
		TWA	100 ppm	OSHA Z-2
		CEIL	200 ppm	OSHA Z-2
		Peak	300 ppm	OSHA Z-2
		TWA	50 ppm 270 mg/m3	OSHA P0
		STEL	200 ppm 1,080 mg/m3	OSHA P0
		STEL	100 ppm 537 mg/m3	CAL PEL
		C	300 ppm	CAL PEL
		PEL	25 ppm 135 mg/m3	CAL PEL
Distillates (petroleum), hydrotreated heavy naphthenic	64742-52-5	TWA (Mist)	5 mg/m3	OSHA Z-1
		TWA (Inhalable fraction)	5 mg/m3	ACGIH
2-(2-butoxyethoxy)ethanol	112-34-5	TWA (Inhalable fraction and vapor)	10 ppm	ACGIH

carbon dioxide	124-38-9	TWA	5,000 ppm	ACGIH
		STEL	30,000 ppm	ACGIH
		TWA	5,000 ppm 9,000 mg/m3	NIOSH REL
		ST	30,000 ppm 54,000 mg/m3	NIOSH REL
		TWA	5,000 ppm 9,000 mg/m3	OSHA Z-1
		TWA	10,000 ppm 18,000 mg/m3	OSHA P0
		STEL	30,000 ppm 54,000 mg/m3	OSHA P0
		PEL	5,000 ppm 9,000 mg/m3	CAL PEL
		STEL	30,000 ppm 54,000 mg/m3	CAL PEL
pentyl acetate	628-63-7	TWA	100 ppm 525 mg/m3	NIOSH REL
		TWA	100 ppm 525 mg/m3	OSHA Z-1
		TWA	100 ppm 525 mg/m3	OSHA P0
2-methylbutyl acetate	624-41-9	TWA	50 ppm	ACGIH
		STEL	100 ppm	ACGIH

Biological occupational exposure limits

Component	CAS-No.	Control parameters	Biological specimen	Sampling time	Permissible concentration	Basis
TRICHLOROETHENE	79-01-6	Trichloroacetic acid	Urine	End of shift at end of workweek	15 mg/l	ACGIH BEI
TRICHLOROETHENE		Trichloroethanol	In blood	End of shift at end of workweek	0.5 mg/l	ACGIH BEI
TRICHLOROETHENE		Trichloroethylene	In end-exhaled air	End of shift at end of workweek		ACGIH BEI

Engineering measures : effective ventilation in all processing areas

Personal protective equipment

Respiratory protection : Use respiratory protection unless adequate local exhaust ventilation is provided or exposure assessment demonstrates that exposures are within recommended exposure guidelines.

Hand protection
Material : Protective gloves
Remarks : The suitability for a specific workplace should be discussed with the producers of the protective gloves.

Eye protection	:	Tightly fitting safety goggles Wear face-shield and protective suit for abnormal processing problems.
Skin and body protection	:	Impervious clothing Choose body protection according to the amount and concentration of the dangerous substance at the work place.
Hygiene measures	:	When using do not eat or drink. When using do not smoke. Wash hands before breaks and at the end of workday.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	:	Aerosol containing a compressed gas
Colour	:	brown
Odour	:	characteristic
Odour Threshold	:	No data available
pH	:	Not applicable
Boiling point	:	87.22 °C
Flash point	:	Not applicable
Evaporation rate	:	< 1
Flammability (solid, gas)	:	Not classified as a flammability hazard
Upper explosion limit	:	Not applicable
Lower explosion limit	:	Not applicable
Vapour pressure	:	Not applicable
Relative vapour density	:	No data available
Density	:	1.137 g/cm3
Solubility(ies)		
Water solubility	:	insoluble
Partition coefficient: n-octanol/water	:	No data available
Auto-ignition temperature	:	not determined
Thermal decomposition	:	No data available
Viscosity		
Viscosity, dynamic	:	Not applicable
Heat of combustion	:	20.59 kJ/g

SECTION 10. STABILITY AND REACTIVITY

Reactivity	:	Stable
Chemical stability	:	Stable under normal conditions.
Possibility of hazardous reactions	:	Vapours may form explosive mixture with air. No decomposition if stored and applied as directed.
Conditions to avoid	:	Heat, flames and sparks. Extremes of temperature and direct sunlight.
Incompatible materials	:	Metals Oxidizing agents
Hazardous decomposition products	:	Carbon monoxide, carbon dioxide and unburned hydrocarbons (smoke). Chlorine Phosgene Hydrogen chloride gas

SECTION 11. TOXICOLOGICAL INFORMATION

Potential Health Effects

Aggravated Medical Condition	:	None known.
Symptoms of Overexposure	:	Effects are immediate and delayed. Symptoms may include irritation, redness, pain, and rash. Symptoms may include central nervous system depression, resulting in headache, nausea and/or dizziness. Chronic effects are delayed and symptoms may not be observed during an exposure.

Carcinogenicity:

IARC	Group 1: Carcinogenic to humans	
	trichloroethylene	79-01-6
ACGIH	Suspected human carcinogen	
	trichloroethylene	79-01-6
OSHA	No component of this product present at levels greater than or equal to 0.1% is on OSHA's list of regulated carcinogens.	
NTP	Known to be human carcinogen	
	trichloroethylene	79-01-6

Acute toxicity

Product:

Acute oral toxicity : Acute toxicity estimate : > 5,000 mg/kg
Method: Calculation method

Components:

trichloroethylene:

Acute oral toxicity : LD50 Oral Rat: 4,920 mg/kg

Acute inhalation toxicity : LC50 Mouse: 8450 ppm
Exposure time: 4 h

Acute dermal toxicity : LD50 Dermal Rabbit: > 20,000 mg/kg

Distillates (petroleum), hydrotreated heavy naphthenic:

Acute oral toxicity : LD50 Rat: > 5,000 mg/kg

Acute inhalation toxicity : LC50 Rat: > 5 mg/l
Exposure time: 4 h

Acute dermal toxicity : LD50 Rabbit: > 5,000 mg/kg

Skin corrosion/irritation

Product:

Remarks: Irritating to skin.

Serious eye damage/eye irritation

Product:

Remarks: Severe eye irritation

Respiratory or skin sensitisation

Product:

Remarks: Causes sensitisation.

Germ cell mutagenicity

No data available

Carcinogenicity

No data available

Reproductive toxicity

No data available

STOT - single exposure

No data available

STOT - repeated exposure

No data available

Aspiration toxicity

No data available

Further information

Product:

Remarks: No data available

Remarks: Symptoms of overexposure may be headache, dizziness, tiredness, nausea and vomiting., Concentrations substantially above the TLV value may cause narcotic effects., Solvents may degrease the skin.

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

No data available

Persistence and degradability

No data available

Bioaccumulative potential

Product:

Partition coefficient: n-octanol/water	:	Remarks: No data available

Components:

trichloroethylene :

Partition coefficient: n-octanol/water	:	log Pow: 2.29

2-(2-butoxyethoxy)ethanol :

Partition coefficient: n-octanol/water	:	Pow: 1

pentyl acetate :

Partition coefficient: n-octanol/water	:	log Pow: 2.3

Mobility in soil

No data available

Other adverse effects

No data available

Product:

Regulation	40 CFR Protection of Environment; Part 82 Protection of Stratospheric Ozone - CAA Section 602 Class I Substances
Remarks	This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

Additional ecological information	:	An environmental hazard cannot be excluded in the event of unprofessional handling or disposal., Harmful to aquatic life with long lasting effects.

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues	:	The product should not be allowed to enter drains, water courses or the soil. Do not contaminate ponds, waterways or ditches with chemical or used container. Dispose of in accordance with local regulations.
Contaminated packaging	:	Empty remaining contents. Dispose of as unused product. Do not re-use empty containers. Do not burn, or use a cutting torch on, the empty drum.

SECTION 14. TRANSPORT INFORMATION

Transportation Regulation: 49 CFR (USA):
UN1950, AEROSOLS, NON-FLAMMABLE, 2.2, (6.1), - Limited quantity

Transportation Regulation: IMDG (Vessel):
UN1950, AEROSOLS, NON-FLAMMABLE, 2.2, (6.1), - Limited quantity

Transportation Regulation: IATA (Cargo Air):
UN1950, AEROSOLS, NON-FLAMMABLE, 2.2, (6.1), - Limited quantity

Transportation Regulation: IATA (Passenger Air):
UN1950, AEROSOLS, NON-FLAMMABLE, 2.2, (6.1), - Limited quantity

Transportation Regulation: TDG (Canada):
UN1950, AEROSOLS, NON-FLAMMABLE, 2.2, (6.1),

The product as delivered to the customer conforms to packaging requirements for shipment by road under US Department of Transportation (DOT) regulations. Additional transportation classifications noted above are for reference only, and not a certification or warranty of the suitability of the packaging for shipment under these alternative transport regulations.

SECTION 15. REGULATORY INFORMATION

TSCA list	:	The following substance(s) is/are subject to TSCA 12(b) export notification requirements: trichloroethylene 79-01-6

No substances are subject to a Significant New Use Rule.

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
trichloroethylene	79-01-6	100	212

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : Gases under pressure
Skin corrosion or irritation
Serious eye damage or eye irritation
Respiratory or skin sensitisation
Carcinogenicity
Specific target organ toxicity (single or repeated exposure)

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

SARA 313 : The following components are subject to reporting levels established by SARA Title III, Section 313:

trichloroethylene	79-01-6	47 %
2-(2-butoxyethoxy)ethanol	112-34-5	4.3931 %
2-butoxyethanol	111-76-2	0.0669 %

California Prop. 65

WARNING: This product can expose you to chemicals including trichloroethylene, which is/are known to the State of California to cause cancer and birth defects or other reproductive harm. For more information go to www.P65Warnings.ca.gov.

The components of this product are reported in the following inventories:

DSL All components of this product are on the Canadian DSL
TSCA On TSCA Inventory

For information on the country notification status for other regions please contact the manufacturer's regulatory group.

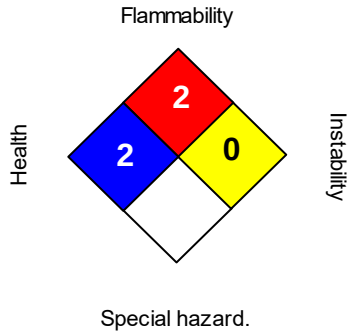
Inventory Acronym and Validity Area Legend:

TSCA (USA), DSL (Canada), NDSL (Canada)

SECTION 16. OTHER INFORMATION

Further information

NFPA:



HMIS III:

HEALTH	2*
FLAMMABILITY	2
PHYSICAL HAZARD	3

0 = not significant, 1 =Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

OSHA - GHS Label Information:

Hazard pictograms :

Signal word : **Danger:**

Hazard statements : Contains gas under pressure; may explode if heated. Causes skin irritation. May cause an allergic skin reaction. Causes serious eye irritation. May cause drowsiness or dizziness. May cause cancer.

Precautionary statements :

Prevention: Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Avoid breathing dust/ fume/ gas/ mist/ vapours/ spray. Wash skin thoroughly after handling. Use only outdoors or in a well-ventilated area. Contaminated work clothing should not be allowed out of the workplace. Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response: IF ON SKIN: Wash with plenty of soap and water. IF INHALED: Remove person to fresh air and keep comfortable for breathing. Call a POISON CENTER/doctor if you feel unwell. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. IF exposed or concerned: Get medical advice/ attention. If skin irritation or rash occurs: Get medical advice/ attention. If eye irritation persists: Get medical advice/ attention. Take off contaminated clothing and wash before reuse.
Storage: Store in a well-ventilated place. Protect from sunlight. Store in a well-ventilated place.
Disposal: Dispose of contents/container in accordance with local regulation.

Version:	2.2
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