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WEST PALM BEACH

November 27, 1991

Mr. Jeffrey Smith
Hazardous Waste Section
Florida Department of Environmental
Regulation - Southeast District
1900 S. Congress Ave., Suite A
West Palm Beach, FL 33406

FLD 984167791

RE: 11/5/91 RCRA Inspection at Boynton Beach Facility

Per our phone conversation on this date. I advised you that the black poly drums that were on the southeast side of our building were not from the coating of the floor in the storage area. These were from the installation of our Fire Suppression unit in the storage area. The material that was in these drums was put into the fire suppression unit. The material is FC-600 Light Water Brand ATC/APFF by 3M. (MSDS attached) I was holding these drums until I could RCRA clean them.

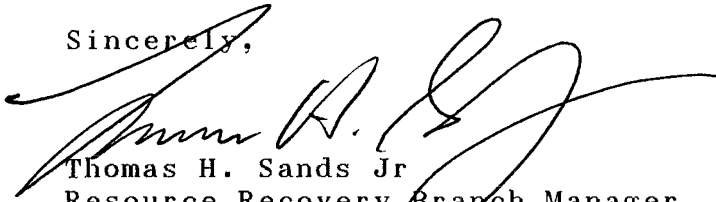
During the week of November 18th, we cut the tops off these drums and pressure washed them in the containment area of our dump and fill to make sure that they were completely cleaned and RCRA empty. The water that we used to cleaned them was then pumped into our waste solvent tank. We then disposed of drums through the municipal garbage system.

I firmly believed that this was the best way to handle these drums and to make sure that there is never any product of any kind that is able to leave the facility through water run off.

As further information, a previous letter from our Regional Environmental Engineer, Victor San Agustin, sent to Robert Kukleski, stated that there was to be an internal personnel change concerning my Branch Facility Manager, who is responsible for compliance at our facility. I am proud to say that this change has taken place and I now have a more qualified person to handle these matters in our facility.

I hope this letter will further explain the comments during the exit interview and our phone conversations.

Sincerely,



Thomas H. Sands Jr
Resource Recovery Branch Manager
Boynton Beach FLD 984167791

cc: Catherine McCord, EHS/Eastern Division
Fred Stockbarger, Regional Manager
Rick Peoples, EHS
Jerry Breen, BFM - Boynton Beach
Victor San Agustin, R.E.E.- Tampa Region

3M General Offices
3M Center
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Duns No.: 00-617-3082

3M

MATERIAL SAFETY
DATA SHEET

FACSIMILE COPY

DIVISION: INDUSTRIAL CHEMICAL PRODUCTS DIVISION

TRADE NAME: FC-600 LIGHT WATER Brand ATC/APFF

3M I.D. NUMBER: 98-0211-0334-0 98-0211-0335-7 98-0211-1798-5
CF-1206-0172-3 CF-1206-0173-1 CF-1206-0212-7 CF-1206-0213-5
CG-7900-7591-7 ZF-0000-3815-6 ZF-0000-3816-4 ZF-0000-3817-2
ZF-0002-0109-3 ZF-0002-0176-2 ZF-0002-0198-6

ISSUED: August 13, 1990

SUPERSEDES: September 06, 1988

DOCUMENT: 10-3869-4

1. INGREDIENTS	CAS NO.	PERCENT	EXPOSURE LIMITS			
			VALUE	UNIT	TYPE	AUTH
Water	7732-18-5	82.0	NONE	NONE	NONE	NONE
Ethanol, 2-(2-butoxyethoxy)-	112-34-5	12.0	35	ppm	TWA	CMRG
Synthetic Detergents +(5157P, 5036P)	TS	< 5.0	NONE	NONE	NONE	NONE
Fluoroalkyl Surfactants +(5132P, 5144P)	TS	< 5.0	NONE	NONE	NONE	NONE
Thickener +(5127P, 5123P)	TS	< 5.0	NONE	NONE	NONE	NONE

SOURCE OF EXPOSURE LIMIT DATA:

- CMRG: Chemical Manufacturer Recommended Guidelines
- NONE: None Established

NOTE: New Jersey Trade Secret Registry (EIN) 04499600-+

THIS PRODUCT CONTAINS THE FOLLOWING TOXIC CHEMICAL OR CHEMICALS SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372:

Ethanol, 2-(2-butoxyethoxy)-

2. PHYSICAL DATA

BOILING POINT:..... ca. 93.00 C
(Tinitial)
VAPOR PRESSURE:..... ca. 30.400 mmHg
Calc. @ R.T.
VAPOR DENSITY:..... ca. 00.62 Air = 1
Calc. @ R.T.
EVAPORATION RATE:..... < 1.00 Butyl Acetate = 1
SOLUBILITY IN WATER:..... Miscible
SPECIFIC GRAVITY:..... ca. 1.030 Water = 1
PERCENT VOLATILE:..... ca. 94.00 %
VOLATILE ORGANICS:..... N/D
pH:..... ca. 7.00-8.50

Abbreviations: N/D - Not Determined

N/A - Not Applicable

2. PHYSICAL DATA (continued)

VISCOSITY:..... N/D
APPEARANCE AND ODOR: Clear, amber colored liquid.

3. FIRE AND EXPLOSION HAZARD DATA

FLASH POINT:..... None (Setaflash CC)
FLAMMABILITY LIMIT - LEL:..... N/A
FLAMMABILITY LIMIT - UEL:..... N/A
AUTOIGNITION TEMPERATURE:..... N/D
EXTINGUISHING MEDIA:
FC-600 is a fire extinguishing agent.
SPECIAL FIRE FIGHTING PROCEDURES:
None Known
UNUSUAL FIRE AND EXPLOSION HAZARDS:
Toxic by-products, including small amounts of HF, may be formed. See
Section 6.

4. REACTIVITY DATA

STABILITY: Stable
INCOMPATIBILITY - MATERIALS TO AVOID:
Not Applicable
HAZARDOUS POLYMERIZATION: Will Not Occur
HAZARDOUS DECOMPOSITION PRODUCTS:
Thermal decomposition may produce toxic materials including HF.
Decomposition of usage concentrations does not present a hazard.

5. ENVIRONMENTAL INFORMATION

SPILL RESPONSE:
Observe precautions from other sections. Cover with absorbent
material. Collect spilled material. Clean up residue with water.

RECOMMENDED DISPOSAL:
Bleed spent solutions and small product quantities, <5 gal., to a
wastewater treatment system. Reduce discharge rate if foaming occurs.
Mix with flammable material and incinerate in an industrial or
commercial incinerator. Combustion products will include HF. Disposal
alternative: Dispose of completely absorbed waste product in a
facility permitted to accept chemical wastes. Since regulations vary,
consult applicable regulations or authorities before disposal. U.S.
EPA Hazardous Waste No.: None

ENVIRONMENTAL DATA:
96-Hr. LC50, Bluegill Sunfish(*Lepomis macrochirus*)=1500 mg/l; 96-Hr.
LC50, Fathead Minnow(*Pimephales promelas*)=1700 mg/l; 48-Hr. EC50,
Daphnia magna=2800 mg/l; COD=0.35 g/g; BOD20=0.21 g/g.

SARA HAZARD CLASS:

FIRE HAZARD: No PRESSURE: No REACTIVITY: No ACUTE: Yes CHRONIC: Yes

6. SUGGESTED FIRST AID

EYE CONTACT:

Abbreviations: N/D - Not Determined N/A - Not Applicable

6. SUGGESTED FIRST AID (continued)

Immediately flush with plenty of water. Continue for 10 minutes. Call a physician.

SKIN CONTACT:

Wash affected area with soap and water.

INHALATION:

Remove to fresh air.

INGESTION:

Give two glasses of water. Call a physician or Poison Control Center.

OTHER FIRST AID:

NONE

7. PRECAUTIONARY INFORMATION

Use only in well ventilated areas with sufficient air movement to maintain airborne levels at recognized health and safety levels. Avoid prolonged breathing of vapors. Avoid eye and skin contact. Store above 30 degrees F.

SPECIAL PROTECTION:

EYE PROTECTION: Safety Glasses or Goggles

SKIN PROTECTION: Rubber Gloves

VENTILATION: General ventilation adequate.

RESPIRATORY PROTECTION: Above component exposure limits, use organic vapor cartridge respirator.

8. HEALTH HAZARD DATA

EYE CONTACT: Can cause moderate irritation of the eye on direct contact with the concentrate. Diluted FC-600 (6 parts FC-600 in 94 parts water) is minimally irritating to the eyes.

SKIN CONTACT: Causes moderate irritation of skin on direct contact with FC-600 concentrate. Causes minimal irritation of skin on direct contact with FC-600 diluted (6 parts FC-600 and 94 parts water). May be absorbed through the skin in harmful amounts.

INHALATION: Mist or vapors may cause irritation of respiratory system. Very high concentration of vapors may cause vomiting, nausea, diarrhea, abdominal pain, pulmonary edema and stupor. Symptoms of overexposure may include unconsciousness; repeated overexposure may include nystagmus, recurrent unconsciousness, hemolysis and bone marrow depression.

INGESTION: Undiluted FC-600 has an acute oral LD50 (rat) greater than 10 grams per kilogram of body weight. This classifies this product as being practically non-toxic orally.

Abbreviations: N/D - Not Determined N/A - Not Applicable

The information on this Data Sheet represents our current data and best opinion as to the proper use and handling of this material under normal conditions. Any use of the material which is not in conformance with this Data Sheet or which involves using the material in combination with any other material or any other process is the responsibility of the user.