

From: [Roy P. Subia](#)
To: [Bayly, Karen](#)
Cc: [Jim Murray](#)
Subject: Clewiston EPA Inspection follow-up
Date: Wednesday, February 19, 2020 3:54:33 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[SDS-Ices-TNT.pdf](#)

Good afternoon Karen,

Thank you for taking the time to visit Clewiston last week.

Below are the updates to the items you mentioned during your visit.

- Analytical testing will be on schedule for every four years or sooner
 - We will also make the determination of frequency with our parts washers
 - We are working with Phoslab, they are building the test kits for us
 - BTEX
 - FL-Pro
 - PCB
 - TCLP RCRA 8
 - Flashpoint
- Lamps are planned for FCC's next pickup at Clewiston
- Fire extinguishers were given a larger space (photos attached)
 - We constantly work on small 5s projects in the shops, the lines will be redone
- Hazardous tanks now have hazardous labeling per hazardous code (photo attached)
- The dirt that had some saturation next to the wash rack dirt was removed and placed back into the large dirt pile (photo attached)
 - A berm was also put in place to prevent any excess water from escaping the dirt pile
- Secondary container has been added to the 55-gallon drum at the wash rack (photo attached)
- SDS for TNT Ultimate Degreaser is attached
- Clewiston has a total of 4 parts washers

Thank you and please let me know if there was something missing or needs anything further clarification.

Roy Subia, ASP

Safety and Environmental Manager
Kelly Tractor Co.
8255 NW 58th Street
Miami, FL 33166
W: 305-592-5360
C: 305-332-7244

Roy_Subia@kellytractor.com

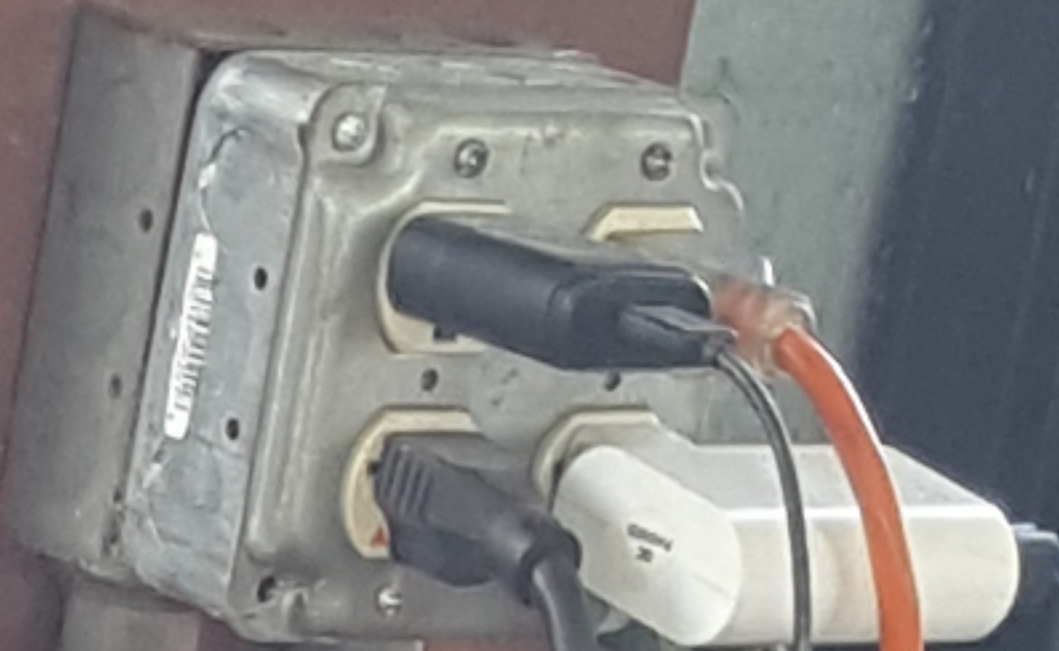
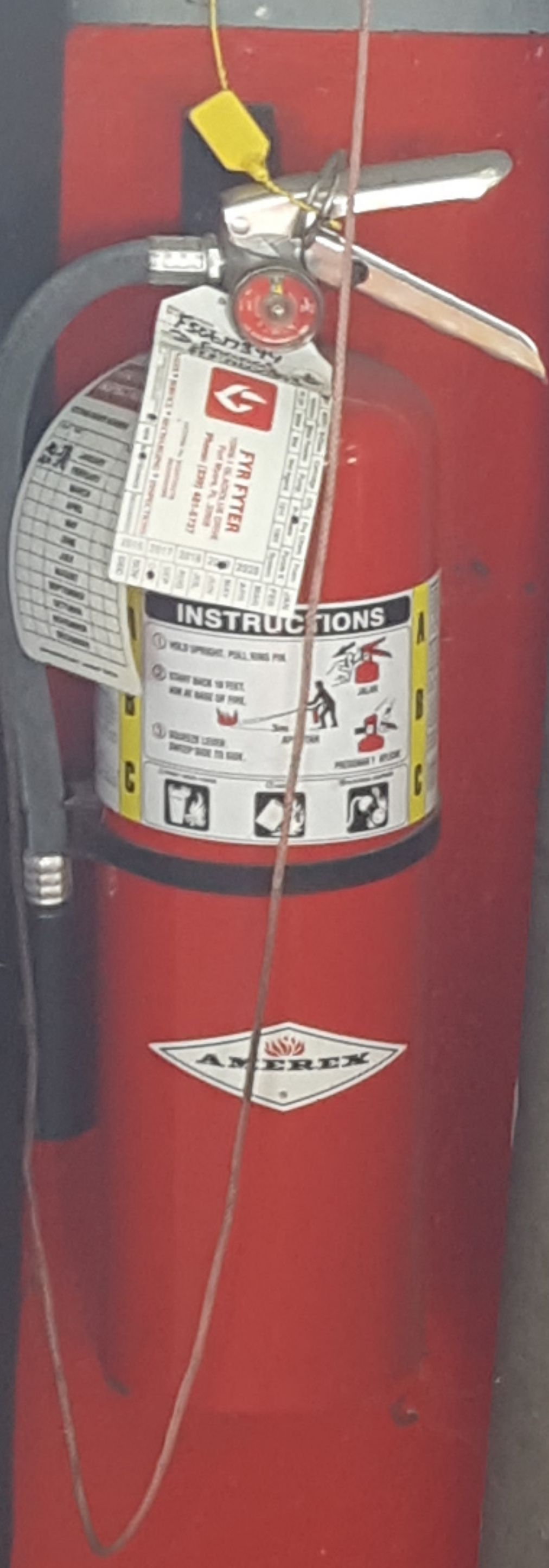




HDD
813.385.3221

FIRE
EXTINGUISHER
↓

OPEN
CL. SE
STOP



DIE
Not







USED
OIL

Condor







SAFETY DATA SHEET

For Chemical Emergency Spill, Leak, Fire Exposure or Accident
Call INFOTRAC Day or Night
North America: 800-535-5053

Section 1– Product And Company Information

Supplier's Name Industrial Cleaning Equipment & Supplies
Supplier's Address: 1490 S. Dixie Hwy East, Pompano Beach FL 33060
Product Name: TNT The Ultimate Degreaser
Product Number: DG-375

DOT Proper Shipping/ Hazard Name (49 CFR 172.101): Sodium Hydroxide, solution
DOT ID # (49 CFR 172.101): UN 1824
DOT Hazard Class (49 CFR 172.101): Class 8, PGIII

FLAMMABILITY (Red): NFPA: ND HMIS: 0
HEALTH (Blue): NFPA: ND HMIS: 2
REACTIVITY (Yellow): NFPA: ND HMIS: 1
Personal Protection (HMIS)= D

Section 2 – Health Hazard Identification

Primary Route of Exposure: Skin, eyes, and ingestion.

Effects of Acute Overexposure:

Skin: Contact can cause irritation, burns, and defatting of skin.

Eyes: Can cause severe irritation, redness, tearing.

Breathing: Excessive inhalation of vapors can cause nasal and respiratory irritation, coughing, and shortness of breath.

Swallowing: Can cause gastrointestinal irritation, nausea, diarrhea, and vomiting.

Effects of Chronic Overexposure: None known.

Section 3– Components

<u>Component</u>	<u>CAS#</u>	<u>%</u>	<u>ACGIH(TLV-TWA)</u>	<u>OSHA (TWA)</u>
Nonyl Phenol Ethoxylate	127087-87-0	—	NE	NE
Sodium Hydroxide	1310-73-2	10%	2mg/m3	2mg/m3
Sodium Metasilicate	683-49-20	—	NE	NE
Water and non active ingredients	Blend	—	NA	NA

Section 4 - First Aid Measures

If On Skin: Thoroughly wash exposed area with soap and water remove contaminated clothing. If necessary, neutralize with lemon juice. Launder before reuse. Get medical attention.

If In Eyes: Flush with water for 15 minutes, lifting upper and lower lids occasionally. Can be neutralized with lemon juice. Seek medical attention immediately.

If Breathed: If affected, remove individual to fresh air. If breathing is difficult, administer oxygen. Keep person warm and quiet. Get medical attention.

If Swallowed: Do not induce vomiting. Give lemon juice and water to drink. Keep person warm, quiet and seek immediate medical attention.

Section 5 – Fire Fighting Measures

Flash Point: None

Flammable Limits in Air: Upper: NAP Lower: NAP

Extinguishing Media: Regular foam, carbon dioxide, dry chemical, for surrounding fire.

Hazardous Decomposition Products: Carbon and Nitrogen Oxides.

Firefighting Procedures: Wear self-contained breathing apparatus with a full facepiece operated in the positive pressure demand mode when fighting fires.

Special Fire and Explosion Hazards: None

Section 6 - Accidental Release Measures

Personal Precautions:

For personal protection see section 8. Persons not wearing protective equipment should be excluded from the area of the spill until cleanup has been completed.

Environmental Precautions:

Prevent from entering drains, sewers, streams or other bodies of water. Prevent from spreading. If runoff occurs notify authorities as required.

Methods for Cleaning Up Spills:

Small Spill: Absorb spilled product with absorbent material but do not use saw dust. If possible, vacuum spilled product into container. Dispose as directed by local regulatory norms.

Large Spill: Stop spill at source. Absorb spill with non combustible material or collect with vacuum pump. Keep away from heat and fire source. Provide adequate ventilation. Call authorities for assistance on disposal. Disposal should be made in accordance with federal, state, and local regulations.

Section 7 – Storage & Handling

KEEP OUT OF REACH OF CHILDREN, For industrial and institutional use only.

For industrial and institutional use only. Store in a cool, dry, ventilated area away from heat or open flame. Never store at temperatures in excess of 120 °F.

Always store in original container. Follow all label instructions and precautions

Section 8 - Exposure Control / Personal Protection

Respiratory Protection: If workplace exposure limits product or any component is exceeded, a NIOSH/MSHA approved air supplied respirator is advised in absence of proper environmental control. OSHA regulations also permit other NIOSH/MSHA respirators (negative pressure types) under specified conditions. Engineering or administrative controls should be implemented to reduce exposure.

Ventilation: Provide sufficient mechanical ventilation to maintain exposure below TLV.

Protective Gloves: Rubber, neoprene or other resistant elastomer.

Eye Protection: Chemical splash resistant goggles or face shield.

Other Protective Clothing & Equipment: Rubber aprons and boots when working with large quantities.

Section 9-Physical And Chemical Properties

Boiling Point: 212 °F

Vapor Pressure: ND

Solubility in Water: Soluble

% Volatile: 90%

Specific Gravity (H₂O = 1): 1.09 gr/cc

Vapor Density: (Air = 1): NA

Appearance: Amber liquid.

pH: 10

Section 10 – Stability And Reactivity Information

Stability: Stable

Hazardous Polymerization: Will not occur

Incompatibility (Materials to Avoid): Oxidizing Materials. Acids. Metals (aluminum, copper)

Conditions To Avoid: none.

Section 11 - Toxicological Information

Oral Toxicity (LD50): Nonyl Phenol Ethoxylate 1410 mg/kg [Rat]

Sodium Hydroxide 500 mg/kg [Rabbit]

Inhalation Toxicity: No data

Dermal Toxicity: Nonyl Phenol Ethoxylate (LD50) 2830 mg/kg [Rabbit]

Irritancy of Product: This product is irritating to the skin, eyes, respiratory, and digestive tract.

Section 12 - Ecological Information

Toxicity: This product has the potential to be hazardous to aquatic life.

Persistence and Degradability: Possibly hazardous short term degradation products are not likely. However, hazardous long term degradation products may arise.

Bio-accumulative Potential: No data.

Other Adverse Effects: The products of degradation are less toxic than the product itself.

Section 13 - Disposal Considerations

Waste Disposal Method:

Disposal should be made in accordance with federal, state, and local regulations.

Section 14 - Transport Information

DOT Proper Shipping/ Hazard Name (49 CFR 172.101): Sodium Hydroxide, solution

DOT ID # (49 CFR 172.101): UN 1824

DOT Hazard Class (49 CFR 172.101): Class 8, PGIII

Marine Pollutant: No data

International Air Transport Association Shipping Information (IATA): UN 1824, Sodium Hydroxide, solution, Class 8, PGIII

International Maritime Organization Shipping Information (IMO): UN 1824, Sodium Hydroxide, solution, Class 8, PGIII

Section 15 - Regulatory Information

Federal and State Regulations: Illinois toxic substances disclosure to employee act: Sodium hydroxide Illinois chemical safety act: Sodium hydroxide New York release reporting list: Sodium hydroxide Rhode Island RTK hazardous substances: Sodium hydroxide Pennsylvania RTK: Sodium hydroxide Minnesota: Sodium hydroxide Massachusetts RTK: Sodium hydroxide New Jersey: Sodium hydroxide Louisiana spill reporting: Sodium hydroxide California Director's List of Hazardous Substances: Sodium hydroxide TSCA 8(b) inventory: Sodium hydroxide

CERCLA: Hazardous substances.: Sodium hydroxide: 1000 lbs. (453.6 kg)

OSHA: Components of this product are considered hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200). EINECS: Listed.

FLAMMABILITY (Red): NFPA: ND **HMIS:** 0

HEALTH (Blue): NFPA: ND **HMIS:** 2

REACTIVITY (Yellow): NFPA: ND **HMIS:** 1

Personal Protection (HMIS): D

Section 16 – Special Precautions Or Other Comments

Wash hands with soap and water after use. Avoid contact with open wounds. Although information contained herein is believed to be correct as of the date of this document, We makes no representation as to the completeness or accuracy of such information. We shall in no event be responsible for any damages directly or indirectly from use of or reliance on this information. This information is provided solely to assist the customer with the Occupational Safety and Health Act of 1970 and The Right to Know regulations. Any other use is prohibited.

Prepared by:

J. Valentino

Legend:

NE: Not Evaluated

ND: Not Determined

NA: Not Available

NAP: Not Applicable

NR: Not Regulated