16 November 2021

Division for Air Quality
200 Fair Oaks Lane, 1st Floor
Frankfort, Kentucky 40601

RE: Renewal request for Permit F-17-016

Dear Sirs:

Our permit F-17-016 expires June 8, 2022, so we are required to apply for renewal by December 8, 2021. This cover letter for our renewal request summarizes process changes pertinent to our Air Quality Permit that have occurred since the issuance of our current permit. These changes include those that we have not notified you of and those we have given prior notification and received approval for. Additionally, we have a failure in our reporting of emissions at Emission Unit 04 that was discovered during our preparation for this renewal request. We are currently following DAQ guidance to formally address this administrative error and therefore the issue is not completely resolved. I provide a status update below for this issue.

**Request for Renewal**

I have submitted DEP7007AI with this letter and hereby request that our permit be renewed with the modifications described below and the other modifications we have submitted during the life of the permit.

**Process Changes – No Prior Notification**

We are notifying you of process changes which we have not previously notified you of.
Process Change – Elimination of Isocyanate Based Packaging Foam – EU03/EP#03

We discontinued use of all isocyanate based packing foam that we previously employed having replaced the foam with recyclable corrugated packaging. This has thereby eliminated from our process Emission Unit 03 / EP#03 and the following materials and their emissions:

<table>
<thead>
<tr>
<th>Foam Material</th>
<th>Eminence Part #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Instapak Part A</td>
<td>88066-1</td>
</tr>
<tr>
<td>Instapak Part B</td>
<td>88066-2</td>
</tr>
<tr>
<td>Gflex Part A</td>
<td>88076-1</td>
</tr>
<tr>
<td>Gflex Part B</td>
<td>88076-2</td>
</tr>
<tr>
<td>Xtraflex Part A</td>
<td>88116-1</td>
</tr>
<tr>
<td>Xtraflex Part B</td>
<td>88116-2</td>
</tr>
</tbody>
</table>

Process Change – Addition of Higher Viscosity Activator Solution – EU05/EP#05

We added a modified formulation of activator for a structural acrylic adhesive. The original formulation included an activator component, Eminence PN 87086, which was modified by the addition of fumed silica at from 2-4% to increase the viscosity. Aside from the fumed silica component, the new and old formulations are identical. The higher viscosity activator formulation was assigned PN 87126. This modification resulted in a significant decrease in the volume of activator used per unit manufactured. The SDSs for PN 87026 and PN 87126 is included with this request.

Process Changes – Prior Notification

You have been notified and approved the flowing changes in the permit since its issuance.

<table>
<thead>
<tr>
<th>Title of Change</th>
<th>Approval</th>
<th>Approval Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative Change request for</td>
<td>Off-permit and Section 502(b)(10) Change</td>
<td>November 2, 2021</td>
</tr>
<tr>
<td>Permit F-12-016 (Eliminate EP01a and</td>
<td></td>
<td>Shufang Yang</td>
</tr>
<tr>
<td>make EP01b into EP01)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Using a Rust-Oleum aerosol solvent</td>
<td>Off-permit and Section 502(b)(10) Change</td>
<td>October 18, 2020</td>
</tr>
<tr>
<td>based paint product</td>
<td></td>
<td>Shufang Yang</td>
</tr>
<tr>
<td>Addition of second exhaust stack to</td>
<td>Off-Permit change</td>
<td>December 27, 2018</td>
</tr>
<tr>
<td>the Gas Oven</td>
<td></td>
<td>William Parsons</td>
</tr>
<tr>
<td>(via email)</td>
<td></td>
<td>(via email)</td>
</tr>
<tr>
<td>Installation of a Natural Gas Oven</td>
<td>Off-permit and Section 502(b)(10) Change</td>
<td>February 25, 2018</td>
</tr>
<tr>
<td>and E-Coat Emissions Correction</td>
<td></td>
<td>Rick Shewekah</td>
</tr>
</tbody>
</table>

I have included documentation of the Addition of second exhaust stack to the Gas Oven for completeness.

Failure to Report Error Emission Unit 4, High Gloss – With Prior Notification

We have recently notified you of an error in our tracking and monitoring process that impacted the reporting of emissions from EU04 – High Gloss paint booth. Our notification
was dated November 3, 2021 (via email) and we have received guidance from Mitchell Kukla on how to fully address the issue.

The administrative errors were discovered while reviewing our tracking and monitoring process in preparation for our permit renewal request. Our thorough review was additionally important since we have made a significant upgrade in our Material Requirements Planning software that integrates with the software that consolidates and performs calculations of emission tracking data. Our transition to the upgraded MRP system occurred on June 1, 2021. The errors were in the Workbook that consolidates and calculates the emission data and were corrected October 25, 2021. We audited the interface between the MRP and the Workbook believe there to be no issues there.

Mr. Kukla requested we resubmit our 2020 Annual Certification and the 2020 2nd Semi-Annual Monitoring Report. Additionally, we are to correct our reporting to eliminate MEK as a HAP, since it was removed from the HAP list in 2005. We are currently in the process of completing the resubmissions requested by Mr. Kukla.

Sincerely,

Courtney F. Morgan, PhD
Lean, Quality and Environmental Manager
1. IDENTIFICATION

Product identifier
Product Name: EF Activator 15

Other means of identification
Product Code: MS-015
UN/ID no.: None
Synonyms: None

Recommended use of the chemical and restrictions on use
Recommended Use: Activator.
Uses advised against: None known

Details of the supplier of the safety data sheet
Manufacturer Address: Hernon Manufacturing Inc.
121 Tech Drive
Sanford, FL 32771
800-527-0004

Emergency telephone number
Company Phone Number: 407-322-4000
Emergency Telephone: Chemtel 800-255-3924

2. HAZARDS IDENTIFICATION

Classification
OSHA Regulatory Status
This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

Carcinogenicity
Category 1B

Label elements
Emergency Overview

Danger

Hazard statements
May cause cancer

Appearance
No information available
Physical state
Liquid
Odor
Aromatic
Precautionary Statements - Prevention
Obtain special instructions before use
Do not handle until all safety precautions have been read and understood
Wear protective gloves/protective clothing/eye protection/face protection

Precautionary Statements - Response
IF exposed or concerned: Get medical advice/attention

Precautionary Statements - Storage
Store locked up

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)
Not applicable

Other Information
Not applicable

3. COMPOSITION/INFORMATION ON INGREDIENTS

<table>
<thead>
<tr>
<th>Substance</th>
<th>Chemical Name</th>
<th>CAS No.</th>
<th>Weight-%</th>
<th>Trade Secret</th>
</tr>
</thead>
<tbody>
<tr>
<td>Butyraldehyde-Aniline Condensate</td>
<td>68411-20-1</td>
<td>60 - 100</td>
<td>*</td>
<td></td>
</tr>
<tr>
<td>Copper naphthenate</td>
<td>1338-02-9</td>
<td>0.1 - 1</td>
<td>*</td>
<td></td>
</tr>
</tbody>
</table>

*The exact percentage (concentration) of composition has been withheld as a trade secret.

4. FIRST AID MEASURES

Description of first aid measures

Eye contact
Rinse thoroughly with plenty of water for at least 15 minutes, lifting lower and upper eyelids. Consult a physician.

Skin contact
Wash with soap and water. Flush skin with water for several minutes. Remove contaminated clothing and shoes. If irritation develops, seek medical attention. Wash clothing before reuse.

Inhalation
Remove to fresh air. If breathing is difficult, give oxygen. If breathing has stopped, give artificial respiration. Get medical attention immediately.

Ingestion
Do NOT induce vomiting. Never give anything by mouth to an unconscious person. Call a POISON CENTER or doctor/physician if you feel unwell.

Most important symptoms and effects, both acute and delayed

Symptoms
No information available.

Indication of any immediate medical attention and special treatment needed

Note to physicians
Treat symptomatically.

5. FIRE-FIGHTING MEASURES

Suitable extinguishing media
Use CO2, dry chemical, or foam.
Unsuitable extinguishing media  No information available.

Specific hazards arising from the chemical
No information available.

Hazardous combustion products Carbon oxides. Nitrogen oxides (NOx).

Explosion data
Sensitivity to Mechanical Impact  None.
Sensitivity to Static Discharge  None.

Protective equipment and precautions for firefighters
As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions
Use personal protective equipment as required. Ensure adequate ventilation, especially in confined areas.

For emergency responders
Use personal protection recommended in Section 8.

Environmental precautions
Do not allow into any sewer, on the ground or into any body of water. See Section 12 for additional ecological information.

Methods and material for containment and cleaning up

Methods for containment
Prevent further leakage or spillage if safe to do so.

Methods for cleaning up
Soak up with inert absorbent material. Store in a closed container until ready for disposal.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling
Avoid contact with skin, eyes or clothing. Avoid breathing vapors or mists. Wash thoroughly after handling. Ensure adequate ventilation, especially in confined areas.

Conditions for safe storage, including any incompatibilities

Storage Conditions
Keep at temperatures between 7 and 29 °C.

Incompatible materials

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Exposure Guidelines

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>ACGIH TLV</th>
<th>OSHA PEL</th>
<th>NIOSH IDLH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate 1338-02-9</td>
<td>TWA: 1 mg/m³ Cu dust and mist</td>
<td>-</td>
<td>IDLH: 100 mg/m³ Cu dust and mist</td>
</tr>
</tbody>
</table>

Appropriate engineering controls
Engineering Controls
Ensure adequate ventilation, especially in confined areas.

Individual protection measures, such as personal protective equipment

Eye/face protection
Wear safety glasses with side shields (or goggles).

Skin and body protection
Wear protective gloves and protective clothing. Use rubber or plastic gloves.

Respiratory protection
If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

General Hygiene Considerations
Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

<table>
<thead>
<tr>
<th>Property</th>
<th>Values</th>
<th>Remarks</th>
<th>Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical state</td>
<td>Liquid</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Appearance</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Color</td>
<td>Amber yellow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Odor</td>
<td>Aromatic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Odor threshold</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>pH</td>
<td>Does not apply</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Melting point / freezing point</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Boiling point / boiling range</td>
<td>&gt; 250 °C / 482 °F</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flash point</td>
<td>116 °C / 240.8 °F</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evaporation rate</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flammability (solid, gas)</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flammability Limit in Air</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Upper flammability limit:</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lower flammability limit:</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vapor pressure</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vapor density</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Relative density</td>
<td>1.08</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water solubility</td>
<td>Insoluble in water</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Solubility in other solvents</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Partition coefficient</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Autoignition temperature</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Decomposition temperature</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kinematic viscosity</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dynamic viscosity</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Explosive properties</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oxidizing properties</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Softening point</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Molecular weight</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>VOC Content (%)</td>
<td>8.45%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Density</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulk density</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10. STABILITY AND REACTIVITY

Reactivity
No data available
Chemical stability
Stable under recommended storage conditions.

Possibility of Hazardous Reactions
None under normal processing.

Conditions to avoid
Incompatible materials. Extremes of temperature and direct sunlight.

Incompatible materials

Hazardous Decomposition Products
Carbon oxides. Nitrogen oxides (NOx).

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information

Inhalation
No data available.

Eye contact
No data available.

Skin contact
No data available.

Ingestion
No data available.

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>Oral LD50</th>
<th>Dermal LD50</th>
<th>Inhalation LC50</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>2 g/kg (Rat)</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Information on toxicological effects

Symptoms
No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization
No information available.

Germ cell mutagenicity
No information available.

Carcinogenicity

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>ACGIH</th>
<th>IARC</th>
<th>NTP</th>
<th>OSHA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>-</td>
<td>Group 2A</td>
<td>-</td>
<td>X</td>
</tr>
</tbody>
</table>

Reproductive toxicity
No information available.

STOT - single exposure
No information available.

STOT - repeated exposure
No information available.

Aspiration hazard
No information available.

Numerical measures of toxicity - Product Information

The following values are calculated based on chapter 3.1 of the GHS document.
No information available.
12. ECOLOGICAL INFORMATION

Ecotoxicity
No information available.

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Other adverse effects
No information available.

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes
Disposal should be in accordance with applicable regional, national and local laws and regulations.

Contaminated packaging
Do not reuse container.

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>California Hazardous Waste Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>Toxic</td>
</tr>
</tbody>
</table>

14. TRANSPORT INFORMATION

DOT

<table>
<thead>
<tr>
<th>UN/ID no.</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proper shipping name</td>
<td>Not regulated</td>
</tr>
<tr>
<td>Hazard Class</td>
<td>None</td>
</tr>
<tr>
<td>Packing Group</td>
<td>None</td>
</tr>
<tr>
<td>Special Provisions</td>
<td>None</td>
</tr>
</tbody>
</table>

IATA

<table>
<thead>
<tr>
<th>UN/ID no.</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proper shipping name</td>
<td>Not regulated</td>
</tr>
<tr>
<td>Hazard Class</td>
<td>None</td>
</tr>
<tr>
<td>Packing Group</td>
<td>None</td>
</tr>
<tr>
<td>Special Provisions</td>
<td>None</td>
</tr>
</tbody>
</table>

IMDG

<table>
<thead>
<tr>
<th>UN/ID no.</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proper shipping name</td>
<td>Not regulated</td>
</tr>
<tr>
<td>Hazard Class</td>
<td>None</td>
</tr>
<tr>
<td>Packing Group</td>
<td>None</td>
</tr>
<tr>
<td>Special Provisions</td>
<td>None</td>
</tr>
</tbody>
</table>

15. REGULATORY INFORMATION

International Inventories

<table>
<thead>
<tr>
<th>TSCA</th>
<th>Complies</th>
</tr>
</thead>
<tbody>
<tr>
<td>DSL/NDSL</td>
<td>Complies</td>
</tr>
<tr>
<td>EINECS/ELINCS</td>
<td>Complies</td>
</tr>
<tr>
<td>ENCS</td>
<td>Complies</td>
</tr>
<tr>
<td>ENCS</td>
<td>Complies</td>
</tr>
<tr>
<td>IECSC</td>
<td>Complies</td>
</tr>
</tbody>
</table>
All ingredients are on the inventory or are exempt from listing.

**Legend:**
- TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
- DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
- EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
- ENCS - Japan Existing and New Chemical Substances
- KECL - China Inventory of Existing Chemical Substances
- PICCS - Philippines Inventory of Chemicals and Chemical Substances
- AICS - Australian Inventory of Chemical Substances

### US Federal Regulations

#### SARA 313
Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>SARA 313 - Threshold Values %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate - 1338-02-9</td>
<td>1.0</td>
</tr>
</tbody>
</table>

**SARA 311/312 Hazard Categories**

<table>
<thead>
<tr>
<th>Hazard Category</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acute health hazard</td>
<td>Yes</td>
</tr>
<tr>
<td>Chronic Health Hazard</td>
<td>No</td>
</tr>
<tr>
<td>Fire hazard</td>
<td>No</td>
</tr>
<tr>
<td>Sudden release of pressure hazard</td>
<td>No</td>
</tr>
<tr>
<td>Reactive Hazard</td>
<td>No</td>
</tr>
</tbody>
</table>

**CWA (Clean Water Act)**
This product contains the following substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42)

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>CWA - Reportable Quantities</th>
<th>CWA - Toxic Pollutants</th>
<th>CWA - Priority Pollutants</th>
<th>CWA - Hazardous Substances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate - 1338-02-9</td>
<td>-</td>
<td>X</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**CERCLA**
This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material

### US State Regulations

**California Proposition 65**
This product does not contain any Proposition 65 chemicals

### U.S. State Right-to-Know Regulations

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>New Jersey</th>
<th>Massachusetts</th>
<th>Pennsylvania</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate - 1338-02-9</td>
<td>X</td>
<td>-</td>
<td>X</td>
</tr>
</tbody>
</table>

**U.S. EPA Label Information**
**EPA Pesticide Registration Number** Not applicable
### 16. OTHER INFORMATION, INCLUDING DATE OF PREPARATION OF THE LAST REVISION

<table>
<thead>
<tr>
<th>NFPA</th>
<th>Health hazards -</th>
<th>Flammability -</th>
<th>Instability -</th>
<th>Physical and Chemical Properties -</th>
</tr>
</thead>
<tbody>
<tr>
<td>HMIS</td>
<td>Health hazards -</td>
<td>Flammability -</td>
<td>Physical hazards -</td>
<td>Personal protection -</td>
</tr>
</tbody>
</table>

**Prepared By**  
SDS coordinator

**Issue Date**  
20-Nov-2015

**Revision Date**  
11-Oct-2017

**Revision Note**  
No information available

**Disclaimer**
The information provided in this Material Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet
1. IDENTIFICATION

Product identifier
Product Name EF Activator 101890

Other means of identification
Product Code MS-101890
UN/ID no. None
Synonyms None

Recommended use of the chemical and restrictions on use
Recommended Use Activator.
Uses advised against None known

Details of the supplier of the safety data sheet
Manufacturer Address
Hernon Manufacturing Inc.
121 Tech Drive
Sanford, FL 32771
800-527-0004

Emergency telephone number
Company Phone Number 407-322-4000
Emergency Telephone Chemtel 800-255-3924

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status
This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

Carcinogenicity Category 1B

Label elements

Emergency Overview

Danger

Hazard statements
May cause cancer

Appearance No information available
Physical state Liquid
Odor Aromatic
Precautionary Statements - Prevention
Obtain special instructions before use
Do not handle until all safety precautions have been read and understood
Wear protective gloves/protective clothing/eye protection/face protection

Precautionary Statements - Response
IF exposed or concerned: Get medical advice/attention

Precautionary Statements - Storage
Store locked up

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)
Not applicable

Other Information
Not applicable

3. COMPOSITION/INFORMATION ON INGREDIENTS

<table>
<thead>
<tr>
<th>Substance</th>
<th>Chemical Name</th>
<th>CAS No.</th>
<th>Weight-%</th>
<th>Trade Secret</th>
</tr>
</thead>
<tbody>
<tr>
<td>Butyraldehyde-Aniline Condensate</td>
<td>68411-20-1</td>
<td>60 - 100</td>
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<td>1338-02-9</td>
<td>0.1 - 1</td>
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<td>68611-44-9</td>
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</tr>
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</table>

*The exact percentage (concentration) of composition has been withheld as a trade secret.

4. FIRST AID MEASURES

Description of first aid measures

Eye contact
Rinse thoroughly with plenty of water for at least 15 minutes, lifting lower and upper eyelids. Consult a physician.

Skin contact
Wash with soap and water. Flush skin with water for several minutes. Remove contaminated clothing and shoes. If irritation develops, seek medical attention. Wash clothing before reuse.

Inhalation
Remove to fresh air. If breathing is difficult, give oxygen. If breathing has stopped, give artificial respiration. Get medical attention immediately.

Ingestion
Do NOT induce vomiting. Never give anything by mouth to an unconscious person. Call a POISON CENTER or doctor/physician if you feel unwell.

Most important symptoms and effects, both acute and delayed

Symptoms
No information available.

Indication of any immediate medical attention and special treatment needed

Note to physicians
Treat symptomatically.

5. FIRE-FIGHTING MEASURES

Suitable extinguishing media
Use CO2, dry chemical, or foam.
Unsuitable extinguishing media  No information available.

Specific hazards arising from the chemical
No information available.

Hazardous combustion products  Carbon oxides. Nitrogen oxides (NOx).

Explosion data
Sensitivity to Mechanical Impact  None.
Sensitivity to Static Discharge  None.

Protective equipment and precautions for firefighters
As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

### 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

**Personal precautions**  Use personal protective equipment as required. Ensure adequate ventilation, especially in confined areas.

**For emergency responders**  Use personal protection recommended in Section 8.

**Environmental precautions**  Do not allow into any sewer, on the ground or into any body of water. See Section 12 for additional ecological information.

**Methods and material for containment and cleaning up**

**Methods for containment**  Prevent further leakage or spillage if safe to do so.

**Methods for cleaning up**  Soak up with inert absorbent material. Store in a closed container until ready for disposal.

### 7. HANDLING AND STORAGE

Precautions for safe handling

**Advice on safe handling**  Avoid contact with skin, eyes or clothing. Avoid breathing vapors or mists. Wash thoroughly after handling. Ensure adequate ventilation, especially in confined areas.

**Conditions for safe storage, including any incompatibilities**

**Storage Conditions**  Keep at temperatures between 7 and 29 °C.

**Incompatible materials**  Strong acids. Strong bases. Oxidizing agents.

### 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

**Exposure Guidelines**

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<tr>
<th>Chemical Name</th>
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**Appropriate engineering controls**
Engineering Controls
Ensure adequate ventilation, especially in confined areas.

Individual protection measures, such as personal protective equipment

Eye/face protection
Wear safety glasses with side shields (or goggles).

Skin and body protection
Wear protective gloves and protective clothing. Use rubber or plastic gloves.

Respiratory protection
If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

General Hygiene Considerations
Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

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<td>Appearance</td>
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<td>Explosive properties</td>
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</tr>
<tr>
<td>Oxidizing properties</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Other Information

Softening point                         | No information available    |              |                |
Molecular weight                         | No information available    |              |                |
VOC Content (%)                          | 8.45%                       |              |                |
Density                                 | No information available    |              |                |
Bulk density                            | No information available    |              |                |

10. STABILITY AND REACTIVITY

Reactivity
No data available
Chemical stability
Stable under recommended storage conditions.

Possibility of Hazardous Reactions
None under normal processing.

Conditions to avoid
Incompatible materials. Extremes of temperature and direct sunlight.

Incompatible materials

Hazardous Decomposition Products
Carbon oxides. Nitrogen oxides (NOx).

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information

Inhalation
No data available.

Eye contact
No data available.

Skin contact
No data available.

Ingestion
No data available.

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>Oral LD50</th>
<th>Dermal LD50</th>
<th>Inhalation LC50</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>= 2 g/kg (Rat)</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Information on toxicological effects

Symptoms
No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization
No information available.

Germ cell mutagenicity
No information available.

Carcinogenicity

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>ACGIH</th>
<th>IARC</th>
<th>NTP</th>
<th>OSHA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>-</td>
<td>Group 2A</td>
<td>-</td>
<td>X</td>
</tr>
</tbody>
</table>

Reproductive toxicity
No information available.

STOT - single exposure
No information available.

STOT - repeated exposure
No information available.

Aspiration hazard
No information available.

Numerical measures of toxicity - Product Information

The following values are calculated based on chapter 3.1 of the GHS document.
No information available.
12. ECOLOGICAL INFORMATION

Ecotoxicity
No information available.

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Other adverse effects
No information available.

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes
Disposal should be in accordance with applicable regional, national and local laws and regulations.

Contaminated packaging
Do not reuse container.

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>California Hazardous Waste Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>Toxic</td>
</tr>
<tr>
<td>1338-02-9</td>
<td></td>
</tr>
</tbody>
</table>

14. TRANSPORT INFORMATION

DOT
UN/ID no. None
Proper shipping name Not regulated
Hazard Class None
Packing Group None
Special Provisions None

IATA
UN/ID no. None
Proper shipping name Not regulated
Hazard Class None
Packing Group None
Special Provisions None

IMDG
UN/ID no. None
Proper shipping name Not regulated
Hazard Class None
Packing Group None
Special Provisions None

15. REGULATORY INFORMATION

International Inventories
TSCA Complies
DSL/NDSL Complies
EINECS/ELINCS Complies
ENCS Complies
IECSC  Complies
KECL  Complies
PICCS  Complies
AICS  Complies

All ingredients are on the inventory or are exempt from listing.

**Legend:**

- **TSCA** - United States Toxic Substances Control Act Section 8(b) Inventory
- **DSL/NDSL** - Canadian Domestic Substances List/Non-Domestic Substances List
- **EINECS/ELINCS** - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
- **ENCS** - Japan Existing and New Chemical Substances
- **IECSC** - China Inventory of Existing Chemical Substances
- **KECL** - Korean Existing and Evaluated Chemical Substances
- **PICCS** - Philippines Inventory of Chemicals and Chemical Substances
- **AICS** - Australian Inventory of Chemical Substances

**US Federal Regulations**

**SARA 313**
Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>SARA 313 - Threshold Values %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>1.0</td>
</tr>
</tbody>
</table>

**SARA 311/312 Hazard Categories**

- Acute health hazard: Yes
- Chronic Health Hazard: No
- Fire hazard: No
- Sudden release of pressure hazard: No
- Reactive Hazard: No

**CWA (Clean Water Act)**

This product contains the following substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42)

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>CWA - Reportable Quantities</th>
<th>CWA - Toxic Pollutants</th>
<th>CWA - Priority Pollutants</th>
<th>CWA - Hazardous Substances</th>
</tr>
</thead>
<tbody>
<tr>
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**CERCLA**

This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material

**US State Regulations**

**California Proposition 65**
This product does not contain any Proposition 65 chemicals

**U.S. State Right-to-Know Regulations**

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>New Jersey</th>
<th>Massachusetts</th>
<th>Pennsylvania</th>
</tr>
</thead>
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**U.S. EPA Label Information**

**EPA Pesticide Registration Number** Not applicable
16. OTHER INFORMATION, INCLUDING DATE OF PREPARATION OF THE LAST REVISION

<table>
<thead>
<tr>
<th>NFPA</th>
<th>Health hazards</th>
<th>Flammability</th>
<th>Instability</th>
<th>Physical and Chemical Properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>HMIS</td>
<td>Health hazards</td>
<td>Flammability</td>
<td>Physical hazards</td>
<td>Personal protection</td>
</tr>
</tbody>
</table>

Prepared By: SDS coordinator
Issue Date: 20-Nov-2015
Revision Date: 11-Oct-2017
Revision Note: No information available

Disclaimer
The information provided in this Material Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet
1. IDENTIFICATION

Product identifier
Product Name EF Activator 101890

Other means of identification
Product Code MS-101890
UN/ID no. None
Synonyms None

Recommended use of the chemical and restrictions on use
Recommended Use Activator.
Uses advised against None known

Details of the supplier of the safety data sheet
Manufacturer Address Hernon Manufacturing Inc.
121 Tech Drive
Sanford, FL 32771
800-527-0004

Emergency telephone number
Company Phone Number 407-322-4000
Emergency Telephone Chemtel 800-255-3924

2. HAZARDS IDENTIFICATION

Classification
OSHA Regulatory Status
This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

Carcinogenicity Category 1B

Label elements

Danger

Hazard statements
May cause cancer

Appearance No information available Physical state Liquid Odor Aromatic
Precautionary Statements - Prevention
Obtain special instructions before use
Do not handle until all safety precautions have been read and understood
Wear protective gloves/protective clothing/eye protection/face protection

Precautionary Statements - Response
IF exposed or concerned: Get medical advice/attention

Precautionary Statements - Storage
Store locked up

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)
Not applicable

Other Information
Not applicable

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<td>VOC Content (%)</td>
<td>8.45%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Density</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulk density</td>
<td>No information available</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 10. STABILITY AND REACTIVITY

Reactivity
No data available
Chemical stability
Stable under recommended storage conditions.

Possibility of Hazardous Reactions
None under normal processing.

Conditions to avoid
Incompatible materials. Extremes of temperature and direct sunlight.

Incompatible materials

Hazardous Decomposition Products
Carbon oxides. Nitrogen oxides (NOx).

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information

<table>
<thead>
<tr>
<th>Route</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inhalation</td>
<td>No data available.</td>
</tr>
<tr>
<td>Eye contact</td>
<td>No data available.</td>
</tr>
<tr>
<td>Skin contact</td>
<td>No data available.</td>
</tr>
<tr>
<td>Ingestion</td>
<td>No data available.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>Oral LD50</th>
<th>Dermal LD50</th>
<th>Inhalation LC50</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate 1338-02-9</td>
<td>= 2 g/kg (Rat)</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Information on toxicological effects

Symptoms
No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization
No information available.

Germ cell mutagenicity
No information available.

Carcinogenicity

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>ACGIH</th>
<th>IARC</th>
<th>NTP</th>
<th>OSHA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate 1338-02-9</td>
<td>-</td>
<td>Group 2A</td>
<td>-</td>
<td>X</td>
</tr>
</tbody>
</table>

Reproductive toxicity
No information available.

STOT - single exposure
No information available.

STOT - repeated exposure
No information available.

Aspiration hazard
No information available.

Numerical measures of toxicity - Product Information

The following values are calculated based on chapter 3.1 of the GHS document.
No information available.
12. ECOLOGICAL INFORMATION

Ecotoxicity
No information available.

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Other adverse effects
No information available.

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes
Disposal should be in accordance with applicable regional, national and local laws and regulations.

Contaminated packaging
Do not reuse container.

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>California Hazardous Waste Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate</td>
<td>Toxic</td>
</tr>
<tr>
<td>1338-02-9</td>
<td></td>
</tr>
</tbody>
</table>

14. TRANSPORT INFORMATION

DOT

UN/ID no.  None
Proper shipping name  Not regulated
Hazard Class  None
Packing Group  None
Special Provisions  None

IATA

UN/ID no.  None
Proper shipping name  Not regulated
Hazard Class  None
Packing Group  None
Special Provisions  None

IMDG

UN/ID no.  None
Proper shipping name  Not regulated
Hazard Class  None
Packing Group  None
Special Provisions  None

15. REGULATORY INFORMATION

International Inventories

TSCA  Complies
DSL/NDSL  Complies
EINECS/ELINCS  Complies
ENCS  Complies
IECSC Complies
KECL Complies
PICCS Complies
AICS Complies

All ingredients are on the inventory or are exempt from listing.

Legend:
TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
ENCS - Japan Existing and New Chemical Substances
IECSC - China Inventory of Existing Chemical Substances
KECL - Korean Existing and Evaluated Chemical Substances
PICCS - Philippines Inventory of Chemicals and Chemical Substances
AICS - Australian Inventory of Chemical Substances

US Federal Regulations

SARA 313
Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>SARA 313 - Threshold Values %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate - 1338-02-9</td>
<td>1.0</td>
</tr>
</tbody>
</table>

SARA 311/312 Hazard Categories

- Acute health hazard: Yes
- Chronic Health Hazard: No
- Fire hazard: No
- Sudden release of pressure hazard: No
- Reactive Hazard: No

CWA (Clean Water Act)
This product contains the following substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42)

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>CWA - Reportable Quantities</th>
<th>CWA - Toxic Pollutants</th>
<th>CWA - Priority Pollutants</th>
<th>CWA - Hazardous Substances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate - 1338-02-9</td>
<td>-</td>
<td>X</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

CERCLA
This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material

US State Regulations

California Proposition 65
This product does not contain any Proposition 65 chemicals

U.S. State Right-to-Know Regulations

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>New Jersey</th>
<th>Massachusetts</th>
<th>Pennsylvania</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper naphthenate - 1338-02-9</td>
<td>X</td>
<td>-</td>
<td>X</td>
</tr>
</tbody>
</table>

U.S. EPA Label Information
EPA Pesticide Registration Number Not applicable
16. OTHER INFORMATION, INCLUDING DATE OF PREPARATION OF THE LAST REVISION

<table>
<thead>
<tr>
<th>NFPA</th>
<th>Health hazards</th>
<th>Flammability</th>
<th>Instability</th>
<th>Physical and Chemical Properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>HMIS</td>
<td>Health hazards</td>
<td>Flammability</td>
<td>Physical hazards</td>
<td>Personal protection</td>
</tr>
</tbody>
</table>

Prepared By: SDS coordinator  
Issue Date: 20-Nov-2015  
Revision Date: 11-Oct-2017  
Revision Note: No information available

Disclaimer
The information provided in this Material Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet
If you are changing stack/ventilation information, that shouldn’t be anything more than an off-permit change. A proper revision shouldn’t be required.

Have a nice holiday.

William Parsons

---

Dear Mr. Parsons,

I hope you had a Merry Christmas and are preparing for a great New Year’s celebration.

We’ve been having trouble with temperature control in our new gas oven and the oven manufacturer is now recommending that we add a second exhaust to balance it. It currently has one exhaust stack about 1/4th of the way from entrance to exit and they are proposing a second exhaust about 3/4ths of the way from entrance to exit as sketched below.

Will this require a permit revision?

Happy New Year!

Rob
Hello Robert,

Attached is your Off-permit change letter. A paper copy will not be sent. Please reply that you have received this.

William Parsons
Environmental Engineer Assistant II
Division for Air Quality
300 Sower Blvd 2nd floor
Frankfort, Kentucky 40601
502-782-6729