

INSPECTION REPORT

Inspection Entry Date/Time	06/26/2024 09:50 AM (CT)		Announced: No	
Inspection Exit Date/Time	06/26/2024 10:59 AM (CT)		Access: Granted	
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Ports America Corporation			
Facility/Site Identifier	TXR000078378			
Facility/Site Physical Address	575 Pete Schaff Blvd #206			
City, State, Zip Code	Freeport, TX 77541			
County/Borough	Brazoria County			
Generator Status	Very Small Quantity Generator (VSQG)			
NAICS	488320			
Type of Operation	Ports America Corporation serves as stevedores for various tenants around the port.			
Geographic Coordinates	28.9444, -95.346			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Elizabeth Pham	Inspector	EPA REGION 6	Pham.Elizabeth@epa.gov	(214) 665-8354
Erin Young-Dahl	Inspector	EPA REGION 6	YoungDahl.Erin@epa.gov	(214) 665-3166
Neil Rapp	Contractor	Eastern Research Group (ERG)	Neil.Rapp@erg.com	(480) 450-6517
Lead Inspector:				
Vince Damiano				
	ERG	Vince.Damiano@erg.com	(703) 633-1732	

SECTION I – INTRODUCTION**Site Entry and Purpose of the Inspection**

The Port Freeport and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Vince Damiano	(703) 633-1732	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Neil Rapp	(480) 450-6517	Neil.Rapp@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Elizabeth Pham	(214) 665-8354	Pham.Elizabeth@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Erin Young-Dahl	(214) 665-3166	YoungDahl.Erin@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Ports America Corporation	06/26/24	Ports America Corporation (Ports America) unloads cargo from ships for other companies at Port Freeport docks. It uses its own trucks and forklifts but operate cranes owned by Port Freeport. Ports America does maintain a MARPOL COA but does not remove any waste from ships.	Yes

SECTION II – OBSERVATIONS

Tenant: Ports America Corporation			
Section: 2.1	Date: 06/26/24, 09:50 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Vince Damiano	Attendees: Scott Bowman (Terminal Manager), William Barrett (Safety Manager)		
Ports America is located within Port Freeport and operates as a stevedore for multiple tenants within the port. Ports America uses Port Freeport owned cranes to load and offload cargo for its clients, while operating its own fleet of forklifts and trucks to move the cargo within the port. The company mainly operates at Docks 2, 5, 7, and 8. Ports America does maintain a MARPOL COA. Mr. Bowman stated Ports America does not remove any waste from ships; it only removes cargo. Ports America is registered with the EPA as a VSQG (TXR000078378). Mr. Bowman explained Ports America does not generate any hazardous waste but mainly generates used oil, universal waste, and spent aerosol cans in its maintenance shop. The inspection team conducted a visual inspection of Ports America's maintenance area. The inspection team observed a full 55-gallon drum of used oil that was not properly labeled as 'Used Oil' inside secondary containment (see Appendix 1 – Photo 1) [AOC #1: Ports America did not clearly label containers used to store used oil with the words "Used Oil." – 40 CFR 279.22 (c)(1)]. Next to the used oil drum, the inspection team observed a full 55-gallon drum of "Aerosol Can Waste" where Ports America drains liquid waste from punctured Brakleen aerosol cans (see Appendix 1 – Photo 2). When asked if there was a waste determination for the waste aerosol liquid, Ports America personnel stated that they did not know how the waste was characterized. [AOC #2: Ports America did not make a waste determination on the waste aerosol liquid at the point of generation. – 40 CFR 262.11(a)]. The inspection team also observed a solvent parts washer in the maintenance shop that is managed by a third-party, Safety Kleen. The inspection team did not observe any other apparent AOCs at the time of the inspection. A closing conference was conducted at approximately 11:00 PM with Ports America personnel. The AOCs were communicated during the closing. Following the inspection, Mr. Bowman provided the inspection team with a waste determination for the waste aerosol liquid; based on the content of the Brakleen aerosol waste being disposed of in the drum, it was determined to be a hazardous waste (see Appendix 2). Mr. Bowman stated as a VSQG, Ports America would make sure the waste was appropriately labeled and managed. He added that disposal documentation for the waste would be maintained when it occurs, and that disposal of this waste stream has never occurred before. Mr. Bowman also provided a photograph of the 55-gallon drum of used oil properly labeled (see Appendix 3).			

SECTION III – RECORDS REVIEW

No RCRA-regulated records were reviewed during this focused onsite inspection.

SECTION IV – AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: Ports America Corporation		
AOC #1 – Ports America did not clearly label containers used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.22 (c)(1)	Section: 2.1
AOC #2 – Ports America did not make a waste determination on the waste aerosol liquid at the point of generation.	Citation: 40 CFR 262.11(a)	Section: 2.1

SECTION V – FOLLOW UP**Follow-Up**

Any facility follow-up items are as discussed in the observations in Section II. Documents or files provided by the facility were transmitted via email and included responses to AOCs or provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 06/28/24 Ports America email – Scott Bowman responded to the AOCs found; providing a waste determination and used oil label correction photograph.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Ports America 06/26/24 Waste Determination Response

Appendix 3. Photograph of Labeled Used Oil

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Ports America		
City: Freeport	County/Parish: Brazoria	State: Texas



Photo File Name: DSCN7384

Date of Photo: 06/26/2024

Time of Photo: 11:29 hrs.

Photographer: Vince Damiano

Description: A 55-gallon container of used oil in Ports America's maintenance shop not properly labeled.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Ports America		
City: Freeport	County/Parish: Brazoria	State: Texas



Photo File Name: DSCN7385

Date of Photo: 06/26/2024

Time of Photo: 11:29 hrs.

Photographer: Vince Damiano

Description: A full 55-gallon container of aerosol can waste containing Brakleen fluid in Ports America's maintenance shop.

APPENDIX 2.
PORTS AMERICA 06/26/24 WASTE DETERMINATION RESPONSE

RE: Follow-up from EPA Visit 6/26

Scott Bowman <scott.bowman@portsamerica.com>

Fri 6/28/2024 1:28 PM

To: Neil Rapp <Neil.Rapp@erg.com>; Kelli Hardesty <Kelli.Hardesty@portsamerica.com>

Cc: Vince Damiano <Vince.Damiano@erg.com>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>

 2 attachments (981 KB)

Brakleen SDS.pdf; 741204890.jpg;

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Good Morning Neil,

Thank yall for visiting the site earlier this week.

Attached is the SDS for Brakleen, which can be provided to EPA in the response. See below for proposed response and let me know if there are further suggestions.

- A hazardous waste determination for the aerosol can waste.
 - The aerosol can waste drum contains only Brakleen fluid from the drained aerosol cans. Attached is the SDS. Based on the composition of the Brakleen fluid, the acetone and toluene would classify this as a non-acute hazardous waste based on listing. As a Very Small Quantity Generator (VSQG), we will continue to manage it appropriately. A label will be placed in an observable location to identify the contents of the drum, as well as other necessary information associated with hazardous waste labeling.
- Shipping documentation for the last time Ports America disposed of aerosol can waste.
 - Ports America has not disposed of the aerosol can waste to-date. As a VSQG, Ports America will continue to evaluate accumulation quantity limits allowed for VSQG (i.e., < 2,220 lbs). When disposal does occur, Ports America will use a TSDf who is licensed to manage and dispose of hazardous waste (e.g., Clean Harbors, etc.) and documentation will be maintained.

Please let me know if I can assist any further.

Best Regards,

Scott Bowman

Terminal Manager - Freeport

Ports America

M. 281-667-6583

Website: <https://freeport.portsamerica.com/>

From: Neil Rapp <Neil.Rapp@erg.com>

Sent: Wednesday, June 26, 2024 4:10 PM

To: Scott Bowman <scott.bowman@portsamerica.com>

Cc: Vince Damiano <Vince.Damiano@erg.com>; Young-Dahl, Erin <YoungDahl.Erin@epa.gov>; Pham, Elizabeth <Pham.Elizabeth@epa.gov>

Subject: Follow-up from EPA Visit 6/26

Hi Scott,

Thank you for your assistance this afternoon. I am following up with a list of items and notes from our inspection today. We would like you to send us:

- A hazardous waste determination for the aerosol can waste.
- Shipping documentation for the last time Ports America disposed of aerosol can waste.
- Pictures of any responses to the areas of concern we communicated to you today.

Please send the requested information to me and the persons copied on this email within two weeks. In addition, please see below a list of initial areas of concern that we noted today:

- Unlabeled 55-gallon drum of used oil (Attached picture of correct labeling)

Thanks again for your time and please let us know if you have any questions or concerns.

Regards,



Neil Rapp, P.E.

Senior Engineer

Cell: 480-450-6517

neil.rapp@erg.com

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SAFETY DATA SHEET

1. Identification

Product identifier Brakleen® Brake Parts Cleaner

Other means of identification

Product code 05151

Recommended use Brake parts cleaner

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Manufactured or sold by:

Company name CRC Industries, Inc.

Address 885 Louis Dr.
Warminster, PA 18974 US

Telephone

General Information 215-674-4300

Technical 800-521-3168

Assistance

Customer Service 800-272-4620

24-Hour Emergency 800-424-9300 (US)

(CHEMTREC) 703-527-3887 (International)

Website www.crcindustries.com

2. Hazard(s) identification

Physical hazards	Flammable aerosols	Category 1
	Gases under pressure	Compressed gas
Health hazards	Serious eye damage/eye irritation	Category 2
	Reproductive toxicity (the unborn child)	Category 2
	Specific target organ toxicity, single exposure	Category 3 narcotic effects
	Specific target organ toxicity, repeated exposure	Category 2
Environmental hazards	Hazardous to the aquatic environment, acute hazard	Category 3
OSHA defined hazards	Not classified.	
Label elements		



Signal word Danger

Hazard statement Extremely flammable aerosol. Contains gas under pressure; may explode if heated. Causes serious eye irritation. May cause drowsiness or dizziness. Suspected of damaging the unborn child. May cause damage to organs (liver, kidneys, brain, lungs) through prolonged or repeated exposure. Harmful to aquatic life.

Precautionary statement

Prevention

Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Keep away from heat/sparks/open flames/hot surfaces. - No smoking. Do not spray on an open flame or other ignition source. Do not apply while equipment is energized. Pressurized container: Do not pierce or burn, even after use. Extinguish all flames, pilot lights and heaters. Vapors will accumulate readily and may ignite. Use only with adequate ventilation; maintain ventilation during use and until all vapors are gone. Open doors and windows or use other means to ensure a fresh air supply during use and while product is drying. If you experience any symptoms listed on this label, increase ventilation or leave the area. Do not breathe mist or vapor. Wash thoroughly after handling. Wear protective gloves/protective clothing/eye protection/face protection. Avoid release to the environment.

Response	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 eye irritation persists: Get medical attention. If exposed or concerned: Get medical attention.
Storage	Store in a well-ventilated place. Store locked up. Protect from sunlight. Do not expose to temperatures exceeding 50°C/122°F. Exposure to high temperature may cause can to burst.
Disposal	Dispose of contents/container in accordance with local/regional/national regulations.
Hazard(s) not otherwise classified (HNOC)	Static accumulating flammable liquid can become electrostatically charged even in bonded and grounded equipment. Sparks may ignite liquid and vapor. May cause flash fire or explosion.
Supplemental information	11.8% of the mixture consists of component(s) of unknown acute hazards to the aquatic environment.

3. Composition/information on ingredients

Mixtures

Chemical name	Common name and synonyms	CAS number	%
Acetone		67-64-1	80 - 90
Carbon dioxide		124-38-9	10 - 20
Toluene		108-88-3	1 - 3

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

4. First-aid measures

Inhalation	Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or doctor/physician if you feel unwell.
Skin contact	Rinse skin with water/shower. Get medical attention if irritation develops and persists.
Eye contact	Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention if irritation develops and persists.
Ingestion	In the unlikely event of swallowing contact a physician or poison control center. Rinse mouth.
Most important symptoms/effects, acute and delayed	May cause drowsiness and dizziness. Headache. Nausea, vomiting. Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Prolonged exposure may cause chronic effects.
Indication of immediate medical attention and special treatment needed	Provide general supportive measures and treat symptomatically. Keep victim under observation. Symptoms may be delayed.
General information	IF exposed or concerned: Get medical advice/attention. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Alcohol resistant foam. Water fog. Carbon dioxide (CO2). Dry chemical powder, carbon dioxide, sand or earth may be used for small fires only.
Unsuitable extinguishing media	Do not use water jet as an extinguisher, as this will spread the fire.
Specific hazards arising from the chemical	Contents under pressure. Pressurized container may rupture when exposed to heat or flame. This product is a poor conductor of electricity and can become electrostatically charged. If sufficient charge is accumulated, ignition of flammable mixtures can occur. Static electricity accumulation may be significantly increased by the presence of small quantities of water or other contaminants. Material will float and may ignite on surface of water. During fire, gases hazardous to health may be formed.
Special protective equipment and precautions for firefighters	Firefighters must use standard protective equipment including flame retardant coat, helmet with face shield, gloves, rubber boots, and in enclosed spaces, SCBA.
Fire-fighting equipment/instructions	In case of fire: Stop leak if safe to do so. Move containers from fire area if you can do so without risk. Containers should be cooled with water to prevent vapor pressure build up.
General fire hazards	Extremely flammable aerosol. Contents under pressure. Pressurized container may rupture when exposed to heat or flame.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Keep out of low areas. Remove all possible sources of ignition in the surrounding area. Many vapors are heavier than air and will spread along ground and collect in low or confined areas (sewers, basements, tanks). Wear appropriate protective equipment and clothing during clean-up. Do not breathe mist or vapor. Emergency personnel need self-contained breathing equipment. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ventilate closed spaces before entering them. Use appropriate containment to avoid environmental contamination. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Eliminate all ignition sources (no smoking, flares, sparks, or flames in immediate area). Keep combustibles (wood, paper, oil, etc.) away from spilled material. Stop the flow of material, if this is without risk. Prevent product from entering drains. Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid release to the environment. Prevent further leakage or spillage if safe to do so. Avoid discharge into drains, water courses or onto the ground. Inform appropriate managerial or supervisory personnel of all environmental releases. Use appropriate containment to avoid environmental contamination.

7. Handling and storage

Precautions for safe handling	Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Minimize fire risks from flammable and combustible materials (including combustible dust and static accumulating liquids) or dangerous reactions with incompatible materials. Pressurized container: Do not pierce or burn, even after use. Do not use if spray button is missing or defective. Do not spray on a naked flame or any other incandescent material. Do not smoke while using or until sprayed surface is thoroughly dry. Do not cut, weld, solder, drill, grind, or expose containers to heat, flame, sparks, or other sources of ignition. Use caution around energized equipment. The metal container will conduct electricity if it contacts a live source. This may result in injury to the user from electrical shock and/or flash fire. Do not breathe mist or vapor. Avoid contact with eyes. Avoid prolonged exposure. Pregnant or breastfeeding women must not handle this product. Should be handled in closed systems, if possible. Use only in well-ventilated areas. Wear appropriate personal protective equipment. Observe good industrial hygiene practices. Avoid release to the environment. For product usage instructions, please see the product label.
Conditions for safe storage, including any incompatibilities	Level 3 Aerosol. Pressurized container. Protect from sunlight and do not expose to temperatures exceeding 50°C/122 °F. Do not puncture, incinerate or crush. Do not handle or store near an open flame, heat or other sources of ignition. This material can accumulate static charge which may cause spark and become an ignition source. Avoid spark promoters. These alone may be insufficient to remove static electricity. Store in a well-ventilated place. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value
Acetone (CAS 67-64-1)	PEL	2400 mg/m3 1000 ppm
Carbon dioxide (CAS 124-38-9)	PEL	9000 mg/m3 5000 ppm

US. OSHA Table Z-2 (29 CFR 1910.1000)

Components	Type	Value
Toluene (CAS 108-88-3)	Ceiling TWA	300 ppm 200 ppm

US. ACGIH Threshold Limit Values

Components	Type	Value
Acetone (CAS 67-64-1)	STEL TWA	750 ppm 500 ppm

US. ACGIH Threshold Limit Values

Components	Type	Value
Carbon dioxide (CAS 124-38-9)	STEL	30000 ppm
Toluene (CAS 108-88-3)	TWA	5000 ppm
	TWA	20 ppm

US. NIOSH: Pocket Guide to Chemical Hazards

Components	Type	Value
Acetone (CAS 67-64-1)	TWA	590 mg/m3 250 ppm
Carbon dioxide (CAS 124-38-9)	STEL	54000 mg/m3
Toluene (CAS 108-88-3)	TWA	30000 ppm
		9000 mg/m3
	STEL	5000 ppm
		560 mg/m3
		150 ppm
	TWA	375 mg/m3 100 ppm

Biological limit values**ACGIH Biological Exposure Indices**

Components	Value	Determinant	Specimen	Sampling Time
Acetone (CAS 67-64-1)	50 mg/l	Acetone	Urine	*
Toluene (CAS 108-88-3)	0.3 mg/g	o-Cresol, with hydrolysis	Creatinine in urine	*
	0.03 mg/l	Toluene	Urine	*
	0.02 mg/l	Toluene	Blood	*

* - For sampling details, please see the source document.

Exposure guidelines**US - California OELs: Skin designation**

Toluene (CAS 108-88-3)

Can be absorbed through the skin.

US - Minnesota Haz Subs: Skin designation applies

Toluene (CAS 108-88-3)

Skin designation applies.

Appropriate engineering controls

Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Provide eyewash station.

Individual protection measures, such as personal protective equipment

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

Skin protection

Hand protection Wear protective gloves such as: Nitrile. Neoprene. Polyvinyl alcohol (PVA).

Other Wear suitable protective clothing.

Respiratory protection If engineering controls are not feasible or if exposure exceeds the applicable exposure limits, use a NIOSH-approved cartridge respirator with an organic vapor cartridge. Use a self-contained breathing apparatus in confined spaces and for emergencies. Air monitoring is needed to determine actual employee exposure levels.

Thermal hazards Wear appropriate thermal protective clothing, when necessary.

General hygiene considerations

When using do not smoke. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties**Appearance**

Physical state	Liquid.
Form	Aerosol.
Color	Clear. Colorless.

Odor	Sweet.
Odor threshold	Not available.
pH	Not available.
Melting point/freezing point	-138.8 °F (-94.9 °C) estimated
Initial boiling point and boiling range	132.9 °F (56.1 °C) estimated
Flash point	< 0 °F (< -17.8 °C) Tag Closed Cup
Evaporation rate	Fast.
Flammability (solid, gas)	Not available.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	1.2 % estimated
Flammability limit - upper (%)	12.8 % estimated
Vapor pressure	6962 hPa estimated
Vapor density	2 (air = 1)
Relative density	0.88 estimated
Solubility (water)	Slightly soluble.
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	869 °F (465 °C) estimated
Decomposition temperature	Not available.
Viscosity (kinematic)	Not available.
Percent volatile	88.2 % estimated

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	No dangerous reaction known under conditions of normal use.
Conditions to avoid	Heat, flames and sparks. Avoid temperatures exceeding the flash point. Contact with incompatible materials.
Incompatible materials	Acids. Aluminum.
Hazardous decomposition products	Carbon oxides.

11. Toxicological information

Information on likely routes of exposure

Inhalation	May cause damage to organs through prolonged or repeated exposure by inhalation. May cause drowsiness and dizziness. Headache. Nausea, vomiting.
Skin contact	Prolonged skin contact may cause temporary irritation.
Eye contact	Causes serious eye irritation.
Ingestion	Acetone poisoning may result in liver and kidney damage.
Symptoms related to the physical, chemical and toxicological characteristics	Headache. May cause drowsiness and dizziness. Nausea, vomiting. Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision.

Information on toxicological effects

Acute toxicity	Narcotic effects.
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Product	Species	Test Results
Brakleen® Brake Parts Cleaner		
<u>Acute</u>		
Dermal		
LD50	Rabbit	22231 mg/kg estimated

Product	Species	Test Results
Inhalation		
LC50	Rat	33087 ppm, 4 hours estimated 82 mg/l, 4 Hours estimated
Oral		
LD50	Rat	6560 mg/kg estimated

* Estimates for product may be based on additional component data not shown.

Skin corrosion/irritation	Prolonged skin contact may cause temporary irritation.
Serious eye damage/eye irritation	Causes serious eye irritation.
Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
Carcinogenicity	This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.
IARC Monographs. Overall Evaluation of Carcinogenicity	
Toluene (CAS 108-88-3)	3 Not classifiable as to carcinogenicity to humans.
Reproductive toxicity	Suspected of damaging the unborn child.
Specific target organ toxicity - single exposure	May cause drowsiness and dizziness.
Specific target organ toxicity - repeated exposure	May cause damage to organs through prolonged or repeated exposure: Liver. Kidneys. Brain. Lungs.
Aspiration hazard	Based on available data, the classification criteria are not met.
Chronic effects	May cause damage to organs through prolonged or repeated exposure. Prolonged inhalation may be harmful.

12. Ecological information

Ecotoxicity		Harmful to aquatic life.	
Product		Species	Test Results
Brakleen® Brake Parts Cleaner			
Aquatic			
Acute			
Fish	LC50	Fish	7948.4028 mg/l, 96 hours estimated
Components		Species	Test Results
Acetone (CAS 67-64-1)			
Aquatic			
Crustacea	EC50	Water flea (Daphnia magna)	10294 - 17704 mg/l, 48 hours
Fish	LC50	Rainbow trout,donaldson trout (Oncorhynchus mykiss)	4740 - 6330 mg/l, 96 hours
Toluene (CAS 108-88-3)			
Aquatic			
Crustacea	EC50	Water flea (Daphnia magna)	5.46 - 9.83 mg/l, 48 hours
Fish	LC50	Coho salmon,silver salmon (Oncorhynchus kisutch)	8.11 mg/l, 96 hours

* Estimates for product may be based on additional component data not shown.

Persistence and degradability No data is available on the degradability of this product.

Bioaccumulative potential

Partition coefficient n-octanol / water (log Kow)

Acetone	-0.24
Toluene	2.73

Mobility in soil No data available.

Other adverse effects	No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component.
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13. Disposal considerations

Disposal of waste from residues / unused products	If discarded, this product is considered a RCRA ignitable waste, D001. Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Contents under pressure. Do not puncture, incinerate or crush. Do not allow this material to drain into sewers/water supplies. Do not contaminate ponds, waterways or ditches with chemical or used container. Dispose in accordance with all applicable regulations.
Hazardous waste code	D001: Waste Flammable material with a flash point <140 F
Contaminated packaging	Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

UN number	UN1950
UN proper shipping name	Aerosols, flammable, Limited Quantity
Transport hazard class(es)	
Class	2.1
Subsidiary risk	-
Label(s)	2.1
Packing group	Not applicable.
Special precautions for user	Read safety instructions, SDS and emergency procedures before handling.
Special provisions	N82
Packaging exceptions	306
Packaging non bulk	None
Packaging bulk	None

IATA

UN number	UN1950
UN proper shipping name	Aerosols, flammable, Limited Quantity
Transport hazard class(es)	
Class	2.1
Subsidiary risk	-
Packing group	Not applicable.
Environmental hazards	No.
ERG Code	10L
Special precautions for user	Read safety instructions, SDS and emergency procedures before handling.
Other information	
Passenger and cargo aircraft	Allowed.
Cargo aircraft only	Allowed.

IMDG

UN number	UN1950
UN proper shipping name	AEROSOLS, LIMITED QUANTITY
Transport hazard class(es)	
Class	2
Subsidiary risk	-
Packing group	Not applicable.
Environmental hazards	
Marine pollutant	No.
EmS	F-D, S-U
Special precautions for user	Read safety instructions, SDS and emergency procedures before handling.

15. Regulatory information

US federal regulations	This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.
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TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

SARA 304 Emergency release notification

Not regulated.

US EPCRA (SARA Title III) Section 313 - Toxic Chemical: Listed substance

Toluene (CAS 108-88-3)

CERCLA Hazardous Substance List (40 CFR 302.4)

Acetone (CAS 67-64-1)

Listed.

Toluene (CAS 108-88-3)

Listed.

CERCLA Hazardous Substances: Reportable quantity

Acetone (CAS 67-64-1)

5000 LBS

Toluene (CAS 108-88-3)

1000 LBS

Spills or releases resulting in the loss of any ingredient at or above its RQ require immediate notification to the National Response Center (800-424-8802) and to your Local Emergency Planning Committee.

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Toluene (CAS 108-88-3)

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.**Drug Enforcement Administration (DEA). List 2, Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2) and Chemical Code Number**

Acetone (CAS 67-64-1)

6532

Toluene (CAS 108-88-3)

6594

Drug Enforcement Administration (DEA). List 1 & 2 Exempt Chemical Mixtures (21 CFR 1310.12(c))

Acetone (CAS 67-64-1)

35 %WV

Toluene (CAS 108-88-3)

35 %WV

DEA Exempt Chemical Mixtures Code Number

Acetone (CAS 67-64-1)

6532

Toluene (CAS 108-88-3)

594

Food and Drug Administration (FDA) Not regulated.**Superfund Amendments and Reauthorization Act of 1986 (SARA)****Section 311/312****Hazard categories**

Immediate Hazard - Yes

Delayed Hazard - Yes

Fire Hazard - Yes

Pressure Hazard - Yes

Reactivity Hazard - No

SARA 302 Extremely hazardous substance

No

US state regulations**US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))**

Acetone (CAS 67-64-1)

Toluene (CAS 108-88-3)

US. California Controlled Substances. CA Department of Justice (California Health and Safety Code Section 11100)

Not listed.

US. New Jersey Worker and Community Right-to-Know Act

Acetone (CAS 67-64-1)

Carbon dioxide (CAS 124-38-9)

Toluene (CAS 108-88-3)

US. Massachusetts RTK - Substance List

Acetone (CAS 67-64-1)

Carbon dioxide (CAS 124-38-9)

Toluene (CAS 108-88-3)

US. Pennsylvania Worker and Community Right-to-Know Law

Acetone (CAS 67-64-1)

Toluene (CAS 108-88-3)

Carbon dioxide (CAS 124-38-9)

US. Rhode Island RTK

Acetone (CAS 67-64-1)

Toluene (CAS 108-88-3)

US. California Proposition 65

WARNING: This product contains a chemical known to the State of California to cause cancer and birth defects or other reproductive harm.

US - California Proposition 65 - CRT: Listed date/Carcinogenic substance

Benzene (CAS 71-43-2)	Listed: February 27, 1987
Cumene (CAS 98-82-8)	Listed: April 6, 2010
Ethanal (CAS 75-07-0)	Listed: April 1, 1988
Ethylbenzene (CAS 100-41-4)	Listed: June 11, 2004

US - California Proposition 65 - CRT: Listed date/Developmental toxin

Benzene (CAS 71-43-2)	Listed: December 26, 1997
Toluene (CAS 108-88-3)	Listed: January 1, 1991

US - California Proposition 65 - CRT: Listed date/Female reproductive toxin

Toluene (CAS 108-88-3)	Listed: August 7, 2009
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US - California Proposition 65 - CRT: Listed date/Male reproductive toxin

Benzene (CAS 71-43-2)	Listed: December 26, 1997
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Volatile organic compounds (VOC) regulations

EPA

VOC content (40 CFR 51.100(s)) 2.7 %

Consumer products (40 CFR 59, Subpt. C) Not regulated

State

Consumer products This product is regulated as a Brake Cleaner. This product is compliant for use in all 50 states. This product also complies with South Coast Air Quality Management District Rule 1171.

VOC content (CA) 2.7 %

VOC content (OTC) 2.7 %

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	Yes
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	Yes
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date	05-26-2015
Prepared by	Allison Cho
Version #	01
Further information	CRC # 668A
HMIS® ratings	Health: 1* Flammability: 4 Physical hazard: 0 Personal protection: B

NFPA ratings

Health: 1
Flammability: 4
Instability: 0

NFPA ratings**Disclaimer**

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APPENDIX 3.
PHOTOGRAPH OF LABELED USED OIL



Properly labeled drum of Used Oil