

HOECHST CELANESE CORPORATION
Spartanburg, South Carolina

DATE: October 11, 1989

TO: Dick Rodermond

FROM: Jim Stowe *Stowe*

SUBJ: Regulatory Information

Dick, as discussed please find attached a quick summary I put together on the Asbestos: Manufacture, Importation, Processing, and Distribution in Commerce Prohibitions rule recently promulgated by the EPA. Should you require a full copy of the rule, I have copies available. I have included as attachment the MSDS for the CP-10 material we discussed as well. I would appreciate your thoughts.

HNA SB STEW 6784

DISTRIBUTION

SHE Staff

Site Management Safety Committee

Pipe Spec Committee
members including

J. Bindewald

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B. Massengill

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B. Russell

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T. Trnavsky

C. Queen

HOECHST CELANESE CORPORATION
Spartanburg, South Carolina

DATE: August 4, 1989

TO: Distribution

FROM: Jim Stowe *J Stowe*

SUBJ: Asbestos Ban and Phase Back Rule

On July 12, 1989 the Environmental Protection Agency (EPA) published in the Federal Register its final rule, Asbestos: Manufacture, Importation, Processing, and Distribution in Commerce Prohibitions. The rule contains the following general provisions.

I) General Provisions

A) The rule imposes a 3-stage ban on the manufacture, importation, processing, and distribution in commerce of various asbestos containing products.

B) The rule contains a requirement that products subject to a manufacture, importation, and processing ban, but not yet subject to a ban on distribution in commerce be labelled in a specific manner.

C) The rule contains a rather lengthy procedure for requesting an exemption from the rule's provisions, and a means of claiming business confidentiality in that exemption procedure.

D) As with all EPA regulations, there are of course recording keeping requirements and enforcement provisions.

The asbestos containing products which have been banned, their dates of manufacture/import/processing ban, and their corresponding dates of distribution in commerce ban are as follow.

II) Product/Ban Dates

A) As of August 27, 1990 the following listed products can no longer be manufactured, imported or processed. Flooring felt, roofing felt, pipeline wrap, asbestos cement (A/C) flat sheet, A/C corrugated sheet, vinyl/asbestos floor tile, and asbestos clothing. Those listed products can no longer be distributed in commerce after August 25, 1992.

B) As of August 25, 1993 the following listed products can no longer be manufactured, imported or processed. Beater-add gaskets (except specialty industrial gaskets), sheet gaskets (except

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specialty industrial gaskets), clutch facings, automatic transmissions components, commercial/industrial friction products, drum brake linings (on original equipment market), and disc brake pads for light/medium weight vehicles. Those listed products can no longer be distributed in commerce after August 25, 1994.

C) As of August 26, 1996 the following listed products can no longer be manufactured, imported or processed. A/C pipe, commercial paper, corrugated paper, rollboard, millboard, A/C shingle, specialty paper, roof coatings, brake blocks, drum brake linings (aftermarket equipment), disc brake pads-aftermarket equipment for light/medium weight vehicles, and disc brake pads-aftermarket equipment for heavy weight vehicles. Those listed products can no longer be distributed in commerce after August 25, 1997.

III) Notes of Interest and Importance

A) It is critical that the definitions of the listed asbestos containing products that are to be banned are understood. To that end, I have included as attachment to this memo three pages of definition taken directly from the Federal Register. Once you have had a chance to review the definitions, I believe you begin to feel how much impact the ban will have on all industrial facilities. Definitions 7, 8, 9, 16, 21, 22, 23, 31, 36, 40, 42, 44, 48, 49, 50, 51, 52, 53 and 54 are examples of potential impact points.

B) Although it would appear by viewing the listings of the banned materials that specialty industrial gaskets (both beater-add and sheet type gaskets) would be exempt, a further reading of the definitions indicates that those gasket types are exempt only when they are utilized in environments where temperatures are 750 degrees Fahrenheit (399 degrees centigrade) or greater, or when utilized in a corrosive environment (ie. an environment where the gasket is exposed to concentrated [pH less than 2], highly oxidizing mineral acids at temperatures above ambient). As a result of these definitions, I could visualize a situation where certain segments of a heating system would be allowed to utilize asbestos containing gaskets, while others segments of that same system would not.

C) Stockpiling of materials falling under a specific ban would be eliminated as manufactures, importers, and processors would be required to dispose of any remaining stock-on-hand within 6 months its distribution in commerce ban.

I would assume there will be some form of litigation in response to the finalization of this rule. Direction of that litigation is unknown at this time. Should you have questions regarding any of this information, or would like a copy of the rule for your review, please feel free to contact me at 579-5117.

requesting exemptions from the provisions of this subpart.

§ 763.163 Definitions.

For purposes of this subpart:

- 1) "Acetylene cylinder filler" means an asbestos-containing product which is intended for use as a filler for acetylene cylinders.
- 2) "Act" means the Toxic Substances Control Act, 15 U.S.C. 2601 *et seq.*
- 3) "Aftermarket part" means any part offered for sale for installation in or on a motor vehicle after such vehicle has left the manufacturer's production line.
- 4) "Agency" means the United States Environmental Protection Agency.
- 5) "Arc chute" means an asbestos-containing product that acts as a chute or guidance device and is intended to guide electric arcs in applications such as motor starter units in electric generating plants.
- 6) "Asbestos" means the asbestiform varieties of chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite-grunerite); tremolite; anthophyllite; and actinolite.
- 7) "Asbestos-cement (A/C) corrugated sheet" means an asbestos-containing product made of cement and in the form of a corrugated sheet used as a non-flat-surfaced reinforcing or insulating material. Major applications of this product include: building siding or roofing; linings for waterways; and components in cooling towers.
- 8) "Asbestos-cement (A/C) flat sheet" means an asbestos-containing product made of cement and in the form of a flat sheet used primarily as a flat-surfaced reinforcing or insulating material. Major applications of this product include: wall linings; partitions; soffit material; electrical barrier boards; bus bar run separators; reactance coil partitions; laboratory work surfaces; and components of vaults, ovens, safes, and boilers.
- 9) "Asbestos-cement (A/C) pipe and fittings" means an asbestos-containing product made of cement and intended for use as pipe or fittings for joinings. Major applications of this product include: pipe used for transmitting water or sewage; conduit pipe for protection of utility or telephone cables and pipes; used for air ducts.
- 10) "Asbestos-cement (A/C) shingle" means an asbestos-containing product made of cement and intended for use as a siding, roofing, or construction shingle serving the purpose of covering and insulating the surface of building walls and roofs.
- 11) "Asbestos clothing" means an asbestos-containing product designed to be worn by persons.
- 12) "Asbestos-containing product" means any product to which asbestos is deliberately added in any concentration or which contains more than 1.0 percent asbestos by weight or area.
- 13) "Asbestos diaphragm" means an asbestos-containing product that is made of paper and intended for use as a filter in the production of chlorine and other chemicals, and which acts as a mechanical barrier between the cathodic and anodic chambers of an electrolytic cell.
- 14) "Automated transmission component" means an asbestos-containing product used as a friction material in vehicular automatic transmissions.
- 15) "Battery separator" means an asbestos-containing product used as an insulator or separator between the negative and positive terminals in batteries and fuel cells.
- 16) "Beater-add gasket" means an asbestos-containing product that is made of paper intended for use as a gasket, and designed to prevent leakage of liquids, solids, or gases and to seal the space between two sections of a component in circumstances not involving rotary, reciprocating, and helical motions. Major applications of beater-add gaskets include: gaskets for internal combustion engines; carburetors; exhaust manifolds; compressors; reactors; distillation columns; and other apparatus.
- 17) "Brake block" means an asbestos-containing product intended for use as a friction material in drum brake systems for vehicles rated at 25,001 pounds gross vehicle weight rating (GVWR) or more.
- 18) "Chemical substance" has the same meaning as in section 3 of the Act.
- 19) "Clutch facing" means an asbestos-containing product intended for use as a friction material or lining in the clutch mechanisms or manual transmission vehicles.
- 20) "Commerce" has the same meaning as in section 3 of the Act.
- 21) "Commercial and industrial friction product" means an asbestos-containing product which is either molded or woven; intended for use as a friction material in braking and gear changing components in industrial and commercial machinery and consumer appliances. Major applications of this product include: band brakes; segment brakes; and other components used in industrial and commercial machinery and consumer appliances.
- 22) "Commercial paper" means an asbestos-containing product which is made of paper intended for use as general insulation paper or muffling paper. Major applications of commercial paper are insulation against fire heat transfer, and corrosion in circumstances that require a thin, but durable, barrier.
- 23) "Corrugated paper" means an asbestos-containing product made of corrugated paper, which is often cemented to a flat backing, may be laminated with foils or other materials, and has a corrugated surface. Major applications of asbestos corrugated paper include: thermal insulation for pipe coverings; block insulation; panel insulation in elevators; insulation in appliances; and insulation in low-pressure steam, hot water, and process lines.
- 24) "Customs territory of the United States" means the 50 States, Puerto Rico, and the District of Columbia.
- 25) "Disc brake pad for heavy-weight vehicles" means an asbestos-containing product intended for use as a friction material in disc brake systems for vehicles rated at 25,001 pounds gross vehicle weight rating (GVWR) or more.
- 26) "Disc brake pad for light and medium-weight vehicles" means an asbestos-containing product intended for use as a friction material in disc brake systems for vehicles rated at less than 25,001 pounds gross vehicle weight rating (GVWR).
- 27) "Distribute in commerce" has the same meaning as in section 3 of the Act, but the term does not include actions taken with respect to an asbestos-containing product (to sell, lease, deliver, or hold) in connection with the end use of the product by persons who are users (persons who use the product for its intended purpose after it is manufactured or processed). The term also does not include distribution by manufacturers, importers, and processors, and other persons solely for purposes of disposal of an asbestos-containing product.
- 28) "Drum brake lining" means an asbestos-containing product intended for use as a friction material in drum brake systems for vehicles rated at less than 25,001 pounds gross vehicle weight rating (GVWR).
- 29) "Flooring felt" means an asbestos-containing product which is made of paper felt intended for use as an underlayer for floor covering to be bonded to the underside of vinyl sheet flooring.
- 30) "Gross vehicle weight rating (GVWR)" means the value specified by the manufacturer as the maximum design loaded weight of a vehicle.
- 31) "High-grade electrical paper" means an asbestos-containing product which is made of paper and contains asbestos fibers and high temperature-resistant organic binders used in conjunction with electrical devices for purposes of

insulation or protection. Major applications of this product include insulation for high-temperature, low voltage applications such as in motors, generators, transformers, switch gears, and other heavy electrical apparatus.

32) Import means to bring into the customs territory of the United States, except for: (1) Shipment through the customs territory of the United States for export without any use, processing, or disposal within the customs territory of the United States; or (2) entering the customs territory of the United States as a component of a product during normal personal or business activities involving use of the product.

33) Importer means anyone who imports a chemical substance, including a chemical substance as part of a mixture or article, into the customs territory of the United States. "Importer" includes the person primarily liable for the payment of any duties on the merchandise or an authorized agent acting on his or her behalf. The term includes as appropriate:

(1) The consignee.

(2) The importer of record.

(3) The actual owner if an actual owner's declaration and superseding bond has been filed in accordance with 19 CFR 141.20.

(4) The transferee, if the right to withdraw merchandise in a bonded warehouse has been transferred in accordance with Subpart C of 19 CFR Part 144.

34) Manufacture means to produce or manufacture in the United States.

35) Manufacturer means a person who produces or manufactures in the United States.

36) Millboard means an asbestos-containing product made of paper and similar in consistency to cardboard produced in sections rather than as a continuous sheet. Major applications of this product include: thermal protection for large circuit breakers; barriers from flame or heat; linings in floors; partitions, and fire doors; linings for stoves and heaters; gaskets; table pads; trough liners; covers for operations involving molten metals and stove mats.

37) Missile liner means an asbestos-containing product used as a liner for coating the interior surfaces of rocket motors.

38) Model year means the manufacturer's annual production period which includes January 1 of such calendar year, provided that if the manufacturer has no annual production period the term "model year" shall mean the calendar year.

39) New uses of asbestos means commercial uses of asbestos not identified in § 763.153 the manufacturer,

importation or processing of which would be initiated for the first time after August 25, 1989. The following products are also not new uses of asbestos: acetylene cylinders, arc chutes, asbestos diaphragms, battery separators, high grade electrical paper, missile liner, reinforced plastic, sealant tape, and textiles.

40) "Non-roof coating" means an asbestos-containing product intended for use as a coating, cement, adhesive, or sealant and not intended for use on roofs. Major applications of this product include: liquid sealants; semi-liquid glazing, caulking and patching compounds; asphalt-based compounds; epoxy adhesives; butyl rubber sealants; vehicle undercoatings; vinyl sealants; and compounds containing asbestos fibers that are used for bonding, weather-proofing, sound deadening, sealing, coating, and other such applications.

41) "Original equipment market part" means any part installed in or on a motor vehicle in the manufacturer's production line.

42) Packing means an asbestos-containing product intended for use as a mechanical seal in circumstances involving rotary, reciprocating, and helical motions, and which are intended to restrict fluid or gas leakage between moving and stationary surfaces. Major applications of this product include: seals in pumps; seals in valves; seals in compressors; seals in mixers; seals in swing joints; and seals in hydraulic cylinders.

43) Person means any natural person, firm, company, corporation, joint-venture, partnership, sole proprietorship, association, or any other business entity; any State or political subdivision thereof; or any municipality; any interstate body and any department, agency, or instrumentality of the Federal Government.

44) Pipeline-wrap means an asbestos-containing product made of paper felt intended for use in wrapping or coating pipes for insulation purposes.

45) Process has the same meaning as in section 3 of the Act.

46) Processor has the same meaning as in section 3 of the Act.

47) Reinforced plastic means an asbestos-containing product made of plastic. Major applications of this product include: electro-mechanical parts in the automotive and appliance industries; components of printing plates and as high-performance plastics in the aerospace industry.

48) Rollboard means an asbestos-containing product made of paper that is produced in a continuous sheet, is flexible and is rolled to achieve a desired thickness. Asbestos rollboard

consists of two sheets of asbestos paper laminated together. Major applications of this product include: office partitioning; garage paneling; linings for stoves and electric switch boxes; and fire-proofing agent for security boxes, safes, and files.

49) Roof coating means an asbestos-containing product intended for use as a coating, cement, adhesive, or sealant on roofs. Major applications of this product include: waterproofing; weather resistance; sealing; repair and surface rejuvenation.

50) Roofing felt means an asbestos-containing product that is made of paper felt intended for use on building roofs as a covering or underlayer for other roof coverings.

51) Sealant tape means an asbestos-containing product which is initially a semi-liquid mixture of butyl rubber and asbestos, but which solidifies when exposed to air, and which is intended for use as a sealing agent. Major applications of this product include: sealants for building and automotive windows; sealants for aerospace equipment components; and sealants for insulated glass.

52) Sheet gasket means either: (1) an asbestos-containing product consisting of asbestos and elastomeric or other binders rolled in homogeneous sheets at some point in its manufacture and intended for use as a gasket; or (2) any asbestos-containing product made from braided or twisted rope, slit or woven tape, yarn, or other textile products intended for use as a gasket. Sheet gaskets are used to seal the space between two sections of a component and thereby prevent leakage in such applications as: exhaust cylinder head, and intake manifolds; pipe flanges; autoclaves; vulcanizers; pressure vessels; cooling towers; turbochargers; and gear cases. This category includes flanges, spiral wound, tadpole, manhole, handhole, door, and other gaskets or seals.

53) Specialty industrial gaskets means sheet or beater-add gaskets designed for industrial uses in either: (1) environments where temperatures are 750 degrees Fahrenheit or greater; or (2) corrosive environments. An industrial gasket is one designed for use in an article which is not a consumer product within the meaning of the Consumer Product Safety Act (CPSA), 15 U.S.C. 2052, or for use in a motor vehicle or motor vehicle equipment within the meaning of the National Traffic and Motor Vehicle Safety Act of 1966 (as amended), 49 U.S.C. 1501. A corrosive environment is one in which the gasket is exposed to concentrated

(pH less than 2), highly oxidizing mineral acids (e.g., sulfuric, nitric, or chromic acid) at temperatures above ambient.

54) "Specialty paper" means an asbestos-containing product that is made of paper intended for use as filters for beverages or other fluids or as paper fill for cooling towers. Cooling tower fill consists of asbestos paper that is used as a cooling agent for liquids from industrial processes and air conditioning systems.

55) "State" has the same meaning as in section 3 of the Act.

56) "Stock-on-hand" means the products which are in the possession, direction, or control of a person and are intended for distribution in commerce.

57) "Textiles" means an asbestos-containing product such as: yarn; thread; wick; cord; braided and twisted rope; braided and woven tubing; mat; roving; cloth; slit and woven tape; lap; felt; and other bonded or non-woven fabrics.

58) "United States" has the same meaning as in section 3 of the Act.

59) "Vinyl-asbestos floor tile" means an asbestos-containing product composed of vinyl resins and used as floor tile.

§ 763.165 Manufacture and importation prohibitions.

(a) After August 27, 1990, no person shall manufacture or import the following asbestos-containing products, either for use in the United States or for export: A/C corrugated sheet, A/C flat sheet, asbestos clothing, flooring felt, pipeline wrap, roofing felt, vinyl/asbestos floor tile, and new uses of asbestos.

(b) After August 25, 1993, no person shall manufacture or import the following asbestos-containing products, either for use in the United States or for export: automatic transmission components, clutch facings, commercial and industrial asbestos friction products, and sheet and beater-add gaskets (except specialty industrial gaskets).

(c) After August 25, 1993, no person shall manufacture or import, including as part of a motor vehicle, asbestos-containing disc brake pads for light-, medium-, and heavy-weight vehicles, and drum brake linings for the following uses in the United States or for export:

(1) As original equipment in 1984 or later model year motor vehicles; or

(2) As aftermarket replacement parts in brake systems designed for use with non-asbestos replacement parts.

(d) After August 25, 1993, no person shall manufacture or import the following asbestos-containing products, either for use in the United States or for export: disc brake pads for use in light-, medium-, and heavy-weight vehicles

and drum brake linings manufactured, imported, or marketed for use as aftermarket replacement parts in brake systems designed for use with asbestos-containing friction products: A/C pipe, A/C shingle, brake blocks, commercial paper, corrugated paper, millboard, non-roofing coatings, rollboard, roof coatings, and specialty paper.

(e) The import prohibitions of this subpart do not prohibit:

(1) The import into the customs territory of the United States of products imported solely for shipment outside the customs territory of the United States, unless further repackaging or processing of the product is performed in the United States; or

(2) Activities involving purchases or acquisitions of small quantities of products made outside the customs territory of the United States for personal use in the United States.

§ 763.167 Processing prohibitions.

(a) After August 27, 1990, no person shall process for any use, either in the United States or for export, any of the asbestos-containing products listed at § 763.165(a).

(b) After August 25, 1993, no person shall process for any use, either in the United States or for export, any of the asbestos-containing products listed at § 763.165(b) and (c).

(c) After August 25, 1993, no person shall process for any use, either in the United States or for export, any of the asbestos-containing products listed at § 763.165(d).

§ 763.169 Distribution in commerce prohibitions.

(a) After August 25, 1992, no person shall distribute in commerce, either for use in the United States or for export, any of the asbestos-containing products listed at § 763.165(a).

(b) After August 25, 1994, no person shall distribute in commerce, either for use in the United States or for export, any of the asbestos-containing products listed at § 763.165(b) and (c).

(c) After August 25, 1997, no person shall distribute in commerce, either for use in the United States or for export, any of the asbestos-containing products listed at § 763.165(d).

(d) A manufacturer, importer, processor, or any other person who is subject to a ban on distribution in commerce in paragraph (a), (b), or (c) of this section must within 6 months of the effective date of the ban of a specific asbestos-containing product from distribution in commerce dispose of all their remaining stock-on-hand of that product by manufacturing or compliance with applicable local State

and Federal restrictions which are current at that time.

§ 763.171 Labeling requirements.

(a) After August 27, 1990, manufacturers, importers, and processors of all asbestos-containing products that are identified in § 763.165(a) shall label the products as specified in this subpart at the time of manufacture, import, or processing. This requirement includes labeling all manufacturers', importers', and processors' stock-on-hand as of August 27, 1990.

(b) After August 25, 1993, manufacturers, importers, and processors of all asbestos-containing products that are identified in § 763.165(b) and (c), and disc brake pads for use in light-, medium-, and heavy-weight vehicles and drum brake linings manufactured, imported, or marketed for use as aftermarket replacement parts in brake systems designed for use with asbestos-containing friction products shall label the products as specified in this subpart at the time of manufacture, import, or processing. This requirement includes labeling all manufacturers', importers', and processors' stock-on-hand as of August 25, 1993.

(c) After August 25, 1995, manufacturers, importers, and processors of all asbestos-containing products that are identified in § 763.165(d), except disc brake pads for use in light-, medium-, and heavy-weight vehicles and drum brake linings manufactured, imported, or marketed for use as aftermarket replacement parts in brake systems designed for use with asbestos-containing friction products, shall label the products as specified in this subpart at the time of manufacture, import, or processing. This requirement includes labeling all manufacturers', importers', and processors' stock-on-hand as of August 25, 1995.

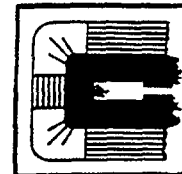
(d) The label shall be placed directly on the visible exterior of the wrappings and packaging in which the product is placed for sale, shipment or storage. If the product has more than one layer of external wrapping or packaging, the label must be attached to the innermost layer adjacent to the product. If this innermost layer of product wrapping or packaging does not have a visible exterior surface larger than 3 square inches, either a tag meeting the requirements of paragraph (e) of this section must be securely attached to the product's innermost layer of product wrapping or packaging, or a label must be attached to the next outer layer of product packaging or wrapping. Any products that are distributed in

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MATERIAL SAFETY DATA SHEET

CHILDERS PRODUCTS CO.

Approved by U.S. Department of Labor "Essentially Similar" to OSHA Form-20



Section I

Manufacturer's Name:

CHILDERS PRODUCTS CO.**2061 HARTEL****BRISTOL, PA. 19007**

Emergency Telephone No.

(215-943-7600)

Trade Name:

CP-10/11 VICRYL®

Chemical Family:

POLYVINYL ACETATE EMULSION

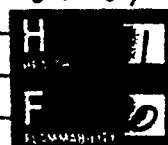
Section II - HAZARDOUS INGREDIENTS

INGREDIENT	CAS NUMBER	PERCENT	PPM	TLV mg/m ³
Titanium Dioxide	13463-67-7	3		15mg/m ³
Ethylene Glycol	107-21-1	2	50	
Diacetone Alcohol	123-42-2	1	50	
Calcium Silicate	10101-39-0	9		10mg/m ³

Section III - PHYSICAL DATA

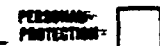
BOILING POINT (°F):	212 deg. F	EVAPORATION RATE:	1 (Water=1)
SOLUBILITY IN WATER:	Appreciable.	VAPOR PRESSURE:	Not established.
SPECIFIC GRAVITY:	1.2	VAPOR DENSITY:	Not established.
% VOLATILE BY VOLUME:	38		
APPEARANCE AND ODOR:	Thick paste, characteristic paint odor.		

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Section IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT:	Not determined - aqueous system.	FLAMMABLE LIMITS:	Not applicable.
EXTINGUISHING MEDIA:	Product will not burn until water evaporates. Then use water.		



Section V - EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT:	Flush thoroughly with water for at least 15 minutes. Consult a physician if irritation persists.
SKIN CONTACT:	Wash thoroughly with soap and water.
INHALATION:	With normal ventilation no inhalation problems should occur.
INGESTION:	If this product is swallowed, DO NOT induce vomiting. Seek immediate medical advice and/or attention.

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Section VI — PHYSIOLOGICAL EFFECTS AND HEALTH INFORMATION

EYE EFFECTS:	This product may be an eye irritant.
SKIN EFFECTS:	This product may cause skin irritation in sensitive individuals upon prolonged or repeated contact.
INHALATION:	Toxicity information not available on this route of exposure.
INGESTION:	Oral toxicity not available on compound. Seek medical attention.
SYSTEMIC EFFECTS:	None.

Section VII — SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION:	None required.
VENTILATION:	General mechanical ventilation is sufficient.
PROTECTIVE GLOVES:	The use of impermeable gloves is advised to prevent skin irritation in sensitive individuals.
EYE PROTECTION:	Safety glasses, chemical goggles and/or face shields are recommended to safeguard against potential eye contact, irritation or injury.
OTHER PROTECTIVE EQUIPMENT:	The availability of eye washes and safety showers in work areas is recommended.

Section VIII — REACTIVITY DATA

STABILITY:	Stable.	HAZARDOUS POLYMERIZATION:	Will not occur.
INCOMPATIBILITY: (Materials to avoid)	None.		
HAZARDOUS DECOMPOSITION PRODUCTS:	Thermal decomposition in the presence of air may yield carbon monoxide and/or carbon dioxide.		

Section IX — SPILL OR LEAK PROCEDURES

PRECAUTIONS IN CASE OF RELEASE OR SPILL:	Material will not flow. Spills should be collected for disposal.
WASTE DISPOSAL METHODS:	Bury in landfill where permitted under appropriate government regulations.

Section X — STORAGE AND SPECIAL PRECAUTIONS

DOT FLAMMABILITY CLASSIFICATION:	Non-flammable.
EXTINGUISHING MEDIA:	Product will not burn until water evaporates. Then use Water.
UNUSUAL FIRE AND EXPLOSION HAZARDS:	• None - water based material.
SPECIAL FIRE FIGHTING PROCEDURES:	None.

Section XI — DOCUMENTARY INFORMATION

ISSUE DATE:	March 11, 1987 Supersedes August 1, 1986	PREPARED BY:	Robert Andrews, Chief Chemist
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