

400 Seventh St., S.W. Washington, D.C. 20590

Ref. No.: 02-0084

.111 1 0 2002

Ms. Joan Van Matre
US Liquids of Georgia Solvent Division
1184 Logan Circle
Atlanta, GA 30318

Dear Ms. Van Matre:

This responds to your March 18, 2002 letter requesting clarification on shipping paper documentation and placarding under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask the correct shipping description and proper placard required for your non-bulk and bulk shipments of combustible plate wash solvent.

According to your letter, you ship a plate wash solvent that you have classed as a "Combustible liquid" in 55-gallon drums and in 275-gallon totes. The shipping papers attached with your letter are not in compliance with the HMR. The basic shipping description (the proper shipping name, hazard class number, UN identification number, and packing group number) is incorrect. Regarding the sequence of information, the type of packaging, e.g., "drums, (55 gal)" may be entered before or after the basic description. Any additional information concerning the material must be placed after the basic description required by § 172.202(a).

In addition, "plate wash solvent" is not a proper shipping name or proper technical name. Generic shipping paper entries such as "Combustible liquid, n.o.s.", requires a technical name or chemical name of the ingredient that makes the material combustible. A technical name is a recognized chemical name or microbiological name currently used in scientific and technical handbooks, journals, and texts. Generic descriptions are authorized for use as a technical names provided they readily identify the general chemical group, or microbiological group. Examples of acceptable generic chemical descriptions are organic phosphate compounds, petroleum aliphatic hydrocarbons and tertiary amines. Trade names may not be used as technical names.

The following is an example of a proper shipping description for a "Combustible liquid, n.o.s." material:

1 tote, Combustible liquid, n.o.s.(proper technical name), NA 1993, 400 lbs.

In response to your placarding question, if you meet provisions in § 173.150(f), the non-bulk (55-gallon drum) shipment of the plate wash solvent is not subject to the HMR, including shipping paper, marking, labeling, and placarding, unless it is a hazardous waste, hazardous substance, or marine pollutant.

However, the bulk (tote) shipment of the plate wash solvent is subject to the HMR as stated in § 173.150(f) and must be properly described on the shipping paper, marked, packaged, and placarded. Each bulk package must be marked with the UN identification number as specified in §§ 172.302 and 172.322. In accordance with § 172.504(a), each bulk packaging, freight container, unit load device, transport vehicle, or rail car containing any quantity of a hazardous must be placarded on each side and each end with the type of placards specified in tables 1 or 2 of this subpart. In addition, under § 172.514(c), a tote or portable tank having a capacity of less than 3,785 L (1,000 gallons) may be placarded on only two opposite sides or, alternatively, may be labeled instead of placarded. For your information, there is no combustible label authorized in the HMR. A placard on a tote may be used to meet vehicle placarding if it is visible on all four sides; however, if the bulk package is inside a freight container or transport vehicle and the placards are not visible, the motor vehicle must be placarded on all four sides and the UN identification number displayed.

I hope this answers your inquiry.

Sincerely,

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Delmer F. Billings

Chief, Standards Development

Office of Hazardous Materials Standards

Boothe \$172.101 \$172.544 Proper Shipping Name Placarding 02.0084

March 18, 2002

Mr. Ed Mazzullo
The Hazardous Materials Information Center

Dear Mr. Mazzullo,

We need your help in clarifying the correct shipping papers and truck placarding for the plate wash solvent that we ship.

I am faxing you the following:

Our standard shipping Bill of Lading (for 1-55 gallon drum/275 gallon tote/24 -55 gallon drums)

The MSDS for two of the solvents that we ship

We need information in writing please for the following:

- For a 275 gallon tote shipment correct shipping papers and correct truck placard
- For a 55 gallon drum (each drum weighs 400 lbs.) correct shipping papers and truck placard if any required
- For 20 55 gallon drums or more correct shipping papers and truck placard if any required

Also, we need to know if a common carrier is carrying 20 – 55 gallon drums and the trailer had combustible placarding, and he had the shipping papers completed as we are sending you for plate wash solvent, was he in violation for having the combustible placards on the trailer?

He had a DOT officer pull him over on Friday and he was given a ticket for having the combustible placard on his trailer. The officer said it was not supposed to be placarded at all since it was drums not bulk (tote).

We do put 2 combustible labels on the 275 gallon totes for shipment and we have been giving the freight carrier driver the combustible placards for their trailer. Also we have been giving the drivers the combustible placards for their trailers when we ship more than 2200 lbs in 55 gallon drums but we do not put the combustible labels on the 55 gallon drums.

Please fax your response to my attention at 404-605-0095 and please mail the original to: Joan VanMatre

US Liquids of Georgia Solvent Division

1184 Logan Circle

Atlanta, Georgia 30318

If you have any questions, please call me at 404-605-0085. Thank You for your assistance.

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(Signature of Consignor)

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# STRAIGHT BILL OF LADING

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March 18, 2002 Prepaid

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SHIPPER

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CONSIGNEE

DESCRIPTION

US Liquids

1184 Logan Circle, N.W.

Atlanta

PIECES

GA 30318

BILL TO OR REMIT TO

IN

ISSUING OFFICE OR AGENT

RATE

CHARGES

CLASS

WEIGHT LBS.

**GENERAL COMMENTS** 

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This is to certify that the above named metarials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

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## STRAIGHT BILL OF LADING

ORIGINAL-NOT NEGOTIABLE

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BOL, NBR. 8376

March 18, 2002 TERMS

Prepaid

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SHIPPER

US Liquids

1184 Logan Circle, N.W.

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BILL TO OR REMIT TO

ISSUING OFFICE OR AGENT

CONSIGNEE

**GENERAL COMMENTS** 

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PIECES	IN	н	DESCRIPTION		WEIGHT LBS.	RATE	CHARGES	CLASS
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SHIPPER

US Liquids

CARRIER

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Information in this format is provided as a service to our customers and is intended only for their use. Others may use it at their own discretion and risk.

The MSDS format adheres to U.S. standards and regulatory requirements and may not meet regulatory requirements in other locations.

This information is based upon technical information DuPont believes to be reliable. It is subject to revision as additional knowledge and experience are gained. Please return to this website for the most current version.

# "OPTISOL" IN-LINE SOLUTION CONTAINING "CYREL" FLEXOGRAPHIC PLATE MATERIAL

P0000197

Revised 15-MAR-2000

# CHEMICAL PRODUCT/COMPANY IDENTIFICATION

Material Identification

Cyrel OptiSol, Cyrel are registered trademarks of DuPont.

Product Use

"Cyrel" Flexographic Printing Plates are considered articles by OSHA (CFR1910.1200). However, unexposed plates contain material that may cause skin irritation or allergic skin reactions and sensitization in susceptible persons. "Cyrel OptiSol" In-Line Solution used in the plate developing process will contain some unexposed plate material.

This MSDS is applicable only to spent solutions (before distillation) and/or stillbottom wastes (after distillation) generated during processing of "Cyrel" Flexographic Printing Plates with "Cyrel OptiSol" In-Line Solution.

Company Identification

MANUFACTURER/DISTRIBUTOR
DuPont "Cyrel" Packaging Graphics

MSDS Number: P0000197

Products Chestnut Run Plaza, Building 702 Wilmington DE 19880-0702

PHONE NUMBERS

Product Information : 800-345-9999 - press 1 Transport Emergency : 800-424-9300 (CHEMTREC)

Medical Emergency : 800-441-3637

# COMPOSITION/INFORMATION ON INGREDIENTS

#### Components

CAS Number Material 90438-79-2 ~5-70 Heptyl Acetates Heptyl Alcohols 70914-20-4 ~5-30 Unexposed "Cyrel" Flexographic Printing Plate 10-95 material (contains synthetic rubber and acrylates)

Components (Remarks)

Material is not known to contain Toxic Chemicals under Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR part 372.

### HAZARDS IDENTIFICATION

Potential Health Effects

THIS PRODUCT CAN BE USED SAFELY WHEN USED AS DIRECTED AND WHEN APPLICABLE SAFETY PRECAUTIONS ARE FOLLOWED.

#### INHALATION

Short-term overexposure may cause: Irritation of nose, throat, and lungs with cough, difficulty breathing or shortness of breath. Central nervous system depression with dizziness, confusion, incoordination, drowsiness or unconsciousness. Non-specific effects such as headache, nausea and weakness.

The distinctive odor of "Cyrel OptiSol" In-Line Solution which is said to be noticeable at 0.1 to 2.0 ppm may be disagreeable to some individuals.

**SKIN CONTACT** 

Short-term overexposure may cause: Irritation with itching,

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burning, redness, swelling or rash. Repeated and/or prolonged exposure may cause: Skin sensitization with allergic rashes.

#### EYE CONTACT

Contact with liquid may cause: Severe eye irritation with tearing, pain or blurred vision. Contact with the vapor or aerosol may cause eye irritation with tearing, pain or blurred vision.

#### INGESTION

The major ingestion hazard is aspiration (liquid entering the lungs during ingestion or vomiting) which may result in "chemical pneumonia". Symptoms include coughing, gasping, choking, shortness of breath, bluish discoloration of the skin, rapid breathing and heart rate, and fever. Pulmonary edema or bleeding, drowsiness, confusion, coma and seizures may occur in more serious cases. Symptoms may develop immediately or as late as 24 hours after exposure, depending on how much chemical entered the lungs.

#### Carcinogenicity Information

None of the components present in this material at concentrations equal to or greater than 0.1% are listed by IARC, NTP, OSHA or ACGIH as a carcinogen.

# FIRST AID MEASURES

#### First Aid

#### INHALATION .

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.

#### SKIN CONTACT

In case of contact, immediately wash skin with soap and water. Wash contaminated clothing before reuse.

#### EYE CONTACT

In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

#### INGESTION

If swallowed, do not induce vomiting. Immediately give 2 glasses of water. Never give anything by mouth to an unconscious person. Call a physician.

#### Notes to Physicians

No antidote or specific treatment regimens known. Use supportive measures as needed.

### FIRE FIGHTING MEASURES

#### Flammable Properties

Flashpoint: >141 F and <200 F

Combustible. The solvent can form combustible mixtures at or above the flashpoint and can accumulate static charges which can cause an incendiary electrical discharge.

Extinguishing Media

Water Spray, Foam, Dry Chemical.

Fire Fighting Instructions

Keep personnel removed and upwind of fire. Wear self-contained breathing apparatus. Wear full protective equipment. Cool tank/container with water spray.

## ACCIDENTAL RELEASE MEASURES

Safeguards (Personnel)

NOTE: Review FIRE FIGHTING MEASURES and HANDLING (PERSONNEL) sections before proceeding with clean-up. Use appropriate PERSONAL PROTECTIVE EQUIPMENT during clean-up.

Initial Containment

Remove source of heat, sparks, flame, impact, friction or electricity. Dike spill. Prevent material from entering sewers, waterways, or low areas.

Spill Clean Up

Soak up with noncombustible absorbent materials.

# HANDLING AND STORAGE

Handling (Personnel)

Avoid breathing vapors or mist. Avoid contact with eyes, skin, or clothing. Wash thoroughly after handling. Wash contaminated clothing prior to reuse.

Handling (Physical Aspects)

Keep away from heat, sparks and flames. Ground container when pouring.

Storage

Store in a well ventilated place. Store in a cool place. Keep container tightly closed.

# EXPOSURE CONTROLS/PERSONAL PROTECTION

Engineering Controls

Use sufficient ventilation to keep employee exposure below recommended limits.

Personal Protective Equipment

EYE/FACE PROTECTION

Wear coverall chemical splash goggles and face shield when possibility exists for eye and face contact due to splashing or spraying materials.

RESPIRATORY PROTECTION

Where airborne concentrations are expected to exceed exposure limits, a NIOSH approved respirator should be selected based on the form and concentration of the contaminant in air and in accordance with OSHA Respiratory Protection Standard CFR 1910.134.

PROTECTIVE CLOTHING

Wear impervious clothing, such as gloves, apron, boots, or whole bodysuit as appropriate.

Exposure Guidelines

Exposure Limits

"OPTISOL" IN-LINE SOLUTION CONTAINING "CYREL" FLEXOGRAPHIC PLATE

MATERIAL

(OSHA) PEL

: None Established

TLV (ACGIH)

: None Established

### PHYSICAL AND CHEMICAL PROPERTIES

Physical Data

Form

: Varies from liquid to semi-solid

Color

: Varies

Odor

: Slight odor

# STABILITY AND REACTIVITY

Chemical Stability

Stable at normal temperatures and storage conditions.

Incompatibility with Other Materials

Incompatible or can react with strong oxidizers, strong acids, bases.

Polymerization

Polymerization will not occur.

# TOXICOLOGICAL INFORMATION

Animal Data

For toxicity information, contact "Cyrel" Packaging Graphics Products at 1-800-345-9999.

# **ECOLOGICAL INFORMATION**

Ecotoxicological Information

For information, contact "Cyrel" Packaging Graphics Products at 1-800-345-9999.

# DISPOSAL CONSIDERATIONS

Waste Disposal

Treatment, storage, transportation, and disposal must be in accordance with applicable Federal, State/Provincial, and Local regulations. Do not flush to surface water or sanitary sewer

system.

Spent solutions and/or stillbottom wastes containing "Cyrel" Flexographic Printing Plate material with "Cyrel OptiSol" In-Line Solution have been analyzed by the Toxicity Characteristic Leachate Procedure (TCLP) for metals and organics and are below all regulatory levels currently listed by the Environmental Protection Agency (EPA).

Spent solutions and/or stillbottom wastes containing "Cyrel" Flexographic Printing Plate material with "Cyrel OptiSol" In-Line Solution do not meet the Federal definition of a RCRA hazardous waste. Incineration in an approved facility is the recommended disposal method. DO NOT landfill. EPA has banned liquids from landfills. Spent solutions and/or stillbottom wastes containing "Cyrel" Flexographic Printing Plate material with "Cyrel OptiSol" In-Line Solution may not meet the EPA requirements.

## REGULATORY INFORMATION

#### U.S. Federal Regulations

TSCA Inventory Status : In compliance with TSCA Inventory

requirements for commercial purposes.

TITLE III HAZARD CLASSIFICATIONS SECTIONS 311, 312

Acute : Yes Chronic : Yes Fire : Yes Reactivity : No Pressure : No

## OTHER INFORMATION

#### Additional Information

For additional Material Safety Data Sheets, contact your DuPont dealer or the DuPont marketing service center which serves your area.

The data in this Material Safety Data Sheet relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process.

Responsibility for MSDS: DuPont "Cyrel" Packaging Graphics

Products

Address : Chestnut Run Plaza - 702

Telephone

Wilmington, DE 19880-0702 : 800-345-9999 (Press 1)

End of MSDS



# Flex-Light® Letterflex® Systems

5210 Phillip Lee Drive Atlanta, GA 30336 24 Hour Emergency Chemtrec: 800-424-9300

# MATERIAL SAFETY DATA SHEET

# I. PRODUCT IDENTIFICATION

TRADE NAME: Solvit® QD

SYNONYMS: NA

# II. HAZARDOUS COMPONENTS

Components	CAS #	<u>%</u>	OSHA PEL	ACGIH TLV
Petroleum Hydrocarbon	* *	50	NE	NE
Aliphatic Alcohol*	*	50	50 ppm (skin)	50 ppm (skin)

<sup>\*</sup> The specific chemical identity is a Trade Secret and is therefore not being disclosed in the MSDS. The MSDS includes health hazard information for these compounds. Potential hazard information is not being withheld. The specific chemical identity will be provided upon request by a physician or other health-related personnel.

NA = Not Applicable NE = Not Established

# III. PHYSICAL DATA

BOILING POINT: 353-390°F at 760 mm Hg

MELTING POINT: Liquid at room temperature

SPECIFIC GRAVITY (H2O=1): 0.87 @ 60°F

VAPOR PRESSURE: 1 mm @ 100°F

VAPOR DENSITY (AIR=1): 4.0

SOLUBILITY IN H2O: Less than 0.1% @ 77F

% VOLATILES BY VOLUME: 100

EVAPORATION RATE: 0.1 (Butyl Acetate = 1)

# SOLVIT® QD PAGE 2 of 5

APPEARANCE AND ODOR: Clear, colorless liquid; aromatic hydrocarbon odor.

VOC'S: 100%

WEIGHT: 7.3 Pounds per Gallon

# IV. FIRE AND EXPLOSION DATA

FLASH POINT: 145°F minimum, Pensky-Martens Closed Cup

NFPA 704: Health 2 Flammability 2 Reactivity 0

AUTO IGNITION TEMPERATURE: ~802°F

EXPLOSIVE LIMITS IN AIR:

Lower Explosion Limit: ~1.8%

Upper Explosion Limit: 11.7%

EXTINGUISHING MEDIA: Carbon Dioxide, foam, water spray, dry chemical.

SPECIAL FIRE FIGHTING PROCEDURES: Use self-contained breathing apparatus.

UNUSUAL FIRE AND EXPLOSION HAZARD: Combustible liquid. May ignite if exposed to heat, sparks or open flame. Could generate oxides of Carbon and other decomposition products of undetermined hazard.

EMPTY CONTAINER WARNING: Empty containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION AS THEY MAY EXPLODE AND CAUSE INJURY OR DEATH.

#### V. REACTIVITY DATA

STABILITY: Product is stable.

INCOMPATABLITY: Sulfuric acid, strong oxidizing agents, inorganic acids, halogens, aldehydes, acid anhydrides, alkylene oxides, monomers and polymerizable esters.

HAZARDOUS DECOMPOSITION PRODUCTS: In case of fire, flammable hydrocarbons.

HAZARDOUS POLYMERIZATION: Will not occur.

#### VI. HEALTH HAZARD DATA

EXPOSURE LIMITS: None established for mixture.

TOXICITY DATA: Irritating to rabbits in a primary dermal irritation study. No skin sensitization was observed in guinea pigs (Buehler).

CARCINOGENICTY: NTP? See below IARC Monographs? No OSHA Regulated? No

PRIMARY ROUTE(S) OF EXPOSURE: Eye contact, skin contact, inhalation.

#### EFFECTS OF OVEREXPOSURE:

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ACUTE: Eye contact causes severe irritation. If not removed promptly, eye injury will occur which may result in permanent damage. Skin contact causes irritation. Although not present under normal conditions, high vapor concentrations are irritating to the eyes and the respiratory tract and may cause headaches, dizziness, unconsciousness and other central nervous system effects. These effects are temporary and reversible.

CHRONIC: This product contains 0.3% Naphthalene. An NTP draft report states that lifetime inhalation exposure to naphthalene resulted in increases in tumors of the nose in rats. In a previous study, lifetime inhalation exposure increased lung tumors in female mice. The relevance of these findings to humans is not known.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: Asthma, bronchitis, emphysema and any other respiratory disorders.

### VII. SPECIAL PROTECTION INFORMATION

VENTILATION REQUIREMENTS: Use local and mechanical exhaust to minimize exposure to vapors or mists.

RECOMMENDED OCCUPATIONAL EXPOSURE LIMITS: 100 ppm total hydrocarbons, 50 ppm alcohol.

#### PERSONAL PROTECTIVE EQUIPMENT:

RESPIRATORY: Not required under normal operating conditions. Respiratory protection may be needed under certain conditions where significant exposure to fumes or mists may occur. A NIOSH approved air purifying respirator equipped with NIOSH approved organic vapor cartridges is recommended. Use must comply with the OSHA standard for respiratory protection (29 CFR 1910.134) including appropriate fit testing and training.

EYE: Chemical splash goggles.

# SOLVIT® QD PAGE 4 of 5

GLOVES: Impervious nitrile or butyl rubber.

## VIII. FIRST AID PROCEDURES

#### EYE CONTACT:

If the material gets in the eyes, immediately wash the eyes with copious amounts of water, occasionally lifting the lower and upper eyelids. Continue for 15 minutes. Get medical attention immediately.

#### SKIN CONTACT:

If the material gets on the skin, immediately wash the area with soap and water and flush with water. If the material gets on clothing, remove the clothing and wash the affected area with soap and water. If irritation develops, get medical attention. Wash contaminated clothing before reuse.

#### INGESTION:

If the material has been swallowed, do not induce vomiting. Get medical attention immediately.

#### INHALATION:

If dizziness, coughing, irritation or tightness in the chest is experienced, remove to fresh air. Administer oxygen if breathing is difficult. Get medical attention immediately.

## IX: SPILL OR LEAK PROCEDURES

## STEPS TO BE TAKEN IN CASE MATERIAL IS SPILLED:

Evacuate area of all non-essential personnel. Remove all sources of ignition. Ventilate confined spaces. Wear gloves, goggles, apron or lab coat and respirator. Contain spill with absorbent socks to prevent sewer runoff. Absorb spill with absorbent material such as sand or earth. Do not use combustible materials such as sawdust. Using non-sparking tools, shovel into salvage container.

## WASTE DISPOSAL METHOD:

Waste liquid can be incinerated or used for fuel blending. Waste products may be hazardous due to ignitability. Comply with federal, state and local regulations.

## X. SPECIAL PRECAUTIONS

Store in a cool, well-ventilated area away from flammable materials and sources of heat, sparks or flame. Use with electrically grounded equipment.

Practice good housekeeping and vigorous personal hygiene to minimize contact with material.

This product is for industrial use only. Do not reuse container.

# XI. REGULATORY COMMENTS

DOT CLASSIFICATION: Not regulated for non-bulk packaging. For bulk packaging:

Combustible liquid, n.o.s.; Combustible liquid; NA 1993; PG III

TSCA STATUS: All components are on the TSCA Chemical Substance Inventory.

SARA TITLE III: This product contains no chemicals on the EPA's list of Toxic Release Chemicals under Section 313 above regulated thresholds.

1990 CAA Amendments HAP's: This product contains 0.3% Naphthalene, CAS# 91-20-3.

### XII. PREPARATION INFORMATION

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DATE: April 4, 2001

SUPERSEDES: December 20, 2000

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