

September 21, 2017

Mr. William F. Durham, Director
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street
Charleston, West Virginia 25304

RE: Permit Determination Request
Tank Change from Poly to MDI/PMDI Storage
Permit No. R13-2948B
Plant I.D. No. 011-00175
Rubberlite, Incorporated – Huntington Facility

Dear Mr. Durham:

Rubberlite, Incorporated's (Rubberlite) Huntington Facility in Cabell County, West Virginia produces foam material, foam laminates, and coated foam. The foam material we use is either produced at the site or is purchased from other sources. We manufacture foam using a two-component system consisting of Part A-Isocyanate and Part B-Polyol Resin.

We are proposing to convert one of the existing 7,000-gallon polyol storage tanks into a methylene diphenyl diisocyanate (MDI)/polymeric methylene diphenyl diisocyanate (PMDI) storage tank. The tank change is being completed to allow for more flexibility in delivery of MDI/PMDI from the few existing suppliers. This request is not related to increased production. The process rates, as currently permitted, continue to be sufficient for our production needs. With the relatively few suppliers and the potential for disruption of delivery (typically weather related and ranging from hurricanes in port areas to deep snowfall in the delivery area), we need to assure that the facility has a sufficient supply of material to continue to operate in case of a supply interruption.

Polyol is stored in tanks but does not have an emissions value. Therefore, the polyol tanks are not listed in the air permit. The MDI/PMDI does have a very small volatile organic compound (VOC)/MDI emissions rate ($6.70E^{-6}$ pounds per hour as estimated in the existing Permit No. R13-2948B application) for the current 7,000-gallon tanks. The emission rate will be the same for the proposed tank since it is the same size as the existing MDI/PMDI tanks. Multiplying the hourly emission rate by 8,760 hours per year results in a yearly emission rate of $2.94E^{-5}$ tons per year. These emission values are less than the trigger limits for permitting of 6 pounds per hour and 10 tons per year for VOCs and 2 pounds per hour or 5 tons per year of hazardous air pollutants.

In reviewing this issue and the possible air permitting implications of changing the material stored in the tank, we requested input from Mr. Steve Pursley, Permit Engineer, at your agency. In a

Mr. William F. Durham, Director
September 21, 2017
Page 2

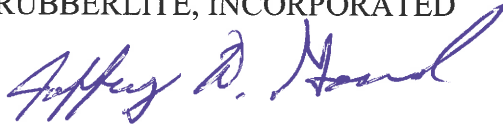
phone call on Monday, September 11, 2017, Mr. Pursley raised the issue of compliance with 40 CFR 63, Subpart OOOOOO. During the phone call, we worked through the issue. As identified in the permit application and as stated in the Engineering Evaluation/Fact Sheet for the permit, we use water as the blowing agent. We meet the requirement for Subpart OOOOOO paragraph 63.11416 (2) which allows compliance with the rule to be determined by "Use no material containing methylene chloride for any purpose in any slabstock flexible foam production process". With our compliance method, there is no specific Subpart OOOOOO emissions standard applicable to our process. Therefore, we believe Subpart OOOOOO is not a substantive requirement of an emission control rule promulgated by the Secretary (40CSR13 2.24.a).

We are hereby submitting this permit determination form for your review and concurrence that a permit is not required to switch the contents of the tank from polyol to MDI/PMDI.

If you have any questions during the review please call me at (304) 525-3116 or Mr. Patrick Ward of Potesta & Associates, Inc. at (304) 342-1400. We look forward to your response.

Sincerely,

RUBBERLITE, INCORPORATED



Jeffrey D. Goad
Vice President - Polyurethanes

Attachment: Permit Determination Form

C: Patrick Ward, Potesta & Associates, Inc.

**PERMIT DETERMINATION FORM
STORAGE TANK CONTENT CHANGE
HUNTINGTON FACILITY**

Prepared for:

Rubberlite, Incorporated
2501 Guyan Avenue
Huntington, West Virginia 25703

Prepared by:

Potesta & Associates, Inc.
7012 MacCorkle Avenue, SE
Charleston, West Virginia 25304
Phone: (304) 342-1400 Fax: (304) 343-9031
Email: potesta@potesta.com

Project No. 0101-15-0160-010

September 2017

 **POTESTA**

TABLE OF CONTENTS

Permit Determination Form SECTION I

Area Map ATTACHMENT A

Process Flow Diagram ATTACHMENT B

Safety Data Sheets (SDS) ATTACHMENT D

Potential to Emit ATTACHMENT E

Attachment C – Process Description provided in cover letter which is part of the application.

SECTION I

PERMIT DETERMINATION FORM



WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

**PERMIT DETERMINATION FORM
(PDF)**

FOR AGENCY USE ONLY: PLANT I.D. # _____
PDF # _____ PERMIT WRITER: _____

1. NAME OF APPLICANT (AS REGISTERED WITH THE WV SECRETARY OF STATE'S OFFICE):

Rubberlite, Incorporated

2. NAME OF FACILITY (IF DIFFERENT FROM ABOVE):

Huntington Facility

3. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS) CODE:

326291

4A. MAILING ADDRESS:

2501 Guyan Avenue
Huntington, West Virginia 25703

4B. PHYSICAL ADDRESS:

Same

5A. DIRECTIONS TO FACILITY (PLEASE PROVIDE MAP AS ATTACHMENT A):

From I-64 West, take Exit 15 toward Huntington to U.S. 60. Left turn on Third Avenue, right onto 25th Street, then left onto Guyan Avenue.

5B. NEAREST ROAD:

Guyan Avenue

5C. NEAREST CITY OR TOWN:

Huntington

5D. COUNTY:

Cabell

5E. UTM NORTHING (KM):

376.625

5F. UTM EASTING (KM):

4,254.55754

5G. UTM ZONE:

17

6A. INDIVIDUAL TO CONTACT IF MORE INFORMATION IS REQUIRED:

Corbet Dowdy

6B. TITLE:

EH&S Manager

6C. TELEPHONE:

(304) 525-3116

6D. FAX:

(304) 697-2167

6E. E-MAIL:

cdowdy@rubberlite.com

7A. DAQ PLANT I.D. NO. (FOR AN EXISTING FACILITY ONLY):

11-00174

7B. PLEASE LIST ALL CURRENT 45CSR13, 45CSR14, 45CSR19 AND/OR TITLE V (45CSR30) PERMIT NUMBERS ASSOCIATED WITH THIS PROCESS (FOR AN EXISTING FACILITY ONLY):

R-13-2948B

7C. IS THIS PDF BEING SUBMITTED AS THE RESULT OF AN ENFORCEMENT ACTION? IF YES, PLEASE LIST: No

8A. TYPE OF EMISSION SOURCE (CHECK ONE):

NEW SOURCE

ADMINISTRATIVE UPDATE

MODIFICATION

OTHER (PLEASE EXPLAIN IN 11B)

8B. IF ADMINISTRATIVE UPDATE, DOES DAQ HAVE THE APPLICANT'S CONSENT TO UPDATE THE EXISTING PERMIT WITH THE INFORMATION CONTAINED HEREIN?

YES

NO

9. IS DEMOLITION OR PHYSICAL RENOVATION AT AN EXISTING FACILITY INVOLVED?

YES

NO

10A. DATE OF ANTICIPATED INSTALLATION OR CHANGE:

10/12/2017

10B. DATE OF ANTICIPATED START-UP:

10/12/2017

11A. PLEASE PROVIDE A DETAILED PROCESS FLOW DIAGRAM SHOWING EACH PROPOSED OR MODIFIED PROCESS EMISSION POINT AS ATTACHMENT B.

11B. PLEASE PROVIDE A DETAILED PROCESS DESCRIPTION AS ATTACHMENT C. Tank Content Change Only. See Cover Letter

12. PLEASE PROVIDE MATERIAL SAFETY DATA SHEETS (MSDS) FOR ALL MATERIALS PROCESSED, USED OR PRODUCED AS ATTACHMENT D. FOR CHEMICAL PROCESSE, PLEASE PROVIDE A MSDS FOR EACH COMPOUND EMITTED TO AIR.

13A. REGULATED AIR POLLUTANT EMISSIONS:

⇒ **FOR A NEW FACILITY**, PLEASE PROVIDE PLANT WIDE EMISSIONS BASED ON THE POTENTIAL TO EMIT (PTE) FOR THE FOLLOWING AIR POLLUTANTS INCLUDING ALL PROCESSES.

⇒ **FOR AN EXISTING FACILITY**, PLEASE PROVIDE THE PROPOSED CHANGE IN EMISSIONS BASED ON THE PTE OF ALL PROCESS CHANGES FOR THE FOLLOWING AIR POLLUTANTS.

PTE FOR A GIVEN POLLUTANT IS TYPICALLY BEFORE AIR POLLUTION CONTROL DEVICES AND IS COLLECTED BASED ON THE MAXIMUM DESIGN CAPACITY OF PROCESS EQUIPMENT.

| POLLUTANT | HOURLY PTE (LB/HR) | YEARLY PTE (TON/YR) (HOURLY PTE MULTIPLIED BY 8760 HR/YR) DIVIDED BY 2000 LB/TON |
|-------------------------------------|----------------------|--|
| PM | NA | NA |
| PM ₁₀ | NA | NA |
| VOCs | 6.70E ⁻⁰⁶ | 2.94E ⁻⁰⁵ |
| CO | NA | NA |
| NO _x | NA | NA |
| SO ₂ | NA | NA |
| Pb | NA | NA |
| HAPs (AGGREGATE AMOUNT) MDI/PMDI | 6.70E ⁻⁰⁶ | 2.94E ⁻⁰⁵ |
| TAPs (INDIVIDUALLY)* | NA | NA |
| OTHER (INDIVIDUALLY)* | NA | NA |

* ATTACH ADDITIONAL PAGES AS NEEDED

13B. PLEASE PROVIDE ALL SUPPORTING CALCULATIONS AS ATTACHMENT E.

CALCULATE AN HOURLY AND YEARLY PTE OF EACH PROCESS EMISSION POINT (SHOWN IN YOUR DETAILED PROCESS FLOW DIAGRAM) FOR ALL AIR POLLUTANTS LISTED ABOVE INCLUDING INDIVIDUAL HAP'S (LISTED IN SECTION 112[b] OF THE 1990 CAAA), TAP'S (LISTED IN 45CSR27), AND OTHER AIR POLLUTANTS (E.G. POLLUTANTS LISTED IN TABLE 45-13A OF 45CSR13, MINERAL ACIDS PER 45CSR7, ETC.).

14. CERTIFICATION OF DATA

I, Jeffrey D. Goad (TYPE NAME) ATTEST THAT ALL THE REPRESENTATIONS CONTAINED IN THIS APPLICATION, OR APPENDED HERETO, ARE TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE BASED ON INFORMATION AND BELIEF AFTER REASONABLE INQUIRY, AND THAT I AM A **RESPONSIBLE OFFICIAL**** (PRESIDENT, VICE PRESIDENT, SECRETARY OR TREASURER, GENERAL PARTNER OR SOLE PROPRIETOR) OF THE APPLICANT.

SIGNATURE OF RESPONSIBLE OFFICIAL: _____

TITLE: Vice President - Polyurethanes

DATE: 09 / 21 / 2017

** THE DEFINITION OF THE PHRASE 'RESPONSIBLE OFFICIAL' CAN BE FOUND AT 45CSR13, SECTION 2.23.

NOTE: PLEASE CHECK ENCLOSED ATTACHMENTS:

ATTACHMENT A ATTACHMENT B ATTACHMENT C ATTACHMENT D ATTACHMENT E

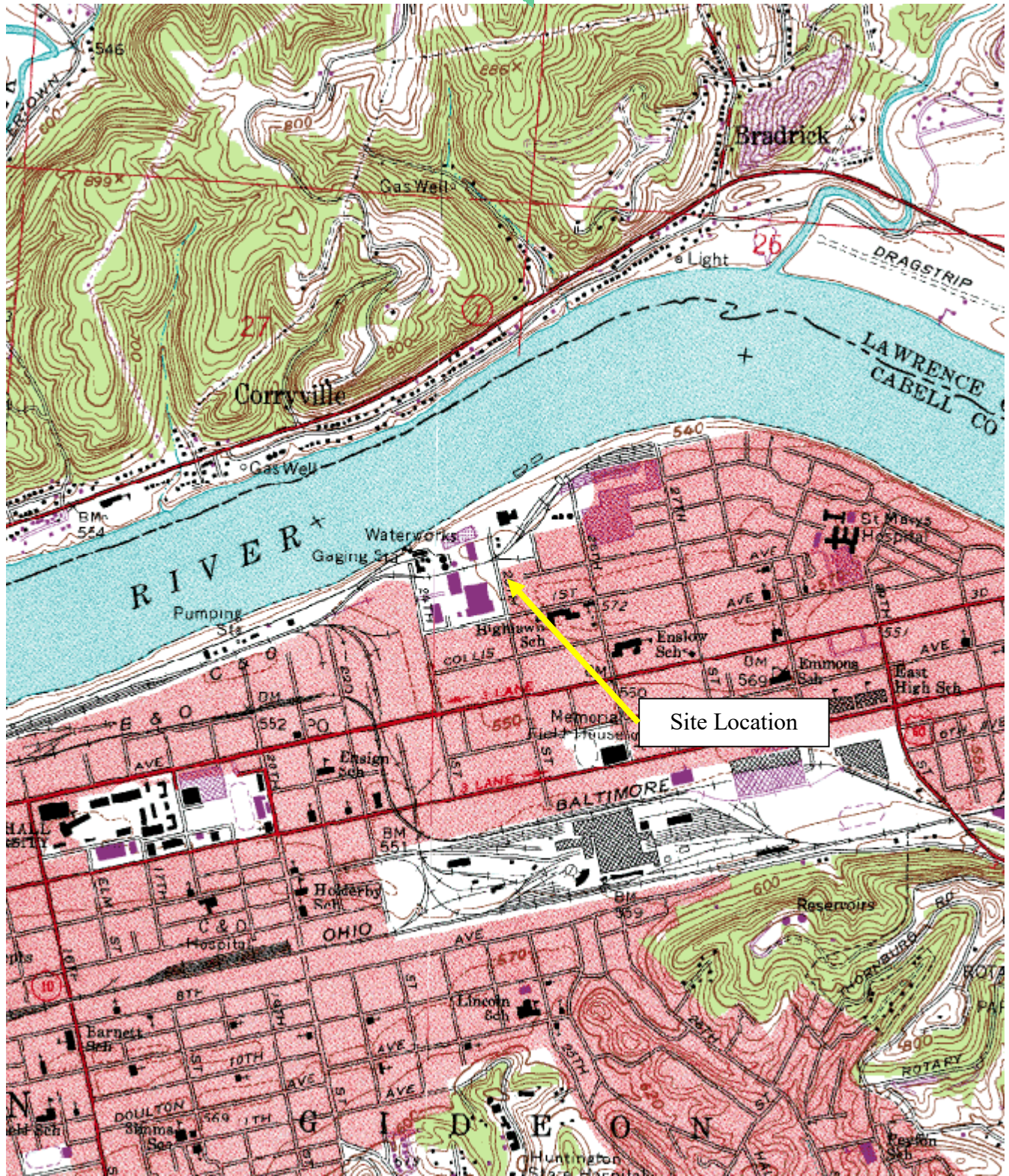
RECORDS ON ALL CHANGES ARE REQUIRED TO BE KEPT AND MAINTAINED ON-SITE FOR TWO (2) YEARS.

THE PERMIT DETERMINATION FORM WITH THE INSTRUCTIONS CAN BE FOUND ON DAQ'S PERMITTING SECTION WEB SITE:

www.dep.wv.gov/daq

ATTACHMENT A

AREA MAP



7012 MacCorkle Avenue, SE
Charleston, West Virginia 25304
Phone: (304) 342-1400
Fax: (304) 343-9031

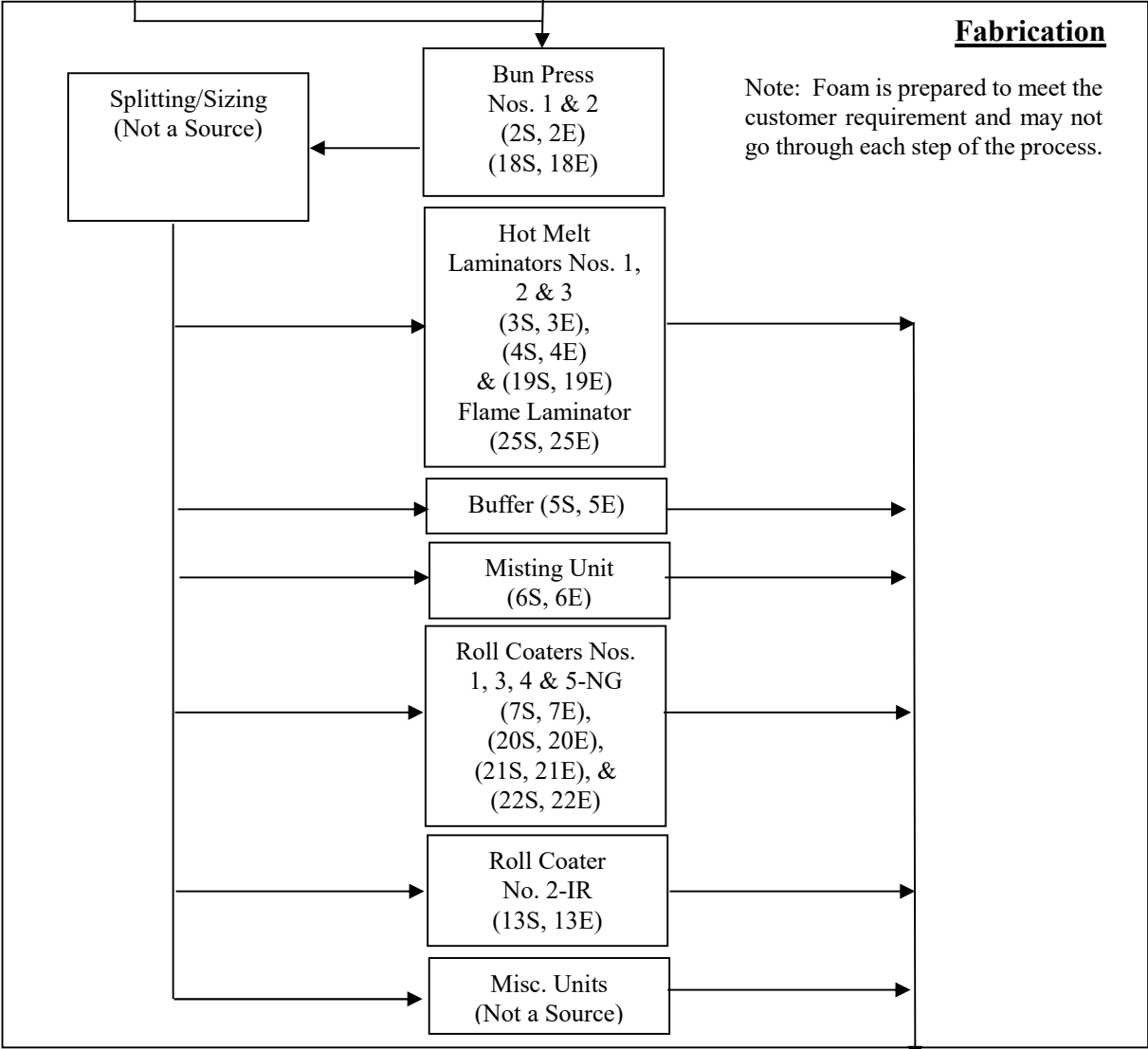
Area Map
Rubberlite, Incorporated
Huntington Facility
Huntington, West Virginia

ATTACHMENT B
PROCESS FLOW DIAGRAM

Foam Delivery, Raw Materials
Delivery from Others
Vehicle Activity (12S, 12E)

**Foam Production
Unit No. 1**
(1S, 1E) Including
ISO Tanks (10S, 10E)
and Glycol Tanks (11S,
11E)

**Foam Production
Unit No. 2**
(15S, 15E) Including
ISO Tanks (16S, 16E)
and Glycol Tanks
(17S, 17E)



Lab Production
Unit
(9S, 9E)

Solvent Cleaning Stations
(8S, 8E) (14S, 14E) & (23S, 23E)

Emergency Generator No. 1
(24S, 24E)



7012 MacCorkle Avenue, S.E.
Charleston, West Virginia 25304
Phone: (304) 342-1400
Fax: (304) 343-9031

Huntington Facility
Rubberlite, Incorporated
Cabell County, West Virginia
Project No. 0101-15-0160-010

ATTACHMENT D
SAFETY DATA SHEETS

SAFETY DATA SHEET



SUPRASEC® 2543

Section 1. Identification

GHS product identifier : SUPRASEC® 2543

Product code : 00007714

Other means of identification : Not available.

Product type : Liquid.

Material uses : Component of a Polyurethane System

Supplier's details : Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)
P.O. Box 4980
The Woodlands, TX 77387

For Polyurethanes product information/assistance:
The Woodlands: (800) 257-5547
Auburn Hills: (800) 553-8624
Canada: (905) 678-9150

e-mail address of person responsible for this SDS : MSDS@huntsman.com

Emergency telephone number (24h/7day) : Chemtrec: (800) 424-9300 or (703) 527-3887

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Classification of the substance or mixture : ACUTE TOXICITY: INHALATION - Category 4
SKIN CORROSION/IRRITATION - Category 2
SERIOUS EYE DAMAGE/ EYE IRRITATION - Category 2B
RESPIRATORY SENSITIZATION - Category 1
SKIN SENSITIZATION - Category 1
SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) [Respiratory tract irritation] - Category 3

GHS label elements

Hazard pictograms



Signal word

: Danger

Hazard statements

: Harmful if inhaled.
Causes skin and eye irritation.
May cause allergy or asthma symptoms or breathing difficulties if inhaled.
May cause an allergic skin reaction.
May cause respiratory irritation.

SUPRASEC® 2543

Section 2. Hazards identification

Precautionary statements : Wear protective gloves. Wear eye or face protection. In case of inadequate ventilation wear respiratory protection. Use only outdoors or in a well-ventilated area. Avoid breathing vapor. Wash hands thoroughly after handling. Contaminated work clothing should not be allowed out of the workplace. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or physician if you feel unwell. If experiencing respiratory symptoms: Call a POISON CENTER or physician. IF ON SKIN: Wash with plenty of soap and water. Take off contaminated clothing. Wash contaminated clothing before reuse. If skin irritation or rash occurs: Get medical attention. 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. Store locked up. Dispose of contents and container in accordance with all local, regional, national and international regulations.

Other hazards which do not result in classification : Not available.

Section 3. Composition/information on ingredients

Substance/mixture : Mixture

| ingredient name | % | CAS number |
|---|---------|-------------|
| Diphenylmethane 4,4'-diisocyanate | 30 - 60 | 101-68-8 |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | 30 - 60 | 27083-55-2 |
| Oxybispropanol, polymer with oxirane, methyloxirane and 4,4'-diphenylmethane diisocyanate | 13 - 30 | 393528-91-1 |
| Homopolymer of methylenediphenyl diisocyanate | 3 - 7 | 25686-28-6 |

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

Eye contact : In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Get medical attention immediately.

Inhalation : Move exposed person to fresh air. Get medical attention immediately. Treatment is symptomatic for primary irritation or bronchospasm. If breathing is laboured, oxygen should be administered by qualified personnel.

Skin contact : After contact with skin, wash immediately with plenty of warm soapy water: Remove contaminated clothing and shoes. Continue to rinse for at least 10 minutes. An MDI study has demonstrated that a polyglycol-based skin cleanser (such as D-Tam™, PEG-400) or corn oil may be more effective than soap and water. Get medical attention if symptoms occur. Wash clothing before reuse. Clean shoes thoroughly before reuse.

Ingestion : Do not induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Provided the patient is conscious, wash out mouth with water. Get medical attention if symptoms appear.

Most important symptoms/effects, acute and delayed

Potential acute health effects

Eye contact : Causes eye irritation.

SUPRASEC® 2543

Section 4. First aid measures

- Inhalation** : Harmful if inhaled. May cause respiratory irritation. This product is a respiratory irritant and potential respiratory sensitiser: repeated inhalation of vapour or aerosol at levels above the occupational exposure limit could cause respiratory sensitisation. Symptoms may include irritation to the eyes, nose, throat and lungs, possibly combined with dryness of the throat, tightness of chest and difficulty in breathing. The onset of the respiratory symptoms may be delayed for several hours after exposure. A hyper-reactive response to even minimal concentrations of MDI may develop in sensitised persons. LC50 (rat) : ca. 490 mg/m³ (4 hours) : using experimentally produced respirable aerosol having aerodynamic diameter <5microns.
- Skin contact** : Causes skin irritation. May cause sensitization by skin contact. Animal studies have shown that respiratory sensitisation can be induced by skin contact with known respiratory sensitisers including diisocyanates. These results emphasize the need for protective clothing including gloves to be worn at all times when handling these chemicals or in maintenance work.
- Ingestion** : Low oral toxicity, but ingestion may cause irritation of the gastrointestinal tract.

Over-exposure signs/symptoms

- Eye contact** : Adverse symptoms may include the following:
pain or irritation
watering
redness
- Inhalation** : Adverse symptoms may include the following:
respiratory tract irritation
coughing
wheezing and breathing difficulties
asthma
- Skin contact** : Adverse symptoms may include the following:
irritation
redness
- Ingestion** : No specific data.

Indication of immediate medical attention and special treatment needed, if necessary

- Notes to physician** : Symptomatic treatment and supportive therapy as indicated. Following severe exposure the patient should be kept under medical review for at least 48 hours.
- Protection of first-aiders** : No action shall be taken involving any personal risk or without suitable training. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

- Flash point** : Closed cup: >110°C (>230°F) [DIN 51758 EN 22719 (Pensky-Martens Closed Cup)]

Extinguishing media

- Suitable extinguishing media** : Foam, CO₂ or dry powder.
- Unsuitable extinguishing media** : Water may be used if no other available and then in copious quantities. Reaction between water and hot isocyanate may be vigorous. Prevent washings from entering water courses, keep fire exposed containers cool by spraying with water.

SUPRASEC@ 2543

Section 5. Fire-fighting measures

- Specific hazards arising from the chemical** : In a fire or if heated, a pressure increase will occur and the container may burst.
- Hazardous thermal decomposition products** : Combustion products may include: carbon monoxide, carbon dioxide, nitrogen oxides, hydrocarbons and HCN.
- Special protective actions for fire-fighters** : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.
- Special protective equipment for fire-fighters** : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode. PVC boots, gloves, safety helmet and protective clothing should be worn.
- Remark** : Due to reaction with water producing CO₂-gas, a hazardous build-up of pressure could result if contaminated containers are re-sealed. Containers may burst if overheated.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

- For non-emergency personnel** : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Avoid breathing vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment (see Section 8).
- For emergency responders** : If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".
- Environmental precautions** : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).
- Methods and materials for containment and cleaning up** : If the product is in its solid form: Spilled MDI flakes should be picked up carefully. The area should be vacuum cleaned to remove remaining dust particles completely. If the product is in its liquid form: Absorb spillages onto sand, earth or any suitable adsorbent material. Leave to react for at least 30 minutes. Shovel into open-top drums for further decontamination. Wash the spillage area with water. Test atmosphere for MDI vapour. Neutralise small spillages with decontaminant. Remove and dispose of residues. The compositions of liquid decontaminants are given in Section 16. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Persons with a history of skin sensitization problems or asthma, allergies or chronic or recurrent respiratory disease should not be employed in any process in which this product is used. Avoid exposure - obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not get in eyes or on skin or clothing. Do not ingest. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Keep in the original container or an

SUPRASEC® 2543

Section 7. Handling and storage

- approved alternative made from a compatible material, kept tightly closed when not in use. Empty containers retain product residue and can be hazardous.
- Advice on general occupational hygiene** : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.
- Conditions for safe storage, including any incompatibilities** : Store in accordance with local regulations. Keep container tightly closed in a cool, well-ventilated place. Keep away from moisture. Due to reaction with water producing CO₂-gas, a hazardous build-up of pressure could result if contaminated containers are re-sealed. Do not reseal contaminated containers. Uncontaminated containers, free of moisture, may be resealed only after placing under a nitrogen blanket. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. Unsuitable containers: Do not store in containers made of copper, copper alloys or galvanized surfaces.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

| Ingredient name | Exposure limits |
|-------------------------------------|---|
| 4,4'-Methylenediphenyl diisocyanate | ACGIH TLV (United States, 3/2012). TWA: 0.005 ppm 8 hours. OSHA PEL (United States, 6/2010). CEIL: 0.02 ppm CEIL: 0.2 mg/m ³ |

- Appropriate engineering controls** : Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. Diisocyanates can only be smelled if the occupational exposure limit has been exceeded considerably.
- Medical supervision of all employees who handle or come in contact with respiratory sensitizers is recommended. Personnel with a history of asthma-type conditions, bronchitis or skin sensitisation conditions should not work with MDI based products. The Occupational Exposure Limits listed do not apply to previously sensitised individuals. Sensitised individuals should be removed from any further exposure.
- Environmental exposure controls** : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

- Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
- Eyeface protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists or dusts.

SUPRASEC® 2543

Section 8. Exposure controls/personal protection

| | |
|-------------------------------|--|
| Hand protection | : Use chemical resistant gloves classified under Standard EN374: protective gloves against chemicals and microorganisms. Examples of glove materials that might provide suitable protection include :Butyl rubber, Chlorinated polyethylene, Polyethylene, Ethyl vinyl alcohol copolymers laminated ("EVAL"), Polychloroprene (Neoprene*), Nitrile/butadiene rubber ("nitrile" or "NBR"), Polyvinyl chloride ("PVC" or "vinyl"), Fluoroelastomer (Viton*). |
| | When prolonged or frequently repeated contact may occur, a glove with protection class of 5 or higher (breakthrough time greater than 240 minutes according to EN374) is recommended. |
| | Contaminated gloves should be decontaminated and disposed of. Notice: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all requisite workplace factors such as, but not limited to : other chemicals that may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), as well as instructions/specifications provided by the glove supplier. Protective gloves should be worn when handling freshly made polyurethane products to avoid contact with trace residual materials which may be hazardous in contact with skin. |
| Body protection | : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. Recommended: Overall (preferably heavy cotton) or Tyvek-Pro Tech 'C', Tyvek-Pro 'F' disposable coverall. |
| Other skin protection | : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. |
| Respiratory protection | : Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator. |
| Thermal hazards | : Not available. |

Section 9. Physical and chemical properties

Appearance

| | |
|---|--|
| Physical state | : Liquid. [Liquid.] |
| Color | : Not available. |
| Odor | : Not available. |
| Odor threshold | : Not available. |
| pH | : Not available. |
| Melting point/Freezing point | : Not available. |
| Boiling/condensation point | : >300°C decomposes |
| Flash point | : Closed cup: >110°C (>230°F) [DIN 51758 EN 22719 (Pensky-Martens Closed Cup)] |
| Evaporation rate | : Not available. |
| Flammability (solid, gas) | : Not available. |
| Lower and upper explosive (flammable) limits | : Not available. |
| Vapor pressure | : Not available. |
| Vapor density | : Not available. |
| Relative density | : Not available. |
| Solubility in water | : Not available. |

SUPRASEC® 2543

Section 9. Physical and chemical properties

Partition coefficient: n-octanol/water : Not available.

Auto-ignition temperature : >600°C

Decomposition temperature : Not available.

Viscosity : Not available.

Section 10. Stability and reactivity

Reactivity : No specific test data related to reactivity available for this product or its ingredients.

Chemical stability : Stable at room temperature.

Possibility of hazardous reactions : Reaction with water (moisture) produces CO₂-gas. Exothermic reaction with materials containing active hydrogen groups. The reaction becomes progressively more vigorous and can be violent at higher temperatures if the miscibility of the reaction partners is good or is supported by stirring or by the presence of solvents. MDI is insoluble with, and heavier than water and sinks to the bottom but reacts slowly at the interface. A solid water-insoluble layer of polyurea is formed at the interface by liberating carbon dioxide gas.

Conditions to avoid : Avoid high temperatures.

Incompatible materials : Water, alcohols, amines, bases, and acids.

Hazardous decomposition products : Combustion products may include: carbon oxides (CO, CO₂) nitrogen oxides (NO, NO₂ etc.) hydrocarbons and HCN

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

| Product/ingredient name | Test | Endpoint | Species | Result |
|--|---|---------------------------------|-----------------------|--------------|
| Diphenylmethane 4,4'-diisocyanate | OECD 403 Acute Inhalation Toxicity | LC50 Inhalation Dusts and mists | Rat - Male, Female | 0.49 mg/l |
| | OECD 401 Acute Oral Toxicity | LD50 Oral | Rat - Male | >10000 mg/kg |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | OECD 403 Acute Inhalation Toxicity | LC50 Inhalation Dusts and mists | Rat - Male, Female | 0.49 mg/l |
| | OECD 402 Acute Dermal Toxicity | LD50 Dermal | Rabbit - Male, Female | >9400 mg/kg |
| | OECD 401 Acute Oral Toxicity | LD50 Oral | Rat - Male | >10000 mg/kg |
| Homopolymer of methylenediphenyl diisocyanate | OECD 403 Acute Inhalation Toxicity | LC50 Inhalation Dusts and mists | Rat - Male, Female | 0.49 mg/l |
| | OECD 425 Acute Oral Toxicity: Up-and-Down Procedure | LD50 Oral | Rat - Female | >5000 mg/kg |

Conclusion/Summary :

SUPRASEC® 2543

Section 11. Toxicological information

4,4'-Methylenediphenyl diisocyanate Irritating to respiratory system.
 Isocyanates, reaction product of polyol with methylenediphenyl diisocyanate Irritating to respiratory system.

Irritation/Corrosion

| Product/ingredient name | Test | Species | Result |
|--|--|---------|----------------------|
| Diphenylmethane 4,4'-diisocyanate | OECD 404 Acute Dermal Irritation/Corrosion | Rabbit | Skin - Irritant |
| | OECD 405 Acute Eye Irritation/Corrosion | Rabbit | Eyes - Non-irritant. |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | OECD 404 Acute Dermal Irritation/Corrosion | Rabbit | Skin - Irritant |
| | OECD 405 Acute Eye Irritation/Corrosion | Rabbit | Eyes - Non-irritant. |
| Homopolymer of methylenediphenyl diisocyanate | OECD 405 Acute Eye Irritation/Corrosion | Rabbit | Eyes - Non-irritant. |
| | OECD 404 Acute Dermal Irritation/Corrosion | Rabbit | Skin - Irritant |
| | OECD 404 Acute Dermal Irritation/Corrosion | Other | Non-corrosive |

Conclusion/Summary

Skin

- : Diphenylmethane 4,4'-diisocyanate Irritating to skin.
- Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate Irritating to skin.
- Oxybispropanol, polymer with oxirane, methyloxirane and 4,4'-diphenylmethane diisocyanate No additional information.
- Homopolymer of methylenediphenyl diisocyanate Irritating to skin.

Eyes

- : Diphenylmethane 4,4'-diisocyanate Based on the human occupational exposure data, this substance is considered as irritating to eyes.
- Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate Based on the human occupational exposure data, this substance is considered as irritating to eyes.
- Oxybispropanol, polymer with oxirane, methyloxirane and 4,4'-diphenylmethane diisocyanate No additional information.
- Homopolymer of methylenediphenyl diisocyanate Irritating to eyes.

Respiratory :

SUPRASEC® 2543

Section 11. Toxicological information

| | |
|---|----------------------------|
| Diphenylmethane 4,4'-diisocyanate | No additional information. |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | No additional information. |
| Oxybispropanol, polymer with oxirane, methyloxirane and 4,4'-diphenylmethane diisocyanate | No additional information. |
| Homopolymer of methylenediphenyl diisocyanate | No additional information. |

Sensitization

| Product/ingredient name | Test | Route of exposure | Species | Result |
|--|---|-------------------|------------|-----------------|
| Diphenylmethane 4,4'-diisocyanate | OECD 429 Skin Sensitization: Local Lymph Node Assay | skin | Mouse | Sensitizing |
| | OECD 406 Skin Sensitization | skin | Guinea pig | Not sensitizing |
| | No official guidelines | Respiratory | Guinea pig | Sensitizing |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | OECD 429 Skin Sensitization: Local Lymph Node Assay | skin | Mouse | Sensitizing |
| | OECD 406 Skin Sensitization | skin | Guinea pig | Not sensitizing |
| | No official guidelines | Respiratory | Guinea pig | Sensitizing |
| Homopolymer of methylenediphenyl diisocyanate | OECD 406 Skin Sensitization | skin | Guinea pig | Sensitizing |
| | No official guidelines | Respiratory | Guinea pig | Sensitizing |

Mutagenicity

| Product/ingredient name | Test | Result |
|--|--|----------|
| Diphenylmethane 4,4'-diisocyanate | Experiment: In vitro Subject: Bacteria Metabolic activation: +/- | Negative |
| | Experiment: In vivo Subject: Mammalian-Animal | Negative |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | Experiment: In vitro Subject: Bacteria Metabolic activation: +/- | Negative |
| | Experiment: In vivo Subject: Mammalian-Animal | Negative |
| Homopolymer of methylenediphenyl diisocyanate | Experiment: In vitro Subject: Bacteria Metabolic activation: +/- | Negative |
| | Experiment: In vivo Subject: Mammalian-Animal | Negative |

SUPRASEC® 2543

Section 11. Toxicological information

Conclusion/Summary :

4,4'-Methylenediphenyl diisocyanate No mutagenic effect.
 Isocyanates, reaction product of polyol with methylenediphenyl diisocyanate No mutagenic effect.

Carcinogenicity

| Product/ingredient name | Test | Species | Dose | Exposure | Result/Result type |
|--|---|--------------------|---------------------|--------------------------|-------------------------------|
| Diphenylmethane 4,4'-diisocyanate | OECD 453 Combined Chronic Toxicity/ Carcinogenicity Studies | Rat - Male, Female | 1 mg/m ³ | 2 years; 5 days per week | Positive - Inhalation - NOAEL |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | OECD 453 Combined Chronic Toxicity/ Carcinogenicity Studies | Rat - Male, Female | 1 mg/m ³ | 2 years; 5 days per week | Positive - Inhalation - NOAEL |
| Homopolymer of methylenediphenyl diisocyanate | OECD 453 Combined Chronic Toxicity/ Carcinogenicity Studies | Rat - Male, Female | 1 mg/m ³ | 2 years; 5 days per week | Negative - Inhalation - NOAEL |

Carcinogenic class

| Product/ingredient name | IARC | OSHA |
|-------------------------------------|------|------|
| 4,4'-Methylenediphenyl diisocyanate | 3 | - |

Reproductive toxicity

| Product/ingredient name | Test | Species | Maternal toxicity | Fertility | Developmental effects |
|-----------------------------------|--|--------------------|-------------------|-----------|-----------------------|
| Diphenylmethane-2,4'-diisocyanate | OECD 414 Prenatal Developmental Toxicity Study | Rat - Female | Negative | - | - |
| | OECD 414 Prenatal Developmental Toxicity Study | Rat - Male, Female | Negative | - | - |
| | OECD 414 Prenatal Developmental Toxicity Study | Rat - Male, Female | Negative | Negative | Negative |

Conclusion/Summary :

SUPRASEC® 2543

Section 11. Toxicological information

4,4'-Methylenediphenyl diisocyanate No known significant effects or critical hazards.

Isocyanates, reaction product of polyol with methylenediphenyl diisocyanate No known significant effects or critical hazards.

Teratogenicity

| Product/ingredient name | Test | Species | Result/Result type |
|--|--|--------------------|-----------------------|
| Diphenylmethane 4,4'-diisocyanate | OECD 414 Prenatal Developmental Toxicity Study | Rat - Female | Negative - Inhalation |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | OECD 414 Prenatal Developmental Toxicity Study | Rat - Female | Negative - Inhalation |
| Homopolymer of methylenediphenyl diisocyanate | OECD 414 Prenatal Developmental Toxicity Study | Rat - Male, Female | Negative - Inhalation |

Conclusion/Summary :

4,4'-Methylenediphenyl diisocyanate No known significant effects or critical hazards.

Isocyanates, reaction product of polyol with methylenediphenyl diisocyanate No known significant effects or critical hazards.

Specific target organ toxicity (single exposure)

| Product/ingredient name | Category | Route of exposure | Target organs |
|---|------------|-------------------|------------------------------|
| Diphenylmethane 4,4'-diisocyanate | Category 3 | Not applicable. | Respiratory tract irritation |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | Category 3 | Not applicable. | Respiratory tract irritation |
| Oxybispropanol, polymer with oxirane, methyloxirane and 4,4'-diphenylmethane diisocyanate | Category 3 | Not applicable. | Respiratory tract irritation |
| Homopolymer of methylenediphenyl diisocyanate | Category 3 | Not applicable. | Respiratory tract irritation |

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Eye contact : Causes eye irritation.

SUPRASEC® 2543

Section 11. Toxicological information

- Inhalation** : Harmful if inhaled. May cause respiratory irritation. This product is a respiratory irritant and potential respiratory sensitiser: repeated inhalation of vapour or aerosol at levels above the occupational exposure limit could cause respiratory sensitisation. Symptoms may include irritation to the eyes, nose, throat and lungs, possibly combined with dryness of the throat, tightness of chest and difficulty in breathing. The onset of the respiratory symptoms may be delayed for several hours after exposure. A hyper-reactive response to even minimal concentrations of MDI may develop in sensitised persons. LC50 (rat) : ca. 490 mg/m³ (4 hours) : using experimentally produced respirable aerosol having aerodynamic diameter <5microns.
- Skin contact** : Causes skin irritation. May cause sensitization by skin contact. Animal studies have shown that respiratory sensitisation can be induced by skin contact with known respiratory sensitisers including diisocyanates. These results emphasize the need for protective clothing including gloves to be worn at all times when handling these chemicals or in maintenance work.
- Ingestion** : Low oral toxicity, but ingestion may cause irritation of the gastrointestinal tract.

Symptoms related to the physical, chemical and toxicological characteristics

- Eye contact** : Adverse symptoms may include the following:
pain or irritation
watering
redness
- Inhalation** : Adverse symptoms may include the following:
respiratory tract irritation
coughing
wheezing and breathing difficulties
asthma
- Skin contact** : Adverse symptoms may include the following:
irritation
redness
- Ingestion** : No specific data.

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

- Potential immediate effects** : Not available.
- Potential delayed effects** : Not available.

Long term exposure

- Potential immediate effects** : Not available.
- Potential delayed effects** : Not available.

Potential chronic health effects

| Product/ingredient name | Test | Endpoint | Species | Result |
|---|---|---|--------------------|-----------------------|
| Homopolymer of methylenediphenyl diisocyanate | OECD 453 Combined Chronic Toxicity/ Carcinogenicity Studies | Chronic NOEC Inhalation Dusts and mists | Rat - Male, Female | 0.2 mg/m ³ |
| | OECD 413 Subchronic Inhalation Toxicity: 90-day Study | Sub-chronic NOEC Inhalation Dusts and mists | Rat - Male, Female | <4 mg/m ³ |

SUPRASEC® 2543

Section 11. Toxicological information

- General** : May cause damage to organs through prolonged or repeated exposure if inhaled. Once sensitized, a severe allergic reaction may occur when subsequently exposed to very low levels.
- Carcinogenicity** : Rats have been exposed for two years to a respirable aerosol of polymeric MDI which resulted in chronic pulmonary irritation at high concentrations. Only at the top level (6 mg/m³), there was a significant incidence of a benign tumour of the lung (adenoma) and one malignant tumour (adenocarcinoma). There were no lung tumours at 1 mg/m³ and no effects at 0.2 mg/m³. Overall, the tumour incidence, both benign and malignant, and the number of animals with the tumours were not different from controls. The increased incidence of lung tumours is associated with prolonged respiratory irritation and the concurrent accumulation of yellow material in the lung, which occurred throughout the study. In the absence of prolonged exposure to high concentrations leading to chronic irritation and lung damage, it is highly unlikely that tumour formation will occur.
- Mutagenicity** : No known significant effects or critical hazards.
- Teratogenicity** : No known significant effects or critical hazards.
- Developmental effects** : No birth defects were seen in two independent animal (rat) studies. Fetotoxicity was observed at doses that were extremely toxic (including lethal) to the mother. Fetotoxicity was not observed at doses that were not maternally toxic. The doses used in these studies were maximal, respirable concentrations, which are well in excess of defined occupational exposure limits.
- Fertility effects** : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

| Route | ATE value |
|------------------------------|-----------|
| Inhalation (dusts and mists) | 1.5 mg/l |

Other information : Not available.

Section 12. Ecological information

Toxicity

| Product/ingredient name | Test | Endpoint | Exposure | Species | Result |
|---|---|---------------|---------------------|----------|------------|
| Diphenylmethane 4,4'-diisocyanate Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | OECD 203 Fish, Acute Toxicity Test | Acute LC50 | 96 hours Static | Fish | >1000 mg/l |
| | OECD 202 <i>Daphnia</i> sp. Acute Immobilisation Test | Acute EC50 | 24 hours Static | Daphnia | >1000 mg/l |
| | OECD 203 Fish, Acute Toxicity Test | Acute LC50 | 96 hours Static | Fish | >1000 mg/l |
| | OECD 211 <i>Daphnia Magna</i> Reproduction Test | Chronic NOEC | 21 days Semi-static | Daphnia | >10 mg/l |
| Homopolymer of methylenediphenyl diisocyanate | OECD 201 Alga, Growth Inhibition Test | Chronic NOECr | 72 hours Static | Algae | 1640 mg/l |
| | OECD 201 Alga, Growth Inhibition Test | Acute EC50 | 72 hours Static | Algae | >1640 mg/l |
| | OECD 209 Activated Sludge, Respiration | Acute EC50 | 3 hours Static | Bacteria | >100 mg/l |

8/6/2014.

Not available.

13/18

SUPRASEC® 2543

Section 12. Ecological information

| | | | | | | | |
|--|--|---------|------|------------------------|---------|-------|------|
| | Inhibition Test OECD 202 <i>Daphnia</i> sp. Acute | Acute | EC50 | 24 hours Static | Daphnia | >1000 | mg/l |
| | Immobilisation Test OECD 203 Fish, Acute Toxicity Test | Acute | LC50 | 96 hours Static | Fish | >1000 | mg/l |
| | OECD 211 <i>Daphnia</i> <i>Magna</i> Reproduction Test | Chronic | NOEC | 21 days Semi-static | Daphnia | >10 | mg/l |

Persistence and degradability

| Product/ingredient name | Test | Period | Result |
|--|---|---------|--------|
| Diphenylmethane 4,4'- diisocyanate | OECD 302C Inherent Biodegradability: Modified MITI Test (II) | 28 days | 0 % |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | OECD 302C Inherent Biodegradability: Modified MITI Test (II) | 28 days | 0 % |
| Homopolymer of methylenediphenyl diisocyanate | OECD 302C Inherent Biodegradability: Modified MITI Test (II) | 28 days | 0 % |

Conclusion/Summary : 4,4'-Methylenediphenyl diisocyanate Not biodegradable
Isocyanates, reaction product of polyol with methylenediphenyl diisocyanate Not biodegradable

| Product/ingredient name | Aquatic half-life | Photolysis | Biodegradability |
|--|-----------------------|------------|------------------|
| Diphenylmethane 4,4'- diisocyanate | Fresh water 0.83 days | - | Not readily |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | Fresh water 0.83 days | - | Not readily |
| Homopolymer of methylenediphenyl diisocyanate | - | - | Not readily |

Bioaccumulative potential

| Product/ingredient name | LogP _{ow} | BCF | Potential |
|--|--------------------|-----|-----------|
| Diphenylmethane 4,4'- diisocyanate | 4.51 | 200 | low |
| Isocyanates, reaction product of polyol with methylenediphenyldiisocyanate | 4.51 | 200 | low |
| Homopolymer of methylenediphenyl diisocyanate | 8.56 | 200 | low |

Mobility in soil

SUPRASEC® 2543

Section 12. Ecological information

Mobility : By considering the production and use of the substance, it is unlikely that significant environmental exposure in the air or water will arise. Immiscible with water, but will react with water to produce inert and non-biodegradable solids. Conversion to soluble products, including diamino- diphenylmethane (MDA), is very low under the optimal laboratory conditions of good dispersion and low concentration. In air, the predominant degradation process is predicted to be a relatively rapid OH radical attack, by calculation and by analogy with related diisocyanates.

Other adverse effects : No known significant effects or critical hazards.

Other ecological information

BOD5 : Not determined.

COD : Not determined.

TOC : Not determined.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe way. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

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

Section 14. Transport information


Proper shipping name

DOT : OTHER REGULATED SUBSTANCES, LIQUID, N.O.S. (Methylene Diphenyl Diisocyanate)

TDG : Not regulated.

IMDG : Not regulated.

IATA : Not regulated.

| Regulatory information | UN number | Classes | PG* | Label | Additional information |
|------------------------|----------------|---------|-----|--|---|
| DOT Classification | NA3082 | 9 | III |  | Reportable quantity 5000 lbs. (2270 kg) Single containers less than 5,000 lbs. are not regulated. |
| TDG Classification | Not regulated. | - | - | | - |

SUPRASEC@ 2543

Section 14. Transport information

| | | | | |
|---------------------|----------------|---|---|---|
| IMDG Classification | Not regulated. | - | - | - |
| IATA Classification | Not regulated. | - | - | - |

PG* : Packing group

Section 15. Regulatory information

Safety, health and environmental regulations specific for the product

United States Regulations

TSCA 8(b) inventory : All components are listed or exempted.

TSCA 5(a)2 final significant new use rule (SNUR) : No ingredients listed.

TSCA 5(e) substance consent order : No ingredients listed.

TSCA 12(b) export notification : No ingredients listed.

SARA 311/312 : Immediate (acute) health hazard

| | <u>Product name</u> | <u>Concentration %</u> |
|--|---------------------------------------|------------------------|
| Clean Air Act Section 112(b) Hazardous Air Pollutants (HAPs) | : 4,4'-Methylenediphenyl diisocyanate | 47.749 - 53.498 |

Clean Air Act - Ozone Depleting Substances (ODS) : This product does not contain nor is it manufactured with ozone depleting substances.

| | <u>Product name</u> | <u>Concentration %</u> |
|--|---------------------------------------|------------------------|
| SARA 313 Form R - Reporting requirements | : 4,4'-Methylenediphenyl diisocyanate | 47.749 - 53.498 |

| | <u>Ingredient name</u> | <u>%</u> | <u>Section 304 CERCLA Hazardous Substance</u> | <u>CERCLA Reportable Quantity (Lbs)</u> | <u>Product Reportable Quantity (Lbs)</u> |
|-----------------------------|---------------------------------------|------------------|---|---|--|
| CERCLA Hazardous substances | : 4,4'-Methylenediphenyl diisocyanate | 53.4975606392438 | Listed | 5000 | 9346 |

State regulations

PENNSYLVANIA - RTK : 4,4'-Methylenediphenyl diisocyanate

SUPRASEC® 2543

Section 15. Regulatory information

California Prop 65 : This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

Canadian regulations

CEPA DSL : All components are listed or exempted.

WHMIS Classes : WHMIS Class D-2A: Material causing other toxic effects (Very toxic).
WHMIS Class D-2B: Material causing other toxic effects (Toxic).

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations.

Brazil Requiutions

Classification system used : **Norma ABNT-NBR 14725-2:2012**

international lists

- : **Australia inventory (AICS)**: At least one component is not listed.
- : **China inventory (IECSC)**: All components are listed or exempted.
- : **Japan inventory**: All components are listed or exempted.
- : **Korea inventory**: All components are listed or exempted.
- : **Malaysia Inventory (EHS Register)**: Not determined.
- : **New Zealand Inventory of Chemicals (NZIoC)**: At least one component is not listed.
- : **Philippines inventory (PICCS)**: Not determined.
- : **Taiwan inventory (CSNN)**: Not determined.

Section 16. Other information

Hazardous Material Information System (U.S.A.) :

| | |
|---------------------|---|
| Health | 2 |
| Flammability | 1 |
| Physical hazards | 1 |
| Personal protection | |

The customer is responsible for determining the PPE code for this material.

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on SDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

National Fire Protection Association (U.S.A.) :



Reprinted with permission from NFPA 704-2001, Identification of the Hazards of Materials for Emergency Response Copyright ©1997, National Fire Protection Association, Quincy, MA 02269. This reprinted material is not the complete and official position of the National Fire Protection Association, on the referenced subject which is represented only by the standard in its entirety.

SUPRASEC® 2543

Section 16. Other information

Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Date of printing : 8/6/2014.
 Date of issue : 8/6/2014.
 Date of previous issue : 05/25/2010
 Version : 2

▮ Indicates information that has changed from previously issued version.

Liquid decontaminants (percentages by weight or volume):

Decontaminant 1 : *- sodium carbonate : 5 - 10 % *- liquid detergent : 0.2 - 2 % *- water : to make up to 100 %
 Decontaminant 2 : *- concentrated ammonia solution : 3 - 8 % *- liquid detergent : 0.2 - 2 % *- water : to make up to 100 %

Decontaminant 1 reacts slower with diisocyanates but is more environmentally friendly than decontaminant 2.

Decontaminant 2 contains ammonia. Ammonia presents health hazards. (See supplier safety information.)

Literature reference: PU 193-1 : 'MDI-Based Compositions : Hazards and Safe Handling Procedures.'

PU 181-15 : Recommended melting procedures for MDI-based isocyanates.

ISOPA Guidelines for safe Loading/Unloading, Transportation, Storage of TDI and MDI , Ref.03-96 PSC-0005-GUIDL.

SPI PMDI User Guidelines for the Chemical Protective Clothing Selection.

References of methods used in the Physico-Chemical Properties section are reported in Annex V part A to Commission Directive 92/69/EEC of 31 July 1992 adapting to technical progress for the Seventeenth time Council Directive 67/548/EEC.

Notice to reader

While the information and recommendations in this publication are to the best of our knowledge, information and belief accurate at the date of publication, NOTHING HEREIN IS TO BE CONSTRUED AS A WARRANTY, EXPRESS OR OTHERWISE.

IN ALL CASES, IT IS THE RESPONSIBILITY OF THE USER TO DETERMINE THE APPLICABILITY OF SUCH INFORMATION AND RECOMMENDATIONS AND THE SUITABILITY OF ANY PRODUCT FOR ITS OWN PARTICULAR PURPOSE.

THE PRODUCT MAY PRESENT HAZARDS AND SHOULD BE USED WITH CAUTION. WHILE CERTAIN HAZARDS ARE DESCRIBED IN THIS PUBLICATION, NO GUARANTEE IS MADE THAT THESE ARE THE ONLY HAZARDS THAT EXIST.

Hazards, toxicity and behaviour of the products may differ when used with other materials and are dependent upon the manufacturing circumstances or other processes. Such hazards, toxicity and behaviour should be determined by the user and made known to handlers, processors and end users.

NO PERSON OR ORGANIZATION EXCEPT A DULY AUTHORIZED HUNTSMAN EMPLOYEE IS AUTHORIZED TO PROVIDE OR MAKE AVAILABLE DATA SHEETS FOR HUNTSMAN PRODUCTS. DATA SHEETS FROM UNAUTHORIZED SOURCES MAY CONTAIN INFORMATION THAT IS NO LONGER CURRENT OR ACCURATE. NO PART OF THIS DATA SHEET MAY BE REPRODUCED OR TRANSMITTED IN ANY FORM, OR BY ANY MEANS, WITHOUT PERMISSION IN WRITING FROM HUNTSMAN. ALL REQUESTS FOR PERMISSION TO REPRODUCE MATERIAL FROM THIS DATA SHEET SHOULD BE DIRECTED TO HUNTSMAN, MANAGER, PRODUCT SAFETY AT THE ABOVE ADDRESS.



Safety Data Sheet
DIEXTER-G 1100G-50

Safety Data Sheet dated: 4/27/2015 - version 1

Date of first edition: 4/27/2015

1. IDENTIFICATION

Product identifier

Mixture identification:

Trade name: DIEXTER-G 1100G-50

Other means of identification:

Trade code: N.A.

Recommended use of the chemical and restrictions on use

Recommended use: Saturated polyester resin; Industrial uses: Uses of substances as such or in preparations at industrial sites

Restrictions on use: N.A.

Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

Company: COIM USA, Inc

286 Mantua Grove Rd, West Deptford, NJ 08066

Phone: (856) 224-8560

Email address of person responsible for this SDS:

US_SDS@us.coimgroup.com

Emergency telephone number

CHEMTREC, U.S. : (800) 424-9300 International: (703) 527-3887

2. HAZARD(S) IDENTIFICATION

Classification of the chemical

Classification of the chemical

0 The product is not classified as dangerous according to OSHA Hazard Communication Standard (29 CFR 1910.1200).

Label elements

The product is not classified as dangerous according to OSHA Hazard Communication Standard (29 CFR 1910.1200).

Ingredient(s) with unknown acute toxicity:

None

Hazards not otherwise classified identified during the classification process:

None

OSHA/HCS status:

While this material is not considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200), this SDS contain valuable information critical to the safe handling and proper use of the product. This SDS should be retained and available for employees and other users of this product.

3. COMPOSITION/INFORMATION ON INGREDIENTS

Substances

N.A.

Mixtures

Hazardous components within the meaning of 29 CFR 1910.1200 and related classification:

List of components

| Quantity | Name | Ident. Numb. |
|----------|---|----------------|
| 99-100 % | HEXANEDIOIC ACID, POLYMER WITH 2, 2'-OXYBIS[ETHANOL] AND 1,2,3-PROPANETRIOL | CAS:26760-54-3 |

4. FIRST AID MEASURES

Description of first aid measures

In case of skin contact:

Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Get medical attention if symptoms occur.

In case of eye contact:

Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention.

In case of Ingestion:

Wash out mouth with water. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Do not induce vomiting unless directed to do so by medical personnel. Get medical attention if symptoms occur.

In case of Inhalation:

Remove victim to fresh air and keep at rest in a position comfortable for breathing. Get medical attention if symptoms occur.

Most important symptoms/effects, acute and delayed

N.A.

Indication of any immediate medical attention and special treatment needed

5. FIRE-FIGHTING MEASURES

Extinguishing media

Use an extinguishing agent suitable for the surrounding fire.

Suitable extinguishing media:

Water.

Carbon dioxide (CO₂).

Unsuitable extinguishing media:

None in particular.

Specific hazards arising from the chemical

Do not inhale explosion and combustion gases.

Burning produces heavy smoke.

Hazardous combustion products: N.A.

Explosive properties: N.A.

Oxidizing properties: N.A.

Special protective equipment and precautions for fire-fighters

Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Use suitable breathing apparatus .

Collect contaminated fire extinguishing water separately. This must not be discharged into drains.

Move undamaged containers from immediate hazard area if it can be done safely.

6. ACCIDENTAL RELEASE MEASURES

Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Personal precautions, protective equipment and emergency procedures

Wear personal protection equipment.

Remove persons to safety.

See protective measures under point 7 and 8.

Methods and material for containment and cleaning up

Suitable material for taking up: absorbing material, organic, sand

Wash with plenty of water.

7. HANDLING AND STORAGE

Store in accordance with local regulations.

Precautions for safe handling

Avoid contact with skin and eyes, inhalation of vapours and mists.

Do not eat or drink while working.

See also section 8 for recommended protective equipment.

Conditions for safe storage, including any incompatibilities

Storage temperature: N.A.

Incompatible materials:

None in particular.

Instructions as regards storage premises:

Adequately ventilated premises.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

No Data Available

Appropriate engineering controls:

Use ventilation adequate to keep exposures (airborne levels of dust, fume, vapor, etc.) below recommended exposure limits.
Handle in accordance with good industrial hygiene and safety practice.

Individual protection measures

Eye protection:

Not needed for normal use. Anyway, operate according good working practices.

Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts.

Protection for skin:

Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

No special precaution must be adopted for normal use.

Protection for hands:

Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

Not needed for normal use.

Respiratory protection:

N.A.

Hygiene measures

Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Contaminated work clothing should not be allowed out of the workplace. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical State: Liquid @25°C

Appearance and colour: N.A.

Odour: N.A.

Odour threshold: N.A.

pH: N.A.

Melting point / freezing point: N.A.

Initial boiling point and boiling range: N.A.

Flash point: 250.0 °C (482.0 °F)

Evaporation rate: N.A.

Upper/lower flammability or explosive limits: N.A.

Vapour density: N.A.

Vapour pressure: N.A.

Relative density: 1.12 REL

Solubility in water: Insoluble

Solubility in oil: N.A.

Partition coefficient (n-octanol/water): N.A.

Auto-ignition temperature: N.A.

Decomposition temperature: N.A.

Viscosity: 19,000.00 cPs @25°C

Explosive properties: N.A.

Oxidizing properties: N.A.

Solid/gas flammability: N.A.

Other information

Substance Groups relevant properties N.A.

Miscibility: N.A.

Fat Solubility: N.A.

Conductivity: N.A.

10. STABILITY AND REACTIVITY

Reactivity

Stable under normal conditions

Chemical stability

Data not Available.

Possibility of hazardous reactions

None.

Conditions to avoid

Stable under normal conditions.

Incompatible materials

None in particular.

Hazardous decomposition products

None.

11. TOXICOLOGICAL INFORMATION

Information on toxicological effects

Toxicological information of the product:

No Data Available

Substance(s) listed on the IARC Monographs:

None

Substance(s) listed as OSHA Carcinogen(s):

None

Substance(s) listed as NIOSH Carcinogen(s):

None

Substance(s) listed on the NTP report on Carcinogens:

None

12. ECOLOGICAL INFORMATION

Toxicity

Adopt good working practices, so that the product is not released into the environment.

Eco-Toxicological Information:

List of Eco-Toxicological properties of the product

No Data Available

Persistence and degradability

N.A.

Bioaccumulative potential

N.A.

Mobility in soil

N.A.

Other adverse effects

N.A.

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Recover if possible. In so doing, comply with the local and national regulations currently in force.

14. TRANSPORT INFORMATION

UN number

ADR-UN number: N/A

DOT-UN Number: N/A

IATA-Un number: N/A

IMDG-Un number: N/A

UN proper shipping name

ADR-Shipping Name: N/A

DOT Proper Shipping Name: N/A

IATA-Technical name: N/A

IMDG-Technical name: N/A

Transport hazard class(es)

ADR-Class: N/A

DOT Hazard Class: N/A

IATA-Class: N/A

IMDG-Class: N/A

Packing group

ADR-Packing Group: N/A
DOT-Packing group: N/A
IATA-Packing group: N/A
IMDG-Packing group: N/A

Environmental hazards

Marine pollutant: No
Environmental Pollutant: N.A.

Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code

N.A.

Special precautions

Department of Transportation (DOT):

DOT-Special Provision(s): N/A
DOT Label(s): N/A
DOT Symbol: N/A
DOT Cargo Aircraft: N/A
DOT Passenger Aircraft: N/A
DOT Bulk: N/A
DOT Non-Bulk: N/A

Road and Rail (ADR-RID):

ADR-Label: N/A
ADR - Hazard identification number: N/A
ADR Tunnel Restriction Code: N/A

Air (IATA):

IATA-Passenger Aircraft: N/A
IATA-Cargo Aircraft: N/A
IATA-Label: N/A
IATA-Subrisk: N/A
IATA-Erg: N/A
IATA-Special Provisions: N/A

Sea (IMDG):

IMDG-Stowage Code: N/A
IMDG-Stowage Note: N/A
IMDG-Subrisk: N/A
IMDG-Special Provisions: N/A
IMDG-Page: N/A
IMDG-Label: N/A
IMDG-EMS: N/A
IMDG-MFAG: N/A

15. REGULATORY INFORMATION**USA - Federal regulations****TSCA - Toxic Substances Control Act****TSCA inventory:**

All the components are listed or exempted on the TSCA inventory

TSCA listed substances:

HEXANEDIOIC ACID, POLYMER WITH 2, is listed in TSCA Section 8b
2'-OXYBIS[ETHANOL] AND 1,2,
3-PROPANETRIOL

SARA - Superfund Amendments and Reauthorization Act**Section 302 - Extremely Hazardous Substances:**

no substances listed

Section 304 - Hazardous substances:

no substances listed

Section 313 - Toxic chemical list:

no substances listed

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act**Substance(s) listed under CERCLA:**

no substances listed

CAA - Clean Air Act

CAA listed substances:

no substances listed

CWA - Clean Water Act

CWA listed substances:

no substances listed

USA - State specific regulations

California Proposition 65

Substance(s) listed under California Proposition 65:

no substances listed

Massachusetts Right to know

Substance(s) listed under Massachusetts Right to know:

no substances listed

Pennsylvania Right to know

Substance(s) listed under Pennsylvania Right to know:

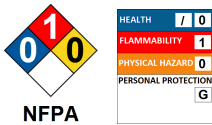
no substances listed

New Jersey Right to know

Substance(s) listed under New Jersey Right to know:

no substances listed

Additional classification information



HMIS Health: 0 = MINIMAL

HMIS Flammability: 1 = Combustible if heated

HMIS Reactivity: 0 = MINIMAL

HMIS P.P.E.: G - Safety glasses, gloves, vapor respirators

NFPA Health: 0 = MINIMAL

NFPA Flammability: 1 = Combustible if heated

NFPA Reactivity: 0 = MINIMAL

NFPA Special Risk: NONE

16. OTHER INFORMATION

Safety Data Sheet dated: 4/27/2015 - version 1

The information contained herein is based on our state of knowledge at the above-specified date. It refers solely to the product indicated and constitutes no guarantee of particular quality. The information relates only to the specific material and may not be valid for such material used in combination with any other material or in any process.

This document was prepared by a competent person who has received appropriate training.

It is the duty of the user to ensure that this information is appropriate and complete with respect to the specific use intended.

This MSDS cancels and replaces any preceding release.

Legend to abbreviations and acronyms used in the safety data sheet:

ADR: European Agreement concerning the International Carriage of Dangerous Goods by Road.

RID: Regulation Concerning the International Transport of Dangerous Goods by Rail.

IMDG: International Maritime Code for Dangerous Goods.

IATA: International Air Transport Association.

IATA-DGR: Dangerous Goods Regulation by the "International Air Transport Association" (IATA).

ICAO: International Civil Aviation Organization.

ICAO-TI: Technical Instructions by the "International Civil Aviation Organization" (ICAO).

GHS: Globally Harmonized System of Classification and Labeling of Chemicals.

CLP: Classification, Labeling, Packaging.

EINECS: European Inventory of Existing Commercial Chemical Substances.

INCI: International Nomenclature of Cosmetic Ingredients.

CAS: Chemical Abstracts Service (division of the American Chemical Society).
GefStoffVO: Ordinance on Hazardous Substances, Germany.
LC50: Lethal concentration, for 50 percent of test population.
LD50: Lethal dose, for 50 percent of test population.
DNEL: Derived No Effect Level.
PNEC: Predicted No Effect Concentration.
TLV: Threshold Limiting Value.
TWATLV: Threshold Limit Value for the Time Weighted Average 8 hour day. (ACGIH Standard).
STEL: Short Term Exposure limit.
STOT: Specific Target Organ Toxicity.
WGK: German Water Hazard Class.
KSt: Explosion coefficient.
y for the damage.

ATTACHMENT E
EMISSIONS CALCULATIONS

By: ADM

Checked by: PEW

Date: September 13, 2017

Date: September 13, 2017

ISO Storage Tanks (10S and 16S)

The ISO Storage tanks emissions in Tables 1 and 2 were submitted in the previous Reg 13 permit modification application for the Huntington Facility in September 2015. For the permit determination, the yearly emissions of an ISO storage tank are based on multiplying the hourly potential to emit by 8,760 hour per year divided by 2000 lb/ton on an uncontrolled basis.

Working losses occur when MDI/PMDI (R-1209) vapor that is present over the liquid in a storage tank is displaced from the tank by addition of MDI/PMDI (R-1209) liquid during tank filling. A reasonable worst case estimate of working losses can be made based on the size and number of storage tanks, the average storage temperature, and the number of times each tank is filled in one year. For an emissions estimate it is assumed each tank is filled a number of times per month. There are two sets of ISO storage tanks; one set for Foam Production Unit No. 1 and one set for Foam Production Unit No. 2.

The working losses can be estimated from the following expression:
 $Lw = Qw * (1 / 359) * (273.15 / Tamb) * (Vpamb / 760) * MW * Kmdi$

- Lw = storage tank losses in lb/year
- Qw = annual throughput of MDI in ft³/year
- Tamb = ambient temperature in degrees K
- VPamb = vapor pressure of MDI at ambient temperature in mm Hg
- MW = molecular weight of MDI
- Kmdi = adjustment factor to the vapor pressure that is a function of MDI concentration

| | | | | | | |
|-------------------------|-----------|-----------------------|----------------|----------|---------------------------------|---|
| Tank Volume = | 7,000 | gallons | VPamb = | 1.23E-05 | mm Hg | 2 |
| 1 Gallon = | 0.1605 | ft ³ | MW = | 250.26 | lb/lb-mol | 3 |
| Number of tanks = | 2 | | Kmdi = | 0.58 | | 4 |
| Tanks Fillings (each) = | 24 | each | Lw = | 3.22E-04 | lbs/year | |
| Volume = | 336,000 | gallons | Filling Time = | 1 | hr (assume one tanks at a time) | |
| Qw = | 53,928.00 | ft ³ /year | Lw = | 6.70E-06 | lbs/hr | |
| Tamb = | 299.8 | K | | 1.61E-07 | tpy | |

- 1 Stored inside at a temperature of 80 degrees F, equals 299.8 degrees K
- 2 Table 1, Appendix A - Vapor Pressure / Temperature Chart
- 3 MDI has a molecular weight of 250.26 lb/lb-mol
- 4 Table 2, Appendix B - Adjustment Factor

| Table 1: Storage Tank Emissions | | | | |
|---------------------------------|--------------|----------|------------|----------|
| Type | Uncontrolled | | Controlled | |
| | lbs/hr | tpy | lbs/hr | tpy |
| VOC | 6.70E-06 | 1.61E-07 | 6.70E-06 | 1.61E-07 |
| MDI | 6.70E-06 | 1.61E-07 | 6.70E-06 | 1.61E-07 |

| Table 2: Total for 2 Units | | | | |
|----------------------------|--------------|----------|------------|----------|
| Type | Uncontrolled | | Controlled | |
| | lbs/hr | tpy | lbs/hr | tpy |
| VOC | 1.34E-05 | 3.22E-07 | 1.34E-05 | 3.22E-07 |
| MDI | 1.34E-05 | 3.22E-07 | 1.34E-05 | 3.22E-07 |

Since the material is stored indoors at a constant temperature there are no breathing losses associated with the process.
 Reference: This emissions estimate is adapted from the TRI Emissions Estimate prepared by Rubberlite, Incorporated.

| Table 3: Permit Determination Emissions | | |
|---|--------------|------------|
| Type | Uncontrolled | |
| | lb/hr | tpy @8,760 |
| VOC | 6.70E-06 | 2.94E-05 |
| MDI/PMDI | 6.70E-06 | 2.94E-05 |