Impact of Drilled Shaft Synthetic Slurries on Groundwater Quality

WA-RD 773.1

Akram Hossain William Cofer David Yonge June 2011





Washington State Department of Transportation Office of Research & Library Services

WSDOT Research Report

FINAL REPORT

IMPACT OF DRILLED SHAFT SYNTHETIC SLURRIES ON GROUNDWATER QUALITY

Phase I: Literature Survey

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Prepared for

Washington State Department of Transportation Paula J. Hammond, Secretary Olympia, WA 98504-7372

June 2011

1. REPORT NO.	2. GOVERNMENT ACCESSIO	N NO. <u>3. R</u>	ECIPIENTS CATALOG N	10
WA-RD 773.1				
4. TITLE AND SUBTITLE			5. REPORT DATE	
Impact of Drilled Shaft Synthetic	Slurries on Groundwat	ter Ju	ne 2011	
Quality		6. PI	ERFORMING ORGANIZ.	ATION CODE
7. AUTHOR(S)		8. PI	ERFORMING ORGANIZ	ATION REPORT NO.
Akram Hossain, William Cofer, ar	nd David Yonge			
9. PERFORMING ORGANIZATION NAME ANI	D ADDRESS	10. V	WORK UNIT NO.	
Washington State Transportation	Center (TRAC)			
Washington State University	.	11. 0	CONTRACT OR GRANT	NO.
Dept. of Civil and Environmental Pullman, WA 99164-2910	Engineering		T4120-18	
12. CO-SPONSORING AGENCY NAME AND A	DDRESS	13. 1	TYPE OF REPORT AND	PERIOD COVERED
Washington State Department of 7	Fransportation		Final Report	
Research Office		14. 5	SPONSORING AGENCY	CODE
Olympia, WA 98504-7372	by 260 705 7079			
Kesearch Manager. Kini winough	lby 500.705.7978			
This study was conducted in coop	aration with the U.S. F	Jonartme	nt of Transportati	ion Federal
Highway Administration.		<i>c</i> partitic	int of Transportati	ion, rederar
16. ABSTRACT				
The overall objective of this project slurries on groundwater quality. The comprehensive literature survey to synthetic slurries on groundwater two products and the analyses were the slurries currently being used by and toxicity. New testing would re- same, most recent EPA protocol. A of field conditions (at the working be used to assist in evaluation of p- issues.	ct is to evaluate the eff he objective of Phase I o gather data to evaluate quality. Since chemica re performed in 1991 a y WSDOT contractors esult in a consistent date Analysis should be per concentration and cor- potential groundwater c	fect of th I (this rej te the eff al and bio nd 1998, be tester ta set as formed on taining a contamin	e aforementioned port), however, w ect of the WSDO bassay information , it is our recommend again for priorit all samples would on samples that ar any additives). The ation as well as sl	synthetic as to conduct a T approved n exists for only endation that y pollutants l undergo the e representative he results would lurry disposal
17. KEY WORDS	18. D	DISTRIBUTI	ON STATEMENT	
Polymer slurry, drilled shafts, grou	undwater quality No	restrictio	ons.	I
19. SECURITY CLASSIF. (of this report)	20. SECURITY CLASSIF. (of thi	is page)	21. NO. OF PAGES	22. PRICE
None	None		90	

DISCLAIMER

The contents of this report reflect the views of the authors, who are responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect the official views or policies of the Washington State Department of Transportation or the Federal Highway Administration. This report does not constitute a standard, specification, or regulation.

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INTRODUCTION

The Washington State Department of Transportation (WSDOT) constructs about 150 large diameter drilled shafts to support bridge foundations and retaining walls annually. Shafts are generally uncased, 30 to 200 feet deep, and 2-10 feet in diameter. Construction of uncased drilled shafts requires the use of thousands of gallons of synthetic slurry for stability.

The WSDOT approves the use of "Novagel", "Shore Pac GCV", "SlurryPro CDP", and "Super Mud" as synthetic slurries to construct drilled shafts. There is always some loss of synthetic slurries in the surrounding soils under the groundwater table. The impact of loss of WSDOT approved synthetic slurries on groundwater quality is not known and needs to be investigated.

OBJECTIVE

The overall objective of this project is to evaluate the effect of the aforementioned synthetic slurries on groundwater quality. The objective of Phase I (this report), however, was to conduct a comprehensive literature survey to gather data to evaluate the effect of the WSDOT approved synthetic slurries on groundwater quality.

SURVEY METHODOLOGY

The survey was comprised, primarily, of a review of documents sent by the WSDOT, consulting with the manufacturers for relevant information, and a survey of published scientific literature of interest.

The World Wide Web connected by "Google" was explored for any published information on the synthetic slurries of interest. Scientific databases subscribed by the Washington State University (WSU) were also explored. Further, the webpages maintained by the manufacturers were investigated for pertinent information.

The WSDOT provided a boxful of documents on the following synthetic slurries.

- 1. PolyboreTM polymer
- 2. Shore Pac GCV

- 3. Slurry Pro CDP
- 4. Super Mud

The documents are listed in Appendix A. Some documents were supplied in duplicate as indicated in the Appendix.

RESULTS

The review enabled us to obtain material safety data sheets (MSDS) of the slurries of concern. The MSDS obtained are included in Appendix B. The review also made it possible to obtain bioassay and chemical analysis data for some of the slurries. These data are included in Appendix C.

The MSDS

Novagel is described as a mixture based on acrylate/acrylamide copolymer and is not considered a hazardous waste, according to the manufacturer. It can be disposed as a non-hazardous liquid waste in compliance with state and local regulations. It is reported to be a very low toxicity substance.

Shore Pac GCV is described as a copolymer of sodium acrylate and acrylamide. It is considered neither hazardous nor carcinogenic. The product is claimed to have no known adverse effect on human health. The material is not expected to be harmful to aquatic life under normal use. However, ecological injuries are not known or are not expected under normal use. This product may yield oxides of nitrogen and ammonia, carbon dioxide, carbon monoxide, and low molecular weight hydrocarbons upon decomposition.

Slurry Pro CDP is reported to belong to the "chemical family" of "vinyl polymer". It is reported to be neither hazardous nor regulated. It is reported to have low toxicity on fish. If incinerated, thermal decomposition byproducts would include low levels of carbon monoxide, carbon dioxide, and various nitrous oxides.

Super Mud is described as an "anionic polyacrylamide in water-in-oil emulsion". It is reported to contain 24% petroleum distillate. Its acute oral (rat) and acute dermal (rabbit) LD50 is reported to be grater than 10 ml/kg. It is highly volatile (~70% by weight). Acute overexposure to petroleum distillate may cause eye and throat irritation. Severe skin irritation is expected with direct skin contact of the petroleum distillate. Pertinent information of these slurries obtained from the respective MSDS are presented in Table 1.

Slurry	Chemical Family	Skin & Eye Irritation	Flammability	рН	Aquatic Toxicity	Source
Novagel	Acrylate/acrylamide	Minor	Not flammable	6-8 ¹	Very low	MSDS 3/15/03
Shore PAC	Sodium acrylate/acrylamide	Yes	Not available	Not available	Expected not to be harmful	MSDS 1/29/09
SlurryPro CDP	Vinyl Polymer	Yes (Appears to be)	Not flammable	Not available	Low	MSDS 08/03/07
Super MUD	Anionic polyacrylamide	Minimal eye and moderate skin	Flash point > 200°F	Not available ²	Not available	MSDS

Table 1. Pertinent Information from MSDS Datasheets.

¹pH of a simple system (simple system is not defined in the MSDS)

 2 In a CD, the optimum pH is reported to be 8-10

Chemical Analysis and Bioassay Test Results

Shore Pac GCV and Super Mud were tested for a host of chemical constituents and toxicity. The results are summarized below and the detailed test results are presented in Appendix C.

Shore PAC GCV Slurry

A 1 lb per 500 gal slurry of Shore PAC was sent for chemical testing in October of 1998 and was tested by Great Lakes Analytical in Buffalo Grove, IL. We are assuming that the pound/500 gal concentration is representative of the slurry used during field application. The slurry was analyzed for chemical oxygen demand (COD), biochemical oxygen demand (BOD), pH, oil and grease, and priority pollutants. The priority pollutant scan includes cyanide, a list 13 metals, polychlorinated biphenyls (PCB), volatile organic compounds (VOC), semi-volatile organic compounds (SVOC) and organochlorine pesticides. Standard EPA protocol was used for all

analyses. The pH of the slurry was reported as 7.3. The only constituents that were above the method detection limits were acetone (noted as likely being an artifact from laboratory contamination), bromodichloromethane (4.4 μ g/L) and chloroform (7.6 μ g/L). The latter two compounds are in the VOC group. It was noted in the analytical report that the concentrations of these two VOCs are "characteristic of those found in chlorinated drinking water".

The Shore PAC slurry was also tested for toxicity using the fathead minnow as the test species under standard toxicity testing protocol. The slurry was diluted, per protocol, with synthetic moderately hard water. The dilutions ranged from 0% (moderately hard water only) up to 10%. We are assuming that the percentage is reported on a volume basis. The number of deaths is reported after a 96 hour exposure period. Essentially no deaths occurred at the highest (10%) concentration. As a result, the lethal concentration that results in 50% of the test organisms dying (LC50) was reported as > 10%. Table 2 summarizes the results for Shore PAC and the actual test results can be found in Appendix C.

Analyte	EPA Method	Results/Comments
BOD ₅	405.1	ND ¹
COD	410.4	ND
pН	150.1	7.3
Oil and Grease		ND
Metals	3015	ND
Pesticides	8081	ND
PCB's	8082	ND
VOC's	8260	ND except acetone $(15A)^2$, bromodichloromethane (4.4
		μ g/L), chloroform (7.6 μ g/l)
Semi-VOC's	8270	ND
Cyanide	9012	ND

Table 2. Chemical Analysis Results for Shore PAC GCV.

¹ non-detectable concentration ² not described in the report

Super Mud

Super Mud was also tested for priority pollutants and toxicity, but unlike Shore PAC, the pure product was tested. The only constituents that tested above detection limits were cyanide (4.8 mg/kg) and copper (3.9 mg/kg). In the analysis report supplied by the manufacturer, they present comparisons to California and Federal allowable drinking water concentrations. We are confused regarding this comparison because the drinking water standards are in mg/L units but

the reported constituent concentrations are in mg/kg and μ g/kg. It is not clear, therefore, if this comparison can be made.

Super Mud was also tested for toxicity in a similar fashion as Shore PAC. However, it was tested by making dilutions into moderately hard water using the full-strength product, not the field strength product (diluted at 1 gal per 800 gal). The reported LC50 was 3.2%. Table 3 summarizes the results for Super Mud and the actual test results can be found in Appendix C.

Table 5. Chemical	Analysis Results for	Super Mud.
Analyte ¹	EPA Method ³	Results/Comments
VOC's	624	ND^2
Acid Extractable	625	ND
Organics		
Base Neutral	625	ND
Compounds		
Pesticides	608	ND
PCB's	608	ND
Cyanide		4.8 mg/kg
Copper		3.9 mg/kg
рН		8 – 10 (optimum zone)

Table 3. Chemical Analysis Results for Super Mud.

¹ The priority pollutant list testing was performed on PURE PRODUCT. In usage "the product is diluted to 800 parts water to one part Super Mud." These statements are taken directly from the report.

² non-detectable concentration

³ The numbers were assumed to be referring to EPA methods

It appears that similar tests were done for Slurry Pro CDP, however, we were unable to obtain the test results.

SUMMARY

Based on the results of the priority pollutant analysis and toxicity testing for Shore PAC and Super Mud, one can conclude, as it was concluded by the manufacturer, that these products, when used at field concentrations, are unlikely to pose a threat to groundwater quality. However, the state of Washington has its own groundwater standard and the testing was done in other states. Further, geochemical environment can change the chemistry and associated toxicity of the slurries.

RECOMMENDATION

Since chemical and bioassay information exists for only two products and the analyses were performed in 1991 and 1998, it is our recommendation that the slurries currently being used by WSDOT contractors be tested again for priority pollutants and toxicity. New testing would result in a consistent data set as all samples would undergo the same, most recent EPA protocol. Analysis should be performed on samples that are representative of field conditions (at the working concentration and containing any additives). The results would be used to assist in evaluation of potential groundwater contamination as well as slurry disposal issues. In summary, the following analytical testing is suggested.

- Test the fresh slurries for priority pollutants, toxicity, pH, alkalinity, biochemical oxygen demand (BOD, and chemical oxygen demand (COD) at field concentrations and containing any additives.
- 2. Test for priority pollutants, toxicity, pH, alkalinity, BOD, COD, and total suspended solids (TSS) of the used slurries prior to preparing them for disposal.
- 3. Test for priority pollutants, toxicity, pH, alkalinity, BOD, COD, and TSS of the slurries following preparation for disposal.

The priority pollutant testing includes testing for 128 compounds (organics, metals, asbestos, and total cyanide). The list of compounds is outlined in volume 40 of the Code of Federal Regulations (40 CFR), Part 423. The recommended toxicity testing is the 96 hour acute toxicity using trout and daphnia. It is suggested that these tests be performed at laboratories certified in Washington state and would be done on representative samples for field application.

The recommended testing would also assist in making decisions regarding ultimate disposal of the used slurries. In addition to toxicity and priority pollutants, values of pH, alkalinity, BOD, COD and TSS would be important if disposal is considered in a wastewater treatment facility.

Appendix A Documents Sent by the WSDOT

POLYBORETM POLYMER

[1] Characterization of the effect of Poly-BoreTM polymer on the construction and performance of drilled shaft foundations: Phase I. (*2 copies*) *Prepared by* Alaa Ata and Michael O'Neill, Department of Civil and Environmental

Engineering, University of Houston, Houston, Texas 77204-4791, May, 1997.

[2] Characterization of the effect of Poly-BoreTM polymer on the construction and performance of drilled shaft foundations, Phase II. (2 copies)
 Prepared by Alaa Ata and Michael O'Neill, Department of Civil and Environmental
 Engineering, University of Houston, Houston, Texas 77204-4791, October, 1997

[3] ADSC-WSDOT Task Force: A Discussion of potential issues to Drilling Shafts Under Slurry versus Open or Cased Drilling Methods: Sidewall Friction Capacity, Reinforcing Steel Bond, "Boney Ground", and Environmental Issues. (2 copies)
Prepared by Chris Burnell, Baroid Industrial Drilling Products, PO Box 287, Winnemucca, NV 89446, chris.burnell@halliburton.com .

SHORE PAC GCV

[4] Shore Pac GCV Final Report for Caltrans Approved List of Synthetic Drilling Slurry's. *Prepared by* John H. Berry, Hydrogeolgist, CETCO, April 29, 1999.

[5] Pile Load Test Report: Caltrans Approval for Shore Pac GCV Synthetic Slurry: Central Viaduct Seismic Retrofit, San Francisco, California. *Prepared by* Delta Geotechnical Services, 4408 G Street, Sacramento, CA 95819.

[6] Shore Pac GCV Drilling & Mixing Field Guide.*Prepared by* CETCO Drilling Products, 1500 W. Shure Dr., Arlington Heights, IL 60004.

[7] An Untitled Document submitted to the WSDOT containing results of chemical analysis and biomonitoring report.

SLURRY PRO CDP

[8] A Technical Discussion & Historical Overview: A Slurry and Earth Stabilization system for the New Millennium. (Booklet)*Prepared by* KB Technologies, Suite 107, 3648 FM 1960 West, Houston, TX 77068.

[9] A Technical Discussion & Historical Overview: A Slurry and Earth Stabilization system for the New Millennium. (Spiral Bound) (2 copies)*Prepared by* KB Technologies, Suite 107, 3648 FM 1960 West, Houston, TX 77068.

[10] KB International's Response to ADSC/WASH DOT Questions.*Prepared by* K. G. Goodhue, Director, Research and Marketing, KB International.

[11] General Operating, Product Application and Slurry Testing Procedures and Recommendations for Bored Piles in Normal Soil Contions.*Prepared by* KB International LLC, P.O. Box 680648, Houston, TX 77268.

[12] Load Test Program: New Mexico DOT: I-25 Bridge over Cuchillo Negro River: Truth or Consequences, New Mexico. (2 copies)Prepared by Albuquerque Caisson & Foundation Drilling.

[13] Nine CDs: one on the product, one on environmental and toxicological information, and seven on load tests.

Prepared by KB International LLC, P.O. Box 680648, Houston, TX 77268.

SUPER MUD

[14] Super MUD & Super MUD Dry Polymer Drilling Slurry: WSDOT Submittal: August 2003.(2 copies)

Submitted by Robert G. Ryan, President, PDSCo Polymer Drilling System, Prepared by PDSCo Polymer Drilling System, P.O. Box 507 El Dorado, AR 71731, August 21, 2003.

[15] Super MUD Polymer Slurry for Excavation Protection.*Prepared by* PDSCo Polymer Drilling System, P.O. Box 507 El Dorado, AR 71731.

[16] Data Report on Drilling Shaft Load Testing (OSTERBERG Method): Production Shaft 101- Four seasons Hotel 1441 Brickell Avenue, Miami FL (LT-8536-4). (2 copies)
Prepared by Deep Foundation Test, Equipment & Services, 2631-D NW 41st Street, Gainsville,
FL 32606.

Appendix B Material Safety Data Sheet (MSDS) **MSDS for NOVAGEL**

Page 1 of 4 MSDS Novagel Fluid Date: 3/15/03 Supersedes: none

MATERIAL SAFETY DATA

Geo-Tech Drilling Fluids 22 Free Street Hingham, MA 02043, USA 1-781-875-1140 1-888-932-3299 info@geotech.us

1. CHEMICAL PRODUCT IDENTIFICATION

Product Name:	NOVAGEL [™] Drilling Fluid
Synonyms:	"Polymer slurry"
Chemical Family:	Mixture based on acrylate/acrylamide copolymer
CAS Reg. No .:	None
Formula:	Mixture
Emergency Phone No.:	1-781-875-1140, 1-888-932-3299

2. COMPOSITION/INGREDIENTS

NAME	CAS Nº	%
Aqueous solution of water-soluble polymer(s). Trade secret. Basic fluid contains Novagel™ polymer and water. Optional formulations may contain pH buffers, Sand Magnet™ additive, Depth Charge™ additive, mineral flour, et al.		100

3. HEALTH HAZARD INFORMATION

Inhalation:	Not applicable.
Ingestion:	May cause discomfort or gastrointestinal disturbance. Low oral toxicity.
Skin:	May cause minor irritation, especially after prolonged or repeated contact.
Eyes:	Contact may cause temporary blurring of vision and/or minor irritation.
Permissible Conc. in Air:	Not applicable.
Unusual Chronic Toxicity:	None known.

4. EMERGENCY AND FIRST AID PROCEDURES

Skin:	Wash off with water. Wipe and dry skin with paper towel or cotton towel.
Eyes:	Immediately flush with water for 5 minutes. If there is irritation, seek medical
	attention.
Ingestion:	If conscious, immediately give 2 to 4 glasses of water. Get medical attention.

5. FIRE AND EXPLOSION DATA

FLAMMABLE PROPERTIES

Flash Point:	Not flammable
Flammable Limits:	Not flammable
Autoignition Temp:	Not applicable
Decomposition Temp:	Not available

6. PHYSICAL AND CHEMICAL PROPERTIES

Material is (at normal conditions): Appearance and Odor: pH: Boiling Point: Melting Point: Specific Gravity: Vapor Pressure: Vapor Density: Solubility in Water: % Volatiles by Weight: Evaporation Rate: Liquid Clear viscous liquid ("thick water"). Odorless. pH of simple system 6 to 8. With buffers may range between 7 and 11. >200° F Not applicable 1.00 – 1.20 Negligible (at 20° C / 68° F) 1.00 absolute Material is a water solution/dispersion. >99.5% in unweighted formulations Less than butyl acetate

7. STABILITY AND REACTIVITY

Stability:	Stable
Conditions to Avoid:	None known
Incompatibility (materials to avoid):	If pH of fluid is above 10, may cause corrosion to aluminum,
	or to galvanized metal parts.
Hazardous Decomposition Products:	None known.
Hazardous Polymerization:	Will not occur.

8. PERSONAL PROTECTIVE EQUIPMENT

Respiratory Protection:	None required for prepared fluid.
Ventilation:	Ventilation is not a major concern, but should be provided in closed areas.
Eye & Face Protection:	Goggles advised.
Hands, Arms, & Body:	Standard work clothing adequate for handling prepared fluid.

9. PRECAUTIONS & PROCEDURES

Fire Extinguishing Agents Recommended:	Not applicable. The fluid is not flammable.
Fire Extinguishing Agents to Avoid:	None.
Special Fire Fighting Precautions:	Not applicable.
Ventilation:	Natural ventilation is normally adequate, as this fluid is normally used outdoors. In enclosed areas, provide positive ventilation.
Normal Handling:	Minimize contact with skin, eyes or clothing. Use normal personal hygiene and housekeeping.
Storage:	Store prepared fluid in open or closed vessels.
Spill or Leak	Use available soil or sand as absorbent to soak up spilled fluid. Dike up with same soil. Scoop up and dispose of in suitable manner.
	Destroy any slippery residue on spill surface by soaking with bleach water (1 par Clorox to 4 parts water). Hose off with clean water.
Special Precautions /	
Procedures / Label Instructions:	CAUTION! Novagel fluids are extremely slippery!

10. ENVIRONMENTAL

Aquatic Toxicity:

Octanol/Water Partition Coefficient: Waste Disposal Methods:

RCRA Status of Unused Material if Discharged: Hazardous Waste Number: DOT Status: Reportable Quantity: Threshold Planning Quantity: Toxic Chemical Release Reporting: EPA Hazard Classification Code: 96-hour LC₅₀ fathead minnows >750,000 mg/L (very low toxicity) Not determined Dispose as non-hazardous liquid waste in compliance with state and local regulations. Not a "Hazardous Waste". NA Not regulated. EPA 40 CFR 302 (CERCLA 102): NA EPA 40 CFR 355 (SERA 311-304): NA EPA 40 CFR 372 (SERA 311-313): NA Acute - No; Chronic - No; Fire - No; Pressure - No; Reactive - No

11. TRANSPORT INFORMATION

	D.O.T. SHIPPING INFORMATION	IMO SHIPPING INFORMATION
SHIPPING NAME	Not Applicable/Not Regulated	Not Applicable/Not Regulated
HAZARD CLASS/PACKING GROUP	Not Applicable	Not Applicable
UN NUMBER	Not Applicable	Not Applicable
IMDG PAGE	Not Applicable	Not Applicable
D.O.T. HAZARDOUS SUBSTANCES	Not Applicable	Not Applicable
TRANSPORT LABEL REQUIRED	None Required	None Required

12. OTHER INFORMATION

NFPA (National Fire Protection Assoc) Hazard Ratings:

	NFPA	
Fire	0	Fire: Non-flammable material
Health	0	Health: Materials which on exposure under fire conditions would offer no hazard beyond that of ordinary combustible material.
Reactivity	0	Reactivity: Materials which in themselves are normally stable, even under fire exposure conditions, and which are not reactive with water.
Special	_	

This information is given without any warranty or representation, and the user of this information should satisfy himself as to its accuracy and completeness. We assume no legal responsibility. Users should read product labels carefully and seek guidance from the seller of the product as needed.

MSDS for SHORE PAC

MATERIAL SAFETY DATA SHEET



1 Draduct and Company	Identification
1. Product and company	
Material name	SHORE PAC®
Version #	11
Revision date	29-January-2009
	Copolymer of Sodium Acrylate and Acrylamide
Chemical description	Powder
CAS #	Mixture
Manufacturer	CETCO Construction Drilling Products 2870 Forbs Avenue Hoffman Estates, IL 60192 US safetydata@amcol.com http://www.constructiondrilling.com/ General Information (800) 527-9948 CHEMTREC® (800) 424-9300
2. Hazards Identification	1
Emergency overview	Health injuries are not known or expected under normal use. No hazards resulting from the material as supplied.
OSHA regulatory status	This product is considered not hazardous under 29 CFR 1910.1200 (Hazard Communication).
Potential health effects	
Eyes	Contact with eyes may cause irritation.
Skin	This product may cause irritation to the skin.
Inhalation	Inhalation of dusts may cause respiratory irritation.
Ingestion	Health injuries are not known or expected under normal use.
3. Composition / Inform	ation on Ingredients
The manufacturer lists no ingredie	nts as hazardous according to OSHA 29 CFR 1910.1200.
Composition comments	This product is not considered to be a cardnogen by IARC, ACGIH, NTP, or OSHA.
4. First Aid Measures	
First aid procedures	Eluch avec with water as a procession. Cet modical attention if initiation develops or persists
Eye contact	Noch off with coap and water. Launder contaminated dething before rause. Get readical attention
Skirtcondet	if irritation develops or persists.
Inhalation	Remove to fresh air. Call a physician if symptoms develop or persist.
Ingestion	Have victim rinse mouth thoroughly with water. If ingestion of a large amount does occur, seek medical attention.
General advice	If you feel unwell, seek medical advice (show the label where possible).
5. Fire Fighting Measures	5
Extinguishing media	
Suitable extinguishing	Small Fires: Dry chemical, CO2, water spray or regular foam.
media	Large Fires: Water spray, fog or regular foam.
6. Accidental Release Me	asures
Environmental precautions	Prevent further leakage or spillage if safe to do so.
Methods for cleaning up	Sweep up or gather material and place in appropriate container for disposal. Avoid dust formation. Small Dry Spills: With dean shovel place material into dean, dry container and cover loosely; move containers from spill area.

Material name: SHORE PAC® CETCO - Construction Drilling Products 4085 Version #: 11 Revision date: 29-January-2009 Print date: 29-January-2

MSDS US 1/4

7. Handling and Storage

Handling	Handle and open container with care. Minimize dust generation and accumulation.
Storage	Keep the container tightly closed and dry.

8. Exposure Controls / Personal Protection

Personal protective equipment

Eye / face protection	Avoid contact with eyes. Wear dust goggles.
Skin protection	Not normally needed. Wear suitable protective clothing.
Respiratory protection	No personal respiratory protective equipment normally required. Use a particulate filter respirator for particulate concentrations exceeding the Occupational Exposure Limit.

9. Physical & Chemical Properties

Appearance	Free flowing wettable powder.
Color	White.
Odor	Not available.
Odor threshold	Not available.
Physical state	Solid.
Form	Solid. Powder.
pH	Not available.
Melting point	Not available.
Freezing point	Not available.
Boiling point	Not available.
Flash point	Not available.
Evaporation rate	Not available.
Flammability	Not available.
Flammability limits in air, upper, % by volume	Not available.
Flammability limits in air, lower, % by volume	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Specific gravity	0.8 - 1
Relative density	Not available.
Solubility (water)	Solubility limited by viscosity
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
VOC	0 % estimated
Percent volatile	0 % estimated
10. Chemical Stability &	Reactivity Information
Chemical stability	Stable at normal conditions.

Chemical stability	Stable at normal conditions.
Incompatible materials	Strong oxidizing agents.
Hazardous decomposition products	Upon decomposition, this product may yield oxides of nitrogen and ammonia, carbon dioxide, carbon monoxide and other low molecular weight hydrocarbons.
Possibility of hazardous reactions	Will not occur.

11. Toxicological Information

Further information This product has no known adverse effect on human health.

 Material name:
 SHORE
 PAC®
 CETCO - Construction Drilling Products

 4085
 Version #: 11
 Revision date:
 29-January-2009
 Print date:
 29-January-2

MSDS US 2 / 4

12. Ecological Information

 Ecotoxicity
 This material is not expected to be harmful to aquatic life.

 Environmental effects
 Ecological injuries are not known or expected under normal use.

 Persistence and degradability
 Not available.

13. Disposal Considerations

Disposal instructions Dispose in accordance with all applicable regulations.

14. Transport Information

DOT Not regulated as dangerous goods. IATA Not regulated as dangerous goods. IMDG Not regulated as dangerous goods.

15. Regulatory Information

US federal regulations

Hazard categories

This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazarc Communication Standard, 29 CFR 1910.1200. CERCLA/SARA Hazardous Substances - Not applicable.

OSHA Process Safety Standard: This material is not known to be hazardous by the OSHA Highly Hazardous Process Safety Standard, 29 CFR 1910.119.

CERCLA (Superfund) reportable quantity

INONE	- 3	Ν	0	ne	
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Superfund Amendments and Reauthorization Act of 1986 (SARA)

Immediate Hazard - No

	Fire Hazard - No Pressure Hazard - No Reactivity Hazard - No	
Section 302 extremely hazardous substance	No	
Section 311 hazardous chemical	Νο	
Inventory status		
Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	No
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	No
Europe	European Inventory of New and Existing Chemicals (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	No
A "Yes" indicates that all compon	ents of this product comply with the inventory requirements administered by	the governing country(s)
State regulations	This product does not contain a chemical known to the State of Ca defects or other reproductive harm.	lifornia to cause cancer, birth

Material name: SHORE PAC® CETCO - Construction Drilling Products

4085 Version #: 11 Revision date: 29-January-2009 Print date: 29-January-2

MSDS US 3 / 4

16. Other Information

Further information	This safety datasheet only contains information relating to safety and does not replace any product information or product specification.		
Recommended restrictions	Workers (and your customers or users in the case of resale) should be informed of the potential presence of respirable dust and respirable crystalline silica as well as their potential hazards. Appropriate training in the proper use and handling of this material should be provided as required under applicable regulations.		
HMIS ratings	HEALTH / O FLAMMABILITY O PHYSICAL HAZARD O PERSONAL PROTECTION		
NFPA ratings	Health: 0 Flammability: 0 Instability: 0		
Disclaimer	The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The manufacturer expressly does not make any representations, warranties, or guarantees as to its accuracy, reliability or completeness nor assumes any liability, for its use. It is the user's responsibility to verify the suitability and completeness of such information for each particular use.		
	Third party materials: Insofar as materials not manufactured or supplied by this manufacturer are used in conjunction with, or instead of this product, it is the responsibility of the customer to obtain, from the manufacturer or supplier, all technical data and other properties relating to these and other materials and to obtain all necessary information relating to them. No liability can be accepted in respect of the use of this product in conjunction with materials from another supplier. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.		
Issue date	29-January-2009		
This data sheet contains changes from the previous version in section(s):	Other Information: Disclaimer Other Information: Other information Other Information: Recommended restrictions Other Information: Further information		
Other information	CETCO is an AMCOL International company.		

MSDS for SLURRYPRO CDP



Material Safety Data Sheet: SlurryPro[®] CDP[™]

August 3, 2007

KB International LLC 735 Broad St., Suite 209 Chattanooga, TN 37402 Phone: (281) 880-7505 Fax: (832) 201-9196 email: info@kbtech.com

1. MATERIAL IDENTIFICATION

Product Name:	SlurryPro [®] CDP [™]
Chemical Family:	Vinyl polymer
CAS Reg. No.:	Proprietary
Formula:	Proprietary
Emergency Phone No.:	(1) (281) 880-7505

2. HAZARDOUS INGREDIENTS

Material or Component No hazardous components Wt % Hazard Data NA

3. PHYSICAL DATA

Material is (at normal conditions):	Solid					
Appearance and Odor:	White granular solid. Odorless					
oH:	NA					
Boiling Point:	NA					
Melting Point:	ND					
Specific Gravity:	1.00-1	.25 (Water = 1.0)				
apor Pressure:	NA (mg Hg / 20°C)					
Vapor Density:	NA	(Air = 1.0)				
Solubility in Water:	1%	(% by weight)				
% Volatiles by Volume:	ND	(at 20°C)				
Evaporation Rate:	NA	(Butyl Acetate = 1) (Ether = 1)				

4. REACTIVITY DATA

Stability:	Stable
Conditions to Avoid:	NA
Incompatibility (materials to avoid):	Oxidizing agents - may cause exothermic reaction.
Hazardous Decomposition Products:	If incinerated at high temperature under controlled
	conditions, thermal decomposition byproducts would include
	low levels of carbon monoxide, carbon dioxide, various
	nitrous oxides.
Hazardous Polymerization:	Will not occur.
Hazardous Polymerization:	Will not occur.

Revision Date: August 3, 2007

NR=Not Required NE=Not Established NA=Not Applicable ND=Not Determined



5. FIRE AND EXPLOSION DATA

Flash Point:	Not flammable					
Auto Ignition Temperature:	ND					
Flammable Limits in Air % by Volume:	ND					
Unusual Fire and Explosion Hazards:	rds: See decomposition products					
6. HEALTH HAZARD INFORMATION						
Inhalation:	Dust may irritate respiratory tract.					
Ingestion:	May cause discomfort or gastrointestinal disturbance. Low oral toxicity.					
Skin:	May cause irritation, especially after prolonged or repeated contact.					
Eyes:	Dust contact and solution contact may cause irritation.					
Permissible Concentration in Air:	None published for polymer.					
Unusual Chronic Toxicity:	None known.					
7. EMERGENCY AND FIRST AID PROCE	EDURES					
Inhalation:	Remove to fresh air. Apply mouth-to-mouth artificial respiration if not					
	breathing. Get immediate medical attention.					
Skin:	Flush with plenty of soap and water for at least 15 minutes. If irritation persists,					
	get medical attention.					
Eyes:	Immediately flush with water, continuing for 15 minutes. Get medical attention					
Ingestion:	If conscious, immediately give 2 to 4 glasses of water. Get medical attention.					
8. PERSONAL PROTECTIVE EQUIPMEN	и <u>т</u>					
Respiratory Protection:	If dusty conditions are encountered, wear NIOSH approved dust respirator.					
Ventilation:	General room ventilation should be satisfactory.					
Eye & Face Protection:	Safety glasses for normal handling conditions. Goggles when handling solutions					
	Do not wear contact lens.					
Hands, Arms, & Body:	Rubber gloves and full work clothing. Add protective (rubber) clothing if					
	splashing or repeated contact with solution is likely.					
9. PRECAUTIONS & PROCEDURES						
Fire Extinguishing Agents Recommend	ed: Foam, carbon dioxide, or dry chemical					
Fire Extinguishing Agents to Avoid:	Water may cause extremely slippery conditions.					
Special Fire Fighting Precautions:	Wear self-contained breathing apparatus. Solutions of product are					

Ventilation:

extremely slippery. Local exhaust if dusting occurs. Natural ventilation - adequate in absence of dust.

Revision Date: August 3, 2007

NR=Not Required NE=Not Established NA=Not Applicable ND=Not Determined



9. PRECAUTIONS & PROCEDURES - Continued

NJTSRN - KBT -0001 Vinyl Resin Copolym	er Wate	er 7732-18-5	
Special	NA	NA	
Reactivity	1	1	
Flammability	0	0	
Health	1	1	
HMIS & NFPA Ratings:	HMIS	NFPA	
	Reactive - No		
EPA Hazard Classification Code:	Acute - No; Chronic - N	lo; Fire - No; Pressure - No;	
Toxic Chemical Release Reporting:	EPA 40 CFR 372 (SER	RA 311-313): NA	
Threshold Planning Quantity:	EPA 40 CFR 355 (SER	RA 311-304): NA	
Reportable Quantity:	EPA 40 CFR 302 (CER	RCLA 102): NA	
DOT Status:	Not regulated.		
Hazardous Waste Number:	NA		
RCRA Status of Unused Material if Discharged:	Not a "Hazardous Was	te".	
	local regulations.		
Waste Disposal Methods:	Dispose as non-hazardous solid waste in compliance with state, and		
Octanol/Water Partition Coefficient:	Not determined		
	accumulate		
	Bioaccumulation partiti	on coefficient (Pow)=0 : No potential to bio	
	toxicity to fich 1 C 50/0	6 hours is 357 mg/L to Brachydanio:	
	mass fragments) in a c	ertified test study. The product is rated as a low	
Degradability / Aquatic Toxicity.	In combination with UV	light for 48 hours, the resulting test solutions are	
Degradability / Aquatia Taviaity	In combination with LIV	light for 40 hours the resulting test colutions are	
10. ENVIRONMENTAL			
Procedures / Label Instructions:	Product solutions are e	extremely slippery.	
Special Procentions /	with same material, wo	p up of pump into same container and so lorth.	
	above. water may be u	ised to complete cleaning. Large spill: Dike up	
	with commercial or othe	er available absorbent. Close and store as	
Personal Protective Equipment):	Sweep up or shovel int	o metal or plastic container. Immediately cover	
Spill or Leak (Always Wear			
Storage:	Store in a cool, dry plac	ce.	
	normal personal hygier	ne and housekeeping.	
Normal Handling:	Avoid contact with skin	, eyes or clothing. Do not inhale dusts. Use	

The information and recommendations are offered for the user's consideration and examination, and it is the user's responsibility to satisfy itself that they are suitable and complete for its particular use. If buyer re-labels this product, legal counsel should be consulted to insure proper health, safety, and other necessary information is included on the container. Seller provides no warranties, either expressed or implied, and assumes no responsibility for the accuracy or completeness of the data contained herein.

Revision Date: August 3, 2007 NR=Not Required NE=Not Established NA=Not Applicable ND=Not Determined

MSDS for SUPER MUD



Page 1 of 4 Super Mud

MATERIAL SAFETY DATA

1. CHEMICAL PRODUCT AND COMPANY INDENTIFICATION

PRODUCT NAME SYNONYMS CHEMICAL FAMILY MOLECULAR FORMULA MOLECULAR WEIGHT

: Super Mud Anionic polyacrylamide in water-in-oil emulsion Anionic polyacrylamide copolymer Mixture Mixture

PDSCo, P.O. BOX 507, WEST SHARP STREET, EL DORADO, AR 71730 USA EMERGENCY PHONE: For emergency call PDSCo: 1 (800) 243-7455

COMPOSITION/INFORMATION ON INGREDIENTS 2.

OSHA REGULATED CO	MPONENTS			
COMPONENT	CAS. NO.	%	TWA/CEILING	REFERENCE
Petroleum distillate Hydrotreated light	064742-47-8	24	400 ppm	OSHA

3. HAZARDS INDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE AND ODOR White, viscous, opaque liquid; slight hydrocarbon odor WARNING! MAY CAUSE SKIN IRRITATION STATEMENTS OF HAZARD IMPORTANT! SPILLS OF THIS PRODUCT ARE VERY SLIPPERY WHEN WET

POTENTIAL HEALTH EFFECTS EFFECTS OF OVEREXPOSURE:

Acute oral (rat) LD50 and acute dermal (rabbit) LD50 of > 10 ml/kg. Direct contact with this material may cause minimal eye and moderate skin irritation.

Refer to Section 11 for toxicology information on the OSHA regulated components of this product.

4. FIRST AID MEASURES

In case of skin contact, wash affected areas of skin with soap and water. Do not reuse clothing without laundering.

In case of eye contact, immediately irrigate with plenty of water for 15 minutes.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES F

FLASH POINT		>200°E (>93 3°C)	METHOD	45	Pansky Martons Closed Cup
	•	-200 (-35.5 0)	METHOD	•	rensky-waitens closed cup
FLAMMABLE LIMITS		2477 IT 8225 ISIS			
(% BY VOL)	:	Not applicable			
AUTOIGNITION TEMP	:	Not available			
DECOMPOSITION TEMP	:	Not available			

EXTINGUISHING MEDIA AND FIRE FIGHTING INSTRUCTIONS

Use water spray, carbon dioxide or dry chemical to extinguish fires. Use water to keep containers cool. Wear self-contained, positive pressure breathing apparatus and full fire-fighting protective clothing. See Section 8 (Exposure Controls/Personal Protection) for special protective clothing.

6. ACCIDENTAL RELEASE MEASURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Cover spill with some inert absorbent material; sweep up and place in waste disposal container. Flush area thoroughly with water. Residual may be very slippery. If slipperiness remains, apply more dry-sweeping compound.

7. HANDLING AND STORAGE

Avoid contact with skin. Wash thoroughly after handling. To avoid product degradation and equipment corrosion, do not use iron, copper, or aluminum container or equipment. OSHA regulations (29 CFR 106.a.14), require that the flashpoint of materials of this type be determined by the Pensky-Martens Closed Tester method. The test for this product indicated it has flash point at >200°F (93.3°C); therefore, caution should be exercised in storage and handling.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE) Engineering controls are not usually necessary if good hygiene practices are followed. Before eating, drinking, or smoking, wash face and hands thoroughly with soap and water. Avoid unnecessary skin contact. Impervious gloves are recommended to prevent prolonged skin contact. For operations where eye or face contact can occur, eye protection is recommended.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AND ODOR BOILING POINT WALTING POINT VAPOR PRESSURE SPECIFIC GRAVITY VAPOR DENSITY % VOLATILE (BY WT) pH SATURATED IN AIR (BY VOL) EVAPORATION RATE SOLUBILITY IN WATER White, viscous, opaque liquid; slight hydrocarbon odor.
~ 347⁶F; ~ 175^oC (value for oil phase)
0^oF; -18^bC
Not available
1.0
Not available
~ 70
Not available
Not available
< 1 (Butyl Acetate = 1)
Appreciable

10. STABILITY AND REACTIVITY

STABILITY		Stable
CONDITIONS TO AVOID	:	None known
POLYMERIZATION		Will not occur
CONDITIONS TO AVOID	1	None known
INCOMPATIBLE MATERIALS	1	Strong oxidizing agents
HAZARDOUS DECOMPOSITION PRODUCTS	1	Thermal decomposition or combustion may produce carbon monoxide, carbon dioxide, ammonia, and/or oxides or nitrogen.

11. TOXICOLOGICAL INFORMATION

Toxicological information on the OSHA regulated components of this product is as follows: Acute overexposure to petroleum distillate vapors may cause eye and throat irritation. On direct skin contact, petroleum distillate may produce a severe skin irritation.

IMO

12. ECOLOGICAL INFORMATION

No aquatic LC50, BOD, or COD data available. OCTANOL/H_2O PARTITION COEF: Not available

13. DISPOSAL CONSIDERATIONS

Disposal must be made in accordance with applicable governmental regulations.

14. TRANSPORT INFORMATION

D.O.T SHIPPING INFORMATION

		SHIPPING I	NFORMATION	SHIPPING INFORMATION	
SHIPPING NAME	:	Not applicat	ble/Not Regulated	Not applicable/Not Regulated	
HAZARD CLASS/ PACKING GROUP	:	Not applicable		Not applicable	
UN NUMBER	:	Not applicat	ble	Not applicable	
IMDG PAGE	:	Not applicat	ble	Not applicable	
D.O.T HAZARDOUS SUBSTANCES	:	(Product Re Not applicat	portable Quantity) ble	Not applicable	
TRANSPORT LABEL REQUIRED	;	None required		None required	
		ICAO/IATA		TRANSPORT CANADA	
SHIPPING NAME	:	Not applicable		Not applicable	
HAZARD CLASS	:	Not applicable		Not applicable	
SUBSIDIARY CLASS	:	Not applicat	ble	Not applicable	
UN / ID NUMBER	2	Not applicat	ble	Not applicable	
PACKING GROUP	;	Not applicable		Not applicable	
TRANSPORT LABEL REQUIRED	:	None required		None required	
PACKING INSTRUCTIONS	:	Passenger Cargo	Not applicable Not applicable	Not applicable	
MAX NET QTY	;	Passenger Cargo	Not applicable Not applicable	Not applicable	
		ADDITIONA	L TRASPORT INFO	RMATION	
LECHNICAL NAME (N.O.S.)	1	Not applicat	ble		

15. REGULATORY INFORMATION

INVENTORY INFORMATION

- US TSCA : This product is manufactured in compliance with all provisions of the Toxic Substances control Act, 15 U.S.C.
- CANASA DSL : Components of this product have been reported to Environment Canada in accordance with subsection 25 of the Canadian Environmental Protection Act and are included on the Domestic Substances List.
- EEC EINECS : All components of this product are included on the European Inventory of Existing Chemical Substances [EINECS] in compliance with Council Directive 67/548/EEC, Amended 79/831/EEC.

OTHER ENVIRONMENTAL INFORMATION

The following components are defined as toxic chemicals subject to reporting requirements of Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations.

COMPONENT	CAS. NO.	%	TPQ(lbs)	RQ (lbs)	S313	RCRA	TSCA 12B
This p	product does not	contain any	components	regulated	under these	sections of the	EPA

PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA Not applicable under SARA TITLE III

16. OTHER INFORMATION

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NFPA HAZARD RATING (National Fire Protection Association)

Fire	FIRE : Materials that must be preheated before ignition can occur.			
1	HEALTH : Materials which on exposure under fire conditions would offer			
Health 0 0 Reactivity	no hazard beyond that of ordinary combustible material.			
5	REACTIVTY : Materials which in themselves are normally stable, even under			
Special	fire exposure conditions, and which are not reactive with water.			

This information is given without any warranty or representation. We do not assume any legal responsibility for same, nor do we give permission, inducement, or recommendation to practice any patented invention without a license. It is offered solely for your consideration, investigation, and verification. Before using any product, read its label.
Appendix C Bioassay and Analytical Results Shore PAC GCV



1500 West Shure Drive, 5th Floor Arlington Heights, IL 60004-7803 847.392.5800/Fax 847.506.6150 www.cetco.com john.berry@cetco.com

October 26, 2001

RE: Benefits of Synthetic Slurry Vs Mineral Slurry

Dear Sir:

As requested a comparison has been prepared for drilling with synthetic drilling slurry Vs conventional mineral slurry. The advantages of using high performance polymer slurry over mineral slurry yield multiple benefits, which improve construction economics in many ways. Shore Pac GCV saves time and money while improving construction quality and reducing defects.

- Highly concentrated. Very small quantities required.
- Controls fluid loss in sands and gravels. Stabilizes excavations.
- Reduces chipping and cleaning of poured concrete.
- Improves productivity of machines and crews.
- Requires less mixing/processing equipment, reducing capital investment, jobsite congestion and fuel costs.
- Reduces are eliminates disposal costs. Product is environmentally safe.
- Reduces transport costs and storage space requirements.

Shore Pac GCV polymer slurry replaces mineral slurry at ratios ranging between 1 to 50 and 1 to 200 in typical application. When using salt water as the mix water only a special mineral called Attapulgite can be used, these ratios mean that 20 pounds of Shore Pac GCV can replace 4 tons of mineral slurry.

Shore Pac GCV slurry cohesively binds excavated soil solids together, facilitating their removal from the excavation and preventing them from dispersing into the slurry. Shore Pac GCV maximizes spoil loading on augers increasing excavation rates. Shore Pac GCV makes it possible to drill with augers, even in sand and gravel, eliminating the need to use a bucket. This feature can reduce drilling time, increase productivity and reduce slurry wastage. With mineral slurry a bucket must be used and half of the spoil is liquid slurry that dumps out over the job-site.



PROVEN ADVANTAGES OVER MINERAL SLURRY

Shore Pac GCV polymer systems have been shown, in definitive laboratory research and in numerous full-scale load tests and construction projects, to provide the following advantages over mineral slurries:

- Greater frictional load testing capacity (skin Friction) in bored piles; higher success rate on load tests.
- Cleaner, harder top surfaces on concrete in bored piles and diaphragm walls; reduces or eliminates cleaning, chipping and dressing.
- Seawater tolerant.
- Improved recyclability and reusability.
- Cleaner more manageable sites.
- Drier, cleaner, firmer spoil which can be used for fill.
- Simplified disposal.

When all of Shore Pac's advantages are taken into consideration and their economic impact is understood, it becomes clear that Shore Pac GCV is the technology that is replacing mineral slurries because mineral slurries ultimately cannot remain competitive. Numerous foundation contractors, including some of the largest and most respected companies in the international industry, have adopted this new technology after trying it on critical, high profile jobs where efficient performance was required to meet schedules and make a profit. Polymer slurry has been tried only after repeated load test failures in problem soils with mineral slurry systems, and in every case has shown better results.

Removing uncertainty on load tests and keeping projects on schedule translates into large monetary savings and reduced liability.

Shore PacTM GCV is a very high molecular weight synthetic polymer with negative charges on the backbone. Its high molecular weight gives viscosity to water at low concentrations.

When Shore PacTM GCV is dissolved in aqueous solution, the very long polymer chains dissolve and orient randomly in the fluid in coils. In fresh water, the repulsion of the negative charges on the backbone of the polymer chains causes the coils to expand and to occupy a large volume in the fluid. When the fluid is sheared, the expanded polymer chains are located in different fluid layers in the shear field. The uncoiling of these expanded polymer chains dissipates mechanical energy and results in viscosity.

The high molecular weight polymer chains are so long that different parts of individual polymer chains bridge different solid particles. It is this adsorption on surfaces and bridging of solid surfaces that makes this polymer effective in keeping solids consolidated while drilling a foundation. In addition, the adsorbed layer of hydrophilic polymer on rock surfaces slows down the diffusion of water into the rock.

If you have any questions do not hesitate to contact me at 847.910.4334.

Sincerely,

John H. Berry, P.G./Hydrogeologist Product Manager/CETCO Drilling Product

A Wholly Owned Subsidiary of AMCOL International

Biomonitoring Report Pimephales promelas

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CETCO SHORE PAC GCV SLURRY

October 1998

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Pimephales promelas ACUTE STATIC-RENEWAL 96-HOUR DEFINITIVE TEST EPA 600 4-90 027F: SECTION 9

Prepared for

CETCO

by

ENVIRONMENTAL ENTERPRISES USA, INC. 58485 PEARL ACRES ROAD, SUITE D SLIDELL, LOUISIANA 70461 - -

(504) 646-2787

DAVID L. DANIEL Laboratory Director

<u>in</u> illic

ALICIA JEWELL QA/QC Officer

10/22/98 . DATE

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10-21-98 DATE

TEST OVERVIEW

A 96-hour static-renewal toxicity test was conducted by Environmental Enterprises to determine toxicity of a lab sample, SHORE PAC GCV SLURRY, to Pimephales promelas larvae. Test organisms were cultured at Environmental Enterprises and 2-days-old when this test was initiated. Reconstituted laboratory-prepared water was used as the diluent and a laboratory performance control was evaluated. Four replicates of the laboratory control and five lab sample concentrations were prepared initially and renewed daily. Lab sample concentrations tested were 1.0%, 1.8%, 3.2%, 5.6%, and 10.0%. With the exception of dilution to the concentrations listed previously, the lab sample was tested as received.

Client: Location: NPDES Permit No.: CETCO 1350 West Shure Drive; Arlington Heights, IL 60004-1440 n/a

Services Requested By: Ms. Amy Suffecool Test Requested: Acute static-renewal 96-hour definitive test using Pimephales promelas. EPA 600 4-90 027F: SECTION 9.

> October 2, 1998, at 1:15pm October 6, 1998, at 3:46pm

Test Initiated: Test Completed:

Sampling Location: Sample Type: Sample Collected:

E.E. Project No.: Results:

96-hour LC50 = > 10.0% effluent.

No Observable Effect Concentration (NOEC): 10.0% effluent.

Lowest Observable Effect Concentration (LOEC): N/A

Principal Investigator:

Grouica Wer lux Effluents Testing Supervisor

Report Date:

October 17, 1998

Veronica McNew

CETCO

Product, Grab

E-9545-98

Conclusion: Pass

Methods, materials, and results are presented in this document. The test was conducted from October 2 - 6, 1998, at the laboratory of Environmental Enterprises. Those involved in performing this test and in preparation of this report were Mark O'Neil, Alicia Jewell, Veronica McNew, and David L. Daniel.

-1-

E-9545-98

MATERIALS AND METHODS

Materials and methods for the work performed are stated in EPA 600 4-90 027F: <u>Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to</u> <u>Freshwater and Marine Organisms</u>. Actual materials and methods are detailed below. This test was performed with strict adherence to the requirements of EPA 600 4-90 027F, Section 9. Additionally, the recommendations and suggestions made elsewhere in EPA 600 4-90 027F were incorporated whenever applicable to optimize the experimental design.

P. promelas was cultured and maintained in reconstituted moderately hard water at $25\pm1^{\circ}$ C. Several clutches from different females comprised the embryo pool from which the test organism population hatched. Test organisms were fed Artemia nauplii less than 24-hours old twice daily.

Sensitivity of test organisms to a known toxicant was determined by performing a chronic Standard Reference Toxicant (SRT) test, PP9810, with sodium dodecyl sulfate (Sigma Chemical, Lot 106H0112, 95% purity). The SRT test, was initiated on September 11, 1998, with less than 24-hour old P. promelas larvae.

SURVIVAL		GROWTH
NOEC :	3.0 mg/l	3.0 mg/l
LOEC:	5.0 mg/l	N/A

On October 1, the SHORE PAC GCV SLURRY sample used in this test was delivered to Environmental Enterprises (Appendix B). Daily, a portion of the sample was warmed to 25°C and used to prepare the test solutions. Test chambers were labeled with concentration, replicate identification, and Environmental Enterprises' project number. Six treatments, five sample concentrations and a laboratory performance control, were prepared and pH was measured in the undiluted sample daily (Appendix A).

Each treatment was poured into a new acid-washed 1-gallon plastic container and placed in an environmental chamber to warm up to test temperature. After the test solutions reached test temperature, initial water quality parameters (temperature, conductivity, and dissolved oxygen (DO)) were measured. At the end of each 24-hour exposure period, prior to renewal, the ending DO, temperature, and pH in each treatment were recorded also (Appendix A, pages 4 - 5). Alkalinity, hardness, and conductivity were measured in the laboratory performance control and undiluted effluent sample October 2 (Appendix A, page 4).

On Day 0, the treatments were poured into their respective test chambers, ten *P. promelas* larvae were distributed randomly to each, and then this test was placed in the environmental chamber. On Days 1-3, the test was renewed: 90% of the treatment solution, excess food, and debris were poured or siphoned out of each replicate. Aliquots of freshly prepared treatments were gented gently into each replicate as appropriate. Surviving test organisms were disturbed as little as possible during renewal. Every 24 hours, survival was recorded (Appendix A, pages 2 - 3). After four days, the final survival data were recorded and this test was terminated.

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E-9545-98

APPENDIX A

10/2/98

EE# E-9545-98

SAMPLE #: SHORE PAC GCV

SLURRY

CLIENT: CETCO

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1350	WEST	SHUR	E DR	IVE	
ARLI	NGTON	HEIG	HTS,	IL	60004
AMY	SUFFE	COOL	(847)	39	92-5800

DILUTION CALCULATIONS

TEST CONCENTRATIONS, % EFFLUENT (EFF)

	Pimephales promelas	TOTAL V CONCENTE	OLUME/ ATION, ml	COLOR CODE	ml EFF	ml DH ₂ O
10.	0%	200	0.0	BLACK	200.0	1800.0
5.	6%			BROWN	112.0	1888.0
• 3.	2%			YELLOW	64.0	1936.0
1.	8%			GREEN	36.0	1964.0
1.	0%			BLUE	20.0	1980.0
LAB PERFORMANC	E CONTROL 0%			WHITE	0.0	2000.0
DH ₂ 0 =	P. pr DILUTION WA ALKALIN HARDN	comelas = 4 1 = 200 TER = SYNTH ITY =(p^2 ESS =2 *****	REPS x <u>500</u> ml ETIC MODER <u>}</u>	ml MATELY HARD	WATER * ***	** *****
PREP DATE	10/02 10/	03 10/04	10/05			
SAMPLE #	1 1	. 1	1			

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NKO

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8.0

COMMENTS:

pH

INITIAL

PAGE 1

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SURVIVAL DATA CONT.

Pimephales promelasto days old									s old		
T						TREAT	IMENT				
M E	REP		LPC WHT		1.0% BLUE	1.8% GREEN	3.2% YELLOW	5.6% BROWN	10.0% BLACK		INITIAL
		jĎ]
	A		10	111	10	10	10	10	10		Infa
0 HR	в		10	111	10	10	10	10	10		192
1:15pm	с	11	10	111	10	10	10	10	10		B
	D		10	111	10	10	10	10	10		
											1
	A		10	111	10	10	10	10	10		20
24 HR	в		10	111	10	10	10	10	10		
1210	с		10	111	10	10	10	10	10		10/3
	D		10	111	10	10	10	10	10		
	A		10	///	ĺ0	io	10	10	10		140
48 HR	в		10	111	10	10	10	10	10		
11:050	1 C		10	111	10	10	10	10	10		10/9
	D		10	111	10	10	D	10	10		
		קב		1					Te		
	A		(0	111	10	10	10	10	10		10
72 HR	в		Ø	111	10	D	10	10	10		10 -
11:20	с		10	111	10	10	10	10	10		12
+100	D		D	111	10	10	10	10	10,		Ц,
COUNT	ED/LO	AI	DED BY	Shann	STRAFZ	WE his	巨	QC/QA B	1: Verou	ica Met	Men

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COMMENTS :

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EE# <u>E-9545-98</u>

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		WAT	ER QU	JALITY I	DATA				
т					TREATM	ent			IN
I M E	PARAMETER	LPC W		1.0% BLUE	1.8% GREEN	3.2% YELLOW	5.6% BROWN	10.0% BLACK	I
	DISSOLVED OXYGEN INITIAL	8.3	//	8.3	8.3	8.3	8.3	8.3	(n
	P. prometas FINAL	7.5	//	7.4	7.4	7.3	7.4	7.4	
	TEMPERATURE INITIAL	24.7	11	25.6	25.4	25.6	25.5	25.2	MAG
	P. prometas- FINAL	25.0	11	25.1	25.0	25.0	24.9	25.0	#3
0 HR	FINAL pH P.promelas	٦.٦	11	ר.ר	7.7	ר.ר	ר.ר	٦.٦	
	CONDUCTIVITY	311	11	305	305	306	306	306	
	ALKALINITY		11	/	1	/	/	/	
•	HARDNESS		11	/	/	/	/	/	
	DISSOLVED OXYGEN INITIAL	8.3	11	8.2	8.1	8.1	8.1	6.2	
	P. promelas- FINAL	7.3	11	7.1	7.3	7.3	7.2	7.2	MAG
	TEMPERATURE INITIAL	24.3	11	24.9	75.1	2-5.1	24.9	25.1	
	P. prometas- FINAL	25:4	11	25.4	25.4	25.4	254	25.5	
24 HR	FINAL pH P.promelas	76	11	7.5	7.5	7.5	7.5	75	
	CONDUCTIVITY	304	11						
	ALKALINITY	64	11	/	1	1	/	/	
	HARDNESS	92	11	/	/	/	1	1	

COMMENTS: 100.0% Eff: 8.0pH, 140alk, 120 hard, 315 cond, 0.28 TPC

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- PAGE 4 PP

EE: E-9545-98

EE# E-9545-98

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•		WAT	TER Q	JALITY I	DATA CON	NT.	1		
т					TREATM	INT			IN
I M E	PARAMETER	LPC W		1.0% BLUE	1.8% GREEN	3.2% YELLOW	5.6% BROWN	10.0% BLACK	I
	DISSOLVED OXYGEN INITIAL	3.1	//	8.0	8.0	8.1	8.1	8.2	
	FINAL	7.5	11	7.5	7.3	7.4	7.3	7.4	ASIEM
	TEMPERATURE INITIAL	as:3	//	25.4	25.4	25.4	25.0	24.6	
48	FINAL	24.5	11	2414	24.4	241	24,5	24.4	9215
HR	FINAL pH P.promelas	7.5	11	7.6	7.6	7.4	7.6	7.6	957-
	CONDUCTIVITY		11	311	306	306	305	305	
	ALKALINITY	64	11	/	1	/	1	1	
	HARDNESS	92	11	1	1	1	1	/	
	DISSOLVED OXYGEN INITIAL	7.7	11	7.8	7.8	7.9	7.9	3.0	A.) 1
	FINAL	63	//	4.3	64	6.3	6.3	68	B
	TEMPERATURE INITIAL	24.8	11	24.8	24.9	24.6	24.6	23.9	Aÿ
70	F. FINAL	255	11	254	254	25.3	254	25.50	
/2 HR	FINAL pH P.promelas	23	311	2.20	2.80	7.8	78	28%	
	CONDUCTIVITY	309	11	309	309	309	309	309	Anim
	ALKALINITY	40	11	/	1	/	1	1	
	HARDNESS	108	11	/	/	/	1	/	

.

DO, DISSOLVED OXYGEN: mg/l pH: SU TEMPERATURE: °C

CONDUCTIVITY: μ S/cm ALKALINITY: mg/l as CaCO₃ HARDNESS: mg/l as CaCO₃

PAGE 5

EE: E-9545-98

APPENDIX B

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	1	1	ř	1485 T Slid	earract lell, Lot (504) (res a lista d'	и , о шист 70461. 7	1	. 	DOSTE		
148063381	6732	ν.		CHAIN.	-at-cu	staby	HECURD	1				
Client: CETCO				Ö	itact pers	son: A	JUS XN	Face	Pp B	scial Handling F	Request	
Address:				Pho	i# euc					[Rush		
			1	P.O	:#:					[Verbal		
			1	Pro	ject:					Other	K 3	
Sample Location	Date	Time	Grab	Comp	No. of Containers	Waste Type	Preservation		Analysis Request	EE Samp	le Number	0
										6-9	54 m - 98	0-
										E-9.	545-98	
56 06 80	Нq	OP1	-al	K	oel	3	pro	315	CONN		HON	
a.astin.	20	Son	4	0	570							
		0										
•							8			-		
Collected By:		Dat		Ē		Relinqu	shed By: K	01, D	bhole Fl	C Dalo 10/1	99, The OSA	~
Received By:	Ri	Dal	192	Ěà	325	Relinqu	Ished By: K	eline	lein	10/1/98	11me	1
Received By: NOUNS	Com	5	6/0	11 2 2	SPM	Relinqu	Ished By:			Date	Time	
Received By:		Dal		Ē		Relinqu	Ished By:			Date	Time	
Received for Laboratory By:		Dal		Ē		Comme	nts (Precauti	ons/Hazard	(s)			
Final Disposition:		2							RIT # A)O	he.		
										l [3]	H-1111-1417-14	



CETCO Drilling Products Laboratory Request Research and Development Department

Project: Submittal for analytical testing CETCO's Shore Pac GCV slurry mixed @ 1 lb per 500 gallons.

Purpose: Shore Pac GCV synthetic slurry must meet strict California Department of Health Services codes for toxic or hazardous waste disposal in California.

The California Code of Regulations Title 22 hazardous waste criteria has demanding regulations more stringent than the Federal EPA standards. Therefore test results certified from an independent laboratory confirming test results for Shore Pac GCV Title 22 non toxic status and documentation of EPA non-toxic conformance must be submitted to the California Department of Health Services for review. This must be completed as part of the approval process to have Shore Pac GCV used on construction projects approved by the State of California.

Laboratory Testing:

1.	Oil & Grease	EPA 413.1
2.	COD	EPA 410.4
3.	BOD	EPA 405.1
4.	PH	EPA 150.1
5.	Metals Discharge	
8.	Cadium	EPA 213.1
b.	Chromium	EPA 218.1
C.	Copper	EPA 220.1
d.	Lead	EPA 239.1
e.	Nickel	EPA 249.1
f	Silver	EPA 272.1
g.	Zinc	EPA 289.1

(Priority Pollutants)

- Base/Neutral Compounds
- Purgeable Compounds (volatiles)
- Acid Compounds
 - Heavy Metals

7.

6.

a.

b.

C.

d.

Bioassay testing utilizing flathead minnows (Pimephales promelas)

Please have a complete analytical report submitted for each procedure

5

÷ -189-4505 67°F BUFFALO GROVE, ILLINOIL 189-450 (847) 808-7766 FAX (847) -8-7772 < 24 HRS. LABORATORY ID NUMBER I.V.I. DATE WW 14.2 1 DAY Yes Ъ 2 DAY CONTROL TEMPERATURE UPON RECEIPT: TAT: 5 DAY 4 DAY 3 DAY PAGE DATE RESULTS NEEDED: TEMPER. RECEIVED RECEIVED EANTE Looft. -inter-FOR 000 CHAIN OF CUSTODY PORT STAR BETTO Phone #: (Fax #: (RELINQUISHED RELINQUISHED TYPE CONTAINERS NO CONTAINERS SAME SLINGTON HEIGHTS, T. 60004-1440 or to: TOHN BERRY FANNE #: (847) 392-5300 State & CALTRANS or to: TOHN BERRY Fax #: (847) 506-6150 Program: Apppoval BAESERMANNES 10.00 DAIF 1911 AND SAMPLE Address: BIII To: COLLECTED DIVISION . PATE FEE BP. RECEIVED RECEIVED ect: SHORE PAC GEV SLURGY ress: 1350 WEST SHURE DEILLING SHARE PAE GEU SLUARY TPLET: RMY SUFFECOOL IL PAS SOD GAL RATTÓ JUNC: TIME I 11.11 FIELD ID, LOCATION OF LANALYTICAL > CEICO Quote #: IQUISHED JOUISHED MENTS: ¥



1380 Busch Parkway Buffalo Grove, Illinois 60089

Email: info@glalabs.com (847) 808-7766 FAX (847) 808-7772

Date: October 13, 1998

Cetco, Drilling Division 1350 W. Shure Dr. Arlington Heights, IL 60004-1440 Attention: John Berry

Project: Shore PAC GCV Sluury

Enclosed are the results from 1 water sample received at Great Lakes Analytical on September 30, 1998. The requested analyses are listed below:

SAMPLE#	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
8095574	Water: 11b per 500 gal. sluury	9/30/98	COD, EPA 410.4
			BOD, EPA 405.1
			pH, EPA 150.1
			Oil & Grease, EPA 413.1
			Priority Pollutants
			Cyanide, EPA 9012
			PCB, EPA 8082
			VOC, EPA 8260
			SVOC, EPA 8270
			Organchlorine Pesticides, EPA 8081
1			1978년 - 1979년 - 1979년 - 1979년 -

The concentrations of Chloroform and Bromodichloromethane detected in this sample by EPA 8260 are charachteristic of those found in chlorinated drinking water.

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Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANALYTICAL

1 Kevin W. Keeley 1 Predident



1380 Busch Parkway Buffalo Grove, Illinois 60089 Email: info@glalabs.com (847) 808-7766 FAX (847) 808-7772

Date: October 8, 1998

Cetco, Drilling Division

1350 W. Shure Dr. Arlington Heights, IL 60004-1440 Attention: John Berry

Project: Shore PAC GCV Sluury

Enclosed are the results from 1 water sample received at Great Lakes Analytical on September 30, 1998. The requested analyses are listed below:

SAMPLE#	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
8095574	Water: 1lb per 500 gal. sluury	9/30/98	COD, EPA 410.4 BOD, EPA 405.1 pH, EPA 150.1 Oil & Grease, EPA 413.1 Priority Pollutants Cyanide, EPA 9012 PCB, EPA 8082 VOC, EPA 8260 SVOC, EPA 8270 Organchlorine Pesticides, EPA 8081

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Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANALYTICAL

C

Kevin W. Keeley Laboratory Director

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	1380 I	Busch Parkway	Email: info@gla	labs.com
	Buffalo G	rove, Illinois 60089	(847) 808-7766 FAX ((847) 808-7772
cetco, Drilling Division	Client Project ID:	Shore PAC GCV Sluury	Sampled:	Sep 30, 1998
1350 W. Shure Dr.	Sample Descript:	Water: 1lb per 500 gal. sluury	Received:	Sep 30, 1998
Arlington Heights, IL 60004-1440 Attention: John Berry	Lab Number:	809-5574	Analyzed: Reported:	Oct 2, 1998 Oct 8, 1998

E.P.A. PRIORITY POLLUTANTS: METALS

Analyte	EPA Method	Detection Limit mg/L (ppm)	ŧ	Sample Results mg/L (ppm)
	3015/6010	0.10		ND
Antimony	3015/7060	0.050		N.D.
Bendlium	3015/6010	0.010		N.D.
	3015/6010	0.010		N.D.
Chromium	3015/6010	0.010		N.D.
Copper	3015/6010	0.050		N.D.
Lead	3015/7421	0.0050		N.D.
Mercury	7470	0.0020	•••••	N.D.
Nickel	3015/6010	0.10	•••••	N.D.
Selenium	3015/7740	0.010		N.D.
Silver	3015/6010	0.050	••••••	N.D.
Thallium	3015/6010	0.50	•••••	N.D.
Zinc	3015/6010	0.50	•••••	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL 0 C

Kevin W. Keeley Laboratory Director

8095574.ccc <1>



ANALYTICAL	1380 I	Busch Parkway	Email: info@gla	alabs.com
	Buffalo G	rove, Illinois 60089	(847) 808-7766 FAX	(847) 808-7772
Cetco, Drilling Division	Client Project ID:	Shore PAC GCV Sluury	Sampled:	Sep 30, 1998
1350 W. Shure Dr.	Sample Descript:	Water: 1lb per 500 gal. slurry	Received:	Sep 30, 1998
Attention: John Berry	Lab Number:	809-5574	Analyzed: Reported:	Sep 30-Oct 5, 1998 Oct 8, 1998

LABORATORY ANALYSIS

Analyte	EPA Method	Detection Limit mg/L	Sample Results mg/L
BOD	405.1	0.60	 N.D.
COD	410.4	100	 N.D.
Cyanide	9012	0.010	 N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

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Kevin W. Keeley Laboratory Director

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pH.....

Email: info@glalabs.com (847) 808-7766 FAX (847) 808-7772 1380 Busch Parkway Buffalo Grove, Illinois 60089 ANALYTICAL Cetco, Drilling Division 1350 W. Shure Dr. Arlington Heights, IL 60004-1440 Attention: John Berry Client Project ID: Sample Descript: Shore PAC GCV Sluury Water: 1lb per 500 gal. slurry Sampled: Received: Sep 30, 1998 Sep 30, 1998 809-5574 Sep 30, 1998 Oct 8, 1998 Lab Number: Analyzed: Reported:

LABORATORY ANALYSIS

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Analyte

EPA Method

150.1

1.

Temperature °C

19

Sample Result pH units

7.3

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Kevin W. Keeley Laboratory Director

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LAKES
Buffalo Grove, Illinois 600891380 Busch Parkway
Buffalo Grove, Illinois 60089Email: info@glalabs.com
(847) 808-7766Cetco, Drilling Division
1350 W. Shure Dr.
Arlington Heights, IL 60004-1440
Attention: John BerryClient Project ID:
Matrix Descript:
Analysis Method:
First Sample #:Shore PAC GCV Sluury
Water
EPA 413.1 (Gravimetric)
809-5574Sampled:
Sep 30, 1998
Extracted:
Oct 5, 1998
Reported:
Oct 6, 1998
Reported:

TOTAL RECOVERABLE OIL & GREASE

Sample Number	Sample Description	Oil & Grease mg/L (ppm)
809-5574	1lb per 500 gal. slurry	N.D.

Detection Limits:

5.0

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTIGAL

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Kevin W. Keeley Laboratory Director

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1380 Busch Parkway Buffalo Grove, Illinois 60089

Email: info@glalabs.com (847) 808-7766 FAX (847) 808-7772

Cetco, Drilling Division 1350 W. Shure Dr. Arlington Heights, IL 60004-1440 Attention: John Berry	Client Project ID: Sample Descript: Analysis Method: Lab Number:	Shore PAC GCV Sluury Water: 1lb per 500 gal. slurry EPA 8081 809-5574	Sampled: Received: Extracted: Analyzed: Reported:	Sep 30, 1998 Sep 30, 1998 Oct 5, 1998 Oct 6, 1998
			Reported:	Oct 8, 1998

ORGANOCHLORINE PESTICIDES (EPA 8081)

Analyte	Detection Limit µg/L		Sample Results µg/L
Aldrin	0.025		N.D.
alpha-BHC	0.025		N.D.
beta-BHC	0.025		N.D.
delta-BHC	0.025		N.D.
gamma-BHC (Lindane)	0.025		N.D.
Chlordane	0.50		N.D.
4 4'-DDD	0.15	•••••	N.D.
4 4'-DDF	0.050		N.D.
4 4'-DDT	0.15		N.D.
Dieldrin	0.050		N.D.
Endosulfan	0.050		N.D.
	0.050		N.D.
Endosulfan sulfate	0.15		N.D.
	0.050		N.D.
drin aldebyde	0.15		N.D.
dentachlor	0.025		N.D.
Hentachlor enovide	0.025		N.D.
Methowychlor	0.50		N.D.
Toxaphene	2.0		N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

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Kevin W. Keeley Laboratory Director

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vetco, Drilling Division 1350 W. Shure Dr. Arlington Heights, IL 60004-1440 Attention: John Berry

Client Project ID: Sample Descript: Analysis Method: Lab Number:

809-5574

1380 Busch Parkway Buffalo Grove, Illinois 60089 Shore PAC GCV Sluury Water: 1lb per 500 gal. slurry EPA 8082

Email: info@glalabs.com (847) 808-7766 FAX (847) 808-7772

Sep 30, 1998 Sep 30, 1998 Oct 5, 1998 Oct 7, 1998 Oct 8, 1998 Sampled: Received: Extracted: Analyzed: Reported:

POLYCHLORINATED BIPHENYLS (EPA 8082)

Analyte	Detection Limit µg/L		Sample Results µg/L
PCB 1016	1.0		N.D.
PCB 1221	1.0		N.D.
PCB 1232	1.0		N.D.
PCB 1242	1.0		N.D.
PCB 1248	1.0		N.D.
PCB 1254	1.0		N.D.
PCB 1260	1.0	••••••	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

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Kevin W. Keeley Laboratory Director

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ANALYTICAL	1380 Buffalo G	Busch Parkway rove, Illinois 60089	Email: info@gla (847) 808-7766 FAX (labs.com (847) 808-7772
Letco, Drilling Division 1350 W. Shure Dr. Adianaton Heights, II, 60004-1440	Client Project ID: Sample Descript: Analysis Method:	Shore PAC GCV Sluury Water: 1lb per 500 gal. slurry EPA 8260	Sampled: Received:	Sep 30, 1998 Sep 30, 1998
Attention: John Berry	Lab Number:	809-5574	Analyzed: Reported:	Oct 7, 1998 Oct 8, 1998

VOLATILE ORGANICS by GC/MS (EPA 8260)

Analyte	Detection Limit µg/L		Sample Results µg/L
Acetone	10		15A
Benzene	2.0		N.D.
Bromodichloromethane	2.0		4.4
Bromoform	2.0		N.D.
Bromomethane	2.0		N.D.
2-Butanone	10		N.D.
Carbon disulfide	2.0		N.D.
Carbon tetrachloride	2.0		N.D.
Chlorobenzene	2.0		N.D.
Chlorodibromomethane	2.0		N.D.
Chloroethane	2.0		N.D.
2-Chloroethyl vinyl ether	10		N.D.
Chloroform	2.0		7.6
Chloromethane	2.0		N.D.
Dichloroethane	2.0		N.D.
2-Dichloroethane	2.0		N.D.
1 1-Dichloroethene	2.0		N.D.
cis 1 2-Dichloroethene	2.0		N.D.
trans 1 2-Dichloroethene	2.0		N.D.
1 2-Dichloropropane	2.0		N.D.
cis 1 3-Dichloropropene	2.0		N.D.
trans 1 3-Dichloropropene	2.0		N.D.
Ethylbenzene	2.0		N.D.
2 Hexanone	10		N.D.
Mothylene chloride	2.0		N.D.
A Methyl-2-pentanone	10		N.D.
Shrono	2.0		N.D.
1 1 2 2 Totrachloroethane	2.0		N.D.
	2.0		N.D.
Tetrachioroethene	2.0		N.D.
1 oluene	2.0		ND
1,1,1-Inchioroethane	2.0		N.D.
1,1,2-1 nchioroethane	2.0		ND
Inchioroethene	2.0		N D
Trichlorofluoromethane	2.0	••••••	N.D.
Vinyl acetate	2.0		N.D.
Vinyl chloride	2.0	······	N.D.
Total Xylenes	2.U		N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTIGAL

-l.C.C.)

Please Note: A = Laboratory artifact - concentrations found of this analyte are characteristic of laboratory artifact.

Kevin W. Keeley Laboratory Director

8095574.ccc <7>



ICAL	1380 Buffalo G	Isch Parkway Email: info@glalabs.com ve, Illinois 60089 (847) 808-776 FAX (847) 808-777		
	Client Project ID: Sample Descript:	Shore PAC GCV Sluury Water: 11b per 500 gal, slurry	Sampled: Received:	Sep 30, 1998 Sep 30, 1998
0004-1440	Analysis Method: Lab Number:	EPA 8270 809-5574	Extracted: Analyzed: Reported:	Oct 4, 1998 Oct 4, 1998 Oct 8, 1998

SEMI-VOLATILE ORGANICS by GC/MS (EPA 8270)

Analyte	Detection Limit		Sample Results
	μg/L		µg/L
Assessment	2.0		ND
Acenaphthelena	2.0		N.D.
Acenaphthylene	2.0		N.D.
Aniine	2.0		N.D.
Anthracene	2.0		N.D.
Benzoic Acid	20	•••••••••••••••••••••••••••••••••••••••	N.D.
Benzo(a)anthracene	2.0	••••••	N.D.
Benzo(b)fluoranthene	2.0	•••••••	N.D.
Benzo(k)fluoranthene	2.0	••••••	N.D.
Benzo(g,h,i)perylene	2.0	•••••	N.D.
Benzo(a)pyrene	2.0		N.D.
Benzyl alcohol	2.0		N.D.
Bis(2-chloroethoxy)methane	2.0		N.D.
Bis(2-chloroethyl)ether	2.0		N.D.
Bis(2-chloroisopropyl)ether	. 2.0		N.D.
p(2-ethylhexyl)phthalate	10	•••••	N.D.
Bromophenyl phenyl ether	2.0		N.D.
Butyl benzyl phthalate	2.0		N.D.
4-Chloroaniline	2.0		N.D.
2-Chloronaphthalene	2.0		N.D.
4-Chloro-3-methylphenol	2.0		N.D.
2-Chlorophenol	2.0		N.D.
4-Chlorophenyl phenyl ether	2.0		N.D.
Chrysene	2.0		N.D.
Dibenzo(a h)anthracene	2.0		N.D.
Dibenzofuran	2.0		N.D.
Di-N-butyl opthalate	10		N.D.
Di-N-octyl phthalate	2.0		N.D.
1 3-Dichlorobenzene	2.0		N.D.
1.4-Dichlorobenzene	2.0		N.D.
1,4-Dichlorobenzene	2.0		N.D.
2.2 Dichlorobenzidine	10		N.D.
2 4 Dichlorophenol	20		N.D.
	20		ND
2 4 Dimethylaboaol	2.0		N.D.
Dimethyl obtholoto	2.0		ND
A C Dista 2 methylphopol	10		ND
4,6-Dinitro-2-methylphenol	10	•••••••••••••••••••••••••••••••••••••••	N.D.
2,4-Dinitrophenol	10		N.D.

GREAT LAKES ANALYTICAL

Page 1 of 2

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ANALYTICAL	1380	Busch Parkway	Email: info@glalabs.com	
	Buffalo G	rove, Illinois 60089	(847) 808-7766 FAX (847) 808-7772	
Artington Heights, IL 60004-1440 Attention: John Berry	Client Project ID: Sample Descript: Analysis Method: Lab Number:	Shore PAC GCV Sluury Water. 1lb per 500 gal. slurry EPA 8270 809-5574	Sampled: Received: Extracted: Analyzed: Reported:	Sep 30, 1998 Sep 30, 1998 Oct 4, 1998 Oct 4, 1998 Oct 8, 1998

SEMI-VOLATILE ORGANICS by GC/MS (EPA 8270)

Analyte	Detection Limit µg/L	Sample Results µg/L
	2.0	 N.D.
2.6 Disitrateluene	2.0	 N.D.
2,0-Dillicoloidene	2.0	 N.D.
Fluorance	2.0	 N.D.
Heveshlersbarzene	2.0	 N.D.
Hexachioroberizene	2.0	 N.D.
	2.0	 N.D.
Hexachiorocyclopentaciene	2.0	N.D.
Hexachioroethane	2.0	N.D.
Indeno(1,2,3-cd)pyrene	2.0	 N.D.
Isophorone	2.0	 N.D.
2 Methylaboral	2.0	 N.D.
2-Methylphenol	2.0	N.D.
	2.0	 N.D.
Naphthalene	10	 N.D.
	10	 N.D.
, Nitroaniline	10	N.D.
4-Nitroaniline	2.0	 N.D.
Nitrobenzene	2.0	 N.D.
2-Nitrophenol.	10	 N.D.
	20	 N.D.
N-Nitrosodiphenylamine	2.0	 N.D.
N-Nitroso-di-N-propylarinite	10	 N.D.
Pentachiorophenol	20	 N.D.
Phenanthrene	2.0	 N.D.
Phenol	2.0	 N.D.
Pyrene	2.0	 N.D.
1,2,4-Trichlorobenzene	10	 N.D.
2,4,5-Trichlorophenol	20	 N.D.
2,4,6-Trichlorophenol	2.0	

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL 0

Kevin W. Keeley Laboratory Director

Page 2 of 2

8095574.ccc <9>

BUFF (847	4	NEE	IPON REC	0	1 / / 54	S S B S	8/2 2/8	2		20						•	 	60 41	•		PAGE	
- A B B B B B B B B B B B B B B B B B B	AME TAT. 6 DAY	DATE RESULTS N	TEMPERATURE U	VAN S Phone #: () Vo JAIR BILL NO.	2 /2/ 2 K 2 2 2 2 2 2 2 2 1	Contraction of the second of t	18/ E (C) a a a a a a	B XXXXX	L P. P. Metals, Cu,	281, 8052, 8260, 80							(RECORDINGING () CARLEND (RECEIVED)	TE RECIMOUSHED DATE RECEIVED	184E		
	Client: C.E.T.C. DRILLING DIVISION Bill TO: 5	Address: 1350 WEST SHURF BR. Address:	ARLINGTON HEVEHTS IL GONOG-1440	Report to: JOHN BERRY Fax #: (847) 343-5300 State & CALTR	Project: SHORE PAC GOU SLURRY	PO/Quote #: A98-SUFFECOOL NOTE 201 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	HELD ID, LOCATION 88 188 48 48	- THAF YAF OFU SLUREY 9-30 10:00 Water					وا		8	<u> </u>		RELIGIONED 11: SOUTHERENT (1 20 11)	RELINOUISHÉD IT DUTE RÉCEIVÉD DATE	COMMENTS: TRACE		

64 | P a g e

SUPER MUD



POLYMER DRILLING SYSTEMS Tel: (870) 863-5707 • (800) 243-7455 Fax: (870) 863-0603 • E-Mail: pdsco@pdscoinc.com

RE: Super Mud (synthetic polymer soil stabilizer) environmental issues.

In response to questions on the environmental impacts of Super Mud we submit the following:

1: Common disposal practice.

In general we recommend oxidation of the slurry prior to disposal to break the polymers and other ingredients in this product into inert products such as CO_2 , H_2 , and minute traces of Nitrogen. Super Mud degradation can be accelerated by oxidation with oxidizers such as hydrogen peroxide (H_2O_2) or 5.25% sodium hypochlorite (household bleach).

The procedure for usage of household bleach to degrade the polymer is simple. A 1:1 ratio of bleach to Super Mud is added to the slurry. For example 1 gallon of household bleach is added to 800 gallons of slurry when the recommended dosage of 800:1 (water:Super Mud) is used. This is then mixed well by methods such as recirculating pumps attached to the slurry tank or by auger rotation until the viscous nature of the slurry is gone.

Hydrogen peroxide may be the preferred oxidant in many applications due to the H_2O_2 degrading to oxygen and inert water . Unlike bleach, no extra chemicals are added to the water such as sodium chloride or chlorine. The procedure for usage of hydrogen peroxide is the same with the exception of dosage. One gallon of household grade H_2O_2 (3% H_2O_2) should be added to the slurry for every 5 gallons of Super Mud.

2: Super Mud is environmentally friendly.

Super Mud is inert and presents no harm to the environment. The volume of <u>pure</u> Super Mud is approximately:

- 40% H₂O & emulsifier

- 35% polymer (an inert polyacrylamide polymer similar to polymers used in water and wastewater as flocculents).

- 25% base oil (light hydrocarbon, contains the identical petroleum distillate which is approved by the FDA for the production of food contact papers and for the clarification of beet, cane sugar juice, liquor, and by the EPA for the treatment of potable water). The CAS number of the petroleum distillate in Super Mud is 064742-47-8. Please note that the

P.O. BOX 507. El Dorado, Arkansas 71731-0507 USA

used slurry is diluted with water 800:1 (water:Super Mud). Super Mud slurry is non-toxic and non-hazardous and disposal should not present a problem. Enclosed is a copy of the official laboratory analysis report on <u>pure</u> Super Mud and a copy of the priority pollutant list content (United States Environmental Protection Agency, EPA). This priority pollutant list indicates that the <u>pure</u> product contains some cyanide and copper however please note the following:

A. The priority pollutant list testing was performed on <u>pure</u> product. In usage the product is diluted, 800 part water to one part Super Mud. During usage the product may undergo further dilution. Regardless, if the product is used at normal dosage or even at a higher dose the resulting slurry would meet the very strict EPA drinking water criteria (criteria for treatment of water for use as a drinking water source).

B. If Super Mud is disposed as <u>pure</u> product, the waste would be classified as non-hazardous per EPA regulations.

C. There are no TCLP (Toxic Characteristics Leaching Procedure) limits for the small quantity of Cyanide and Copper found in the <u>pure</u> product. This is a very intensive testing procedure, required by the EPA, using an acid to determine the potential of a waste or its contaminating constituents to enter into groundwater. Also enclosed is testing performed on Super Mud slurry in regards to the toxicity of this product. From this information it can be observed that this product is non-toxic.

3: Collection and storage.

When a drilled shaft is constructed, the slurry stabilizes the shaft. Once the shaft has been drilled to the desired depth and size, concrete is usually placed in the shaft beginning at the bottom. As the concrete is placed the slurry is displace and pumped to a storage tank for reuse on the next shaft. Following completion of the project, the slurry is mixed in the tank with the oxidants, (if forced degradation is specified), and disposed of per site requirements.

4. Super Mud is biodegradable.

Enclosed is a copy of a letter from our analytical laboratory stating the biodegradability potential for Super Mud. It is felt that this product will biodegrade over time to yield inorganic nitrogen. This product will also photodegrade if left in sunlight.

If you have any questions or if we can be of assistance please let us know.

Best regards,

Rob Newsom



POLYMER DRILLING SYSTEMS Tel: (870) 863-5707 • (800) 243-7455 Fax: (870) 863-0603 • E-Mail: pdsco@pdscoinc.com

RE: Super Mud Dry (synthetic polymer soil stabilizer) environmental issues.

In response to questions on the environmental impacts of Super Mud Dry we submit the following:

1: Common disposal practice.

In general we recommend oxidation of the slurry prior to disposal to break the polymers and other ingredients in this product into inert products such as CO_2 , H_2 , and minute traces of Nitrogen. Super Mud Dry degradation can be accelerated by oxidation with oxidizers such as hydrogen peroxide (H_2O_2) or 5.25% sodium hypochlorite (household bleach).

The procedure for usage of household bleach to degrade the polymer is simple. A 1:1 ratio of bleach to Super Mud Dry is added to the slurry. For example 1 gallon of household bleach is added to 800 gallons of slurry when the recommended dosage of 1 lbs Super Mud Dry to 300 gallons of water is used. This is then mixed well by methods such as recirculating pumps attached to the slurry tank or by auger rotation until the viscous nature of the slurry is gone.

Hydrogen peroxide may be the preferred oxidant in many applications due to the H_2O_2 degrading to oxygen and inert water . Unlike bleach, no extra chemicals are added to the water such as sodium chloride or chlorine. The procedure for usage of hydrogen peroxide is the same with the exception of dosage. One gallon of household grade H_2O_2 (3% H_2O_2) should be added to the slurry for every 5 gallons of Super Mud.

2: Super Mud Dry is environmentally friendly.

Super Mud Dry is inert and presents no harm to the environment. The volume of <u>pure</u> Super Mud Dry is approximately:

- 99% polymer (an inert polyacrylamide polymer similar to polymers used in water and wastewater as flocculents).
- less than 1% water or inert matter

Enclosed is a copy of the official laboratory analysis report on <u>pure</u> Super Mud and a copy of the priority pollutant list content (United States Environmental Protection Agency, EPA). This

P.J. BOX 50

priority pollutant list indicates that the <u>pure</u> product contains some cyanide and copper however please note the following:

A. The priority pollutant list testing was performed on <u>pure</u> product. In usage the product is diluted, 300 gallons of water to one lbs Super Mud Dry. During usage the product may undergo further dilution. Regardless, if the product is used at normal dosage or even at a higher dose the resulting slurry would meet the very strict EPA drinking water criteria (criteria for treatment of water for use as a drinking water source).

B. If Super Mud Dry is disposed as <u>pure</u> product, the waste would be classified as nonhazardous per EPA regulations.

C. There are no TCLP (Toxic Characteristics Leaching Procedure) limits for the small quantity of Cyanide and Copper found in the <u>pure</u> product. This is a very intensive testing procedure, required by the EPA, using an acid to determine the potential of a waste or its contaminating constituents to enter into groundwater. Also enclosed is testing performed on Super Mud slurry in regards to the toxicity of this product. From this information it can be observed that this product is non-toxic.

3: Collection and storage.

When a drilled shaft is constructed, the slurry stabilizes the shaft. Once the shaft has been drilled to the desired depth and size, concrete is usually placed in the shaft beginning at the bottom. As the concrete is placed the slurry is displace and pumped to a storage tank for reuse on the next shaft. Following completion of the project, the slurry is mixed in the tank with the oxidants, (if forced degradation is specified), and disposed of per site requirements.

4. Super Mud is biodegradable.

Enclosed is a copy of a letter from our analytical laboratory stating the biodegradability potential for Super Mud Dry. It is felt that this product will biodegrade over time to yield inorganic nitrogen. This product will also photodegrade if left in sunlight.

If you have any questions or if we can be of assistance please let us know.

Best regards,

Rob Newsom

APPENDIX A: Super Mud Priority Pollutant test report

Please note that where the value(s) is/are shown as "<" (less than), this should be interpreted as "non-detectable."

As you can see from the data below, there are low levels of certain metals in the product samples tested. The Priority Pollutant constituents which are present in pure Super Mud are summarized below:

Volatile Organic Compounds	None Detected				
Base Neutral Compounds	None Detected				
Acid Extractable Organics	None Detected				
Pesticides	None Detected				
PCB's	None Detected				
Metals/Miscellaneous					
Cyanide	4.8 mg/kg				
Copper	3.9 mg/kg				

In an effort to put these low levels in prospective, the tables below compare the results observed to potentially applicable regulatory criteria:

	Super Mud	Comparison With California Standard						
C	oncentration	California	California Title 22 Drinking					
I	Detected in	Title 22 Toxicity						
	Priority Pollutant	Regulatory level	Water Standards					
Chemical Observed	Scan (mg/L)	(section 66261.2)(mg/l)	(section 64435)(mg/l)					
Copper	3.9	25	Not listed					
Cyanide	4.8	Not listed	0.05					

Super Mud Comparison With Federal Standards

	Concentration	Federal	Federal	Federal
	Detected in	RCRA Hazardous	Drinking	Water
Chemical Observed	Priority Pollutant	Waste Standard	Water Standard	Quality Criteria
	Scan (mg/L)	(40 CFR 261)	(40 CFR 141, 143)	(40 CFR 131)
Copper	3.9	Not Regulated	1.0	0.18
Cyanide	4.8	250	0.2	0.02

This priority pollutant list indicates that the <u>pure</u> product contains some cyanide and copper however please note the following:

A. The priority pollutant list testing was performed on <u>PURE PRODUCT</u>. In usage the product is diluted to 800 parts water to one part Super Mud. During <u>usage</u> the product may

11
undergo further dilution. Regardless, if the product was used in the normal dosage or even at a higher dose the resulting slurry would <u>meet the very strict drinking water criteria</u>.

B. If Super Mud is disposed of as a <u>pure product</u>, the waste would be classified as <u>non-hazardous</u>.

C. There are no TCLP (Toxic Characteristics Leaching Procedure) limits for the small quantity of Cyanide and Copper found in the <u>PURE</u> product. This is a very intensive testing procedure, required by the US EPA, using an acid to determine the potential of a waste or its contaminating constituents to enter into groundwater.

PARAMETERS

Volatile Organic Compounds (624)	Report of Results
Acrolein, ug/kg	<5000
Acrylonitrile, ug/kg	<5000
Benzene, ug/kg	<250
Bromoform, ug/kg	<250
Carbon Tetrachloride, ug/kg	<250
Chlorobenzene, ug/kg	<250
Dibromochloromethane, ug/kg	<250
Chloroethane, ug/kg	<500
2-Chloroethylvinyl Ether, ug/kg	<500
Chloroform, ug/kg	<250
Dichlorobromomethane, ug/kg	<250
Dichlorodifluoromethane, ug/kg	<250
1,1- Dichloroethane, ug/kg	<250
1,2- Dichloroethane,ug/kg	<250
1.1- Dichloroethene, ug/kg	<250
1,2- Dichloropropane, ug/kg	<250
1,3- Dichloropropylene, ug/kg	<250
Ethylbenzene, ug/kg	<250
Bromomethane, ug/kg	<500
Chloromethane, ug/kg	<500
Methylene Chloride, ug/kg	<250
1, 1, 2, 2- Tetrachloroethane, ug/kg	<250
Tetrachloroethene, ug/kg	<250
Toluene, ug/kg	<250
Trans-1, 2- Dichloroethene, ug/kg	<250
1, 1, 1- Trichloroethane, ug/kg	<250
1, 1, 2- Trichloroethane, ug/kg	<250
Trichloroethylene, ug/kg	<250
Trichlorofluoromethane, ug/kg	<250
Vinyl Chloride, ug/kg	<500
Xylenes, ug/kg	<250
Dilution factor	50

Base Neutral Compounds (625)

Acenaphthene, ug/kg	<20000 * F68
Acenaphthylene, ug/kg	<20000 * F68
Anthracene, ug/kg	<20000 * F68
Benzidine, ug/kg	<160000 * F68
Benzo (a) Anthracene, ug/kg	<20000 * F68
Benzo (a) pyrene, ug/kg	<20000 * F68
3, 4-Benzofluoranthene, ug/kg	<20000 * F68
Benzo (g,h,i) perylene, ug/kg	<20000 * F68
Benzo (k) fluoranthene, ug/kg	<20000 * F68
bis (2- Chloroethoxy) methane, ug/kg	<20000 * F68
bis (2- Chloroethyl) ether, ug/kg	<20000 * F68
Bis (2- chloroisopropyl) ether, ug/kg	<20000 * F68
bis (2- Ethylhexyl) phthalate, ug/kg	<20000 * F68
4- Bromophenyl - phenyl - ether, ug/kg	<20000 * F68
Butylbenzylphthalate, ug/kg	<20000 * F68
2- Chloronaphthalene, ug/kg	<20000 * F68
4- Chlorophenyl - phenyl ether, ug/kg	<20000 * F68
Chrysene, ug/kg	<20000 * F68
Dibenz (a, h) anthracene, ug/kg	<20000 * F68
1, 2- Dichlorobenzene, ug/kg	<20000 * F68
1, 3- Dichlorobenzene, ug/kg	<20000 * F68
1, 4- Dichlorobenzene, ug/kg	<20000 * F68
3, 3'- Dichlorobenzidine, ug/kg	<40000 * F68
Diethylphthalate, ug/kg	<20000 * F68
Dimethylphthalate, ug/kg	<20000 * F68
Di-n-butylphthalate, ug/kg	<20000 * F68
2, 4- Dinitrotoluene, ug/kg	<20000 * F68
2, 6- Dinitrotoluene, ug/kg	<20000 * F68
Di-n-octylphthalate, ug/kg	<20000 * F68
1, 2- Diphenylhydrazine, ug/kg	<20000 * F68
Fluoranthene, ug/kg	<20000 * F68
Fluorene, ug/kg	<20000 * F68
Hexachlorobenzene, ug/kg	<20000 * F68
Hexachlorobutadiene, ug/kg	<20000 * F68
Hexachloroethane, ug/kg	<20000 * F68
Indeno (1, 2, 3 - cd) pyrene, ug/kg	<20000 * F68
Isophorone, ug/kg	<20000 * F68
Naphthalene, ug/kg	<20000 * F68
Nitrobenzene, ug/kg	<20000 * F68
N - Nitrosodimethylamine, ug/kg	<20000 * F68
N - Nitrosodi-N-Propylamine, ug/kg	<20000 * F68

N - Nitrosodiphenylamine/Diphenylamine, ug/kg	<20000 * F68
Phenanthrene, ug/kg	<20000 * F68
Pyrene, ug/kg	<20000 * F68
1, 2, 4- Trichlorobenzene, ug/kg	<20000 * F68
Dilution factor	50

Acid Extractable Organics (625)

2, 4, 6- Trichlorophenol, ug/kg	<20000 * F68
Phenol, ug/kg	<20000 * F68
Pentachlorophenol, ug/kg	<100000 * F68
p-Chloro-m-cresol, ug/kg	<20000 * F68
4- Nitrophenol, ug/kg	<100000 * F68
2- Nitrophenol, ug/kg	<20000 * F68
2, 4- Dinitrophenol, ug/kg	<100000 * F68
4, 6- Dinitro - 2 - methylphenol, ug/kg	<100000 * F68
2, 4- Dimethylphenol, ug/kg	<20000 * F68
2, 4- Dichlorophenlol, ug/kg	<20000 * F68
2- Chlorophenol, ug/kg	<20000 * F68
2 Chlorenhandl walks	<20000 * ECO

REFERENCE: EPA 40 CER Part 136	*F68 - Due to matrix interference
Phenolics, Total Recoverable (420.1), mg/kg	< 0.40
Zinc, mg/kg	< 0.50
Thallium, mg/kg	< 0.50
Silver, mg/kg	< 0.50
Selenium, mg/kg	< 0.050
Nickel, mg/kg	< 0.50
Mercury, mg/kg	< 0.0050
Lead, mg/kg	< 0.50
Copper, mg/kg	3.9
Chromium, mg/kg	< 0.50
Cadmium, mg/kg	< 0.50
Beryllium, mg/kg	< 0.50
Arsenic, mg/kg	< 0.050
Antimony, mg/kg	< 5.0
Cyanide (EPA 335.2), mg/kg	4.8
Toxaphene, ug/kg	<50
Aroclor-1016, ug/kg	<10
Aroclor-1260, ug/kg	<10
Aroclor-1248, ug/kg	<10
Aroclor-1232, ug/kg	<10
Aroclor-1221, ug/kg	<20
Aroclor-1254, ug/kg	<10
Aroclor-1242, ug/kg	<10
Heptachlor epoxide, ug/kg	< 0.50
Heptachlor, ug/kg	< 0.50
Endrin Aldehyde, ug/kg	< 1.0
Endrin, ug/kg	< 1.0
Endosulfan sulfate, ug/kg	< 1.0
Beta - Endosulfan, ug/kg	< 1.0
Alpha - Endosulfan, ug/kg	< 0.50
Dieldrin, ug/kg	< 1.0
4, 4' - DDD, ug/kg	< 1.0
4, 4' - DDE, ug/kg	< 1.0
4, 4' - DDT, ug/kg	< 1.0
Chlordane, ug/kg	< 5.0
ielta-BHC, ug/kg	< 0.50
amma-BHC, ug/kg	< 0.50
eta-BHC, ug/kg	< 0.50
lpha-BHC, ug/kg	< 0.50
Aldrin, ug/kg	< 0.50
Cational CD S (000)	

*F68 - Due to matrix interference, reported value is estimated.

April 8, 1992

Mr. Robert Ryan POLYMER DRILLING SERVICES P.O. Box 507 El Dorado, AR 71731

Dear Mr. Ryan:

Re: Your Product -- PDS Supermud

In response to your request, we have reviewed the probable fate of the subject product in the soil. Based on our knowledge of the primary constituent--the ammonium salt of a copolymer of acrylamide and acrylic acid--we would anticipate that this polymer would slowly biodegrade in soil to yield inorganic nitrogen.

Very truly yours,

T. Harris

Environmental Specialist

TH:cc THPDSSUP.LET Enc.

cc:	в.	Coc	persmith	-	M2
	R.	A.	Dennis	-	W3
	R.	A.	Deskin	-	W3
	E.	Mil	ler	-	MO

Information or assistance is provided for your consideration without any legal responsibility. Users are expected to perform adequate verification and testing to satisfy themselves that it suits their purposes.

TOTAL P.01

Date Received 3.2 1.8 < u < 10 96 hr LC50 95% Conf. int. = 31.25 TC (tu) Respectfully submitted hh Thomas (Tim) Mikel Laboratory Director 29 NORTH OLIVE STREET, VENTURA, CA 93001 • (805) 643-5621 12

In accordance with the chain of custody dated April 17, 1991, In accordance with the chain of custody dated April 17, 1991, We are pleased to present the enclosed bioassay report, Lab No. We are pleased to present the enclosed bioassay report, Lab No. CHE0410.639, for the sample labeled treated slurry and received in this laboratory on April 17, 1991. The test was conducted in fresh water, utilizing fathead minnows (Pimephales

Treated Slurry April 17, 1991

in chis Laboracory on April 17, 1991. The cest was fresh water, utilizing fathead minnows (Pimephales

promelas), Results were as follows:

Sample I.D.

AQUATIC BIQASSAY & ÓNSULTING LABORATORIES, INC.

April 29, 1991 Mr. Vincent Jue Champion Equipment 8140 E. Rosecrans Ave. Paramount, CA 90723

Dear Mr. Jue:

TOXICITY TESTING . OCEANOGRAPHIC RESEARCH

ABC Laboratories 29 North Olive Street Ventura, CA 93001 (805) <u>648-2735</u> 643-562/

CLIENT	NAME	: Cham	npion	Equi	pment								DAT	E: 04	/17,	/91				
SAMPLE	ID:	Treat	ed S	lurry	-								LAB	. NO:		CHEO4	410.63	39		
TEST TY	PE:	Scree	ning				FL	OW:	Stati	с			TAN	K VOI	UME :	10 I	Liters	5		
DILUTIO	N WAT	TER: R	econ	stitu	ted Fi	esh		HA	RDNES	S: 25	mg	/1	ALK	ALINI	TY :	28 mg	g/l			
AERATIO	N: 5	Single	bubl	ble a	eratic	on in	al	l ta	ENI nks): 3 (A	5 CCL	TEM	₽: 20.	E 0 deg	ND: . C	38				
ORGANIS CARRIER NUMBER	M: Fa : Gre ORGAN	athead eyhoun HISMS	Min d Bu PER 1	now CO. CANK:	DA 10	SPEC	CIE:	S: P: D: 0	imepha 3/26/9	les p 1	prom A	nelas VG. LM	SOU IGTH: 38	RCE: 8 mm	Thom	as Fi AVG	.sh Co .WT:	.бд		
	ſ	Inti	tial		24	Hour	5	_	4 8	Hou	r		72	2 Hou	r		96 H	our		
Date:		04/2	2/91		04,	/23/9	91		04	/24/	91		04	1/25/	91		04/2	6/91		
Time:	L	13	15		1	1315				1300				1300			13	00		
Conc. mg/1	D0	Dg.C	ph	DO	Dg.C	ph	#m	DO	Dg.C	ph	# m	DO	Dg.C	ph	‡m.	DO	Dg , C	ph	¥m	rot. ∦m
			1			1.5	Ľ	1.4	20.0	1.2	0	/6	20.8	7.2	0	7.8	20.8	7.2	0	0
[-				T			_	_											
108	9.0	20.4	7.6	8.2	20.8	7.8	10	-	-	-	-	-	-	-	<u></u>	-	-	-	-	10
5.6%	8.4	20.3	8.0	8.5	21.2	7.1	7	8.8	21.1	7.5	0	8.4	21.3	7.5	1	8.0	21.7	6.6	0	8
3.2%	7.8	19.6	8.1	8.6	21.1	7.1	2	8.6	21.2	7.5	2	8.4	21.3	7.5	1	7.2	21.5	6.8	0	5
1.8%	8.0	18.3	8.1	8.5	21.1	7.0	0	8.6	21.2	7.4	0	8.2	21.4	7.4	0	7.8	21.6	6.8	0	0
1.08	8.2	19.4	8.2	8.5	21.0	7.0	0	8.8	21.2	7.4	0	8.3	21.4	7.4	0	7.4	21.7	7.0	,0	0
L																				-
96 Hour	LC50	= 3.2	2				95%	CON	FIDENC	E IN	TERV	/AL =	1.8 <u 7.46</u 	< 10						
CALCULAT	ION	METHOD	9: Bi	nomia	1 Test		A	NALY	ST:	tha	He.	er X	Chief	Aiolo	gist	DAT	re: 04	/29/	91	
KEMARKS:		Begin	ning	Samo	le Har	dnes	9.5	5 mg	11 100	co 2 .			1000							

Beginning Sample Hardness: 55 mg/L (CACO3) Alkalinity: 37 mg/L Ending Sample Hardness: 65 mg/L (CACO3) Alkalinity: 55 mg/L

CONC.	NUMBER	NUMBER	PERCENT	BINOMIAL
	EXPOSED	DEAD	DEAD	PROB. (%)
10	10	10	100	9.765625E-02
5 6	10	8	80	5.46875
3 2	10	5	50	62.30469
1.8	10	0	0	9.765625E-02
1	10	0	0	9.765625E-02

THE BINOMIAL TEST SHOWS THAT 1.8 AND 10 CAN BE USED AS STATISTICALLY SOUND CONSERVATIVE 95 PERCENT CONFIDENCE LIMITS SINCE THE ACTUAL CONFIDENCE LEVEL ASSOCIATED WITH THESE LIMITS IS 99.80469 PERCENT AN APPROXIMATE LC50 FOR THIS SET OF DATA IS 3.2

>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	>>> RESULTS CALCULATED	USING THE MOVING	AVERAGE METHOD
SPAN	G	LC50	95 PERCENT CONFIDENCE LIMITS
4	.1208808	3.722142	2.86017 5.056305
>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	>>>RESULTS CALCULATED	USING THE PROBIT	METHOD
ITERATIONS	G	н	GOODNESS OF FIT PROBABILITY
7	.2570987	1	.6907188
SLOPE =	5.835559		
95 PERCENT	CONFIDENCE LIMITS	= 2.876644 AM	ND 8.794474
LC50 = 95 PERCENT	3.617213 CONFIDENCE LIMITS	= 2.805555 AM	4.657007
LC1 = 95 PERCENT	CONFIDENCE LIMITS	5336195 AM	D 2.067589

STATE OF ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY 8001 NATIONAL DRIVE, P.O. BOX 8913 LITTLE ROCK, ARKANSAS 72219-8913 PHONE: (501) 682-0744 FAX: (501) 682-0707

April 2, 1996

Mr. Pat Bailey PDSCo., Inc. P.O. Box 507 El Dorado, AR 71731-0507

RE: Land application of drilling fluids

Dear Mr. Bailey:

This is in response to your request dated March 15, 1996, to land apply drilling fluids generated in drilling shafts for the Hwy. 31 railroad overpass near Pine Bluff in Jefferson County. By this letter the Department grants approval to your request with the following conditions:

- The material must be applied evenly to the site.
 Land application shall not occur when soils are saturated or when significant precipitation is anticipated within the next 24 hours.

Please contact me at 682-0655 if you have any questions.

Sincerely,

Buc Rubatist

Bruce Kirkpatrick, P.E. Assistant Chief Water Division



Department of Environmental Protection

Lawton Chiles Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Virginia B. Wetherell Secretary

October 6, 1995

Mr. Rob Newsom, Marketing Director PDSCo PO Box 507 El Dorado, Arkansas 71731-0507]

Dear Mr. Newsom:

It is my pleasure to inform you that the Department of Environmental Protection has found the requested use of PDSCo <u>Super Mud</u> acceptable for the FDOT applications, assuming compliance with the best management practices proposed in your August 1995 report.

Your company's regard for Florida's environment is greatly appreciated. If I can be of further assistance, please contact me at 904/488-3601.

Sincerely,

Ve Silliang

Mary E: Williams, Chief Bureau of Drinking Water and Ground Water Resources

MW/cd

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.



Page 1 of 4 Super Mud

MATERIAL SAFETY DATA

-	CHEMICAL PRODUCT AND COMPANY INDENTIFICATION
1.	PRODUCT NAME : Super Mud SYNONYMS : Anionic polyacrylamide in water-in-oil emulsion CHEMICAL FAMILY : Anionic polyacrylamide copolymer MOLECULAR FORMULA : Mixture MOLECULAR WEIGHT : Mixture
	PDSCo, P.O. BOX 507, WEST SHARP STREET, EL DORADO, AR 71730 USA EMERGENCY PHONE: For emergency call PDSCo: 1 (800) 243-7455
2.	COMPOSITION/INFORMATION ON INGREDIENTS
	OSHA REGULATED COMPONENTS COMPONENT CAS. NO. % TWA/CEILING REFERENCE Petroleum distillate 064742-47-8 24 400 ppm OSHA Hydrotreated light
3.	HAZARDS INDENTIFICATION
	EMERGENCY OVERVIEW APPEARANCE AND ODOR : STATEMENTS OF HAZARD : White, viscous, opaque liquid; slight hydrocarbon odor WARNING! MAY CAUSE SKIN IRRITATION IMPORTANT! SPILLS OF THIS PRODUCT ARE VERY SLIPPERY WHEN WET
	POTENTIAL HEALTH EFFECTS EFFECTS OF OVEREXPOSURE: Acute oral (rat) LD50 and acute dermal (rabbit) LD50 of > 10 ml/kg. Direct contact with this material may cause minimal eye and moderate skin irritation. Refer to Section 11 for toxicology information on the OSHA regulated components of this product.
4.	FIRST AID MEASURES
	In case of skin contact, wash affected areas of skin with soap and water. Do not reuse clothing withou laundering. In case of eye contact, immediately irrigate with plenty of water for 15 minutes.
5.	FIRE FIGHTING MEASURES
	FLAMMABLE PROPERTIES FLASH POINT : >200°F (>93.3°C) MABLE LIMITS (% BY VOL) : Not applicable AUTOIGNITION TEMP : Not available
	DECOMPOSITION TEMP : Not available

6. ACCIDENTAL RELEASE MEASURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Cover spill with some inert absorbent material; sweep up and place in waste disposal container. Flush area thoroughly with water. Residual may be very slippery. If slipperiness remains, apply more dry-sweeping compound.

7. HANDLING AND STORAGE

Avoid contact with skin. Wash thoroughly after handling. To avoid product degradation and equipment corrosion, do not use iron, copper, or aluminum container or equipment. OSHA regulations (29 CFR 106.a.14), require that the flashpoint of materials of this type be determined by the Pensky-Martens Closed Tester method. The test for this product indicated it has flash point at >200°F (93.3°C); therefore, caution should be exercised in storage and handling.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE) Engineering controls are not usually necessary if good hygiene practices are followed. Before eating, drinking, or smoking, wash face and hands thoroughly with soap and water. Avoid unnecessary skin contact. Impervious gloves are recommended to prevent prolonged skin contact. For operations where eye or face contact can occur, eye protection is recommended.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AND ODOR	: White, viscous, opaque liquid; slight hydrocarbon odor.	
BOILING POINT	: ~ 347°F; ~ 175°C (value for oil phase)	
MELTING POINT	: 0°F; -18°C	
VAPOR PRESSURE	: Not available	
SPECIFIC GRAVITY	: 1.0 -	
VAPOR DENSITY	: Not available	
% VOLATILE (BY WT)	: ~ 70	
pН	: Not available	
SATURATED IN AIR (BY VOL)	: Not available	
EVAPORATION RATE	: <1 (Butyl Acetate = 1)	
SOLUBILITY IN WATER	: Appreciable	

10. STABILITY AND REACTIVITY

STABILITY CONDITIONS TO AVOID POLYMERIZATION CONDITIONS TO AVOID		Stable None known Will not occur None known	
INCOMPATIBLE MATERIALS HAZARDOUS DECOMPOSITION PRODUCTS	:	Strong oxidizing agents Thermal decomposition or combustion may produce carbon monoxide, carbon dioxide, ammonia, and/or oxides or nitrogen.	

11. TOXICOLOGICAL INFORMATION

Toxicological information on the OSHA regulated components of this product is as follows: Acute overexposure to petroleum distillate vapors may cause eye and throat irritation. On direct skin contact, petroleum distillate may produce a severe skin irritation.

12. ECOLOGICAL INFORMATION

No aquatic LC50, BOD, or COD data available. OCTANOL/H2O PARTITION COEF: Not available

13. DISPOSAL CONSIDERATIONS

Disposal must be made in accordance with applicable governmental regulations.

14. TRANSPORT INFORMATION

SHIPPING NAME

HAZARD CLASS/

UN NUMBER

IMDG PAGE

SUBSTANCES

SHIPPING NAME

HAZARD CLASS

UN / ID NUMBER

PACKING GROUP

REQUIRED

PACKING GROUP

D.O.T SHIPPING INFORMATION

SHIPPING INFORMATION Not applicable/Not Regulated Not applicable/Not Regulated Not applicable Not applicable : Not applicable Not applicable Not applicable Not applicable : (Product Reportable Quantity) Not applicable D.O.T HAZARDOUS Not applicable . None required None required TRANSPORT LABEL ICAO/IATA TRANSPORT CANADA Not applicable Not applicable Not applicable Not applicable Not applicable Not applicable SUBSIDIARY CLASS Not applicable Not applicable Not applicable Not applicable None required None required TRANSPORT LABEL

IMO

Not applicable

Not applicable

REQUIRED PACKING INSTRUCTIONS MAX NET QTY

TECHNICAL NAME (N.O.S.)

ADDITIONAL TRASPORT INFORMATION Not applicable

Not applicable

Not applicable

Not applicable

Not applicable

Passenger

Passenger

Cargo

Cargo

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1 of 4 Super Mud Dry

MATERIAL SAFETY DATA

1. CHEMICAL PRODUCT AND COMPANY INDENTIFICATION

PRODUCT NAME
SYNONYMS
CHEMICAL FAMILY
MOLECULAR FORMULA
MOLECULAR WEIGHT

Super Mud Dry None Anionic polyacrylamide copolymer Polymer Polymer

PDSCo, P.O. BOX 507, 105 WEST SHARP STREET, EL DORADO, AR 71730 USA EMERGENCY PHONE: For emergency call PDSCo: 1 (800) 243-7455

2. COMPOSITION/INFORMATION ON INGREDIENTS

OSHA REGULATED COMPONENTS COMPONENT CAS. NO. % TWA/CEILING REFERENCE

No permissible Exposure Limits (PEL/TLV) have been established by OSHA or ACGIH

3. HAZARDS INDENTIFICATION

EMERGENCY OVERVIEW APPEARANCE AND ODOR STATEMENTS OF HAZARD

Off-white granular solid IMPORTANT! SPILLS OF THIS PRODUCT ARE VERY SLIPPERY WHEN WET

POTENTIAL HEALTH EFFECTS EFFECTS OF OVEREXPOSURE:

This product has an acute oral (rat) LD50 and acute dermal (rabbit) LD50 of > 2.5 g/kg and >10.0 g/kg respectively. This product produced no eye irritation and no dermal irritation during primary irritation tests in rabbits. The inhalation of the vapors is not likely to cause adverse health effects.

4. FIRST AID MEASURES

In case of skin contact, wash affected areas of skin with soap and water. In case of eye contact, immediately irrigate with plenty of water for 15 minutes.

5. FIRE FIGHTING MEASURES

 FLAMMABLE PROPERTIES

 FLASH POINT
 :
 Not applicable

 FLAMMABLE LIMITS

 (% BY VOL)
 :
 Not applicable

 AUTOIGNITION TEMP
 :
 Not available

 DECOMPOSITION TEMP
 :
 Not available

EXTINGUISHING MEDIA AND FIRE FIGHTING INSTRUCTIONS

As with many solids, any dust that is generated may be explosive if mixed with air in critical proportions and in the presence of a source of ignition. Use water, carbon dioxide or dry chemical to extinguish fires. Wear self-contained, positive pressure breathing apparatus.

6. ACCIDENTAL RELEASE MEASURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Spilled material becomes very slippery when wet. Sweep up spills and place in a waste disposal container. Flush the area thoroughly with water and scrub to remove residual. If slipperiness remains, apply more drysweeping compound. Do not flush large quantity of the material to sewer.

7. HANDLING AND STORAGE

Spills should be scooped up or wiped up immediately, and spill area flushed with water. Maintained good housekeeping to control dust accumulations. To avoid product degradation and equipment corrosion, do not use iron, copper or aluminum container or equipment.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

Engineering controls are not usually necessary if good hygiene practices are followed. Before eating, drinking, or smoking, wash face and hands thoroughly with soap and water. Avoid unnecessary skin contact. Impervious gloves are recommended to prevent prolonged skin contact. For operations where eye or face contact can occur, eye protection is recommended.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AND ODOR	:	Off-white granular solid
BOILING POINT	:	Not applicable
MELTING POINT	: 1	Not available
VAPOR PRESSURE	:	Not applicable
SPECIFIC GRAVITY	12	48 - 55; lb/ft ³
VAPOR DENSITY	:	Not applicable
% VOLATILE (BY WT)	:	8 - 12; (water)
pH	:	7 - 9; (aqueous solution)
SATURATED IN AIR (BY VOL)	:	Not applicable
EVAPORATION RATE	:	Not applicable
SOLUBILITY IN WATER	:	Limited by viscosity

10. STABILITY AND REACTIVITY

STABIL	ITY	0	Stable
CONDI	FIONS TO AVOID	1	None known
POLYM	ERIZATION	:	Will not occur
CONDI	FIONS TO AVOID	:	None known
INCOM	PATIBLE MATERIALS	1	Strong oxidizing agents
HAZAR	DOUS DECOMPOSITION	:	Thermal decomposition or combustion may produce carbon monoxide, carbon dioxide, ammonia, and/or oxides or nitrogen.

11. TOXICOLOGICAL INFORMATION

Toxicological information on the OSHA regulated components of this product is as follows: Not Applicable

Page 3 of 4 Super Mud Dry

12. ECOLOGICAL INFORMATION

LC50

BLUEGILL, 96 HOUR: 180 mg/L TROUT, 96 HOUR: 130 mg/L DAPHNIA, 48 HOUR: > 1000 mg/L OCTANOL/H₂O PARTITION COEF.: Not available

13. DISPOSAL CONSIDERATIONS

Disposal must be made in accordance with applicable governmental regulations.

14. TRANSPORT INFORMATION

		D.O.T SHIPPING I	NFORMATION	IMO SHIPPING INFORMATION
SHIPPING NAME	3	Not applicab	ble/Not Regulated	Not applicable/Not Regulated
HAZARD CLASS/ PACKING GROUP	:	Not applicat	ble	Not applicable
UN NUMBER	:	Not applicat	ble	Not applicable
IMDG PAGE	:	Not applicat	ble	Not applicable
D.O.T HAZARDOUS SUBSTANCES	:	(Product Re Not applicat	portable Quantity) ble	Not applicable
TRANSPORT LABEL REQUIRED	:	None require	ed	None required
		ICAO/IATA		TRANSPORT CANADA
SHIPPING NAME	:	Not applicat	ole/Not Regulated	Not applicable/Not Regulated
HAZARD CLASS	:	Not applicat	ble	Not applicable
SUBSIDIARY CLASS	:	Not applicat	ble	Not applicable
UN / ID NUMBER	4	Not applicat	ble	Not applicable
PACKING GROUP	:	Not applicat	ble	Not applicable
TRANSPORT LABEL REQUIRED	:	None require	ed	None required
PACKING INSTRUCTIONS	:	Passenger Cargo	Not applicable Not applicable	Not applicable
MAX NET QTY	:	Passenger Cargo	Not applicable Not applicable	Not applicable
TECHNICAL NAME (N.O.S.)	÷	ADDITIONA Not applicab	L TRASPORT INFOR	RMATION

15. REGULATORY INFORMATION

INVENTORY INFORMATION

- US TSCA : This product is manufactured in compliance with all provisions of the Toxic Substances control Act, 15 U.S.C.
- CANASA DSL : Components of this product have been reported to Environment Canada in accordance with subsection 25 of the Canadian Environmental Protection Act and are included on the Domestic Substances List.
- EEC EINECS : All components of this product are included on the European Inventory of Existing Chemical Substances [EINECS] in compliance with Council Directive 67/548/EEC, Amended 79/831/EEC.

OTHER ENVIRONMENTAL INFORMATION

The following components are defined as toxic chemicals subject to reporting requirements of Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations.

COMPONENT	CAS. NO.	%	TPQ(lbs)	RQ (lbs)	S313	RCRA	TSCA 12B
This pro	duct does not co	ontain a	ny components	s regulated un	der these se	ections of the	EPA

PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA Not applicable under SARA TITLE III

16. OTHER INFORMATION

NFPA HAZARD RATING (National Fire Protection Association)

F	FIRE	
	HEAL	
Health 0	0 Reactivity	no haz
	0 Reactivity	REAC
Spe	fire ex	

: Materials that must be preheated before ignition can occur. TH : Materials which on exposure under fire conditions would offer zard beyond that of ordinary combustible material. CTIVTY : Materials which in themselves are normally stable, even under posure conditions, and which are not reactive with water.

REASON FOR ISSUE: Revised Section 3

This information is given without any warranty or representation. We do not assume any legal responsibility for same, nor do we give permission, inducement, or recommendation to practice any patented invention without a license. It is offered solely for your consideration, investigation, and verification. Before using any product, read its label.

REGULATORY INFORMATION 15. INVENTORY INFORMATION This product is manufactured in compliance with all provisions of the Toxic US TSCA Substances control Act, 15 U.S.C. : Components of this product have been reported to Environment Canada in CANASA DSL accordance with subsection 25 of the Canadian Environmental Protection Act and are included on the Domestic Substances List. : Product was not required to be included in the European Inventory of Existing EEC EINECS Chemical Substances [EINECS] since the product (or its components) was regarded to be a polymer by the EEC-Commission. This product fulfils the requirements of Council Directive 67/548/EEC, Amended 79/831/EEC. OTHER ENVIRONMENTAL INFORMATION The following components are defined as toxic chemicals subject to reporting requirements of Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations. CAS. NO. % TPQ(lbs) RQ (lbs) S313 RCRA TSCA 12B COMPONENT 007783-20-2 ~2.00 None None Yes None No Ammonium Sulfate PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA Acute (Y) Chronic (N) Fire (N) Reactive (N) Pressure (N) 16. OTHER INFORMATION NFPA HAZARD RATING (National Fire Protection Association) : Materials that must be preheated before ignition can occur. FIRE Fire : Materials which on exposure under fire conditions would offer HEALTH no hazard beyond that of ordinary combustible material. 0 Reactivity Health 2 REACTIVTY : Materials which in themselves are normally stable, even under fire exposure conditions, and which are not reactive with water. Special

Reason for Issue: New Format

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