



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Eastern Region Bend Office
475 NE Bellevue Drive, Suite 110
Bend, OR 97701
(541) 388-6146
FAX (541) 388-8283
TTY 711

March 13, 2025

Mr. William Surber
Environmental Manager
Columbia Plywood Corporation
4949 S. Highway 97
Klamath Falls, OR 97603

RE: Pre-Enforcement Notice
Columbia Forest Products
2025-PEN-9867
File #18677, NPDES Permit #100016
EPA Reference Number: OR0002585
Klamath County

Dear William Surber:

DEQ received your report of an oil spill at the Columbia Plywood Corporation (commonly known as Columbia Forest Products) facility in Klamath Falls. The facility is permitted under National Pollution Discharge Elimination System (NPDES) Permit #100016. Based on review of the spill report, DEQ has documented the following violation of Oregon environmental law.

Violation #1: Discharging waste into waters of the state without a discharge permit or from a discharge point not authorized by a waste discharge permit, in violation of ORS 468B.050(1)(a).

Per your written report, the facility reported that approximately 40 gallons of hydraulic oil were released directly to the Klamath River on February 20, 2025. The release occurred due to a ruptured hydraulic hose fitting on a cherry picker crane used to handle logs in the river. The discharge did not occur via permitted Outfall 001 which is the allowed discharge point for non-contact cooling water for the facility. Upon discovery, the facility shut down the equipment and used oil absorbent booms to clean up and contain the visible oil sheen and repaired the failed hose. This is a Class I violation per OAR 340-012-0055(1)(c).

The permittee must ensure compliance with the terms and conditions of the issued NPDES permit and prevent discharges of oil and/or hazardous materials to waters of the state.

Corrective Actions Required

In follow-up to the incident, the facility provided a copy of their emergency response and public notification plan. The plan includes reporting and response criteria for oil spills. As corrective action, the facility is expected to complete the following actions and provide update by June 1, 2025:

- 1) The facility shall have available an oil skimmer device and secondary containment such as a Baker Tank to remove and contain oil and other hydrocarbons from the waterway, should a spill occur. Should you have questions on the use of such a device, please contact Charles Kennedy, with DEQ's spill program at charles.kennedy@deq.oregon.gov.
- 2) Begin using plant-based biodegradable hydraulic oil in the log picker within 90-days. An example product is Chevron Clarity Bio EliteSyn AW.
- 3) Meet with Charles Kennedy on-site to discuss oil spill response equipment (hard/soft boom, oil skimmer, boat, etc.) and personnel training (on-water booming, etc.).
- 4) Update the facility's Emergency Response and Public Notification Plan with the following changes highlighted in yellow:

5) Entity	When Is Notification Necessary?	Contact Information
Emergency Response Organizations	Immediate, if fire or explosion hazards exist	911
Oregon DEQ	Immediate, when unanticipated upset or bypass occurs. For a release of oil or hazardous material <i>to waters of the State</i> contact OERS and DEQ Eastern Region SOSC. Hazardous materials are defined by: Consolidated List of Lists US EPA Note: the reportable quantity of 42 gallons <i>does not</i> apply to oil or hazardous releases to waters of the State.	Oregon Emergency Response System (OERS): Phone: 1-800-452-0311 Eastern Region SOSC: Charles Kennedy Cell: 541-650-2326 OR Contact: Justin Sterger 475 NE Bellevue Drive, Suite 110 Bend, OR 97701 Phone: 541-714-0206 Email: Justin.Sterger@state.or.us

Oil or Hazardous Material Spill	First Responder performs quick assessment of the spill and initiates response, if safe to do so. Response is controlling the source of the spill and containing the spilled oil or hazardous material. Environmental Manager assesses the situation and investigates the cause of the spill.	Refer to Policy 18.3: Emergency Plan and Procedures for response to a hazardous materials spill. Contact Safety-Kleen for assistance regarding cleanup and disposal.	Refer to Section 3 Emergency Reporting Requirements and Release Reporting Flowchart in Appendix B.	Determine cause and implement corrective actions to prevent failure from recurring.
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Bypasses and Upsets Form

Type of Incident (circle one of the following): UNANTICIPATED BYPASS UPSET

Name of First Responder: _____

Date & Time First Responder Discovered Emergency: _____

Start Date & Time: _ End Date & Time: _____

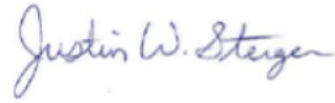
Immediate Internal Notifications	
	Supervisors Onsite During Incident
	Bill Surber (Environmental Manager) – Phone: 541-882-7281 Ext. 2567 or 541-591-0075
	Aaron Abts (Plant Manager) – Phone: 336-831-3629
Immediate External Notifications	
	Fire or Explosion Hazards Present? If Yes, Contact Emergency Response Organizations at 911
	Release of Oil or Hazardous Material to Water? OERS: 1-800-452-0311 Oregon DEQ – 541-650-2326
	Release of Hazardous Material Above Reportable Quantity? If Yes, Contact National Response Center at 1-800-424-8802
	Release of Hazardous Material Above Reportable Quantity? If Yes, Contact EPA Region 10 at 206-553-1200 or 1-800-424-4372
	Klamath County Environmental Health (Ramona Quinn) – Phone: 541-883-1122 or After Hours: 541-891-2015
	Klamath County Emergency Management – Phone: 541-851-3741
	Klamath Tribes – Phone: 1-800-524-9787 or 541-783-2219
	City of Klamath – Phone: 541-883-5316 (Courtesy Notification)
	Keno Fire Department – Phone: 541-883-3062 (Courtesy Notification)
Public Notification	
	Herald and News – Business Hours: 541-885-4410 or After Hours: 541-885-4420
	Klamath Falls News – Phone: 541-887-0087
	KLAD Radio Station – Phone: 541-850-7552
Written Notification	
	Written report submitted to Oregon DEQ within 5 days

Summary

This notice is a pre-enforcement notice and has been referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a DEQ order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide information to me at the office at the address shown at the top of this letter. DEQ will consider new information you submit and take appropriate action. DEQ endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter or desire any follow-up technical assistance, please contact me at (541) 714-0206.

Sincerely,

A handwritten signature in blue ink that reads "Justin W. Sterger". The signature is written in a cursive, flowing style.

Justin W. Sterger
WQ Permit Writer

EC: Mike Hiatt, Eastern Region Permitting Manager
Charles Kennedy, DEQ Spill Program On Scene Coordinator
DEQ Enforcement Section – OCE
Oregon Records Management Solution

Appendix I: Spill Release Report 3-3-2025

SPILL/RELEASE REPORT



1 - GENERAL INFORMATION

OERS No. 800-452-0311

- a. Company/Individual Name: Columbia Forest Products
b. Address: 4949 Hwy 97 S
Klamath Falls, OR. 97603
c. Company Contact Person: Bill Surber
d. Phone Number(s): 541-591-0075
e. Report Prepared by: Bill Surber Phone: 541-591-0075
f. Specific on-site location of the release (and address if different from above):
River Cherry Picker

Please provide a map of the site showing area(s) where the release occurred, any sample collection locations, location of roads/ditches/surface water bodies, etc.

2 - RELEASE INFORMATION

- a. Date/Time Release started: 2-20-25 14:25 Date/Time stopped: 2-20-25 14:28
b. Release was reported to (specify Date/Time/Name of Person contacted where applicable):

ODEQ

OERS 2-20-25 Nichols 15:33

NRC 2-20-25 Mr. Alchibald 15:00

Other (describe): _____

- c. Person(s) reporting release: Bill Surber
d. Name, quantity and physical state (gas, liquid, solid or semi-solid) of material(s) released:
Cher Clarity Hyd Oil ISO AW 46, Liquid, 40 gallons

Please attach copies of material safety data sheets (MSDS) or constituent profiles for released material(s).

- e. The release affected: ☐ Air ☐ Groundwater ☒ Surface Water ☐ Soil ☐ Sediment
f. Name and distance to nearest surface water body(s), even if unaffected (include locations of creeks, streams, rivers and ditches that discharge to surface water on maps):
Klamath River

Has the release reached the surface water identified above?: ☒ Yes ☐ No

Could the release potentially reach the surface water identified above? ☐ Yes ☐ No

Explain: _____

- g. Depth to nearest aquifer/groundwater: 324'

Is nearest aquifer/groundwater potable (drinkable)? ☒ Yes ☐ No

Has the release reached the nearest aquifer/groundwater? ☐ Yes ☒ No

Explain: _____

- h. Release or potential release to the air occurred? ☐ Yes ☒ No

Explain: _____

- i. Was there a threat to public safety? ☐ Yes ☒ No
j. Is there potential for future releases? ☒ Yes ☐ No

Explain: EQUIPMENT IS LOCATED OVER WATER

- k. Describe other effects/impacts from release (emergency evacuation, fish kills, etc.):

THERE WERE NO EFFECTS/IMPACTS OBSERVED.

- l. Describe how the release occurred. Include details such as the release source, cause, contributing weather factors, activities occurring prior to or during the release, dates and times of various activities, first responders involved in containment activities, etc.:

WHILE REMOVING LOGS FROM THE RIVER: PLACING ONTO JACK LADDER
THERE WAS A MECHANICAL FAILURE OF HYD. FITTING ON THE CHEERY
PICKER. BOAT DRIVER NOTICED LEAK: NOTICED CHEERY PICKER OPERATOR WHO
SHOT DOWN EQUIPMENT IMMEDIATELY. ENVIRONMENTAL MANAGER WAS NOTIFIED.
PERSONAL PROMPTLY DISPATCHED ABREHART BOOM SURROUNDING: CONTAINING
SPILL.

3 - SITE INFORMATION

- a. Adjacent land uses include (check all that apply and depict on site maps):

☐ Residential ☐ Commercial ☒ Light Industrial ☐ Heavy Industrial
☒ Agricultural ☐ Other (describe): _____

- b. What is the population density surrounding the site: 1083.1 per square mile

- c. Is the site and/or release area secured by fencing or other means? ☒ Yes ☐ No

- d. Soil types (check all that apply): ☐ alluvial ☐ bedrock ☐ clay ☐ sandy N/A
☐ silt ☐ silty loam ☐ artificial surface (cement/asphalt/etc.)

- e. Describe site topography: Klamath River

4 - CLEANUP INFORMATION

- a. Was site cleanup performed? ☒ Yes ☐ No

If No, explain: _____

- b. Who performed the site cleanup?

Company Name: Columbia Forest Products

Address: 4949 Hwy 97S
Klamath Falls, OR 97603

Cleanup Supervisor: Bill Surber

Phone Number(s): 541-591-0075

- c. Has all contamination been removed from the site? ☒ Yes ☐ No

If No, explain: _____

d. Estimated volume of contaminated soil removed: N/A

e. Estimated volume of contaminated soil left in place: N/A

f. Was a hazardous waste determination made for cleanup materials? ☒ Yes ☐ No

g. Based on the determination, are the cleanup materials hazardous wastes?

☐ Yes ☒ No If Yes, list all waste codes: _____

h. Was contaminated soil or water disposed of at an off-site location? ☐ Yes ☒ No

If yes, attach copies of receipts/manifests/etc., and provide the following information:

Facility Name: _____

Address: _____

Facility Contact: _____

Phone Number(s): _____

i. Is contaminated soil or water being stored and/or treated on-site? ☒ Yes ☐ No

If yes, please describe the material(s), storage and/or treatment area, and methods utilized (attach additional sheets if necessary):

Absorbent Boom was used to remove material from river. Boom was disposed of properly.

j. Describe cleanup activities including what actions were taken, dates and times actions were initiated and completed, volumes of contaminated materials that were removed, etc. (attach additional sheets or contractor reports if necessary or more convenient):

See Attached

5 - SAMPLING INFORMATION

Attach copies of all sample data and indicate locations of sample collection on maps.

a. Were samples of contaminated soil collected? ☐ Yes ☐ No ☒ N/A

b. Were samples of contaminated water collected? ☐ Yes ☒ No ☐ N/A

c. Were samples collected to show that all contamination had been removed?

☒ Yes ☐ No ☐ N/A

d. Describe sampling activities, results and discuss rationale for sampling methods:

Water samples were taken to verify no oil was remaining. Visual observation only.

6 - ADDITIONAL INFORMATION

- a. Provide a description or plan outlining the list of actions to be taken to prevent future releases from occurring.

Fabricate & install shoring to direct flow
into holding tank. Completed 2-21-25
See attached photo

7 - SPILL REPORT CHECKLIST

To ensure that you have gathered all the information requested by the Department in this Spill/Release Report, please complete the following checklist:

☒ Map(s), pre and post cleanup photos of the site showing buildings, roads, surface water bodies, ditches, waterways, point of the release, extent of contamination, areas of excavation and sample collection locations attached.

☒ Material Safety Data Sheet (MSDS), or constituent profiles for released material(s) attached. **Note: an MSDS is not required for motor fuels.**

N/A Sampling data/analytical results attached.

N/A Receipts/manifests (if any) for disposal of cleanup materials attached.

N/A Contractor reports (if any) attached.

If you would like to submit your report by e-mail an electronic version can be downloaded on the internet at this link: <http://www.oregon.gov/deq/filterdocs/SpillReleaseReportForm.pdf>. This form can then be submitted by e-mail to DOSPILLS@deq.state.or.us. Please ensure that emails submitted to DEQ are less than 8 MB each. Multiple emails can be submitted to the DEQ if a report has to be divided into smaller sections for transmittal.

I certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal are true, accurate and complete.

Signature: 

Date: 3-3-25

J. Describe clean up - 2-20-25 2:40 pm

Absorbent boom was placed well outside of area of the spill. Boom and material were drawn in tight : allowed to absorb material. This was accomplished three more times over the next day as well until there was no evidence of material was left on the water. Boom was then removed : bagged then disposed of properly.

Safety Data Sheet



SECTION 1 PRODUCT AND COMPANY IDENTIFICATION

Clarity Hydraulic Oil AW 32, 46, 68, 100

Product Use: Hydraulic Oil

Product Number(s): 230340, 230341, 230342, 255702

Company Identification

Chevron Canada Limited

1050 West Pender

Vancouver, BC V6E 3T4

Canada

www.chevronlubricants.com

Transportation Emergency Response

CHEMTREC: (800) 424-9300 or (703) 527-3887

Health Emergency

Chevron Emergency Information Center: Located in the USA. International collect calls accepted. (800) 231-0623 or (510) 231-0623

Product Information

email : lubemsds@chevron.com

Product Information: (800) LUBE TEK

SECTION 2 HAZARDS IDENTIFICATION

CLASSIFICATION: Not classified as hazardous according to Canada regulatory guidelines.

SECTION 3 COMPOSITION/ INFORMATION ON INGREDIENTS

Revision Number: 10

Revision Date: JANUARY 14, 2016

1 of 9

Clarity Hydraulic Oil AW 32, 46, 68, 100
SDS : 6691CAN

COMPONENTS	CAS NUMBER	AMOUNT
Highly refined mineral oil (C15 - C50)	Mixture	70 - 99 %wt/wt

Information on ingredients that are considered Controlled Products and/or that appear on the WHMIS Ingredient Disclosure List (IDL) is provided as required by the Canadian Hazardous Products Act (HPA, Sections 13 and 14). Ingredients considered hazardous under the OSHA Hazard Communication Standard, 29 CFR 1910.1200, are also listed. See Section 15 for additional regulatory information.

SECTION 4 FIRST AID MEASURES

Description of first aid measures

Eye: No specific first aid measures are required. As a precaution, remove contact lenses, if worn, and flush eyes with water.

Skin: No specific first aid measures are required. As a precaution, remove clothing and shoes if contaminated. To remove the material from skin, use soap and water. Discard contaminated clothing and shoes or thoroughly clean before reuse.

Ingestion: No specific first aid measures are required. Do not induce vomiting. As a precaution, get medical advice.

Inhalation: No specific first aid measures are required. If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

Most important symptoms and effects, both acute and delayed

IMMEDIATE HEALTH EFFECTS

Eye: Not expected to cause prolonged or significant eye irritation.

Skin: Contact with the skin is not expected to cause prolonged or significant irritation. Contact with the skin is not expected to cause an allergic skin response. Not expected to be harmful to internal organs if absorbed through the skin. High-Pressure Equipment Information: Accidental high-velocity injection under the skin of materials of this type may result in serious injury. Seek medical attention at once should an accident like this occur. The initial wound at the injection site may not appear to be serious at first; but, if left untreated, could result in disfigurement or amputation of the affected part.

Ingestion: Not expected to be harmful if swallowed.

Inhalation: Not expected to be harmful if inhaled. Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit. Symptoms of respiratory irritation may include coughing and difficulty breathing.

Indication of any immediate medical attention and special treatment needed

Note to Physicians: In an accident involving high-pressure equipment, this product may be injected under the skin. Such an accident may result in a small, sometimes bloodless, puncture wound. However, because of its driving force, material injected into a fingertip can be deposited into the palm of the hand. Within 24 hours, there is usually a great deal of swelling, discoloration, and intense throbbing pain. Immediate treatment at a surgical emergency center is recommended.

SECTION 5 FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA: Use water fog, foam, dry chemical or carbon dioxide (CO₂) to extinguish flames.

Unusual Fire Hazards: Leaks/ruptures in high pressure system using materials of this type can create a fire hazard when in the vicinity of ignition sources (eg. open flame, pilot lights, sparks, or electric arcs).

PROTECTION OF FIRE FIGHTERS:

Fire Fighting Instructions: This material will burn although it is not easily ignited. See Section 7 for proper handling and storage. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.

Combustion Products: Highly dependent on combustion conditions. A complex mixture of airborne solids, liquids, and gases including carbon monoxide, carbon dioxide, and unidentified organic compounds will be evolved when this material undergoes combustion.

SECTION 6 ACCIDENTAL RELEASE MEASURES

Protective Measures: Eliminate all sources of ignition in vicinity of spilled material.

Spill Management: Stop the source of the release if you can do it without risk. Contain release to prevent further contamination of soil, surface water or groundwater. Clean up spill as soon as possible, observing precautions in Exposure Controls/Personal Protection. Use appropriate techniques such as applying non-combustible absorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Place contaminated materials in disposable containers and dispose of in a manner consistent with applicable regulations.

Reporting: Report spills to local authorities as appropriate or required.

SECTION 7 HANDLING AND STORAGE

General Handling Information: Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water.

Precautionary Measures: DO NOT USE IN HIGH PRESSURE SYSTEMS in the vicinity of flames, sparks and hot surfaces. Use only in well ventilated areas. Keep container closed.

Static Hazard: Electrostatic charge may accumulate and create a hazardous condition when handling this material. To minimize this hazard, bonding and grounding may be necessary but may not, by themselves, be sufficient. Review all operations which have the potential of generating and accumulating an electrostatic charge and/or a flammable atmosphere (including tank and container filling, splash filling, tank

cleaning, sampling, gauging, switch loading, filtering, mixing, agitation, and vacuum truck operations) and use appropriate mitigating procedures.

Container Warnings: Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner or disposed of properly.

SECTION 8 EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:

Consider the potential hazards of this material (see Section 2), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS:

Use in a well-ventilated area.

PERSONAL PROTECTIVE EQUIPMENT

Eye/Face Protection: No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice.

Skin Protection: No special protective clothing is normally required. Where splashing is possible, select protective clothing depending on operations conducted, physical requirements and other substances in the workplace. Suggested materials for protective gloves include: 4H (PE/EVAL), Silver Shield, Viton, Nitrile Rubber.

Respiratory Protection: No respiratory protection is normally required.

If user operations generate an oil mist, determine if airborne concentrations are below the occupational exposure limit for mineral oil mist. If not, wear an approved respirator that provides adequate protection from the measured concentrations of this material. For air-purifying respirators use a particulate cartridge. Use a positive pressure air-supplying respirator in circumstances where air-purifying respirators may not provide adequate protection.

Occupational Exposure Limits:

Component	Country/ Agency	TWA	STEL	Ceiling	Notation
Highly refined mineral oil (C15 - C50)	ACGIH	5 mg/m3	10 mg/m3	--	--

NOTE ON OCCUPATIONAL EXPOSURE LIMITS: Consult local authorities for acceptable provincial values in Canada. Consult the Canadian Standards Association Standard Z94.4-2011 Selection, Use and

Care of Respirators.

SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

Attention: the data below are typical values and do not constitute a specification.

Color: Colorless
Physical State: Liquid
Odor: Petroleum odor
Odor Threshold: No data available
pH: Not Applicable
Vapor Pressure: <0.01 mmHg (Estimated) @ 37.8 °C (100 °F)
Vapor Density (Air = 1): >1 (Estimated)
Initial Boiling Point: 315°C (599°F) (Estimated)
Solubility: Soluble in hydrocarbons; insoluble in water
Freezing Point: Not Applicable
Melting Point: No data available
Density: 0.86 kg/l - 0.87 kg/l @ 15°C (59°F)
Viscosity: 32 mm²/s - 110 mm²/s @ 40°C (104°F)
Evaporation Rate: No data available
Decomposition temperature: No data available
Octanol/Water Partition Coefficient: No data available

FLAMMABLE PROPERTIES:

Flammability (solid, gas): No Data Available

Flashpoint: (Cleveland Open Cup) 190 °C (374 °F) Minimum

Autoignition: No data available

Flammability (Explosive) Limits (% by volume in air): Lower: Not Applicable Upper: Not Applicable

SECTION 10 STABILITY AND REACTIVITY

Reactivity: May react with strong acids or strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.

Chemical Stability: This material is considered stable under normal ambient and anticipated storage and handling conditions of temperature and pressure.

Incompatibility With Other Materials: Not applicable

Hazardous Decomposition Products: None known (None expected)

Hazardous Polymerization: Hazardous polymerization will not occur.

Sensitivity to Mechanical Impact: No.

SECTION 11 TOXICOLOGICAL INFORMATION

Information on toxicological effects

Serious Eye Damage/Irritation: The eye irritation hazard is based on evaluation of data for product components.

Skin Corrosion/Irritation: The skin irritation hazard is based on evaluation of data for product components.

Skin Sensitization: The skin sensitization hazard is based on evaluation of data for product components.

Acute Dermal Toxicity: The acute dermal toxicity hazard is based on evaluation of data for product components.

Acute Oral Toxicity: The acute oral toxicity hazard is based on evaluation of data for product components.

Acute Inhalation Toxicity: The acute inhalation toxicity hazard is based on evaluation of data for product components. For additional information on the acute toxicity of the components, call the technical information center.

Acute Toxicity Estimate: Not Determined

Germ Cell Mutagenicity: The hazard evaluation is based on data for components or a similar material.

Carcinogenicity: The hazard evaluation is based on data for components or a similar material.

Reproductive Toxicity: The hazard evaluation is based on data for components or a similar material.

Specific Target Organ Toxicity - Single Exposure: The hazard evaluation is based on data for components or a similar material.

Specific Target Organ Toxicity - Repeated Exposure: The hazard evaluation is based on data for components or a similar material.

ADDITIONAL TOXICOLOGY INFORMATION:

This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

These oils have not been classified by the American Conference of Governmental Industrial Hygienists (ACGIH) as: confirmed human carcinogen (A1), suspected human carcinogen (A2), or confirmed animal carcinogen with unknown relevance to humans (A3).

SECTION 12 ECOLOGICAL INFORMATION

ECOTOXICITY

This material is not expected to be harmful to aquatic organisms.

The product has not been tested. The statement has been derived from the properties of the individual

components.

MOBILITY

No data available.

PERSISTENCE AND DEGRADABILITY

This material is not expected to be readily biodegradable. The biodegradability of this material is based on an evaluation of data for the components or a similar material.

The product has not been tested. The statement has been derived from the properties of the individual components.

POTENTIAL TO BIOACCUMULATE

Bioconcentration Factor: No data available.

Octanol/Water Partition Coefficient: No data available

SECTION 13 DISPOSAL CONSIDERATIONS

Use material for its intended purpose or recycle if possible. Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods. (See B.C. Reg. GY/92 Waste Management Act; R.R.O. 1990, Reg. 347 General-Waste Management; C.C.S.M.c. W40 The Waste Reduction and Prevention Act; N.S. Reg. 51/95 and N.S. Reg. 179/96 for examples of Provincial legislation.)

SECTION 14 TRANSPORT INFORMATION

The description shown may not apply to all shipping situations. Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

TC Shipping Description: NOT REGULATED AS DANGEROUS GOODS FOR TRANSPORT UNDER TRANSPORT CANADA (TDG)

IMO/IMDG Shipping Description: NOT REGULATED AS DANGEROUS GOODS FOR TRANSPORT UNDER THE IMDG CODE

ICAO/IATA Shipping Description: NOT REGULATED AS DANGEROUS GOODS FOR TRANSPORT UNDER ICAO

DOT Shipping Description: NOT REGULATED AS A HAZARDOUS MATERIAL UNDER 49 CFR

SECTION 15 REGULATORY INFORMATION

REGULATORY LISTS SEARCHED:

01-1=IARC Group 1	03=EPCRA 313
01-2A=IARC Group 2A	04=CA Proposition 65
01-2B=IARC Group 2B	05=MA RTK
02=NTP Carcinogen	06=NJ RTK
	07=PA RTK

No components of this material were found on the regulatory lists above.

CHEMICAL INVENTORIES:

All components comply with the following chemical inventory requirements: AICS (Australia), DSL (Canada), EINECS (European Union), ENCS (Japan), IECSC (China), KECI (Korea), PICCS (Philippines), TSCA (United States).

SECTION 16 OTHER INFORMATION

REVISION STATEMENT: This revision updates the following sections of this Material Safety Data Sheet: 1-16

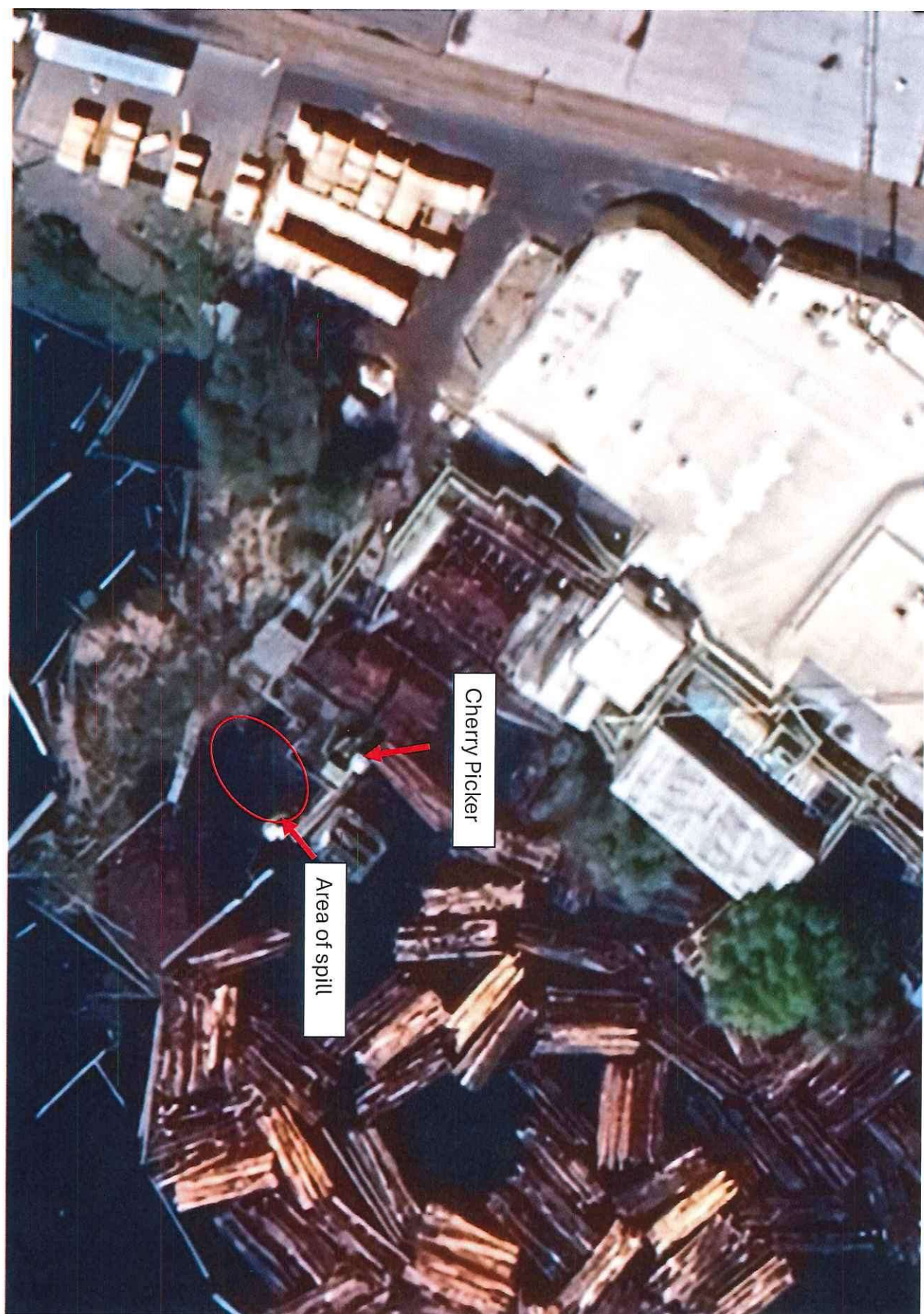
Revision Date: JANUARY 14, 2016

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV - Threshold Limit Value	TWA - Time Weighted Average
STEL - Short-term Exposure Limit	PEL - Permissible Exposure Limit
GHS - Globally Harmonized System	CAS - Chemical Abstract Service Number
ACGIH - American Conference of Governmental Industrial Hygienists	IMO/IMDG - International Maritime Dangerous Goods Code
API - American Petroleum Institute	SDS - Safety Data Sheet
WHMIS - Workplace Hazardous Materials Information System	NFPA - National Fire Protection Association (USA)
DOT - Department of Transportation (USA)	NTP - National Toxicology Program (USA)
IARC - International Agency for Research on Cancer	OSHA - Occupational Safety and Health Administration
NCEL - New Chemical Exposure Limit	EPA - Environmental Protection Agency
SCBA - Self-Contained Breathing Apparatus	

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modifications of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own

determination of the suitability of the material for his particular purpose.



Cherry Picker

Area of spill





