

**VIA EMAIL**

February 6, 2015  
File No. 04.0190022.00



Mr. Gerold Noyes, P.E.  
State of Vermont  
Department of Environmental Conservation  
Sites Management Section  
1 National Life Drive - Davis 1  
Montpelier, Vermont 05620-3704

Re: Supplemental Information  
Henry Filter Coolant Recovery System  
Husky Injection Molding Systems  
Milton, Vermont  
SMS #2009-4003

5 Commerce Park North  
Suite 201  
Bedford, New Hampshire  
03110-6984  
603-623-3600  
FAX 603-624-9463  
www.gza.com

Dear Gerold:

GZA GeoEnvironmental, Inc. (GZA) has prepared this letter to provide the State of Vermont, Department of Environmental Conservation (VT DEC) with supplemental information that was identified during unplanned maintenance of the coolant recovery system at the Husky Injection Molding Systems (Husky) facility located at 288 North Road in Milton, Vermont (site).

As described in our November 19, 2014 letter report<sup>1</sup>, modifications were made to the Henry Filter coolant recovery system during July of 2014. These modifications included the installation of a blower to provide vacuum to selected recovery wells thereby increasing coolant recovery. On November 22, 2014 the blower motor failed and was subsequently replaced. A build-up of oily material was identified in the blower and is believed to have caused the failure of the blower motor. A coalescing filter was installed in the air stream before the blower to capture any oil and limit the potential for a future blower failure.

Samples of oily material were collected from the coolant recovery system including the coolant recovery wells, and were submitted for Total Petroleum Hydrocarbon (TPH) fingerprinting<sup>2</sup> to evaluate the source of the oily material identified in the blower. Samples of Henry Filter coolant and two other cutting oils used at the facility were also submitted for TPH fingerprint analysis. The results of the analyses indicate that Henry Filter coolant and a similar cutting oil used in Gundrill milling machines (Gundrill Oil<sup>3</sup>) are present in groundwater and are both being recovered. A copy of the manufacturer's Material Safety Data Sheet is attached. Previously only, Henry Filter coolant was identified in groundwater samples.

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<sup>1</sup> Letter report by GZA titled "Letter Report, As-Built and Proposed Sampling Program, Henry Filter Coolant Recovery System, Husky Injection Molding Systems, Milton, Vermont, SMS #2009-4003."

<sup>2</sup> United States Environmental Protection Agency (EPA) Modified Method 8100.

<sup>3</sup> The manufacturer's (Houghton International, Inc.'s) product name for the Gundrill Oil is "Superkool 413H."

The source of the Gundrill oil is currently being evaluated. GZA notes that the results of groundwater quality monitoring performed during November 2014 are consistent with historical groundwater quality data for the site. TPH fingerprint and November 2014 groundwater quality data will be submitted to VT DEC within the year 2014 annual summary report (ASR), along with any recommendations based on the ongoing evaluation. This letter was prepared in advance of the ASR to provide the DEC with a summary of our preliminary findings.



On behalf of Husky Injection Molding Systems, we greatly appreciate your review of this letter. If you have any questions, please do not hesitate to contact Mr. James M. Wieck of GZA at (603) 232-8732.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in black ink, appearing to read 'James M. Wieck'.

James M. Wieck, P.G.  
Senior Project Manager

A handwritten signature in black ink, appearing to read 'Steven R. Lamb'.

Steven R. Lamb, P.G., C.G.W.P.  
Principal

A handwritten signature in black ink, appearing to read 'John C. Murphy'.

John C. Murphy, CCM, CHMM  
Consultant Reviewer

JMW/SRL/JCM:mm

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Attachment: Gundrill Oil MSDS

**GUNDRILL OIL MSDS**

**Material Safety Data Sheet  
SUPERKOOL 413H****1. Chemical Product and Company Identification**

Product Name	SUPERKOOL 413H	Emergency Phone Number	24 HOUR - (800) 424-9300 (CHEMTREC)
Company Name	Houghton International Inc. Madison & Van Buren Aves Valley Forge, PA 19482	FAX	(610) 666-1376
Website	www.houghtonintl.com	Customer Service	(888) 459-9844
Telephone	(610) 666-4000		

**2. Hazardous Ingredients**

Component	Cas No	% by Weight	Hazards
Chlorinated Paraffin	85535-85-9	1-10	TLV: N/E PEL: N/E
Mineral Oil	64742-46-7 64742-52-5	60-100	TLV: 5 mg/m <sup>3</sup> as oil mist PEL: 5 mg/m <sup>3</sup> as oil mist STEL: 10 mg/m <sup>3</sup> as oil mist Other:

N/E - Not Established; N/A - Not Applicable; Mfr - Manufacturer Recommendation

**3. Hazards Identification**

Primary Entry Routes	EYES, SKIN, INHALATION
Acute Effects	
Inhalation	INHALATION OF MISTS MAY CAUSE IRRITATION OF THE UPPER RESPIRATORY TRACT.
Eye	MAY CAUSE EYE IRRITATION.
Skin	PROLONGED OR REPEATED SKIN CONTACT MAY CAUSE IRRITATION.
Ingestion	INGESTION MAY CAUSE NAUSEA OR DISCOMFORT. ASPIRATION MAY CAUSE LUNG DAMAGE.
Carcinogenicity	THIS PRODUCT DOES NOT CONTAIN ANY COMPONENT REPORTABLE AS A CARCINOGEN UNDER 29 CFR 1910.1200.
Medical Conditions Aggravated by LongTerm Exposure	PRE-EXISTING SKIN AND RESPIRATORY CONDITIONS MAY BE AGGRAVATED BY EXPOSURE.

**Material Safety Data Sheet  
SUPERKOOL 413H****3. Hazards Identification - continued**

Chronic Effects                      SEE EFFECTS ABOVE.

## HMIS:

Health	1
Flammability	1
Physical Hazard	0

\* Indicates that there may be chronic health effects present

**4. First Aid Measures**

Inhalation	IF INHALED, REMOVE TO A SOURCE OF FRESH AIR.
Eye Contact	FLUSH EYES WITH WATER FOR 15 MINUTES. CONSULT PHYSICIAN.
Skin Contact	WASH SKIN WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE REUSING. CONSULT PHYSICIAN IF IRRITATION PERSISTS.
Ingestion	IF INGESTED, DO NOT INDUCE VOMITING! CONSULT PHYSICIAN.
Note to Physicians	NO SPECIFIC ANTIDOTE KNOWN. BASED ON INDIVIDUAL REACTIONS OF THE PATIENT, THE PHYSICIAN'S JUDGMENT SHOULD BE USED TO CONTROL SYMPTOMS AND CLINICAL CONDITIONS.

N/A - Not Applicable

**5. Fire Fighting Measures**

Flash Point	290°F / 143°C
Method Used	CLEVELAND OPEN CUP
Autoignition Temperature	N/D
LEL	N/D
UEL	N/D
Extinguishing Media	USE CARBON DIOXIDE, DRY CHEMICAL OR FOAM. USE WATER TO COOL CONTAINERS EXPOSED TO FIRE.
Unusual Fire or Explosion Hazards	PRODUCT FLOATS ON WATER CREATING A POTENTIAL FLOATING FIRE HAZARD. COMBUSTION MAY PRODUCE HYDROGEN CHLORIDE.

**Material Safety Data Sheet  
SUPERKOOL 413H****5. Fire Fighting Measures - continued**

Fire Fighting Instructions      WEAR PROTECTIVE GEAR DURING FIREFIGHTING. DO NOT DIRECT A SOLID STREAM OF WATER INTO BURNING POOLS. THIS MAY CAUSE FROTHING AND INCREASE FIRE INTENSITY.

## NFPA:

Health	1
Flammability	1
Reactivity	0
Special	N/A

N/A - Not Applicable; ND - Not Determined; > - Greater Than; < - Less Than

**6. Accidental Release Measures**

Spill or Release Procedures      APPLY DRY ABSORBENT MATERIAL AND SWEEP UP THOROUGHLY.

**7. Handling and Storage**

Handling Precautions      USE WITH ADEQUATE VENTILATION. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING.

Storage Requirements      STORE SEPARATELY FROM OXIDIZERS. KEEP CONTAINERS CLOSED WHEN NOT IN USE. STORE IN A COOL, DRY, WELL VENTILATED AREA. EMPTY CONTAINERS MAY CONTAIN HAZARDOUS VAPORS AND RESIDUE AND THEREFORE RETAIN ALL HAZARDS.

**8. Exposure Controls/Personal Protection**

Engineering Controls      PROVIDE GENERAL AND/OR LOCAL EXHAUST VENTILATION TO MAINTAIN AIRBORNE CONCENTRATIONS BELOW THE EXPOSURE LIMITS IN SECTION 2.

## Personal Protective Equipment

Eye/Face Protection      WEAR SAFETY GOGGLES OR SAFETY GLASSES WITH SIDE SHIELDS.

Skin Protection      USE CHEMICAL RESISTANT GLOVES AND LONG SLEEVES TO MINIMIZE SKIN EXPOSURE. USE APRON OR OVERALLS IF SPLASHING IS EXPECTED.

Respiratory Protection      USE AN APPROVED RESPIRATOR (SEE 29 CFR 1910.134) IF APPLICABLE EXPOSURE LIMITS ARE EXCEEDED.

**Material Safety Data Sheet  
SUPERKOOL 413H****8. Exposure Controls/Personal Protection - continued**

Other	EYEWASH AND SAFETY SHOWER RECOMMENDED.
Comments	USE OF GLOVES AND OTHER SKIN PROTECTION DEPENDS ON THE DURATION OF EXPOSURE AND THE TASK BEING PERFORMED. IF NECESSARY, USE CHEMICALLY RESISTANT GLOVES SUCH AS NEOPRENE, NITRILE OR EQUIVALENT MATERIALS.

Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, or applying cosmetics.

**9. Physical and Chemical Properties**

Appearance	CLEAR, AMBER LIQUID	Water Solubility	INSOLUBLE
Odor	MILD PETROLEUM ODOR	Boiling Point	>300°F
Vapor Pressure (mmHg)	N/D	Freezing/ Melting Point	N/D
Vapor Density (Air = 1)	N/D	Evaporation Rate (BuAc = 1)	< 1
Specific Gravity (Water = 1)	0.909		

N/D - Not Determined; N/A - Not Applicable; > - Greater Than; < - Less Than

**10. Stability and Reactivity**

Stability	THIS PRODUCT IS STABLE AT ROOM TEMPERATURE IN CLOSED CONTAINERS UNDER NORMAL STORAGE AND HANDLING CONDITIONS.
Chemical Incompatibilities	AVOID CONTACT WITH STRONG OXIDIZERS.
Hazardous Decomposition Products	THERMAL: OXIDES OF CARBON AND SULFUR; HYDROGEN CHLORIDE.
Hazardous Polymerization	HAZARDOUS POLYMERIZATION WILL NOT OCCUR.



# Material Safety Data Sheet SUPERKOOL 413H

## 11. Toxicological Information

NO DATA AVAILABLE

## 12. Ecological Information

NO DATA AVAILABLE

## 13. Disposal Considerations

Disposal	FOLLOW PERTINENT REGULATIONS FOR DISPOSAL. IT IS THE RESPONSIBILITY OF THE PRODUCT USER TO DETERMINE, AT THE TIME OF DISPOSAL, WHETHER A MATERIAL CONTAINING THE PRODUCT OR DERIVED FROM THE PRODUCT SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE. (40 CFR 261.20-24)
RCRA Hazardous Waste Number	N/A

## 14. Transportation Information

Proper Shipping Name	NOT HAZARDOUS UNDER DOT, AIR OR IMO REGULATIONS.
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## 15. Regulatory Information

TSCA Section 8(b)	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE TSCA INVENTORY.
DSL	ALL OF THE COMPONENTS IN THIS PRODUCT ARE IN COMPLIANCE WITH THE CANADIAN DSL.
CERCLA Reportable Quantity	NONE
SARA Title III, Section 313	1.5% MAXIMUM ZINC COMPOUND
Ozone Depleting Substances	THIS PRODUCT WAS NOT MANUFACTURED, DOES NOT CONTAIN, AND WAS NOT PACKAGED USING ANY CLASS I OR CLASS II OZONE DEPLETING SUBSTANCE AS DEFINED BY THE CLEAN AIR ACT.
WHMIS	D2B



**Material Safety Data Sheet  
SUPERKOOL 413H**

**16. Other Information**

Prepared By                      GARY CARL  
Title                                MANAGER, PRODUCT SAFETY

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