

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

N211572052

|   |  |                                  |
|---|--|----------------------------------|
| <b>FACILITY:</b> CREATIVE FOAM CORP   |  | <b>SRN / ID:</b> N2115           |
| <b>LOCATION:</b> 300 N ALLOY DR, FENTON   |  | <b>DISTRICT:</b> Lansing         |
| <b>CITY:</b> FENTON   |  | <b>COUNTY:</b> GENESEE           |
| <b>CONTACT:</b> Robert Spring , General Manager   |  | <b>ACTIVITY DATE:</b> 05/29/2024 |
| <b>STAFF:</b> Daniel McGeen   | <b>COMPLIANCE STATUS:</b> Non Compliance | <b>SOURCE CLASS:</b> SM OPT OUT  |
| <b>SUBJECT:</b> Unannounced inspection, and subsequent review of recordkeeping. These PCE activities were conducted as part of a FCE. |  |                                  |
| <b>RESOLVED COMPLAINTS:</b>   |  |                                  |

On May 29, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), (Air Quality Division) AQD, conducted an unannounced inspection of Creative Foam Corporation's facility on Alloy Drive, also known as their Alloy Manufacturing Facility. This inspection was a Partial Compliance Evaluation (PCE) activity, conducted as part of a Full Compliance Evaluation (FCE). Also conducted was a review of facility recordkeeping, which was another PCE activity.

**Facility description:**

Creative Foam makes products which are used by the auto industry to prevent rattles and squeaks in their vehicles. These products are primarily pre-expanded dense foams with an adhesive backing. Typical uses for these products are liners for small storage areas on vehicle dashboards.

**Environmental contacts:**

- Robert Spring, Plant Manager; 810-936-2328; [raspring@creativefoam.com](mailto:raspring@creativefoam.com)
- Cory Dennie, Quality Engineer; [cldennie@creativefoam.com](mailto:cldennie@creativefoam.com)
- Matt Modovsky, Maintenance Manager; 810-394-0917; [mdmodovsky@creativefoam.com](mailto:mdmodovsky@creativefoam.com)

**EGLE, AQD contact:**

Dan McGeen, Inspector; 517-648-7547; [McGeenD@michigan.gov](mailto:McGeenD@michigan.gov)

**Emission units:**

| Emission Units*  | Emission Unit Description   | Permit to Install (PTI) or Michigan Air Pollution Control (MAPC) Rule | Compliance Status |
|------------------|---|---|-------------------|
| EU-Adhesive Line | A coating line consisting of a paper let off, an adhesive roll coater, hot air dryer/vent system, foam lay-up table, nip rollers, and a blank/rewind station. | PTI 159-95B   | Noncompliance     |
| Tool room        |   |   | Compliance        |

|                                 |   |                            |            |
|---------------------------------|---|----------------------------|------------|
|                                 | Various tools, including wood cutting processes, controlled by bag filter and cartridge filter systems which exhaust into the general in-plant environment. | MAPC Rule 285(2)(I)(vi)(B) |            |
| Die-cutting operations          | Multiple die-cutting operations, exhausting to in-plant environment.  | MAPC Rule 285(2)(I)(vi)(B) | Compliance |
| Hot melt adhesive stations      | Stations where hot melt adhesive is applied to surfaces of parts.   | MAPC Rule 287(2)(i)        | Compliance |
| Profile cutter and deck slicers | Tools for cutting foam, which exhaust into the in-plant environment.  | MAPC Rule 285(2)(I)(vi)(B) | Compliance |

\*An emission unit is any part of a stationary source that emits or has the potential to emit an air contaminant.

#### Flexible groups:

| Flexible Group ID** | Flexible Group Description   | Compliance Status |
|---------------------|--|-------------------|
| FG-Facility         | All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment. | Noncompliance     |

\*\*A *flexible group* is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.

#### Regulatory overview:

Creative Foam has an opt-out permit, PTI 159-95B, which contains limits to restrict the facility's Potential to Emit (PTE) for criteria pollutants to less than major source levels, so it can opt out of the Renewable Operating Permit (ROP) program. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM-10), and particulate matter smaller than 2.5 microns (PM2.5). A facility is major if it has a PTE of 100 tons per year (TPY) or more of any one of the criteria pollutants. The PTI limits VOC emissions to 38.0 tons per year (TPY).

Creative Foam's PTI limits hazardous air pollutant (HAP) emissions to 9 TPY for a single HAP, and 22.5 TPY for aggregate HAPs. A facility is major for HAPs if it has a PTE of 10 TPY or more for a single HAP, or 25 TPY or more for aggregate HAPs. This allows Creative Foam to operate as a minor, or *area source*, of HAP emissions, not subject to the ROP program.

There are multiple processes at the plant for which some of the MAPC exemption rules potentially apply. These rules include:

**MAPC Rule 285(2)(i), which exempts the following:**

(i) Brazing, soldering, **welding**, or plasma coating equipment. (*Emphasis added.*)

**MAPC Rule 285(2)(I)(A) and (B), which exempt the following**

(I) The following equipment and any exhaust system or collector exclusively serving the equipment:  
(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(A) Equipment used on a **nonproduction basis**. (*Emphasis added.*)

(B) Equipment that **has emissions that are released only into the general in-plant environment**. (*Emphasis added.*)

(C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

**MAPC Rule 287(2)9i), which exempts the following:**

(i) Equipment that is used for the application of a hot melt adhesive.

#### **Fee status:**

This facility is considered a Category E fee-subject source, because it has an opt-out permit which keeps it from becoming a major source.

The facility is required to submit an annual air emission report each year to MiEnviro.

#### **Location:**

- Address: 300 N. Alloy Drive, Fenton, 48430, Genesee County.
- Location: The facility is at the north end of an industrial park. It is surrounded by industries to the south, east, and west. To the north are a freeway ramp, and small businesses. The closest residences are about 1,500 feet to the east and northeast.

#### **Operating schedule:**

- Office schedule: Monday-Friday 8:00 AM-5:00 PM (environmental staff are at this site on Wed. and Fri.)
- Production schedule: Monday-Thursday 6:00 AM-3:30 AM (two 10-hour shifts), Friday-Sunday overtime, if needed.

#### **Safety attire required:**

**Safety glasses with side shields.**

**Most recent inspections:**

- 3/21/2018: Compliance.
- 7/30/2014: Compliance.

**Complaint history:**

**No complaints exist in the Michigan Air Compliance Enforcement System (MACES) database, which goes back to 2007.**

**Odor evaluation:**

**An odor evaluation was conducted enroute to the facility.**

- Start time of odor evaluation: 9:46 AM
- Weather conditions: Partly sunny, 62 degrees F, and humid, with winds out of the WNW at 10 miles per hour (mph).
- Route taken: W. Silver Lake Dr. east to Fenway Dr., then south, past the plant to Copper Ave. and east to Alloy Dr. Then north on Alloy Dr. to Fenway Dr. and past the plant again. Next, east on Fenway Circle, north on Alloy Dr, and south on Fenway Dr. to the plant's east parking lot.

**Odors detected during the odor evaluation were as follows:**

| <b>Time</b>    | <b>Location</b>  | <b>Odor Level</b> | <b>Odor Description</b> | <b>Comments</b>  |
|----------------|--|-------------------|-------------------------|--|
| <b>9:46 AM</b> | <b>Fenway Dr., south of plant and north of Fenway Circle</b> | <b>1</b>          | <b>Diesel exhaust</b>   | <b>A truck was the suspected source.</b>                     |
| <b>9:53 AM</b> | <b>Fenway Circle</b>   | <b>2</b>          | <b>Diesel exhaust</b>   | <b>A truck at an area business was the suspected source.</b> |

**The AQD 0 to 5 odor scale is as follows:**

**0 - Non-Detect**

**1 - Just barely detectable**

**2 - Distinct and definite odor**

**3 - Distinct and definite objectionable odor**

**4 - Odor strong enough to cause a person to attempt to avoid it completely**

**5 - Odor so strong as to be overpowering and intolerable for any length of time**

The odors detected offsite today were clearly not coming from Creative Foam.

**Arrival:**

The AQD was represented by Dan McGeen, inspector.

- Arrival time: 9:56 AM
- Weather conditions: Partly sunny, 62 degrees F, and humid, with winds out of the WNW at 10 mph.
- Visible emissions detected: None.
- Odors detected: None.

D. McGeen began to check in at a kiosk but a Creative Foam employee brought Plant Manager Robert Spring to the lobby. D. McGeen had previously provided his credentials to R. Spring on 5/20/2024, during a site visit on a Monday, when environmental contacts are typically in meetings most of the day.

Note: Wednesdays and Fridays company environmental staff are here and available, whereas Tuesdays and Thursdays they are at the Creative Foam Corporation Fenway Drive plant, State Registration Number N6574.

R. Spring asked Maintenance Manager Matt Modovsky to accompany him on the inspection, along with Quality Engineer Cory Dennie.

**Inspection:**

Creative Foam does not actually produce foam. They apply water-based adhesives to various urethane foam materials which are manufactured elsewhere. In the 1990s, they used solvent-based adhesives, but have moved to water-based adhesives. The only solvent-based glues they have are in the tape they use onsite, which is manufactured elsewhere. No changes were said to have taken place since the 2018 inspection, other than using robots to perform some of the work once done by employees, like hot melt glue application.

D. McGeen was shown different areas of the plant, as follows.

**Receiving department:**

The start of the production process is when rolls and buns of foam enter the receiving department. The foam products they receive have done practically all their off gassing before they ever reach Creative Foam. They will not accept foam from a supplier before it has had a certain number of days to off-gas.

**Profile cutter and deck slicers; Rule 285(I)(vi)(B):**

A profile cutter and deck slicers cut roll stock and buns of foam to the desired size and thickness. There were no visible emissions from these processes. Scrap foam pieces are recycled. Rule 285(2)(I)(vi)(B) exempts processes for cutting and/or machining certain materials, which exhaust into the general in-plant environment. The rule does not specifically mention foam but does mention rubber and plastics.

**EU-Adhesive Line; PTI No. 159-95B; Rule 285(2)(b):**

The adhesive line operates as follows: Adhesive is pumped to the roll coater, and then applied to a silicone coated release liner. The liner is applied to a rolled foam material. A nip roller applies

pressure to the product to ensure a good bond, and the edge of the product is trimmed. A customer eventually removes the liner, to apply the finished product.

During today's inspection, the adhesive line, or roll coater, was down for adjustments, and it was not back in operation by the end of the inspection. Pressure drop and temperature data therefore could not be obtained for the two zones of the natural gas-fired oven.

There are two adhesives currently used by the company, both water based. They are:

- Henkel 2628 "V"
- ApTec AP-131H

They no longer use the water based adhesive CTI 4520 "W" which had been used at the time of the 2018 inspection.

D. McGeen was informed that there were no HAPs in the two current adhesives. He indicated that under FG-Facility, they still need to document any other HAP emissions from the facility.

#### **Tool room; Rule 285(2)(l)(vi)(B), and 285(2)(l)**

They have a small tool room, where various tools exhaust indoors. These are not production processes and were not running at the time of the inspection. However, they are used to manufacture the production tools themselves. A CNC router for wood was controlled by a vacuum collection system which exhausted to a rotating cartridge filter. Another process was served by a fabric filter.

#### **Die-cutting operations; Rule 285(l)(vi)(B):**

There were multiple die-cutting operations, where presses cut foam backed with adhesive to shape. There are two types of cutting: full cutting, where the foam and adhesive liner are cut, and kiss cutting, where foam is cut, but not the liner. The presses are exhausted into the in-plant environment. There were no visible emissions.

#### **Hot melt adhesive stations; Rule 287(2)(i):**

There were some robotic stations, which applied a hot melt adhesive to parts and then assembled them. Some of the stations were operating at this time, and the adhesive was heated to 375 degrees F. Hot melt adhesives are considered exempt under Rule 287(2)(i).

#### **Miscellaneous:**

Across from the tool room was a small machine area, where robotic assembly processes operate. No emissions were observed.

The maintenance area has a welding unit. Welding is considered exempt from needing a PTI pursuant to MAPC Rule 285(2)(i). There were also metal machining processes which were used on a non-production basis and which exhausted to the general, in-plant environment. Neither the welder nor the machining processes were running at the time of the inspection.

#### **Compliance check with PTI 159-95B, EU-Adhesive Line special conditions (SC):**

| PTI 159-95B SC            | Requirement   | Comments   | Complies? |
|---------------------------|---|--|-----------|
| EU-Adhesive Line, SC 1.1a | VOC emissions are limited to 38.0 TPY over a 12-month rolling time period, as determined at the end of each calendar month.   | The facility was meeting this requirement, as recordkeeping reported 20.23 tons of VOC during 2023.  | Yes       |
| EU-Adhesive Line, SC 1.1b | VOC emissions are limited to 660 lbs/day per calendar day.  | The company met this requirement. VOC totals for the entire month of May 2024 were 62.6 lbs from adhesive V0000 and 75.2 lbs from ApTec AP131H = 137.8 lbs.  | Yes       |
| EU-Adhesive Line, SC 1.1c | <p>VOCs are limited to 2.9 lb/gal (minus water)* as applied, over a daily volume-weighted average.</p> <p>* The phrase “minus water” shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound.</p> | <p>VOC content minus water was reported as:</p> <ul style="list-style-type: none"> <li>• V0000: 0.15 lb/gal</li> <li>• ApTec: 0.15 lb/gal</li> <li>• PU-16224, a solvent-based mold release agent was reported as 5.9423 lb/gal, but this was for a different site with a different State Registration Number (SRN) and PTI, the company later clarified.</li> <li>• PU-15290W, a water-based mold release agent was reported as 0.0083 lb/gal. However, this was also for a nearby site with a different SRN and PTI, the company later clarified.</li> </ul> | Yes       |
| EU-Adhesive Line, SC 1.2  | All waste materials shall be captured and stored in closed containers and shall be disposed of in an acceptable manner in   | The facility was meeting this requirement, as evidenced by sealed totes of liquid, non-hazardous   | Yes       |

|                                 | <b>compliance with all applicable rules and regulations.</b>  | <b>waste from EU-Adhesive Line.</b>  |                  |
|---------------------------------|---|--|------------------|
| <b>EU-Adhesive Line, SC 1.3</b> | <b>The VOC content, water content, and density of any material, as applied and as received, shall be determined using federal Reference Test Method 24 or from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance.</b>   | <b>The facility was meeting this requirement.</b>  | <b>Yes</b>       |
| <b>EU-Adhesive Line, SC 1.4</b> | <b>All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.</b>  | <b>The facility was meeting this requirement, as their spreadsheet calculates emissions when daily throughput is entered.</b>  | <b>Yes</b>       |
| <b>EU-Adhesive Line, SC 1.5</b> | <b>The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request.</b> | <b>AQD requested Safety Data Sheets (SDS) on 9/6/2024, but the SDS received on 9/18 were lacking sufficient detail. AQD requested Environmental Data Sheets (EDS) on 9/24, which have not been received as of the date of this report.</b> | <b>No</b>        |
| <b>EU-Adhesive Line, SC 1.6</b> | <b>The permittee shall keep the following information for EU-Adhesive:</b>  | <b>Please see below.</b>   | <b>See below</b> |
| <b>EU-Adhesive</b>              | <b>Gallons (with water) of each material used on a daily basis.</b>   | <b>The facility met this requirement based on records submitted</b>  | <b>Yes</b>       |



|   |  |  |            |
|---|--|--|------------|
| <b>Line, SC<br/>1.6a</b>                      |  | <b>7/30/2024 which showed gallons of each material used on a daily basis in May 2023 and May 2024.</b>   |            |
| <b>EU-<br/>Adhesive<br/>Line, SC<br/>1.6b</b> | <b>VOC content (minus water and with water) of each material as applied.</b>   | <b>VOC content minus water of each material as applied was reported as:</b><br><br><ul style="list-style-type: none"> <li>· V0000: 0.15 lb/gal</li> <li>· ApTec: 0.15 lb/gal</li> </ul> <b>VOC content with water as applied is still unknown, as the SDS sheets lacked sufficient detail.</b> | <b>No</b>  |
| <b>EU-<br/>Adhesive<br/>Line, SC<br/>1.6c</b> | <b>VOC emission calculations determining the volume-weighted average VOC content of the materials as applied on a daily basis.</b>   | <b>The SDS and the facility records do not contain sufficient detail to determine this.</b>  | <b>No</b>  |
| <b>EU-<br/>Adhesive<br/>Line, SC<br/>1.6d</b> | <b>VOC mass emission calculations determining the daily and monthly emission rate in pounds per day and tons per calendar month.</b>   | <b>The facility met this requirement.</b>  | <b>Yes</b> |
| <b>EU-<br/>Adhesive<br/>Line, SC<br/>1.6e</b> | <b>VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.</b><br><br><b>The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request.</b> | <b>Tons of adhesive used per 12-month rolling time period was reported, but not tons of VOC emissions.</b>   | <b>No</b>  |
| <b>EU-<br/>Adhesive<br/>Line, SC<br/>1.7</b>  | <b>The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air, from a stack SV-1, with a maximum dimension of 22.63 by 33.5 inches</b>   | <b>The exhaust was released through a horizontal vent, instead of a vertical stack.</b>  | <b>No</b>  |

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|--|---|--|--|
|  | and height of not less than 27.0 feet above the ground. |  |  |
|--|---|--|--|

**Compliance check with PTI 159-95B, FG-Facility SC:**

**Compliance check with PTI 159-95B, FG-Facility SC:**

| <b>PTI 159-95B, SC</b>      | <b>Requirement</b>  | <b>Comments</b>  | <b>Complies?</b> |
|-----------------------------|---|--|------------------|
| <b>FG-Facility, SC 2.1a</b> | Each individual HAP from the facility is limited to less than 9.0 TPY over a 12-month rolling time period, as determined at the end of each calendar month.   | The facility recordkeeping did not show HAP emissions. | Unknown          |
| <b>FG-Facility, SC 2.1b</b> | Aggregate HAPs from the facility are limited to less than 22.5 TPY over a 12-month rolling time period, as determined at the end of each calendar month.  | The facility recordkeeping did not show HAP emissions. | Unknown          |
| <b>FG-Facility, SC 2.2</b>  | The HAP content of any material as received and as applied, shall be determined using manufacturer's formulation data. Upon request of the AQD District Supervisor, the manufacturer's HAP formulation data shall be verified using EPA Test Method 311.                                    | Recordkeeping did not show HAP content.                | No               |
| <b>FG-Facility, SC 2.3</b>  | All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. | HAP calculations were not done.                        | No               |
|                             |   |  |                  |

|                             |  |  |                  |
|-----------------------------|--|--|------------------|
| <b>FG-Facility, SC 2.4</b>  | <b>The permittee shall keep the following information on a monthly basis for FG-Facility:</b>  | <b>Please see below.</b>   | <b>See below</b> |
| <b>FG-Facility, SC 2.4a</b> | <b>Gallons or pounds of each HAP containing material used.</b>   | <b>The facility recordkeeping did show gallons of each adhesive used on a monthly basis, and the two adhesives were both HAP containing.</b> | <b>Yes</b>       |
| <b>FG-Facility, SC 2.4b</b> | <b>Where applicable, gallons or pounds of each HAP containing material reclaimed</b>   | <b>The facility recordkeeping did not show HAPs.</b>   | <b>No</b>        |
| <b>FG-Facility, SC 2.4c</b> | <b>HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.</b>  | <b>The facility recordkeeping did not show HAPs.</b>   | <b>No</b>        |
| <b>FG-Facility, SC 2.4d</b> | <b>Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.</b>  | <b>The facility recordkeeping did not show HAPs.</b>   | <b>No</b>        |
| <b>FG-Facility, SC 2.4e</b> | <b>Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.</b><br><br><b>The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request.</b> | <b>The facility recordkeeping did not show HAPs.</b>   | <b>No</b>        |

**(End of compliance check.)**

**Departure:**

- Time of departure: 11:38 AM.
- Weather conditions: Partly sunny and 62 degrees F, winds out of NNW at 5-10 mph.
- Visible emissions: None detected.
- Odors: None detected.

**Post-inspection follow up:**

- 6/10/2024: Having not received requested recordkeeping, D. McGeen sent a reminder email to M. Modovsky and C. Dennie, requesting these records by the end of Friday, 6/14.
- 6/14/2024: The AQD was emailed a copy of the requested recordkeeping.
- 6/15/2024: The AQD was emailed a photo showing a vertical exhaust stack with rain sleeve which were said to have been installed on 6/14. This resolved the compliance issue for the roll coater oven not exhausting vertically unobstructed to the ambient air through a stack no less than 27 feet above ground level. Because the draft inspection report and a draft Violation Notice (VN) were not finished prior to the 6/14 installation of the exhaust stack, no VN was sent.
- 7/1/2024: D. McGeen emailed questions and requested additional records. He received an answer to a question, but not additional records.
- 7/23/2024: D. McGeen sent another email, requesting HAPs content, usage, and emissions, pursuant to FG-Facility, SC 2.1a through 2.4e.
- 7/24/2024: The company corrected an earlier email, and asked a question about a permit requirement, which D. McGeen answered. He requested VOC lb/gal with water.
- 7/30/2024: Additional records were received from Creative Foam.
- 8/27/2024: D. McGeen emailed to explain that spreadsheet lists VOC concentration of 0.15 lb/gal for two adhesives, said in C. Dennie's 7/24 email to be minus water. Therefore, VOC lb/gal with water was again requested.
- 9/3/2024: The company's reply stated that the requested information was on page 1 of their spreadsheet, but the AQD review showed that it was not.
- 9/6/2024: The AQD emailed to request safety data sheets or environmental data sheets, correct a typographical error in a prior email, and propose a Teams meeting to discuss facility recordkeeping.
- 9/16/2024 The AQD did not receive a response and proposed a virtual meeting on 9/17 or 18.
- 9/18/2024: The AQD Lansing District Supervisor Robert Byrnes and D. McGeen had a virtual meeting w/C. Dennie and M. Modovsky to discuss recordkeeping and what was still needed. SDS sheets were received by the AQD that day.
- 9/19/2024: An updated spreadsheet was received from C. Dennie.
- 9/23/2024: The AQD review of the SDS sheets and updated spreadsheet showed that the SDS lacked certain basic information needed for doing calculations. Additionally, Henkel V0000 contained the HAP vinyl acetate, while the ApTec AP-131H adhesive contained the HAPs ethyl acrylate, formaldehyde, 1-4 dioxane, ethylene oxide, and acetaldehyde. The AQD emailed the company to inform them, and to request EDS sheets for the two adhesives. A reply has not been received, as of the date of this report.

**Compliance concerns:**

- PTI 159-95B, EU-Adhesive Line, SC 1.5 requires the permittee to maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The facility provided SDS, which did not

contain sufficient data to allow for complete recordkeeping. On 9/23/2024, the AQD advised the facility of this and requested EDS, but no reply has been received as of the date of this report. This will be included in a VN.

- PTI 159-95B, EU-Adhesive Line, SC 1.6b requires VOC content (minus water and with water) of each material as applied. Only VOC content minus water was received. This will be included in the VN.
- PTI 159-95B, EU-Adhesive Line, SC 1.6c requires VOC emission calculations determining the volume-weighted average VOC content of the materials as applied on a daily basis. The SDS and the facility records did not contain sufficient detail to determine this. This will be added to the VN.
- PTI 159-95B, EU-Adhesive Line, SC 1.6e requires VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. These were not calculated, in violation of SC 1.6e, and will be added to the VN.
- PTI 159-95B, EU-Adhesive Line, SC 1.7 requires that the exhaust gases shall be discharged unobstructed vertically upwards to the ambient air, from a stack SV-1, with a maximum dimension of 22.63 by 33.5 inches and height of not less than 27.0 feet above the ground. During the inspection, it was noted that the exhaust vent was horizontal rather than vertical. An appropriate exhaust stack was installed on 6/14, before a VN could be completed.
- Requested records received in July, August, and September did not include HAP emissions, so compliance could not be checked with HAPs limits in PTI 159-95B, FG-Facility, SC 2.1a and 2.1b.
- Records received did not include HAP content as required by PTI 159-95B, FG-Facility, SC 2.2, which will be added to the VN.
- Records received did not include HAP emissions in a format acceptable to the District Supervisor and were not completed by the 15th of each month for the preceding month as required by PTI 159-95B, FG-Facility, SC 2.3. This will be included in the VN.
- Records received did not include HAP containing materials reclaimed as required by PTI 159-95B, FG-Facility, SC 2.4b. This will be included in the VN.
- Records received did not include HAP content in lb/gal or lb/lb of each HAP containing material used as required by PTI 159-95B, FG-Facility, SC 2.4c. This will be included in the VN.
- Records received did not include individual and aggregate HAP emission calculations in tons/month as required by PTI 159-95B, FG-Facility, SC 2.4d. This will be included in the VN.
- Records received did not include individual and aggregate HAP emission calculations in tons per 12-month rolling time period as required by PTI 159-95B, FG-Facility, SC 2.4e. This will be included in the VN.

### **Conclusion:**

**One instance of noncompliance was identified on 5/29/2024, for lack of a vertical exhaust stack. The company corrected this before a VN could be sent. Subsequently received facility recordkeeping was incomplete, however, and a VN will be sent.**

NAME 

DATE 10/7/2024

SUPERVISOR 

# Safety Data Sheet



Revision Number: 003.0

Issue date: 09/09/2020

## 1. PRODUCT AND COMPANY IDENTIFICATION

**Product name:** AQUENCE PS 2628 known as GELVA GME 2628-03 998KG IBC  
**Product type/use:** Adhesive  
**Restriction of Use:** None identified  
**Company address:** Henkel Corporation  
One Henkel Way  
Rocky Hill, Connecticut 06067

**IDH number:** 1703412

**Region:** United States

**Contact information:**  
Telephone: +1 (860) 571-5100  
MEDICAL EMERGENCY Phone: Poison Control Center  
1-877-671-4608 (toll free) or 1-303-592-1711  
TRANSPORT EMERGENCY Phone: CHEMTREC  
1-800-424-9300 (toll free) or 1-703-527-3887  
Internet: www.henkelna.com

## 2. HAZARDS IDENTIFICATION

### EMERGENCY OVERVIEW

**WARNING:** SUSPECTED OF CAUSING CANCER.

| HAZARD CLASS    | HAZARD CATEGORY |
|-----------------|-----------------|
| CARCINOGENICITY | 2               |

### PICTOGRAM(S)



### Precautionary Statements

**Prevention:** Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Wear protective gloves, clothing, eye and face protection.

**Response:** IF exposed or concerned: Get medical attention.

**Storage:** Store locked up.

**Disposal:** Dispose of contents and/or container according to Federal, State/Provincial and local governmental regulations.

Classification complies with OSHA Hazard Communication Standard (29 CFR 1910.1200) and is consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

See Section 11 for additional toxicological information.

## 3. COMPOSITION / INFORMATION ON INGREDIENTS

| Hazardous Component(s) | CAS Number | Percentage* |
|------------------------|------------|-------------|
| Vinyl acetate          | 108-05-4   | 0.1 - 1     |

\* Exact percentages may vary or are trade secret. Concentration range is provided to assist users in providing appropriate protections.

## 4. FIRST AID MEASURES

**Inhalation:** Move to fresh air. If not breathing, give artificial respiration. If symptoms develop and persist, get medical attention.

**Skin contact:** Immediately wash skin thoroughly with soap and water. Remove contaminated clothing and footwear. If symptoms develop and persist, get medical attention.

IDH number: 1703412

Product name: AQUENCE PS 2628 known as GELVA GME 2628-03 998KG IBC  
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|                     |   |
|---------------------|---|
| <b>Eye contact:</b> | Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Get medical attention.   |
| <b>Ingestion:</b>   | DO NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Get immediate medical attention. |
| <b>Symptoms:</b>    | See Section 11.   |

## 5. FIRE FIGHTING MEASURES

|   |  |
|---|--|
| <b>Extinguishing media:</b>               | Use extinguishing measures appropriate to local circumstances and the surrounding environment.                                     |
| <b>Special firefighting procedures:</b>   | Keep unnecessary personnel away. Fire fighters should wear positive pressure self-contained breathing apparatus (SCBA).            |
| <b>Unusual fire or explosion hazards:</b> | This product is an aqueous mixture which will not burn. If evaporated to dryness, the solid residue may pose a slight fire hazard. |
| <b>Hazardous combustion products:</b>     | Oxides of carbon.  |

## 6. ACCIDENTAL RELEASE MEASURES

Use personal protection recommended in Section 8, isolate the hazard area and deny entry to unnecessary and unprotected personnel.

|                                   |  |
|-----------------------------------|--|
| <b>Environmental precautions:</b> | Prevent further leakage or spillage if safe to do so. Do not allow material to contaminate ground water system. Do not allow product to enter sewer or waterways.                                    |
| <b>Clean-up methods:</b>          | Keep unnecessary personnel away. Ensure adequate ventilation. Wear appropriate protective equipment and clothing during clean-up. Dispose of contaminated material as waste according to Section 13. |

## 7. HANDLING AND STORAGE

|                  |   |
|------------------|---|
| <b>Handling:</b> | Avoid contact with eyes, skin and clothing. Wash thoroughly after handling. |
| <b>Storage:</b>  | Do not freeze.  |

For information on product shelf life, please review labels on container or check the Technical Data Sheet.

## 8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Employers should complete an assessment of all workplaces to determine the need for, and selection of, proper exposure controls and protective equipment for each task performed.

| Hazardous Component(s) | ACGIH TLV                 | OSHA PEL | AIHA WEEL | OTHER |
|------------------------|---------------------------|----------|-----------|-------|
| Vinyl acetate          | 10 ppm TWA<br>15 ppm STEL | None     | None      | None  |

|                                |   |
|--------------------------------|---|
| <b>Engineering controls:</b>   | Work should be done in an adequately ventilated area (i.e., ventilation sufficient to maintain concentrations below one half of the PEL and other relevant standards). Local exhaust ventilation is recommended when general ventilation is not sufficient to control airborne contamination. |
| <b>Respiratory protection:</b> | Use NIOSH approved respirator if there is potential to exceed exposure limit(s). Observe OSHA regulations for respirator use (29 CFR 1910.134).   |
| <b>Eye/face protection:</b>    | Safety goggles or safety glasses with side shields. Full face protection should be used if the potential for splashing or spraying of product exists.   |
| <b>Skin protection:</b>        | Use impermeable gloves and protective clothing as necessary to prevent skin contact. Wear suitable protective clothing.   |

## 9. PHYSICAL AND CHEMICAL PROPERTIES

|  |  |
|--|--|
| Physical state:                          | Liquid                                   |
| Color:                                   | Milky white                              |
| Odor:                                    | Acrylate, Slight                         |
| Odor threshold:                          | Not available.                           |
| pH:                                      | 6 - 8                                    |
| Vapor pressure:                          | Not determined                           |
| Boiling point/range:                     | > 100 °C (> 212°F)                       |
| Melting point/ range:                    | 0 °C (32°F) (Freezing point)             |
| Specific gravity:                        | 1.03                                     |
| Vapor density:                           | Heavier than air.                        |
| Flash point:                             | > 125.00 °C (> 257°F)                    |
| Flammable/Explosive limits - lower:      | Not available.                           |
| Flammable/Explosive limits - upper:      | Not available.                           |
| Autoignition temperature:                | Not determined                           |
| Flammability:                            | Not applicable                           |
| Evaporation rate:                        | Same as water.                           |
| Solubility in water:                     | Soluble                                  |
| Partition coefficient (n-octanol/water): | Not determined                           |
| VOC content:                             | 1.5 % (minus exempt solvents and water). |
| Viscosity:                               | Not available.                           |
| Decomposition temperature:               | Not available.                           |

## 10. STABILITY AND REACTIVITY

|                                   |   |
|-----------------------------------|---|
| Stability:                        | Stable under normal conditions of storage and use.                                    |
| Hazardous reactions:              | Will not occur.   |
| Hazardous decomposition products: | Oxides of carbon.   |
| Incompatible materials:           | Contact with water reactive materials (such as oleum) can cause exothermic reactions. |
| Reactivity:                       | Not available.  |
| Conditions to avoid:              | Do not freeze.  |

## 11. TOXICOLOGICAL INFORMATION

Relevant routes of exposure: Skin, Inhalation, Eyes

### Potential Health Effects/Symptoms

|               |  |
|---------------|--|
| Inhalation:   | Inhalation of vapors or mists of the product may be irritating to the respiratory system.                                      |
| Skin contact: | Prolonged or repeated skin contact may cause skin irritation or allergic skin sensitization reaction.                          |
| Eye contact:  | This product may cause slight irritation to the eyes.  |
| Ingestion:    | Ingestion of this product is unlikely. However, ingestion of product may produce gastrointestinal irritation and disturbances. |

| Hazardous Component(s) | LD50s and LC50s  | Immediate and Delayed Health Effects   |
|------------------------|--|--|
| Vinyl acetate          | Oral LD50 (Rat) = 2,920 mg/kg<br>Oral LD50 (Mouse) = 1,613 mg/kg<br>Dermal LD50 (Rabbit) = 2,335 mg/kg | Central nervous system, Irritant, Mutagen,<br>Some evidence of carcinogenicity |

| Hazardous Component(s) | NTP Carcinogen | IARC Carcinogen | OSHA Carcinogen<br>(Specifically Regulated) |
|------------------------|----------------|-----------------|---|
| Vinyl acetate          | No             | Group 2B        | No  |

## 12. ECOLOGICAL INFORMATION

Ecological information: Not available.



### 13. DISPOSAL CONSIDERATIONS

Information provided is for unused product only.

**Recommended method of disposal:** Legal disposition of wastes is the responsibility of the owner/generator of the waste. Applicable federal, state and/or local regulations must be followed during treatment, storage, or disposal of waste containing this product.

**Hazardous waste number:** Not a RCRA hazardous waste.

### 14. TRANSPORT INFORMATION

The transport information provided in this section only applies to the material/formulation itself, and is not specific to any package/configuration.

#### U.S. Department of Transportation Ground (49 CFR)

|                                  |               |
|----------------------------------|---------------|
| <b>Proper shipping name:</b>     | Not regulated |
| <b>Hazard class or division:</b> | None          |
| <b>Identification number:</b>    | None          |
| <b>Packing group:</b>            | None          |

#### International Air Transportation (ICAO/IATA)

|                                  |               |
|----------------------------------|---------------|
| <b>Proper shipping name:</b>     | Not regulated |
| <b>Hazard class or division:</b> | None          |
| <b>Identification number:</b>    | None          |
| <b>Packing group:</b>            | None          |

#### Water Transportation (IMO/IMDG)

|                                  |               |
|----------------------------------|---------------|
| <b>Proper shipping name:</b>     | Not regulated |
| <b>Hazard class or division:</b> | None          |
| <b>Identification number:</b>    | None          |
| <b>Packing group:</b>            | None          |

### 15. REGULATORY INFORMATION

#### United States Regulatory Information

|   |   |
|---|---|
| <b>TSCA 8 (b) Inventory Status:</b>     | All components are listed as active or are exempt from listing on the Toxic Substances Control Act (TSCA) inventory.  |
| <b>TSCA 12 (b) Export Notification:</b> | None above reporting de minimis   |
| <b>CERCLA/SARA Section 302 EHS:</b>     | None above reporting de minimis.  |
| <b>CERCLA/SARA Section 311/312:</b>     | Immediate Health, Delayed Health  |
| <b>CERCLA/SARA Section 313:</b>         | This product contains the following toxic chemicals subject to the reporting requirements of section 313 of the Emergency Planning and Community Right-To-Know Act of 1986 (40 CFR 372). Vinyl acetate (CAS# 108-05-4). |
| <b>California Proposition 65:</b>       | This product contains a chemical known in the State of California to cause cancer. This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.                 |

#### Canada Regulatory Information

|                             |   |
|-----------------------------|---|
| <b>CEPA DSL/NDL Status:</b> | One or more components are not listed on, and are not exempt from listing on either the Domestic Substances List or the Non-Domestic Substances List. |
|-----------------------------|---|

### 16. OTHER INFORMATION

This safety data sheet contains changes from the previous version in sections: 2, 3 and related sections, 15.

**Prepared by:** Product Safety and Regulatory Affairs

**Issue date:** 09/09/2020

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**AP-131H ADHESIVE**

**1. PRODUCT AND COMPANY IDENTIFICATION**

Aptec, Inc.  
1202 E. Pontaluna Rd.  
Suite B  
Spring Lake, MI 49456

Telephone  
Emergency telephone number

231-737-4418  
1-800-424-9300

Product name                      AP-131H ADHESIVE

**2. HAZARDS IDENTIFICATION**

**Emergency Overview**

Appearance: liquid, white

WARNING!    MAY CAUSE EYE IRRITATION.    MAY CAUSE ALLERGIC SKIN REACTION. MAY CAUSE ALLERGIC RESPIRATORY REACTION.

**Potential Health Effects**

**Exposure routes**

Inhalation, Skin absorption, Skin contact, Eye Contact, Ingestion

**Eye contact**

May cause mild eye irritation. Symptoms include stinging, tearing, and redness.

**Skin contact**

May cause slight skin irritation.

**Ingestion**

Swallowing small amounts of this material during normal handling is not likely to cause harmful effects. Swallowing large amounts may be harmful.

**Inhalation**

It is possible to breathe this material under certain conditions of handling and use (for example, during heating, spraying, or stirring). Breathing small amounts of this material during normal handling is not likely to cause harmful effects. Breathing large amounts may be harmful. Symptoms are not expected at air concentrations below the recommended exposure limits, if applicable (see Section 8.). May cause allergic respiratory reaction. Symptoms are not expected at air concentrations below the recommended exposure limits, if applicable (see Section 8.). May cause allergic respiratory reaction.

**Aggravated Medical Condition**

Preexisting disorders of the following organs (or organ systems) may be aggravated by exposure to this material: lung (for example, asthma-like conditions)

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**Symptoms**

Signs and symptoms of exposure to this material through breathing, swallowing, and/or passage of the material through the skin may include: stomach or intestinal upset (nausea, vomiting, diarrhea), irritation (nose, throat, airways), Cough, Difficulty in breathing

**Target Organs**

No data

**Carcinogenicity**

This material is not listed as a carcinogen by the International Agency for Research on Cancer (IARC), the National Toxicology Program (NTP), or the Occupational Safety and Health Administration (OSHA).

**Reproductive hazard**

There are no data available for assessing risk to the fetus from maternal exposure to this material.

**3. COMPOSITION/INFORMATION ON INGREDIENTS**

| Hazardous Components | CAS-No. / Trade Secret No. | Concentration |
|----------------------|----------------------------|---------------|
| ROSIN ESTER          |                            | >=10-<15%     |
| SURFACTANT           | 254504001-5572             | >=1.5-<5%     |

**4. FIRST AID MEASURES****Eyes**

If symptoms develop, move individual away from exposure and into fresh air. Flush eyes gently with water while holding eyelids apart. If symptoms persist or there is any visual difficulty, seek medical attention.

**Skin**

Remove contaminated clothing. Wash exposed area with soap and water. If symptoms persist, seek medical attention. Launder clothing before reuse.

**Ingestion**

Seek medical attention. If individual is drowsy or unconscious, do not give anything by mouth; place individual on the left side with the head down. Contact a physician, medical facility, or poison control center for advice about whether to induce vomiting. If possible, do not leave individual unattended.

**Inhalation**

If symptoms develop, immediately move individual away from exposure and into fresh air. Seek immediate medical attention; keep person warm and quiet. If person is not breathing, begin artificial respiration. If breathing is difficult, administer oxygen.

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**Notes to physician****Hazards:** No information available.**Treatment:** No information available.**5. FIREFIGHTING MEASURES****Suitable extinguishing media**Dry chemical, Carbon dioxide (CO<sub>2</sub>), Water spray**Hazardous combustion products**

No data

**Precautions for fire-fighting**

Wear full firefighting turn-out gear (full Bunker gear), and respiratory protection (SCBA). Use water spray to cool fire exposed containers and structures until fire is out if it can be done with minimal risk. Avoid spreading burning material with water used for cooling purposes.

**NFPA Flammable and Combustible Liquids Classification**

Combustible Liquid Class IIIB

**6. ACCIDENTAL RELEASE MEASURES****Personal precautions**

For personal protection see section 8. Persons not wearing protective equipment should be excluded from area of spill until clean-up has been completed.

**Environmental precautions**

Prevent spreading over a wide area (e.g. by containment or oil barriers). Do not let product enter drains. Do not flush into surface water or sanitary sewer system.

**Methods for cleaning up**

Keep in suitable, closed containers for disposal. Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust).

**Other information**

Comply with all applicable federal, state, and local regulations.

**7. HANDLING AND STORAGE****Handling**

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid), all hazard precautions given in the data sheet must be observed.

**Storage**

Store in a cool, dry, ventilated area.

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**8. EXPOSURE CONTROLS/PERSONAL PROTECTION****Exposure Guidelines**

Contains no substances with occupational exposure limit values.

**General advice**

These recommendations provide general guidance for handling this product. Personal protective equipment should be selected for individual applications and should consider factors which affect exposure potential, such as handling practices, chemical concentrations and ventilation. It is ultimately the responsibility of the employer to follow regulatory guidelines established by local authorities.

**Exposure controls**

Provide sufficient mechanical (general and/or local exhaust) ventilation to maintain exposure below exposure guidelines (if applicable) or below levels that cause known, suspected or apparent adverse effects.

**Eye protection**

Not required under normal conditions of use. Wear splash-proof safety goggles if material could be misted or splashed into eyes.

**Skin and body protection**

Wear normal work clothing including long pants, long-sleeved shirts and foot covering to prevent direct contact of the product with the skin. Launder clothing before reuse. If skin irritation develops, contact your facility health and safety professional or your local safety equipment supplier to determine the proper personal protective equipment for your use.

Wear resistant gloves (consult your safety equipment supplier).

**Respiratory protection**

A NIOSH-approved air-purifying respirator with an appropriate cartridge and/or filter may be permissible under certain circumstances where airborne concentrations are expected to exceed exposure limits (if applicable) or if overexposure has otherwise been determined. Protection provided by air-purifying respirators is limited. Use a positive pressure, air-supplied respirator if there is any potential for uncontrolled release, exposure levels are not known or any other circumstances where an air-purifying respirator may not provide adequate protection.

**9. PHYSICAL AND CHEMICAL PROPERTIES**

|                    |  |
|--------------------|--|
| Physical state     | liquid                                       |
| Colour             | white  |
| Flash point        | > 201 °F / > 94 °C Seta closed cup           |
| Density            | 1.02 g/cm <sup>3</sup> @ 77.00 °F / 25.00 °C |
|                    | 8.5 lb/gal @ 77.00 °F / 25.00 °C             |
| Viscosity, dynamic | 1,300 mPa.s                                  |

**10. STABILITY AND REACTIVITY**

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**Stability**

Stable.

**Conditions to avoid**

None known.

**Incompatible products**

None known.

**Hazardous decomposition products**

No data

**Hazardous reactions**

Product will not undergo hazardous polymerization.

**11. TOXICOLOGICAL INFORMATION**

Information on likely routes of exposure : Inhalation  
Skin absorption  
Skin contact  
Eye Contact  
Ingestion

**Product**

Acute oral toxicity : no data available

Acute inhalation toxicity : no data available

Acute dermal toxicity : no data available

Skin corrosion/irritation : no data available

Serious eye damage/eye irritation : no data available

Respiratory or skin sensitization : no data available

**Components:****ROSIN ESTER:**Acute oral toxicity : LD 50 Rat:  $\geq 5,000$  mg/kg

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Acute dermal toxicity : LD 50 Rabbit:  $\geq 5,000$  mg/kg

Respiratory or skin sensitization : Species: guinea pig  
Classification: Did not cause sensitisation on laboratory animals.

**SURFACTANT:**

Acute oral toxicity : LD 50 Rat: 4,600 mg/kg

Acute inhalation toxicity : LC 50 Rat: 20 mg/l

Acute dermal toxicity : LD 50 Rat:  $> 2,000$  mg/kg

**12. ECOLOGICAL INFORMATION****Ecotoxicity****Product:**

no data available

**Components:****SURFACTANT:**

Toxicity to fish : LC 50 (Pimephales promelas (fathead minnow)): 36 mg/l  
Exposure time: 96 h  
Test Method: semi-static test

LC 50 (Cyprinus carpio (Carp)): 42 mg/l  
Exposure time: 96 h  
Test Method: static test

Toxicity to daphnia and other aquatic invertebrates : EC 50 (Water flea (Daphnia magna)): 91 mg/l  
Exposure time: 48 h

**Persistence and degradability****Product:**

no data available

**Components:**



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**SURFACTANT:**

Biodegradability : Not readily biodegradable.

**Bioaccumulative potential****Product:**

no data available

**Components:**

no data available

**Mobility in soil****Product:**

no data available

**Components:**

no data available

**13. DISPOSAL CONSIDERATIONS****Waste disposal methods**

Dispose of in accordance with all applicable local, state and federal regulations.

**14. TRANSPORT INFORMATION****REGULATION**

| ID NUMBER | PROPER SHIPPING NAME | *HAZARD CLASS | SUBSIDIARY HAZARDS | PACKING GROUP | MARINE POLLUTANT / LTD. QTY. |
|-----------|----------------------|---------------|--------------------|---------------|------------------------------|
|           |                      |               |                    |               |                              |

**U.S. DOT - ROAD**

Not dangerous goods

**U.S. DOT - RAIL**

Not dangerous goods

**U.S. DOT - INLAND WATERWAYS**

Not dangerous goods

**TRANSPORT CANADA - ROAD**

Not dangerous goods

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**TRANSPORT CANADA - RAIL**

Not dangerous goods

**TRANSPORT CANADA - INLAND WATERWAYS**

Not dangerous goods

**INTERNATIONAL MARITIME DANGEROUS GOODS**

Not dangerous goods

**INTERNATIONAL AIR TRANSPORT ASSOCIATION - CARGO**

Not dangerous goods

**INTERNATIONAL AIR TRANSPORT ASSOCIATION - PASSENGER**

Not dangerous goods

**MEXICAN REGULATION FOR THE LAND TRANSPORT OF HAZARDOUS MATERIALS AND WASTES**

Not dangerous goods

**\*ORM = ORM-D, CBL = COMBUSTIBLE LIQUID**

Dangerous goods descriptions (if indicated above) may not reflect quantity, end-use or region-specific exceptions that can be applied. Consult shipping documents for descriptions that are specific to the shipment.

**15. REGULATORY INFORMATION****California Prop. 65**

WARNING! This product contains a chemical known to the State of California to cause cancer.

ETHYL ACRYLATE  
FORMALDEHYDE  
1,4-DIOXANE  
ETHYLENE OXIDE  
ACETALDEHYDE

WARNING: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.

ETHYLENE OXIDE

**SARA Hazard Classification****SARA 311/312 Classification**

Acute Health Hazard

**SARA 313 Component(s)**

SARA 313: This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

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**Notification status**

|   |                      |
|---|----------------------|
| US. Toxic Substances Control Act  | y (positive listing) |
| Canada. Canadian Environmental Protection Act (CEPA). Domestic Substances List (DSL). (Can. Gaz. Part II, Vol. 133) | y (positive listing) |
| Australia. Industrial Chemical (Notification and Assessment) Act  | n (Negative listing) |
| Japan. ENCS - Existing and New Chemical Substances Inventory  | n (Negative listing) |
| Korea. Toxic Chemical Control Law (TCCL) List   | n (Negative listing) |
| Philippines. The Toxic Substances and Hazardous and Nuclear Waste Control Act                                       | n (Negative listing) |
| China. Inventory of Existing Chemical Substances  | y (positive listing) |

**Reportable quantity - Product**

|  |            |
|--|------------|
| US. EPA CERCLA Hazardous Substances (40 CFR 302) | 193050 lbs |
|--|------------|

**Reportable quantity-Components**

|         |           |         |
|---------|-----------|---------|
| AMMONIA | 7664-41-7 | 100 lbs |
|---------|-----------|---------|

|                  | HMIS | NFPA |
|------------------|------|------|
| Health           | 1*   | 1    |
| Flammability     | 1    | 1    |
| Physical hazards | 0    |      |
| Instability      |      | 0    |
| Specific Hazard  | --   | --   |

**16. OTHER INFORMATION**

Disclaimer: The data in this SDS has been compiled from publicly available sources. This data relates only to the designated product and not to the use of said product in combination with other materials. Because conditions and circumstances of the use of the product are beyond our control and any summary of data as such is represented by this SDS is inherently incomplete, Aptec, Inc. makes no warranty about the accuracy of the data herein and assumes no liability for the use of such data. Responsibility for proper precautions and safe use of the product lies with the user. We recommend that tests be made in a laboratory or plant to determine if this product meets all of your requirements. It is the responsibility of the buyer/user to determine the suitability of this product for his/her application/requirements. It is the responsibility of the user to comply with all applicable federal, state, and local laws and regulations.

List of abbreviations and acronyms that could be, but not necessarily are, used in this safety data sheet:

ACGIH : American Conference of Industrial Hygienists

BEI : Biological Exposure Index

CAS : Chemical Abstracts Service (Division of the American Chemical Society).

CMR : Carcinogenic, Mutagenic or Toxic for Reproduction

FG : Food grade

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

H-statement : Hazard Statement

IATA : International Air Transport Association.

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

ICAO : International Civil Aviation Organization

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

IMDG : International Maritime Code for Dangerous Goods

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ISO : International Organization for Standardization  
logPow : octanol-water partition coefficient  
LCxx : Lethal Concentration, for xx percent of test population  
LDxx : Lethal Dose, for xx percent of test population.  
ICxx : Inhibitory Concentration for xx of a substance  
Ecxx : Effective Concentration of xx  
N.O.S.: Not Otherwise Specified  
OECD : Organization for Economic Co-operation and Development  
OEL : Occupational Exposure Limit  
P-Statement : Precautionary Statement  
PBT : Persistent , Bioaccumulative and Toxic  
PPE : Personal Protective Equipment  
STEL : Short-term exposure limit  
STOT : Specific Target Organ Toxicity  
TLV : Threshold Limit Value  
TWA : Time-weighted average  
vPvB : Very Persistent and Very Bioaccumulative  
WEL : Workplace Exposure Level

CERCLA : Comprehensive Environmental Response, Compensation, and Liability Act  
DOT : Department of Transportation  
FIFRA : Federal Insecticide, Fungicide, and Rodenticide Act  
HMIRC : Hazardous Materials Information Review Commission  
HMIS : Hazardous Materials Identification System  
NFPA : National Fire Protection Association  
NIOSH : National Institute for Occupational Safety and Health  
OSHA : Occupational Safety and Health Administration  
PMRA : Health Canada Pest Management Regulatory Agency  
RTK : Right to Know  
WHMIS : Workplace Hazardous Materials Information System



# Fenway Automotive Compliance Document

Facility ID

Permit #

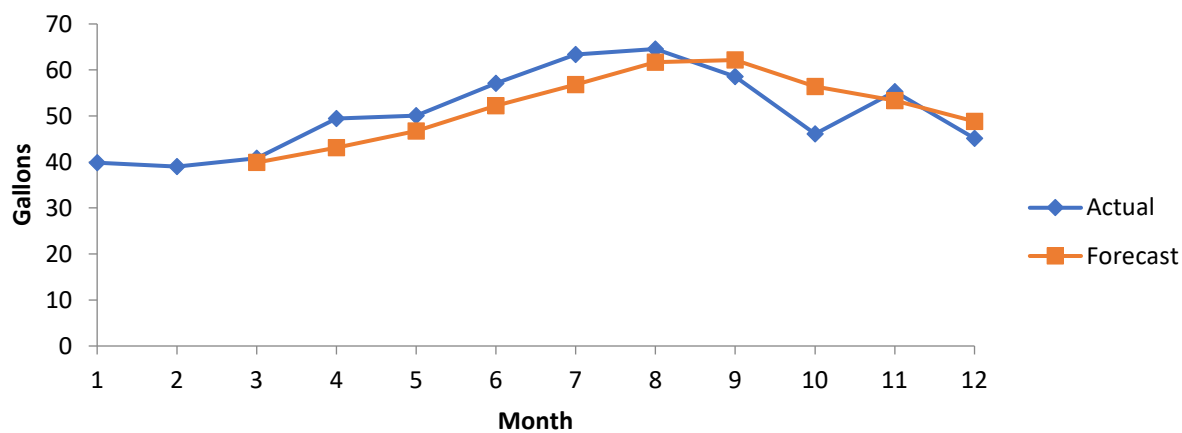
|                                  | PU-15290W<br>Water-based MR (UM01) |   |   | PU-16224<br>Solvent-based Mold Release (UM02) |  |   |   |
|----------------------------------|------------------------------------|---|---|---|--|---|---|
| Month - Year                     | Gal/Month<br>Purchases             | Total Line<br>#1 VOC<br>Emissions<br>(lb) | Total Line #1<br>VOC<br>Emissions<br>(TONS) | Gal/Month<br>Purchases                        | Total Line #2<br>VOC<br>Emissions (lb) | Total Line #2<br>VOC<br>Emissions<br>(TONS) | TOTAL<br>FACILITY<br>WIDE VOC<br>EMISSIONS<br>(TON) |
| Jan-23                           | 520.00                             | 4   | 0.00216                                     | 1200.00                                       | 7,131                                  | 3.57  | 3.57  |
| Feb-23                           | 0.00                               | 0   | 0.00000                                     | 0.00  | 0                                      | 0.00  | 0.00  |
| Mar-23                           | 520.00                             | 4   | 0.00216                                     | 800.00  | 4,754                                  | 2.38  | 2.38  |
| Apr-23                           | 0.00                               | 0   | 0.00000                                     | 0.00  | 0                                      | 0.00  | 0.00  |
| May-23                           | 780.00                             | 6   | 0.00324                                     | 800.00  | 4,754                                  | 2.38  | 2.38  |
| Jun-23                           | 780.00                             | 6   | 0.00324                                     | 800.00  | 4,754                                  | 2.38  | 2.38  |
| Jul-23                           | 780.00                             | 6   | 0.00324                                     | 800.00  | 4,754                                  | 2.38  | 2.38  |
| Aug-23                           | 780.00                             | 6   | 0.00324                                     | 800.00  | 4,754                                  | 2.38  | 2.38  |
| Sep-23                           | 260.00                             | 2   | 0.00108                                     | 800.00  | 4,754                                  | 2.38  | 2.38  |
| Oct-23                           | 780.00                             | 6   | 0.00324                                     | 800.00  | 4,754                                  | 2.38  | 2.38  |
| Nov-23                           |                                    | 0   | 0.00000                                     |   | 0                                      | 0.00  | 0.00  |
| Dec-22                           | 0.00                               | 0   | 0.00000                                     |   | 0                                      | 0.00  | 0.00  |
| Total Yearly<br>Throughput (gal) |                                    |   |   |   |  |   | 20.23   |
|                                  | 5200                               | 43  | 0.0216                                      | 6800.00                                       | 40,408                                 | 20.2038                                     | 20.23   |

[illegible]

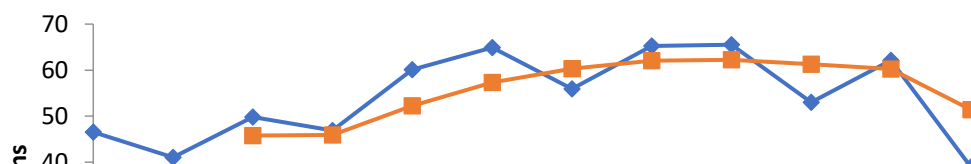
|        | Total Gal Produced |           |              |
|--------|--------------------|-----------|--------------|
|        | V0000              | Aptec     | Combined gal |
| Winter | 1032.4921          | 1054.5485 | 2087.0406    |
| Spring | 1168.674033        | 1307.2365 | 2475.910533  |
| Summer | 1541.990116        | 1551.762  | 3093.752116  |
| Fall   | 1333.5678          | 1505.495  | 2839.0628    |

| .12 LBS per gallon VOC |        |        |                    |                    |
|------------------------|--------|--------|--------------------|--------------------|
|                        | V00000 | AP131H | Rolling Avg V00000 | Rolling Avg AP131H |
| January                | 40     | 47     | #N/A               | #N/A               |
| February               | 39     | 41     | #N/A               | #N/A               |
| March                  | 41     | 50     | 40                 | 46                 |
| April                  | 49     | 47     | 43                 | 46                 |
| May                    | 50     | 60     | 47                 | 52                 |
| June                   | 57     | 65     | 52                 | 57                 |
| July                   | 63     | 56     | 57                 | 60                 |
| August                 | 65     | 65     | 62                 | 62                 |
| September              | 59     | 66     | 62                 | 62                 |
| October                | 46     | 53     | 56                 | 61                 |
| November               | 55     | 62     | 53                 | 60                 |
| December               | 45     | 39     | 49                 | 51                 |

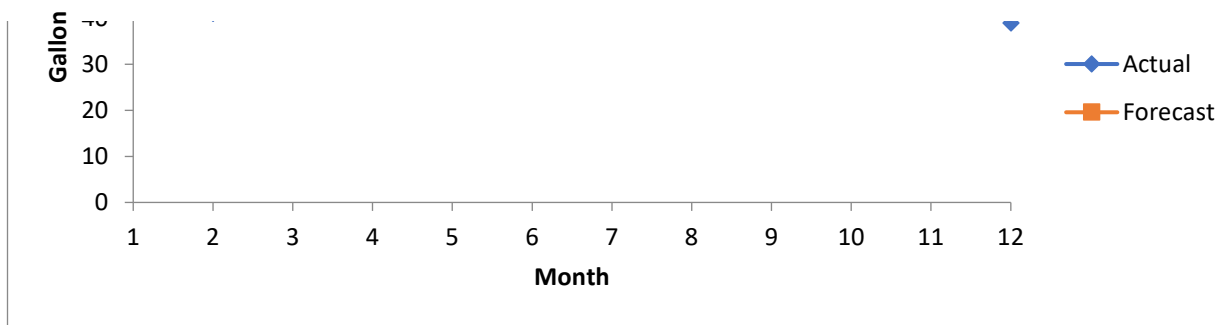
**Rolling Avg V00000**



**Rolling Avg AP131H**

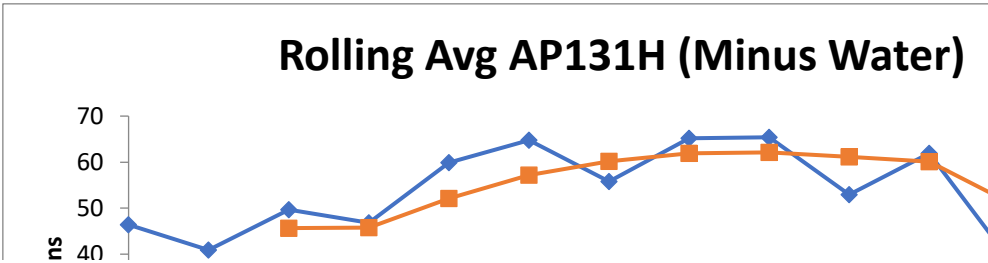
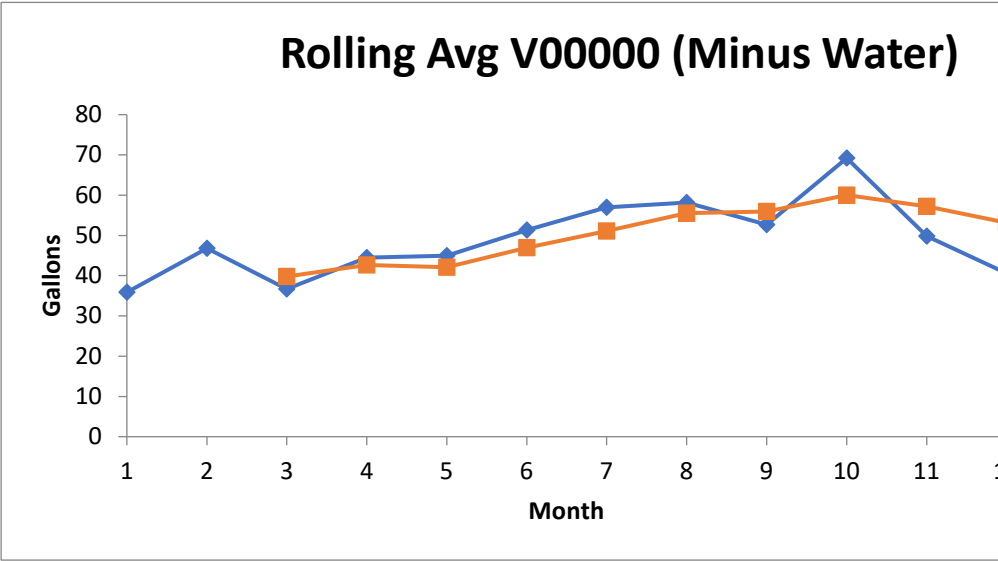


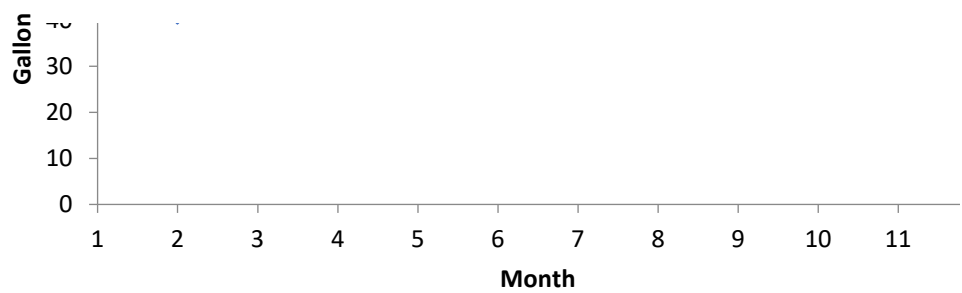




|  | Total Gal Produced<br>(Minus Water Content) |             |                 |
|--|---|-------------|-----------------|
|  | V0000                                       | Aptec       | Combined<br>gal |
|  | Winter                                      | #VALUE!     | #VALUE!         |
|  | Spring                                      | #VALUE!     | 1307.2365       |
|  | Summer                                      | 1541.990116 | 1551.762        |
|  | Fall  | 1333.5678   | 1505.495        |
|  |   |             | 2839.0628       |

| Gallons Used (Minus Water Content) |        |        |                    |
|------------------------------------|--------|--------|--------------------|
|                                    | V00000 | AP131H | Rolling Avg V00000 |
| January                            | 36     | 46     | #N/A               |
| February                           | 47     | 41     | #N/A               |
| March                              | 37     | 50     | 40                 |
| April                              | 45     | 47     | 43                 |
| May                                | 45     | 60     | 42                 |
| June                               | 51     | 65     | 47                 |
| July                               | 57     | 56     | 51                 |
| August                             | 58     | 65     | 56                 |
| September                          | 53     | 65     | 56                 |
| October                            | 69     | 53     | 60                 |
| November                           | 50     | 62     | 57                 |
| December                           | 41     | 39     | 53                 |





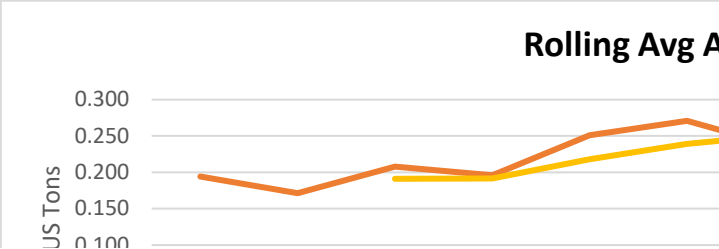
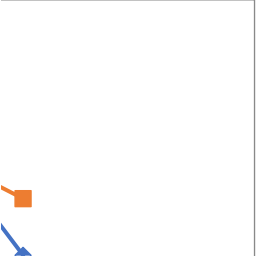
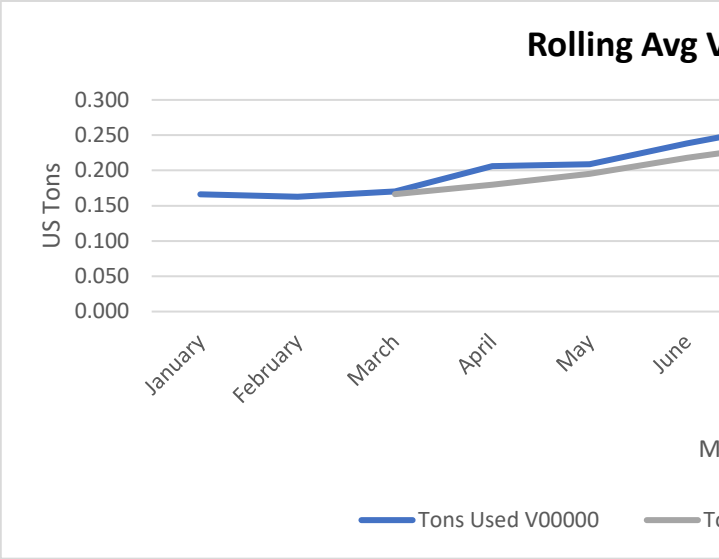
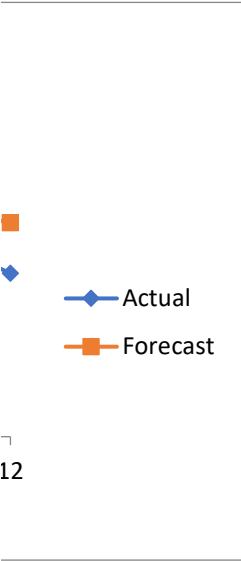
| As Applied VOC Content (lb/gal) W/O water |                 |
|---|-----------------|
| V00000                                    | 0.015           |
| Aptec                                     | 0.015           |
| Water Content                             |                 |
| V00000                                    | 10% by weight   |
| AP131H                                    | 0.25% by weight |

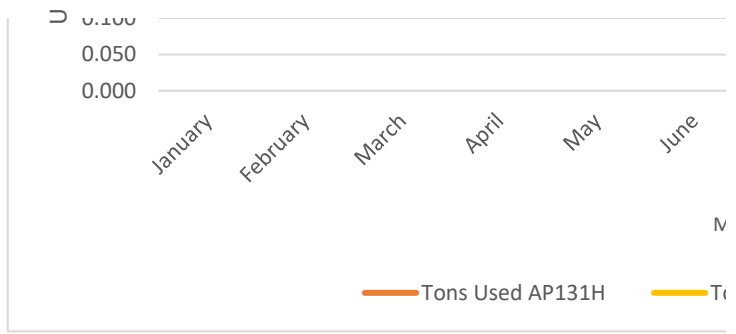
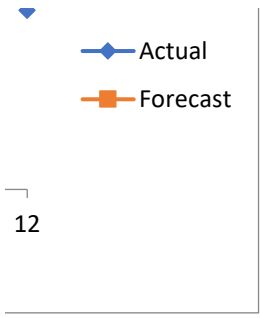
|              |   |
|--------------|---|
| Volume [gal] | = |
|--------------|---|

|        |   |
|--------|---|
| 239.65 | l |
| 0      |   |

| Rolling Avg AP131H |
|--------------------|
| #N/A               |
| #N/A               |
| 46                 |
| 46                 |
| 52                 |
| 57                 |
| 60                 |
| 62                 |
| 62                 |
| 61                 |
| 60                 |
| 51                 |

|           | V00000 | AP131H |
|-----------|--------|--------|
| January   | 0.166  | 0.194  |
| February  | 0.163  | 0.171  |
| March     | 0.170  | 0.208  |
| April     | 0.206  | 0.196  |
| May       | 0.209  | 0.251  |
| June      | 0.238  | 0.271  |
| July      | 0.264  | 0.233  |
| August    | 0.269  | 0.272  |
| September | 0.244  | 0.273  |
| October   | 0.192  | 0.221  |
| November  | 0.231  | 0.259  |
| December  | 0.188  | 0.163  |





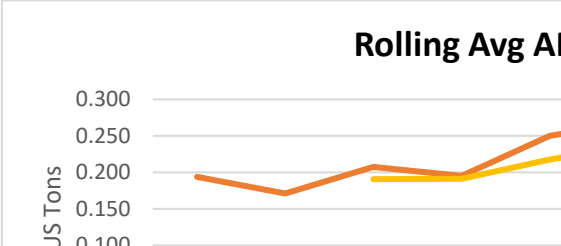
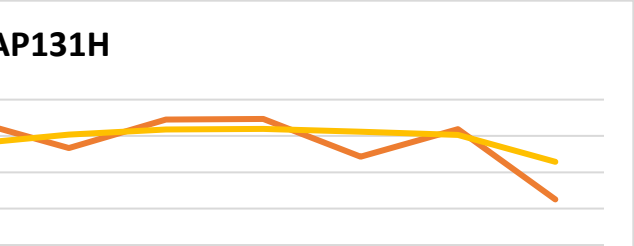
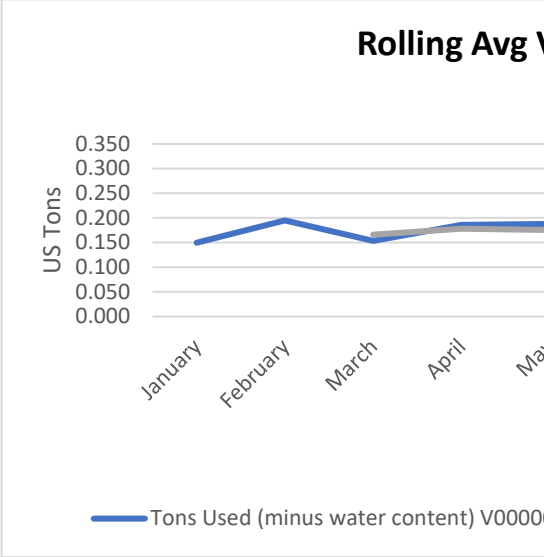
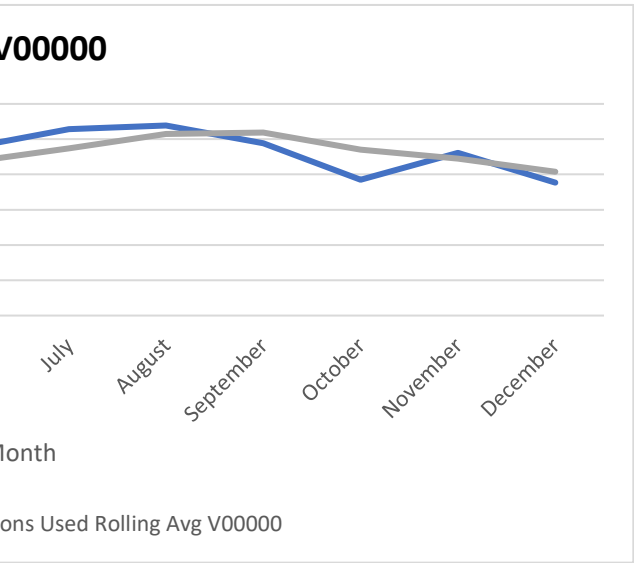
|                   |
|-------------------|
| Mass [ton]        |
| Density [ton/gal] |

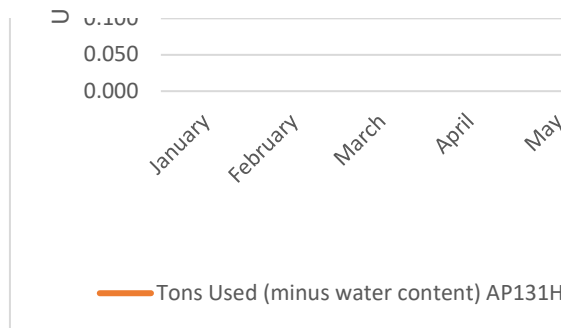
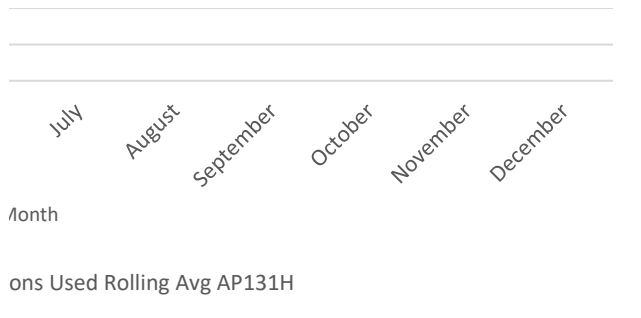
|                   |                 |
|-------------------|-----------------|
| Liquid            | Density         |
| Water (Fresh 4°C) | 8.345 lb/US gal |

|                                 |
|---------------------------------|
| US gallons in a US ton of water |
| 0.0041727 US ton/US gal         |

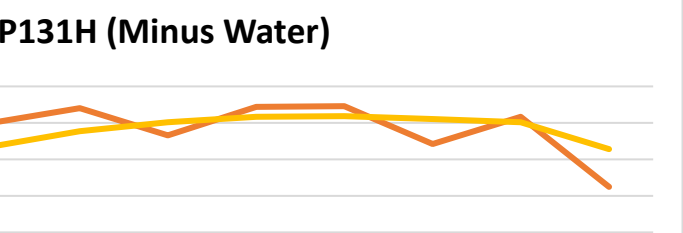
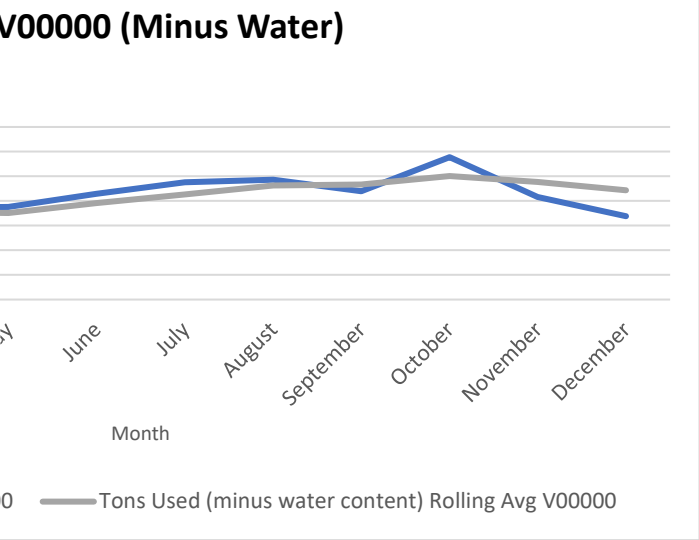
| Tons Used          |                    |
|--------------------|--------------------|
| Rolling Avg V00000 | Rolling Avg AP131H |
| #N/A               | #N/A               |
| #N/A               | #N/A               |
| 0.166              | 0.191              |
| 0.180              | 0.192              |
| 0.195              | 0.218              |
| 0.218              | 0.239              |
| 0.237              | 0.252              |
| 0.257              | 0.259              |
| 0.259              | 0.260              |
| 0.235              | 0.256              |
| 0.222              | 0.251              |
| 0.204              | 0.214              |

|           | V00000 |
|-----------|--------|
| January   | 0.150  |
| February  | 0.195  |
| March     | 0.153  |
| April     | 0.186  |
| May       | 0.188  |
| June      | 0.214  |
| July      | 0.238  |
| August    | 0.243  |
| September | 0.220  |
| October   | 0.289  |
| November  | 0.208  |
| December  | 0.169  |

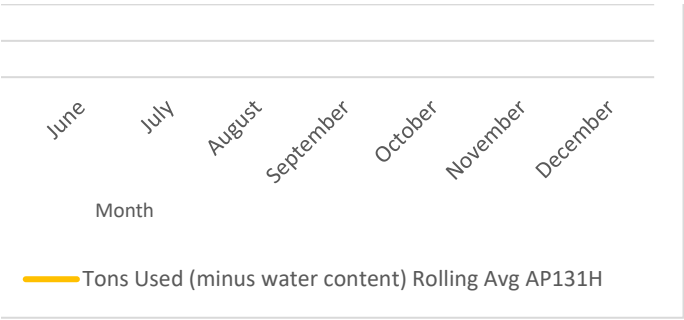




| Tons Used (minus water content) |                    |                    |
|---------------------------------|--------------------|--------------------|
| AP131H                          | Rolling Avg V00000 | Rolling Avg AP131H |
| 0.194                           | #N/A               | #N/A               |
| 0.171                           | #N/A               | #N/A               |
| 0.207                           | 0.166              | 0.191              |
| 0.195                           | 0.178              | 0.191              |
| 0.250                           | 0.176              | 0.217              |
| 0.270                           | 0.196              | 0.239              |
| 0.233                           | 0.213              | 0.251              |
| 0.272                           | 0.232              | 0.258              |
| 0.273                           | 0.234              | 0.259              |
| 0.221                           | 0.250              | 0.255              |
| 0.258                           | 0.239              | 0.251              |
| 0.162                           | 0.222              | 0.214              |







[illegible]

|        | Total Gal Produced |           |              |
|--------|--------------------|-----------|--------------|
|        | V0000              | Aptec     | Combined gal |
|        | 516.24605          | 1054.5485 | 2087.0406    |
|        | 1168.674033        | 1307.2365 | 2475.910533  |
|        | 1541.990116        | 1551.762  | 3093.752116  |
| Winter | 1333.5678          | 1505.495  | 2839.0628    |
| Spring |                    |           |              |
| Summer |                    |           |              |
| Fall   |                    |           |              |

| As Applied VOC Content |        |
|------------------------|--------|
| V00000                 | 0.15   |
| Aptec                  | 0.15   |
| Water Content          |        |
| V00000                 | 10.00% |
| AP131H                 | 0.25%  |

|        | Total Gal Produced<br>(Minus Water Content) |             |              |
|--------|---|-------------|--------------|
|        | V0000                                       | Aptec       | Combined gal |
|        | 464.621445                                  | 1051.912129 | 1516.533574  |
|        | 1165.752348                                 | 1307.2365   | 2472.988848  |
|        | 1541.990116                                 | 1551.762    | 3093.752116  |
| Winter | 1333.5678                                   | 1505.495    | 2839.0628    |
| Spring |   |             |              |
| Summer |   |             |              |
| Fall   |   |             |              |

| Gallons Used |        |        |                    |                    |
|--------------|--------|--------|--------------------|--------------------|
|              | V00000 | AP131H | Rolling Avg V00000 | Rolling Avg AP131H |
| January      | 332    | 388    | #N/A               | #N/A               |
| February     | 325    | 342    | #N/A               | #N/A               |
| March        | 340    | 415    | 332                | 382                |
| April        | 412    | 391    | 359                | 383                |
| May          | 417    | 501    | 390                | 436                |
| June         | 476    | 541    | 435                | 478                |
| July         | 528    | 466    | 473                | 503                |
| August       | 538    | 544    | 514                | 517                |
| September    | 488    | 546    | 518                | 519                |
| October      | 384    | 442    | 470                | 511                |
| November     | 461    | 518    | 445                | 502                |
| December     | 376    | 325    | 407                | 428                |

| Gallons Used |        |
|--------------|--------|
|              | V00000 |
| January      | 299    |
| February     | 292    |
| March        | 306    |
| April        | 371    |
| May          | 375    |
| June         | 428    |
| July         | 475    |
| August       | 485    |
| September    | 439    |
| October      | 346    |
| November     | 415    |
| December     | 338    |

| allons Used (Minus Water Content) |                    |                    |
|-----------------------------------|--------------------|--------------------|
| AP131H                            | Rolling Avg V00000 | Rolling Avg AP131H |
| 387                               | #N/A               | #N/A               |
| 341                               | #N/A               | #N/A               |
| 414                               | 299                | 381                |
| 390                               | 323                | 382                |
| 499                               | 351                | 435                |
| 540                               | 391                | 477                |
| 465                               | 426                | 501                |
| 543                               | 463                | 516                |
| 545                               | 466                | 517                |
| 441                               | 423                | 509                |
| 516                               | 400                | 501                |
| 324                               | 366                | 427                |

## Daily Adh

|               | May-23 |          | 24-May   |         |
|---------------|--------|----------|----------|---------|
|               | AP131H | V0000    | AP131H   | V0000   |
| 1-May         | 55.09  | 0        | 0        | 31.44   |
| 2-May         | 0      | 44.76    | 36.79    | 0       |
| 3-May         | 1.42   | 24.42    | 0        | 0       |
| 4-May         | 48     | 0        | 0        | 0       |
| 5-May         | 0      | 35.02    | 0        | 0       |
| 6-May         | 0      | 15       | 0        | 53.93   |
| 7-May         | 0      | 0        | 56.02    | 9.67    |
| 8-May         | 54.03  | 0.36     | 77.53    | 0       |
| 9-May         | 18.41  | 33.2     | 13.92    | 21.32   |
| 10-May        | 35.36  | 10.06    | 0        | 0       |
| 11-May        | 0      | 29.03    | 0        | 0       |
| 12-May        | 27.59  | 6.62     | 0        | 0       |
| 13-May        | 0      | 0        | 0        | 21.64   |
| 14-May        | 0      | 0        | 77.65    | 8.95    |
| 15-May        | 0      | 45.89    | 44.66    | 0       |
| 16-May        | 28.44  | 25.19    | 13.17    | 18.98   |
| 17-May        | 37.01  | 11.38    | 0        | 0       |
| 18-May        | 1.89   | 30.65    | 0        | 0       |
| 19-May        | 3.86   | 0.56     | 0        | 0       |
| 20-May        | 0      | 0        | 0        | 76.4    |
| 21-May        | 0      | 0        | 10.64    | 77.82   |
| 22-May        | 6.55   | 18.82    | 15.77    | 49.87   |
| 23-May        | 45.94  | 1.96     | 26.15    | 8.24    |
| 24-May        | 52.87  | 0        | 11.37    | 0       |
| 25-May        | 49.38  | 0        | 0        | 0       |
| 26-May        | 0      | 34.55    | 0        | 0       |
| 27-May        | 9.84   | 32.12    | 0        | 0       |
| 28-May        | 0      | 0        | 67.53    | 0       |
| 29-May        | 0      | 0        | 5.15     | 39.28   |
| 30-May        | 15.71  | 7.88     | 25.74    | 46.61   |
| 31-May        | 10.5   | 26.71    | 0        | 10.68   |
| Average usage | 16.19  | 14.00581 | 15.55129 | 15.3171 |
| Average VOC   | 0.243  | 0.21     | 0.233    | 0.233   |

**resive usage for May 2023 & May 2024**