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January 8, 2020

Mr. Michael Schmoller
Wisconsin Department of Natural Resources
South Central Region
3911 Fish Hatchery Road
Fitchburg, WI 53711

Subject: Notification of Renoclean SGC 62 Cleaning Agent Introduced to Groundwater Extraction and Treatment System
Madison-Kipp Corporation, 201 Waubesa Street, Madison, Wisconsin
Facility ID #113125320, WDNR BRRTS #02-13-558625

Dear Mr. Schmoller:

As requested during a phone discussion on January 7, 2020, TRC, on behalf of Madison-Kipp Corp. (MKC), is reporting the unplanned introduction of a small amount of Renoclean SGC 62 (cleaning agent) to the on-site groundwater extraction and treatment system (GETS) at the above referenced facility address. Renoclean SGC 62 is a mild detergent normally used for cleaning machine coolant systems and individual machine sumps. This product is used by MKC for cleaning equipment within their machining centers and discarded to their on-site waste water systems after use. The Safety Data Sheet for the cleaning agent is attached.

This cleaning agent was inadvertently pumped into the GETS between January 6 and 7, 2020. The GETS effluent is discharged to the storm sewer system and some portion of the limited amount of cleaning agent may have been discharged to the storm sewer, after passing through the GETS.

Part of the standard maintenance of the GETS involves the continuous addition of a sequestrant called Ques Industries, Inc. HECLA1, which prevents the buildup of hard water solids on the interior of the GETS equipment and piping. The sequestrant is added to the GETS mixing tank through a metering pump. The water from the mixing tank is pumped through the air-stripper and the treated water is discharged to the storm sewer system.

The HECLA1 sequestrant is delivered to MKC in blue 55-gallon plastic drums and assigned a part number for inventory purposes. On Monday, January 6, 2020, an MKC employee replaced an empty drum of sequestrant with a blue 55-gallon plastic drum of Renoclean SGC 62 and installed the influent line between the drum and the metering pump. This began adding the cleaning agent to the metering pump system. The part number on the blue 55-gallon drum matched the HECLA1 sequestrant, but the MKC employee noted the different product name and noted that the product did not appear visually the same as the HECLA1. It has since been determined that the wrong part number was assigned to the blue drum when it arrived at the MKC receiving department.

- Based on visual observation of the product, the employee spoke with additional MKC personnel and determined it was not the correct product. The influent tubing was then removed from the drum. It is estimated that the cleaning agent was pumped between approximately 8:30 AM and 9:30 AM on Monday January 6, 2020, or for about one-hour total operation of the metering pump.

- After removing the intake line, the metering pump continued to run in order to keep the system operating. Since the sequestrant is not a required element of the treatment, the GETS can continue to operate for short times even if there is no intake of sequestrant. Since the metering

pump continued to run, some of the cleaning agent already in the metering pump intake and discharge lines continued to be pumped into the GETS from Monday, January 6, 2020 at around 9:30 AM until the metering pump lost pressure due to lack of intake fluid (the intake line was no longer in the drum). This happened sometime prior to Tuesday, January 7, 2020 at around 10:40 AM when shut-down occurred. Some of the cleaning agent remained in the discharge line when the GETS was shut-off on Tuesday morning. Therefore, not all the cleaning agent pumped from the drum entered the mixing tank.

- On Tuesday, January 7, 2020, TRC was conducting a regular inspection of the GETS. Soap-like bubbles were observed in the air stripper and tanks of the GETS and the system was shut-down around 10:40 AM.

- MKC and TRC notified WDNR (Mike Schmoller) on Tuesday, January 7, 2020 of the situation and are sending this letter to document the available information.

Based on the metering pump rate, metering pump influent and discharge line lengths, and duration of the Renoclean SGC 62 drum being attached to the system, TRC believes that conservatively, less than 750 milliliters (mL) of Renoclean SGC 62 was pumped from the drum (based on maximum metering pump rate), and probably closer to 350 to 450 mL based on typical metering rates. A small amount of cleaning agent remained in the discharge line, so even less than these estimated amounts actually entered the mixing tank and air stripper components of the GETS.

The GETS remains off and MKC is prepared to clean the components of the GETS to remove any of the cleaning agent remaining in the GETS to the extent possible.

MKC and TRC are awaiting WDNR's recommendation for further actions in regard to this situation. The GETS will remain off until this is further discussed, and appropriate actions can be taken. If you have any questions or comments, please contact Andrew Stehn (608-826-3665) or Katherine Vater (608-826-3663) of TRC.

Sincerely,

TRC

Andrew M. Stehn

Andrew Stehn, P.E.
Senior Project Engineer

Katherine Vater

Katherine Vater, P.E.
Project Manger

Attachments: 1. Renoclean SGC 62 SDS

cc: Mark Sheppard – MKC (electronic)
Alan Hopfensperger – WDNR (electronic)

Attachment 1

Renoclean SGC 62 SDS

SAFETY DATA SHEET

1. Identification

Product name RENOCLEAN SGC 62

Other means of identification No data available.

Recommended use: Industrial cleaning fluid

Restrictions on use: Industrial use only

Manufacturer/Importer/Supplier/Distributor Information

Manufacturer

Company Name: Fuchs Lubricants Co.
Address: 17050 Lathrop Avenue
Harvey, Illinois 60426
Telephone: 708-333-8900
Fax: 708-333-9180

Contact Person: EHS Department
E-mail: sds@fuchsus.com

Emergency telephone number: 708-333-8900 (Bus. hrs) 800-255-3924 (24 hrs)

2. Hazard(s) identification

Hazard Classification

Health Hazards

Skin Corrosion/Irritation	Category 2
Serious Eye Damage/Eye Irritation	Category 2A

Label Elements

Hazard Symbol:

Signal Word: Warning

Hazard Statement: Causes skin irritation.
Causes serious eye irritation.

Precautionary Statements

Prevention: Wash thoroughly after handling. Wear protective gloves/protective clothing/eye protection/face protection.

Response: If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention. IF ON SKIN: Wash with plenty of water. If skin irritation occurs: Get medical advice/attention. Specific treatment (see this label). Take off contaminated clothing.

Other hazards which do not result in GHS classification: None.

3. Composition/information on ingredients

Hazardous Component(s):

Chemical name	CAS-No.	Concentration
Triethanolamine	102-71-6	5 - 10%
Chelating agent	Confidential	1 - 5%
Biocide	Confidential	1 - 5%
Monoethanolamine	141-43-5	1 - 5%

Specific chemical identities and/or exact percentages have been withheld as trade secrets.

4. First-aid measures

Ingestion: Call a POISON CENTER/doctor/.../if you feel unwell. Rinse mouth.

Inhalation: Move to fresh air. Call a POISON CENTER/doctor/.../if you feel unwell.

Skin Contact: Remove contaminated clothing and shoes. Wash contact areas with soap and water. If skin irritation occurs: Get medical advice/attention.

Eye contact: Immediately flush with plenty of water for at least 15 minutes. If easy to do, remove contact lenses. Get medical attention.

Most important symptoms/effects, acute and delayed

Symptoms: No data available.

Indication of immediate medical attention and special treatment needed

Treatment: Get medical attention if symptoms occur.

5. Fire-fighting measures

General Fire Hazards: No unusual fire or explosion hazards noted.

Suitable (and unsuitable) extinguishing media

Suitable extinguishing media: Water spray, fog, CO2, dry chemical, or regular foam. Use fire-extinguishing media appropriate for surrounding materials.

Unsuitable extinguishing media: Do not use water jet as an extinguisher, as this will spread the fire.

Specific hazards arising from the chemical: Heat may cause the containers to explode. During fire, gases hazardous to health may be formed.

Special protective equipment and precautions for firefighters

Special fire fighting procedures: No data available.

Special protective equipment for fire-fighters: Firefighters must use standard protective equipment including flame retardant coat, helmet with face shield, gloves, rubber boots, and in enclosed spaces, SCBA.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures: See Section 8 of the SDS for Personal Protective Equipment. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Keep unauthorized personnel away.

Methods and material for containment and cleaning up: Absorb spill with vermiculite or other inert material, then place in a container for chemical waste. Dike far ahead of larger spill for later recovery and disposal.

Environmental Precautions: Do not contaminate water sources or sewer. Prevent further leakage or spillage if safe to do so.

7. Handling and storage

Precautions for safe handling: Contains amines. Do not add sodium nitrite or other nitrosating agents which may form cancer causing nitrosamines. Observe good industrial hygiene practices. Wear appropriate personal protective equipment. Do not expose to intense heat as product may expand and pressurize container.

Conditions for safe storage, including any incompatibilities: Store in original tightly closed container. Avoid contact with oxidizing agents. Store away from incompatible materials.

8. Exposure controls/personal protection

Exposure Limits

Chemical name	type	Exposure Limit Values	Source
Triethanolamine	TWA	5 mg/m3	US. ACGIH Threshold Limit Values (03 2012)
Monoethanolamine	TWA	3 ppm	US. ACGIH Threshold Limit Values (03 2012)
Monoethanolamine	STEL	6 ppm	US. ACGIH Threshold Limit Values (03 2012)
Monoethanolamine	STEL	6 ppm 15 mg/m3	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
Monoethanolamine	TWA	3 ppm 8 mg/m3	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)

Protective Measures: Provide easy access to water supply and eye wash facilities. Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

Respiratory Protection: In case of inadequate ventilation use suitable respirator. Seek advice from supervisor on the company's respiratory protection standards.

Eye Protection: Wear safety glasses with side shields (or goggles).

Skin and Body Protection: Wear chemical-resistant gloves, footwear, and protective clothing appropriate for the risk of exposure. Contact health and safety professional or manufacturer for specific information.

Hygiene measures: Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing to remove contaminants. Discard contaminated footwear that cannot be cleaned.

9. Physical and chemical properties

Appearance

Physical state: liquid
Form: No data available.
Color: Amber
Odor: Mild
Odor threshold: No data available.
pH: 9.5
Melting point/freezing point: No data available.
Initial boiling point and boiling range: No data available.

Flash Point:	not applicable
Evaporation rate:	No data available.
Flammability (solid, gas):	No data available.
Upper/lower limit on flammability or explosive limits	
Flammability limit - upper (%):	No data available.
Flammability limit - lower (%):	No data available.
Explosive limit - upper (%):	No data available.
Explosive limit - lower (%):	No data available.
Vapor pressure:	No data available.
Vapor density:	No data available.
Relative density:	1.04
Solubility(ies)	
Solubility in water:	Soluble
Solubility (other):	No data available.
Partition coefficient (n-octanol/water):	No data available.
Auto-ignition temperature:	No data available.
Decomposition temperature:	No data available.
Viscosity:	> 2 mm2/s (40 °C)
Other information	
VOC:	57.97 g/l (ASTM E 1868-10) 5.80 g/l 17.2 % (Method 24)

10. Stability and reactivity

Reactivity:	Not reactive during normal use.
Chemical Stability:	Material is stable under normal conditions.
Possibility of hazardous reactions:	None under normal conditions.
Conditions to avoid:	Avoid heat or contamination.
Incompatible Materials:	No data available.
Hazardous Decomposition Products:	Thermal decomposition or combustion may liberate carbon oxides and other toxic gases or vapors.

11. Toxicological information

Information on likely routes of exposure

Ingestion:	May irritate and cause malaise.

Inhalation: May cause irritation to the respiratory system.

Skin Contact: Causes skin irritation.

Eye contact: Causes serious eye irritation.

Symptoms related to the physical, chemical and toxicological characteristics

Ingestion: No data available.

Inhalation: No data available.

Skin Contact: No data available.

Eye contact: No data available.

Information on toxicological effects

Acute toxicity (list all possible routes of exposure)

Oral

Product: ATEmix (): > 5000 mg/kg

Dermal

Product: ATEmix (): > 5000 mg/kg

Inhalation

Product: Not classified for acute toxicity based on available data.

Repeated dose toxicity

Product: No data available.

Skin Corrosion/Irritation

Product: No data available.

Serious Eye Damage/Eye Irritation

Product: No data available.

Respiratory or Skin Sensitization

Product: No data available.

Carcinogenicity

Product: No data available.

IARC Monographs on the Evaluation of Carcinogenic Risks to Humans:
No carcinogenic components identified

US. National Toxicology Program (NTP) Report on Carcinogens:
No carcinogenic components identified

US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050):
No carcinogenic components identified

Germ Cell Mutagenicity

In vitro
Product: No data available.

In vivo
Product: No data available.

Reproductive toxicity
Product: No data available.

Specific Target Organ Toxicity - Single Exposure
Product: No data available.

Specific Target Organ Toxicity - Repeated Exposure
Product: No data available.

Aspiration Hazard
Product: No data available.

Other effects: No data available.

12. Ecological information

General information: This product has not been evaluated for ecological toxicity or other environmental effects.

13. Disposal considerations

Disposal instructions: Discharge, treatment, or disposal may be subject to national, state, or local laws. Dispose of waste at an appropriate treatment and disposal facility in accordance with applicable laws and regulations, and product characteristics at time of disposal. It is the responsibility of the product user or owner to determine at the time of disposal, which waste regulations must be applied.

Contaminated Packaging: Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT
Not regulated.

IMDG
Not regulated.

IATA
Not regulated.

15. Regulatory information

US Federal Regulations

US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)
None present or none present in regulated quantities.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories
Immediate (Acute) Health Hazards

SARA 313 (TRI Reporting)
None present or none present in regulated quantities.

US State Regulations

US. California Proposition 65
This product contains chemical(s) known to the State of California to cause cancer and/or to cause birth defects or other reproductive harm.

16.Other information, including date of preparation or last revision

Issue Date:	28.11.2016
Revision Date:	28.11.2016
Version #:	1.2
Further Information:	No data available.
Disclaimer:	This information is provided without warranty. The information is believed to be correct. This information should be used to make an independent determination of the methods to safeguard workers and the environment.