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ESB Networks Historic Cable Fluid Losses: Preliminary Site Assessment

Location 4: Dodder Road – Templeogue 38 kV – November 2018

Prepared for

ESB Networks Engineering Major Projects One Dublin Airport Central Dublin Airport Cloghran Co. Dublin

Prepared by

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EXECUTIVE SUMMARY

This report presents a preliminary assessment of the potential environmental impacts associated with the historic loss of cable fluid from a section of underground cable located in Rathfarnham, Dublin 14. ESB records indicate that 7,252 litres of cable fluid (linear alkyl benzenes) leaked into the ground from the subject section of cable over a period of 39 months between August 2015 and November 2018.

The PSA was performed with reference to the EPA's 2013 publication "*Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites*". The EPA's guidance document outlines a staged and risk-based approach to contaminated land and groundwater assessment, with the PSA being the first stage in the process. By its nature the PSA stage is precautionary and conservative, aiming to identify those potential "pollutant linkages" where more detailed assessment is required.

Generally, more detailed assessment is only necessary where the assessed risk to a potential receptor is moderate, high or very high. However, in cases where the potential receptor is particularly sensitive, more detailed assessment may be recommended even if the assessed risk is low.

The findings of the PSA for the subject loss of cable fluid can be summarised as follows:

- The leak location is in a mainly residential area on Church Lane, a minor one-way residential street off Main Street in Rathfarnham village, Dublin 14;
- Topography in the vicinity of the leak location dips down gradually towards the northwest (approximately along the line of Church Lane), then dips down more steeply across the public open space towards the River Dodder. The cable route approximately follows the dip direction down this slope to the river;
- The River Dodder is located approximately 150m north-west of the leak location at the closest point and flows generally towards the north-east. The River Dodder discharges to the tidal reaches of the River Liffey adjacent to the East Link bridge, approximately 8 km downstream of the leak location. For the period 2010 2015, water quality in the River Dodder was categorised by the EPA under the WFD classification system as "moderate", and it was categorised as "at risk" with regard to achieving WFD objectives;
- Based on available geological maps, the area of the leak location is underlain by silty clays with subordinate sands and gravels, below which is limestone bedrock. Additionally, gravelly alluvium is mapped along the River Dodder valley, extending to a line approximately 50 metres north-west of the leak location;
- The groundwater body underlying the area of interest is classified as a "locally important" aquifer from a productivity perspective. Its current WFD status is "good", and the associated risk classification is "not at risk" of achieving its WFD objectives. Vulnerability of the bedrock aquifer from a contamination standpoint is "low" in the area of interest, with some areas of higher vulnerability close to the River Dodder;

• The River Dodder including dependent ecosystems, and the bedrock aquifer in the limestone bedrock appear to be the key environmental receptors potentially at risk of impact from the leak of cable fluid from this location. The potential for cable fluid (or some of its constituent compounds) to permeate buried water mains located close to the leak location and impact water quality in the water mains also needs to be considered; however, the low solubility of these compounds and the low rate of permeation are such that they are unlikely to impact water quality in the pipes. Whilst occupants of buildings in the vicinity of the leak could be considered to be potential receptors via vapour intrusion pathways, because of the expected low volatility of the linear alkyl benzenes, the risk of such receptors being impacted is probably low.

A preliminary risk assessment was completed that considered the potential risk posed by the subject leak on the identified potential receptors. The findings of this preliminary risk assessment are summarised in the following table:

Receptor	Risk Category	Comment	
River Dodder Ecosystems	Moderate	Moderate risk of pollution of River Dodder, which lies approximately 150m north-west of the leak location.	
dependent on this water body		The cable trench provides a potential preferential pathway between the leak location and the river and it is currently not known how fa along the cable trench backfill the cable fluid has migrated. The presence of alluvium in the river valley may have limited this distance if the alluvium is gravelly as indicated on GSI maps, whic could allow the fluid to permeate into these soils as well as migrating further along the line of the cable trench.	
		There are understood to have been no reports of pollution of the river linked to the subject loss of cable fluid to date.	
Water mains	Low	Whilst the potential for organic compounds to permeate water mains is known (in particular plastic water pipes and the joints of other types of water pipes), the potential for constituents of the cable fluid to permeate water mains was not established during the PSA. The risk category assumes that cable fluid may be present as residual LNAPL in the water main trench and that there is potential for it to permeate water pipes, but not to the extent that it will impact water	
Bedrock aquifer	Low	quality in the pipes. The bedrock is classified as a "locally important" aquifer. Vulnerability rating is "low" in the area of interest with some areas of higher vulnerability also in the vicinity. This means there are expected to be several metres of silty clay soil protecting the aquifer from near-surface contamination close to the leak location. Whilst this protecting layer may be absent closer to the river, it should also be considered that the hydrocarbon compounds making up the cable fluid have low solubilities and will biodegrade relatively quickly in aerobic groundwater.	

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Receptor	Risk Category	Comment
Occupants of buildings where there are potential confined spaces	Low	There are two residential properties close to the leak location that extend up the edge of Church Lane; there appears to be potential for cable fluid to have migrated beneath the building foundations. No health effects are anticipated; however, this may require more detailed assessment due to the proximity of these residences to the leak location.

More detailed assessment of the risks to the River Dodder and dependent ecosystems is required to refine the level of risk. Further assessment of the risk to occupants of nearby buildings is also recommended as a precaution to confirm the findings of the risk assessment. Further investigation of the risk to water mains and the bedrock aquifer is not considered necessary.

* * * * * * *

1 INTRODUCTION

1.1 Project Background

Geosyntec Consultants Ltd (Geosyntec) is pleased to present the Electricity Supply Board (ESB) this Preliminary Site Assessment (PSA) report, which relates to the potential environmental impacts associated with the historic loss of cable fluid from a section of underground cable located in Rathfarnham, Dublin 14. The alignment of the subject section of cable and the approximate location of the historic loss of cable fluid is illustrated in ESB Drawing Number QD-354120-01-D460-001-008-001 (Figure 1).

The PSA was completed in accordance with Geosyntec proposal reference 190607 dated June 2019, which was authorised by the ESB on 1st July 2019. The PSA was led by Mr Graham Webb, who is an environmental engineer with over 25 years' relevant experience, and Mr Jim Wragg, who is a contaminant hydrogeologist with over 30 years' relevant experience.

ESB Networks operates and maintains a network of High Voltage (HV) underground cables of over 1,600 km across Ireland, of which approximately 205 km (175 km operational) are insulated by a cable fluid. The majority of these fluid-filled cables are located in urban settings across Dublin city and Cork city. The cable fluid acts as an electrical insulator and aids the conduction of heat away from the conductor allowing the cable to be operated more efficiently. The cables are vulnerable to third party interference or damage, and over time, cables can develop leaks due to defects developing in the cable sheath and in joints and terminations. When such leaks occur, there is potential for pollution to arise.

In the case of the section of fluid-filled cable that is the subject of this PSA, ESB records indicate that 7,252 litres of cable fluid leaked into the ground from the cable over a period of 39 months between August 2015 and November 2018.

1.2 Objective and Scope of Work

The primary objective of the PSA was to complete a preliminary assessment of the potential types, locations, extent and significance of environmental impacts associated with the subject historic cable fluid loss. The PSA was performed with reference to the Environmental Protection Agency's (EPA's) 2013 publication "*Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites*". This PSA report is based on the EPA's guideline template report for PSAs, which is linked to the 2013 guidance.

The EPA's 2013 guidance document outlines a staged approach to contaminated land and groundwater assessment, with the PSA being the first stage in the process. During the PSA stage, the guidance requires the assessor to identify environmental "receptors" - including groundwater and surface water bodes and flora and fauna dependent on them as well as people - who are potentially at risk from the source of contamination, and to qualitatively assess the risk to each environmental receptor by considering the viability of each source-pathway-receptor "pollutant linkage". Those pollutant linkages where there is considered to be a moderate or high risk of impact from the source of contamination, or where the receptor

is particularly sensitive, are identified through this process. These pollutant linkages are then carried forward to the next stage of the process during which more detailed assessment can be completed. Given the above, the PSA stage of the process is precautionary and conservative in nature.

Generally, more detailed assessment is only necessary where the assessed risk to a potential receptor is moderate, high or very high. However, in cases where the potential receptor is particularly sensitive, more detailed assessment may be recommended even if the assessed risk is low.

The PSA for the subject loss of cable fluid was based on a desk study of publicly available information and information provided by the ESB, a walkover survey of the immediate vicinity of the cable within approximately 200 metres of the location of the historic loss of cable fluid, and a reconnaissance of the surrounding area.

Information for the desk study element of the PSA was obtained from the following sources:

- Ordnance Survey Ireland (OSI) website (<u>www.osi.ie</u>): historic maps, historic aerial images, recent "street-view" map;
- EPA websites (<u>www.epa.ie</u> and <u>www.catchments.ie</u>): locations of EPA-licensed facilities, locations of Natura 2000 sites and National Heritage Areas (NHAs), information on groundwater and surface water quality, including Water Framework Directive (WFD) classifications;
- Geological Survey of Ireland (GSI) website (<u>www.gsi.ie</u>): overburden and bedrock geology, information on groundwater resources and groundwater vulnerability;
- Office of Public Works (OPW) website (<u>www.opw.ie</u>): flood risk;
- National Waste Collection Permit Office (NWCPO) website (<u>www.nwcpo.ie</u>): register of companies holding waste facility permits or certificates of registration issued by local authorities;
- ESB records outlining the location of the cable fluid loss, the volume of fluid lost and the period over which the fluid loss occurred;
- Safety Data Sheets (SDSs) provided by the ESB for the cable fluids understood to have been used in the subject cable at the time of the cable fluid loss.

The walkover survey and reconnaissance of the area surrounding the subject section of cable was completed by Mr Graham Webb of Geosyntec on 4th July 2019. A series of photographs taken at the time of the walkover survey and reconnaissance is included in Appendix A.

During the walkover survey and reconnaissance, information on the following aspects were recorded:

- The environmental setting, with regard to local topography, surface water drainage and the proximity of local surface water courses;
- Land use, in particular the proximity of residential properties and other potentially sensitive land uses close to the subject section of cable;
- The proximity of the subject section of cable to other below-ground infrastructure, such as water mains, gas mains and sewers;
- Distressed vegetation, which may be indicative of subsurface contamination.

Central to the PSA was the development of a preliminary Conceptual Site Model, which presents potential source-pathway-receptor (SPR) linkages identified during the PSA, and a preliminary assessment of the risk posed to identified human or environmental receptors from residual cable fluid potentially remaining in the vicinity of the subject section of cable.

2 DETAILS OF LOSS EVENT

2.1 Introduction

In the case of the section of fluid-filled cable that is the subject of this PSA, ESB records indicate that 7,252 litres of cable fluid leaked into the ground from the cable over a period of 39 months between August 2015 and November 2018. The type of fluid understood to have been present in the cable is identified in ESB records as linear alkyl benzenes.

2.2 **Properties of Cable Fluid**

The properties of the linear alkyl benzenes understood to have been used in the subject section of cable over the period of the leak, based on information contained within the Safety Data Sheets provided by ESB, are as follows:

- Boiling point: 280°C
- Flash point: >135°C
- Flammability: Non flammable
- Explosive properties: Not explosive
- Vapour pressure: <0.02 kPa at 20°C
- Density: 0.86 g/cm³ at 20°C typical
- Solubility in water: Negligible
- Kinematic Viscosity: 4.2 mm²/s typical

In their 2010 publication "*Classification of Hazardous and Non-Hazardous Substances in Groundwater*", the EPA classifies all petroleum hydrocarbon compounds listed in the document, including linear alkyl benzenes, as hazardous in groundwater. However, this is on the basis that they are former List I substances and it is stated in the document that these classifications are "under review". Based on the methodology outlined in the above-

mentioned publication (which is based on the persistence, toxicity and potential to bioaccumulate of the substance in the environment) and publicly-available information on its properties, Geosyntec has concluded that linear alkyl benzenes should be classified as non-hazardous in groundwater.

2.3 Fate & Transport of Cable Fluid

The fate and transport of cable fluid entering the subsurface during and following the subject leak can be expected to be controlled by the following factors:

- The linear alkyl benzenes that make up the cable fluid are less dense than water;
- The cable fluid mixture has a low water solubility (< 1 mg/l);
- The compounds in the cable fluid mixture are believed to be semi to non-volatile;
- The compounds present in the cable fluid can be expected to biodegrade but at rates that are controlled by the surface area of the fluid in the subsurface (i.e. in the form of a light non-aqueous phase liquid or LNAPL), its solubility where in contact with groundwater, the availability of electron acceptors and the presence of appropriate microbial populations.

Following creation of a breach in the cable structure, the conceptual model of the dispersion of the cable fluid into the subsurface at the subject location can be described as follows:

- As the cable fluid is less dense than water it will tend to migrate into the pore spaces in the sand bedding around the cable and downward under the force of gravity until it reaches either a water table or low permeability horizon, such as natural clay at the base of the cable trench;
- The cable fluid will tend to spread laterally whilst:
 - There is a driving head provided by leakage of further cable fluid;
 - There is a path of relatively low resistance, e.g. the sand bedding around the cable, potentially permeable fill material in other service trenches that the cable trench intersects, or permeable horizons in the overburden.

The migration potential of the cable fluid released to the subsurface as a result of the subject leak is discussed in more detail in Section 4.

3 SITE ENVIRONMENTAL SETTING

3.1 Proximity of Site to Designated Ecologically Sensitive Areas

The National Parks and Wildlife Service on-line mapping tool was consulted to check if the leak location lies close to ecologically sensitive areas. Based on the information reviewed there are no Special Areas of Conservation (SACs - as per the Habitats Directive), Special Protection

Areas (SPAs - as per the Birds Directive) or National Heritage Areas, within a 2 km radius of the leak location.

3.2 Surrounding Land Use & Field Observations

The subject leak location in located on Church Lane, which is a minor one-way street accessed from Main Street in Rathfarnham village, Dublin 14. Land use in the immediate vicinity of the leak location is mainly residential, with some commercial land use. There are two buildings which extend up to the northern edge of Church Lane in the immediate vicinity of the leak location which appear to date from the mid-to-late 19th century; one to the north-west is a two-storey residential property; the other to the north-east is a two-storey building currently occupied (at least in part) by a fitness studio. Approximately 30m west of the leak location is a large detached residential property, which appears to be of similar age (possibly older) and extends up to the southern edge of Church Lane. Further to the west is an area of public open space, which extends down to the River Dodder. South-west of the leak location and with access from Main Street is Rathfarnham Parish Church. Immediately south of the leak location is a terrace of residential houses, which appear to date from the late 20th century.

The earliest historic map available from the OSI's website is dated 1837 – 1842 (Appendix B) and shows the above-mentioned buildings north-east, north-west and south-west of the leak location. The historic map dated 1888 – 1913 indicates no further significant development in the immediate vicinity of the leak location took place over that period.

The earliest aerial image available from OSI's website (other than 19th century historical maps) is dated 1995. As well as the buildings shown in the historical OSI maps outlined above, the terrace of houses situated to the south of the leak location can be seen on this image. This image indicates that in 1995, the layout of the area in the vicinity of the leak location was similar to that observed today.

Based on information from the EPA's and NWCPO's websites there are no facilities in the vicinity of the leak location that operate under an Industrial Emissions licence, an Integrated Pollution Control licence, a Waste licence or a Waste Facility Permit.

3.3 Topography & Surface Water

The leak location lies at an elevation of approximately 50 metres above Ordnance Datum. The topography of the area in the vicinity of the leak location dips down gradually towards the north-west (approximately along the line of Church Lane), then dips down more steeply across the public open space towards the River Dodder. The River Dodder at this location is at an elevation of approximately 40m above Ordnance Datum.

The River Dodder is located approximately 150m north-west of the leak location and flows generally from south-west to north-east at this point. The River Dodder discharges to the tidal reaches of the River Liffey adjacent to the East Link bridge, approximately 8 km north-east of the leak location. The Owenadoher River, which is a tributary of the River Dodder, lies approximately 240m to the south and south-west of the leak location. According to

information on the EPA's website, both the River Dodder (DODDER_050) and Owenadoher River (OWENADOHER_010) are at risk of not meeting current WFD objectives. The River Dodder is stated to be at risk as a result of anthropogenic pressures. The Owenadoher River is reported to suffer from hydromorphological pressure (specifically from man-made embankments). For the period 2010-2015, the EPA classified water quality in both rivers as "moderate" under the WFD classification scheme.

According to the OPW, the route of the cable immediately adjacent to the River Dodder is in an area that has a low probability of flooding.

3.4 Geology & Hydrogeology

The bedrock geology underling the leak location is mapped by the GSI as dark limestones and shale ('Calp') known as the Lucan Formation. The overburden deposits overlying the bedrock are indicated by the GSI to comprise glacial till, which typically comprise silty clay with subordinate sand and gravel. Additionally, gravelly alluvium is mapped along the River Dodder valley, extending to a line approximately 50 metres north-west of the leak location.

The groundwater body (GWB) underlying the leak location and the surrounding area is known as the Dublin GWB. This GWB covers an area of approximately 837 km² extending west from the Dublin coastline to the village of Kilmeage in Co. Kildare and extending from Malahide in north Co. Dublin to the southern limits of Dublin city. The GSI classifies the Dublin GWB as a "locally important aquifer". Such aquifers are generally moderately productive only in local zones.

The vulnerability of the bedrock aquifer close to the leak location is classified by the GSI as "low". However, between the leak location and the River Dodder the groundwater vulnerability increases to moderate and then high, indicating lower overburden thickness in the river valley.

A search of the GSI's online database indicates that the nearest recorded groundwater well to the leak location is approximately 0.9 km to the south-east. This well was drilled to a depth of 76 m with depth to bedrock indicated to be 20 m. The reported yield of the well is "good" at $207 \text{ m}^3/\text{d}$.

The EPA is responsible for classifying GWBs in Ireland in terms of water quality and their ability to meet objectives set out in the WFD. Based on the most recent round of EPA monitoring (2010 – 2015), the status of the Dublin GWB was categorised as "good" and it was categorised as "not at risk" with regard to achieving WFD objectives.

4 CONCEPTUAL SITE MODEL

4.1 Introduction

For the purposes of this Preliminary Site Assessment, it has been assumed that the top of the fluid filled cable is buried at a depth of 0.9 – 1.1m below ground level within a backfilled trench that is around 1.2m deep. The trench backfill is assumed to comprise a 0.35 m deep sand layer (0.85m bgl) above which the trench is filled with granular material.

For the purposes of the PSA, strata adjacent to and below the cable trench in the vicinity of the leak have been assumed to comprise:

- Low permeability silty clay dominated glacial till close to the leak location, with potentially more permeable alluvium within the area of the public open space to the west, and/or;
- Granular fill materials associated with trench backfill for other underground services that intersect the route of the fluid filled cable, and/or;
- Granular fill materials associated with historical development in the surrounding area;

It has also been assumed that perched groundwater may periodically be present within the cable trench.

4.2 Source & Potential Migration Pathways

Based on the expected low permeability of overburden material in the vicinity of the leak location, cable fluid lost to ground in this case can be expected to have spread laterally within the permeable sand bedding and possibly within granular backfill within the cable trench. If the cable trench intersects more permeable material (e.g. deeper fill materials associated with historical development, lenses of natural sands or gravels, or another in-filled services trench) this could result in cable fluid migrating from the line of the cable trench and along a different route or routes.

We have developed a series of indicative estimates for the subject leak location under different ground condition scenarios, with regard to the extent of cable fluid migration. These estimates have assumed that the cable is installed within a 0.35m thick sand bedding and surround layer in a trench 1.1m wide cut into low permeability clay soils, which can be expected at the subject location. It should be noted that potentially more permeable alluvium may be present overlying the clay soils within the area of public open space from a point approximately 50m north-west of the leak location:

• In the case where (i) the sand bedding is dry, (ii) the cable fluid saturation reaches 40% residual saturation of the pore space in the sand bedding and (iii) the overlying granular back-fill material in the trench acts as a capillary break, the theoretical length of trench impacted by LNAPL migration is 235m. Given that the topography locally along the cable route slopes down towards the west, there appears to be potential for cable fluid to migrate preferentially in this direction along the line of the cable trench from the leak location;

- In the event that the base of the trench contains perched water then this would lower the LNAPL saturation in the sand layer surrounding the cable. This could result in LNAPL migration through granular back-fill material above the sand bedding layer. The thickness of LNAPL-saturated soils will likely be less under this scenario than that outlined above, but the cable fluid would tend to spread further. If a 40% residual cable fluid saturation is assumed in granular backfill material over a 0.2m thickness, this would lead to a theoretical length of trench impacted by cable fluid of 412m;
- The third scenario considered herein is where the cable trench passes through an area of granular fill materials of similar properties to those used to backfill the trench. Here a more radial spreading of the cable fluid could occur. If a 0.2m deep soil zone near the leak point is impacted with a LNAPL saturation of 40% then the theoretical radius of cable fluid LNAPL impact away from the release would be 12 metres. Based on the local topography, there is potential for the migration of cable fluid under this scenario to be preferentially towards the north-west; as such, there appears to be potential for cable fluid to have migrated under structures located adjacent to the western end of Church Lane under this scenario;
- It is noted that the theoretical length of trench impacted by cable fluid outlined in the first two scenarios above, is greater than the distance between the leak location and the River Dodder (which is approximately 150m from the leak location), indicating that there is potential for cable fluid to have migrated along the cable trench to the river. However, the presence of gravelly alluvium in the river valley is likely to have reduced the potential for the cable fluid to have migrated that far. The third scenario outlined above (i.e. a radial rather than linear migration pattern) is likely to have applied where the cable trench enters the gravelly alluvium towards the floor of the river valley;
- The cable fluid may have some semi-volatile components (alkyl benzenes) and as such will
 generate a modest vapour pressure. However, this may be attenuated by biodegradation
 processes in the shallow soils. In aerobic shallow soils and groundwater, degradation of
 alkyl benzenes is expected to be relatively quick (half-life in soil of 15 days¹). Conversely,
 degradation is expected to be negligible in anaerobic conditions. Degradation products of
 alkyl benzenes include toluene and ethylbenzene, which have relatively high vapour
 pressures. However, these products would be expected to be only generated in small
 quantities and themselves also degrade quickly;
- Cable fluid has the potential to migrate from the source to underneath confined spaced receptors (such as building cellars), either in LNAPL form or via migration in the dissolved phase in groundwater flow following dissolution from the LNAPL. Vapours generated from the LNAPL or groundwater have the potential to migrate through the unsaturated zone and building defects into confined spaces, where they may be breathed in by building occupants, potentially causing toxic and/or nuisance effects. In the event that free or

¹ Energy cable saturant SDS – refer to Appendix C

dissolved phase impacts have migrated beneath or in the immediate vicinity of buildings with confined spaces, then the potential effects of vapour intrusion should be considered.

In addition to the above scenarios, the following potential migration pathways were considered as part of this PSA but they were not carried forward to the preliminary risk assessment because the source-pathway-receptor (SPR) linkage was not considered viable:

- Soil and dust ingestion from near surface soils;
- Dermal contact with near surface soils;
- Inhalation of fugitive dust from near surface soils; and
- Ingestion of soils via consumption of vegetables grown in near surface soils.

4.3 **Potential Receptors**

With the above migration pathways in mind, the River Dodder, including dependent ecosystems, and the bedrock aquifer in the Carboniferous Limestone appear to be the key environmental receptors potentially at risk of impact from the leak of cable fluid from this location. The potential for cable fluid (or some of its constituent compounds) to permeate buried water mains located close to the leak location and impact water quality in the water mains also needs to be considered; however, the low solubility of these compounds and the low rate of permeation are such that they are unlikely to impact water quality in the pipes.

Whilst occupants of buildings in the vicinity of the leak could be considered to be potential receptors via vapour intrusion pathways, because of the expected low volatility of linear alkyl benzenes, the risk of such receptors being impacted is probably low.

Groundworks contractors performing future tasks in the vicinity of the leak location could also be considered potential receptors (via direct contact, inhalation and ingestion pathways). However, it has been assumed that the potential risks posed to future groundworks contractors would be adequately mitigated through effective health and safety planning and work control procedures at the time the works are being carried out. As a result, groundworks contractors have not been considered potential receptors in the preliminary risk assessment presented in the following section.

5 PRELIMINARY RISK ASSESSMENT

The key potential source-pathway-receptor (SPR) linkages associated with the subject loss of cable fluid are presented in this section, together with a preliminary assessment of the risk posed to the identified receptors. The preliminary risk assessment is based on the methodology outlined in CIRIA C552 (2001) "*Contaminated Land Risk Assessment – A Guide to Good Practice*". This methodology requires the classification of the magnitude of the **consequence** (severity) of a risk occurring, and the **probability** of a risk occurring. The risk assessment methodology is summarised in Tables 1 – 4 below.

The potential consequences of contamination risks occurring are classified in accordance with Table 1.

Classification	Definition of Consequence			
Severe	 Short-term (acute) risk to human health likely to result in significant harm. Short-term risk of pollution of sensitive water resource. Catastrophic damage to buildings/property. A short-term risk to a particular ecosystem, or organism forming part of such ecosystem. 			
Medium	 Chronic damage to human health. Pollution of sensitive water resources. A significant change in a particular ecosystem, or organism forming part of such ecosystem. 			
Mild	 Pollution of non-sensitive water resources. Significant damage to crops, buildings, structures and services. Damage to sensitive buildings/structures/services or the environment. 			
Minor	 Harm, although not necessarily significant harm, which may result in a financial loss, or expenditure to resolve. Non-permanent health effects to human health (easily prevented by means such as personal protective clothing etc.) Easily repairable effects of damage to buildings, structures and services. 			

Table 1: Classification of Consequence

The probability of contamination risks occurring are classified in accordance with Table 2.

Classification	Definition of Probability
High Likelihood	Circumstances are such that an event appears very likely in the short-term or almost inevitable in the long-term; or there is already evidence that such an event has occurred.
Likely	Circumstances are such that such an event is not inevitable but is possible in the short-term and is likely over the long-term.
Low Likelihood	Circumstances are such that it is by no means certain that an event would occur even over a longer period, and it is less likely in the short-term.
Unlikely	Circumstances are such that it is improbable that an event would occur even in the very long-term.

Table 2: Classification of Probability

For each viable SPR linkage, the potential risks are evaluated, as presented in Table 3.

Definitions of the risk categories, together with the investigatory and remedial actions that may be necessary in each case are presented in Table 4.

		Severe Medium		Mild	Minor
	High likelihood	Very high risk	High risk	Moderate risk	Low risk
bility	Likely	High risk	Moderate risk	Moderate risk	Low risk
Probability	Low likelihood	Moderate risk	Moderate risk	Low risk	Very low risk
	Unlikely	Low risk	Low risk	Very low risk	Very low risk

Table 3: Risk Matrix

Table 4: Definition of Risk Categories and Likely Actions Required

Risk Category	Definition and likely actions required		
Very high	There is a high probability that severe harm could arise to a designated receptor from an identified hazard OR there is evidence that severe harm to a designated receptor is currently happening.		
	This risk, if realised, is likely to result in a substantial liability.		
	Urgent investigation (if not undertaken already) and remediation are likely to be required.		
High	Harm is likely to arise to a designated receptor from an identified hazard.		
	Realisation of the risk is likely to present a substantial liability.		
	Urgent investigation (if not undertaken already) is required and remedial works may be necessary in the short term and are likely over the longer term.		
Moderate	It is possible that harm could arise to a designated receptor from an identified hazard. However, it is relatively unlikely that any such harm would be severe. If any harm were to occur, it is more likely that the harm would be relatively mild.		
	Investigation (if not already undertaken) is normally required to clarify the risk and to determine the potential liability. Some remedial works may be required in the longer term.		
Low	It is possible that harm could arise to a designated receptor from an identified hazard, but it is likely that this harm, if realised, would at worst be mild.		
Very low	There is a low possibility that harm could arise to a receptor. In the event of such harm being realised, it is not likely to be severe.		

The key potential SPR linkages associated with the subject loss of cable fluid are presented in Table 5 below, together with a preliminary assessment of the risk posed to the identified receptors in each case, in line with the above methodology.

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Table 5: Preliminary Risk Assessment for Location 4

Source	Potential Pathway	Receptor	Consequence	Probability	Risk Category	Comment
Loss of cable fluid (linear alkyl benzenes) over the period August 2015 to November 2018 (estimated 7,252 litres).	Predominantly lateral migration of cable fluid from the leak location along the cable trench, and/or through granular lenses within the overburden.	River Dodder Ecosystems dependent on this water body	Medium	Low likelihood	Moderate	Moderate risk of pollution of River Dodder, which lies approximately 150m north-west of the leak location. The cable trench provides a potential preferential pathway between the leak location and the river and it is currently not known how far along the cable trench the cable fluid has migrated. The presence of alluvium in the river valley may have limited this distance if the alluvium is gravelly as indicated on GSI maps, which would allow the fluid to permeate into these soils as well as migrating further along the cable trench. There are understood to have been no reports of pollution of the river linked to the subject loss of cable fluid to date.
	Predominantly lateral migration of cable fluid from the leak location along the cable trench, and/or through granular lenses within the overburden, and subsequent migration into backfilled trenches containing water mains. Permeation of constituents of the cable fluid through the walls or joints of the water mains.	Water mains/ Water supply	Medium	Unlikely	Low	Whilst the potential for organic compounds to permeate water mains is known (in particular plastic water pipes and the joints of other types of water pipes), the potential for alkyl benzenes to permeate water mains was not established during the PSA. The risk category assumes that cable fluid may be present as residual LNAPL in the water main trench and that there is potential for it to permeate water pipes. However, the low solubility of the alkyl benzenes and the expected low rate of permeation are such that they are unlikely to impact water quality in the pipes.

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Table 5: Preliminary Risk Assessment for Location 4

Source	Potential Pathway	Receptor	Consequence	Probability	Risk Category	Comment
(as above)	Vertical migration of cable fluid via permeable lenses in the overburden and/or via granular material in in-filled services trenches to groundwater in the bedrock aquifer, followed by dissolution of cable fluid and generation of a dissolved- phase plume of alkyl benzenes in the bedrock aquifer.	Bedrock aquifer	Mild	Low Likelihood	Low	The bedrock is classified as a "locally important" aquifer. Vulnerability rating is "low" in the area of interest with some areas of higher vulnerability also in the vicinity. This means there are expected to be several metres of silty clay soil protecting the aquifer from near-surface contamination close to the leak location. Whilst this protecting layer may be absent closer to the river, it should also be considered that linear alkyl benzenes have low solubilities and will biodegrade relatively quickly in aerobic groundwater.
	Predominantly lateral migration of cable fluid from the leak location along the cable trench, and/or through granular lenses within the overburden, followed by migration along other preferential pathways (e.g. other in-filled services trenches that intersect the cable trench). Release of vapour-phase hydrocarbons and/or daughter products from the LNAPL (noting that there is limited potential for this to occur) and migration in the vapour phase into buildings.	Occupants of buildings where there are potential confined spaces	Minor	Likely	Low	There are two residential properties close to the leak location that extend up the edge of Church Lane; there appears to be potential for cable fluid to have migrated beneath the building foundations. No health effects are anticipated; however, this may require more detailed assessment.

6 CONCLUSIONS

The following conclusions have been drawn based on the information reviewed and observations made during this PSA:

- The leak location is in a mainly residential area close to Rathfarnham village in Dublin 14;
- Ground levels in the vicinity of the leak location dip down gradually towards the north-west (approximately along the line of Church Lane), then dip down more steeply across the public open space towards the River Dodder. The cable route approximately follows the dip direction down this slope to the river;
- The River Dodder is located approximately 150m north-west of the leak location at the closest point and flows generally towards the north-east. The River Dodder discharges to the tidal reaches of the River Liffey adjacent to the East Link bridge, approximately 8 km downstream of the leak location;
- The key receptors potentially at risk of impact from the subject leak are considered to be the River Dodder including dependent ecosystems, the bedrock aquifer underlying the area, water mains in the vicinity of the leak location and occupants of nearby buildings with potential confined spaces;
- Following the preliminary risk assessment methodology outlined in CIRIA publication C552 (2001), the appropriate risk category for these potential receptors and the associated SPR linkages are considered to be:

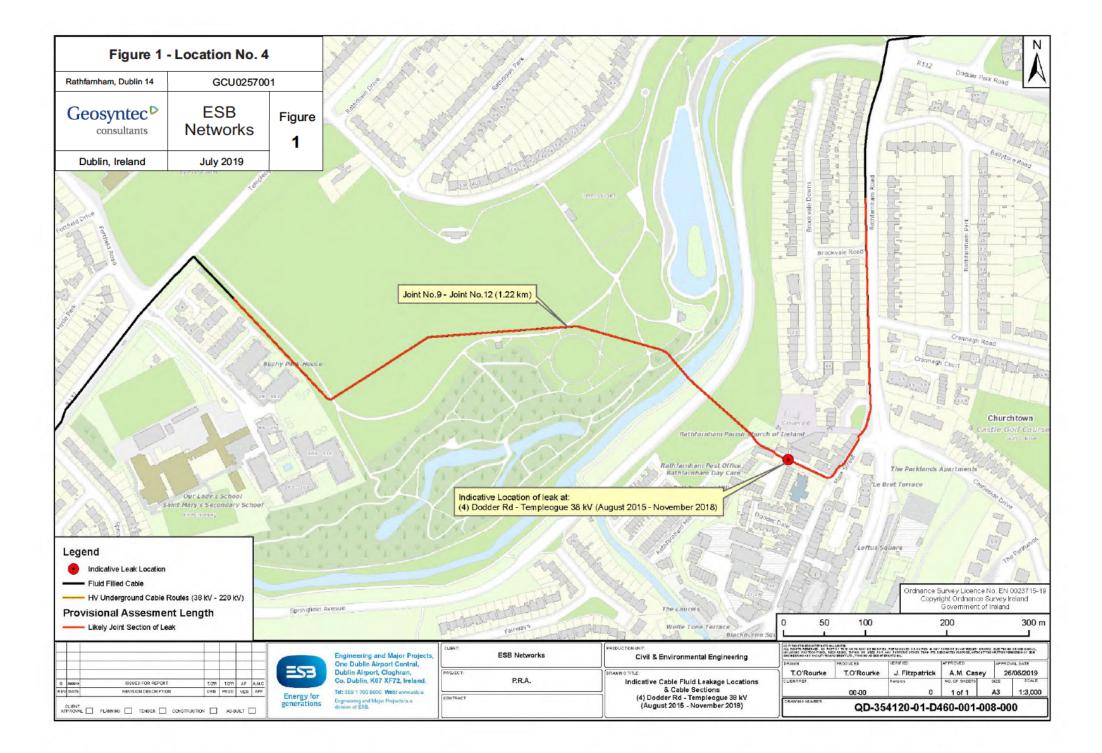
0	River Dodder	-	Moderate
0	Water mains	-	Low
0	Bedrock aquifer	-	Low
0	Occupants of nearby buildings	-	Low

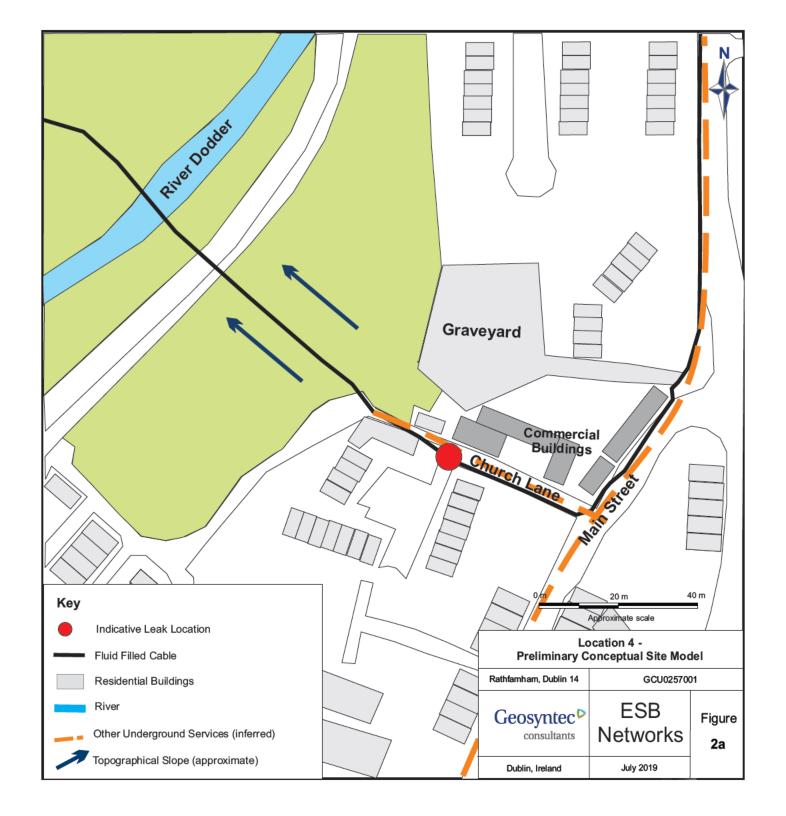
More detailed assessment of the risk to the River Dodder including dependent ecosystems is required to refine the level of risk. Further assessment of the risk to occupants of nearby buildings is also recommended as a precaution to confirm the findings of the risk assessment. Further investigation of the risk to water mains and the bedrock aquifer is not considered necessary.

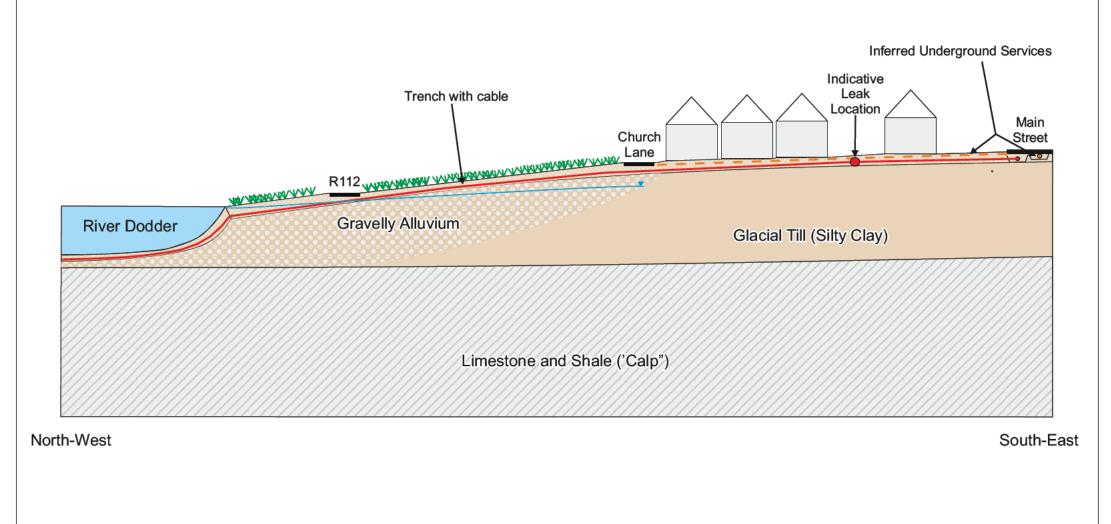
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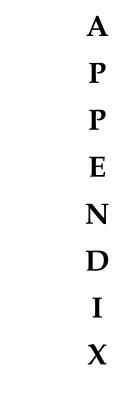






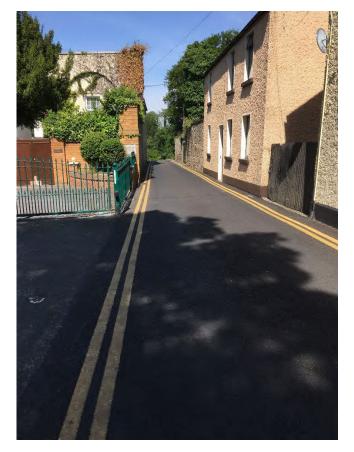
Location 4 - Preliminary Conceptual Site Model				
Rathfarnham, Dublin 14	GCU0257001			
	ESB Networks	Figure 2b		
Dublin, Ireland	July 2019			

Appendix A - Photolog



Α





Photograph 1 – View north-west along Church Lane



Photograph 2 – View north-west towards River Dodder from Church Lane





Photograph 3 – View south-east along Church Lane

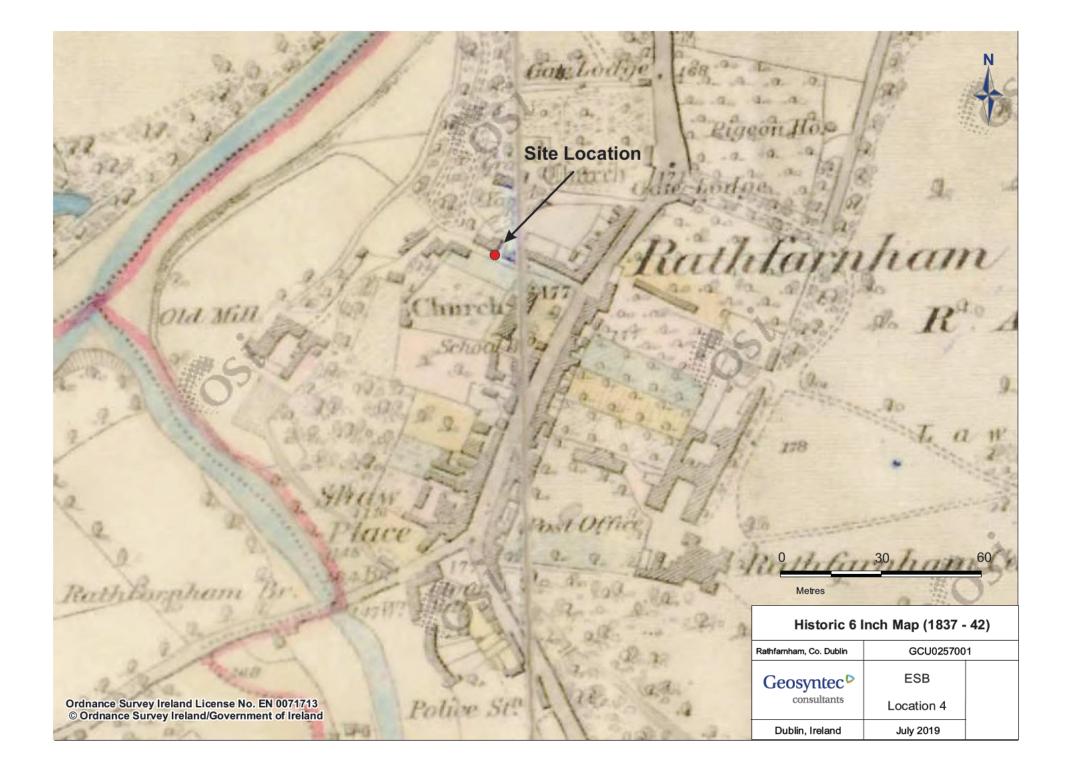


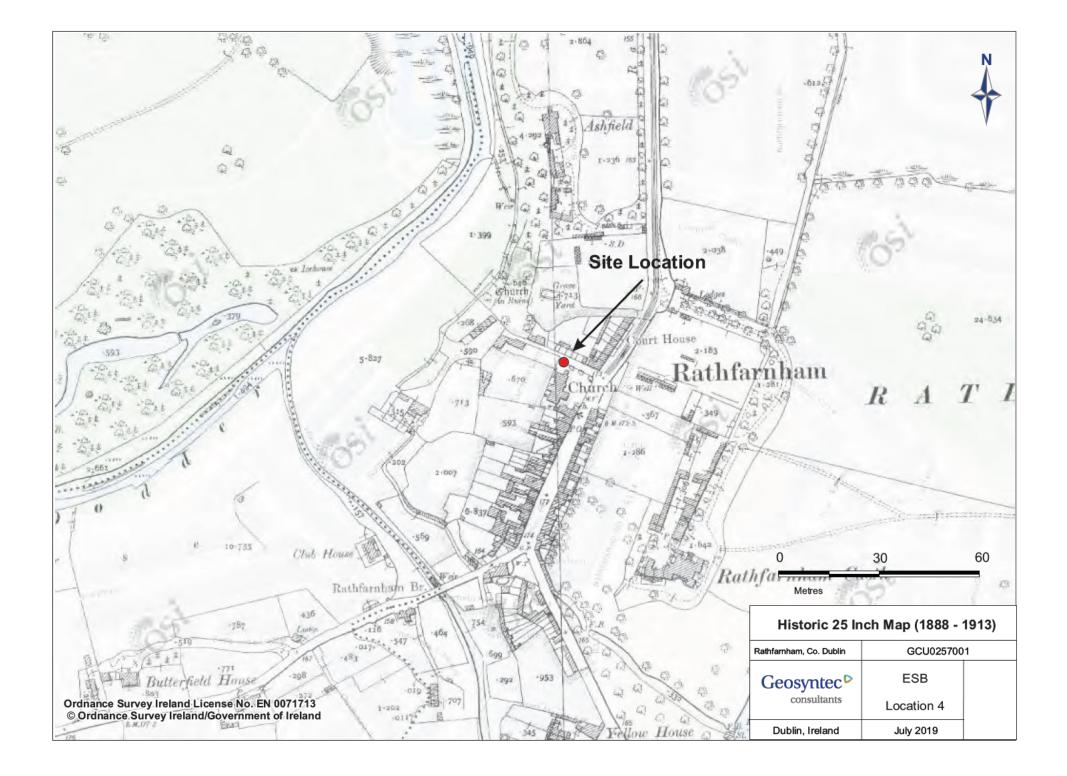
Photograph 4 – View north along Main Street

Appendix B - Historical Maps and Aerial Images

A P P E N D I X

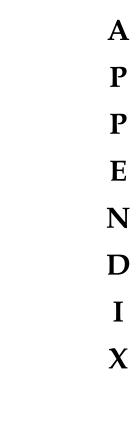
B







Appendix C – Safety Data Sheet for Cable Fluid



С



Safety Data Sheet

according to Regulation (EC) No 1907/2006

T 3788

Revision date: 08.05.2018

Product code: HURBV947130TGE

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SECTION 1: Identification of the substance/mixture and of the company/undertaking 1.1. Product identifier T 3788 CAS No: 67774-74-7 EC No: 267-051-0 1.2. Relevant identified uses of the substance or mixture and uses advised against Use of the substance/mixture ES1 - Industrial use of intermediates. Sector of uses [SU]: SU3: Industrial uses: Uses of substances as such or in preparations at industrial sites Environmental release categories [ERC]: ERC 6a: Use of intermediate Process categories [PROC]: PROC 2: Chemical production or refinery in closed continuous process with occasional controlled exposure or processes with equivalent containment conditions ES2 - Formulation & (re)packing of substances and mixtures - Industrial uses Sector of uses [SU]: SU3: Industrial uses: Uses of substances as such or in preparations at industrial sites Environmental release categories [ERC]: ERC 2: Formulation into mixture (mixtures) Process categories [PROC]: PROC 1: Chemical production or refinery in closed process without likelihood of exposure or processes with equivalent containment conditions PROC 2: Chemical production or refinery in closed continuous process with occasional controlled exposure or processes with equivalent containment conditions PROC 3: Manufacture or formulation in the chemical industry in closed batch processes with occasional controlled exposure or processes with equivalent containment condition PROC 4: Mixing or blending in batch processes PROC 5: Mixing or blending in batch processes PROC 8a: Transfer of substance or mixture (charging and discharging) at non-dedicated facilities PROC 8b: Transfer of substance or mixture (charging and discharging) at dedicated facilities PROC 9: Transfer of substance or mixture into small containers (dedicated filling line, including weighing) PROC 15: Use as laboratory reagent. ES03 - Use in cable oil - industrial use Sector of uses [SU]: SU3: Industrial uses: Uses of substances as such or in preparations at industrial sites Environmental release categories [ERC]: ERC 5: Use at industrial site leading to inclusion into/onto article ERC 7: Use of functional fluid at industrial site Process categories [PROC]: PROC 13: Treatment of articles by dipping and pouring Uses advised against none 1.3. Details of the supplier of the safety data sheet Company name: H&R ChemPharm (UK) Limited Street: **Dudley Road** GB-DY4 8EH Tipton, West Midlands Place:

+441215220100

info.uk@hur.com

Technical/Commercial Enquiries

Responsible Department:

Telephone:

e-mail:

Telefax: +441215220116



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1.4. Emergency telephone

+44(0)2078580111

number:

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Regulation (EC) No 1272/2008

Hazard categories: Aspiration hazard: Asp. Tox. 1 Hazard Statements: May be fatal if swallowed and enters airways.

2 2 Label element

Regulation (EC) No. 1272/2008

Signal word: Danger

Pictograms:



Hazard statements

H304

May be fatal if swallowed and enters airways.

Precautionary statements

•	
P301+P310	IF SWALLOWED: Immediately call a POISON CENTER/doctor.
P331	Do NOT induce vomiting.
P501	Dispose of contents/container to local/regional/national/international regulations.

2.3. Other hazards

This substance does not meet the PBT/vPvB criteria of REACH, Annex XIII.

SECTION 3: Composition/information on ingredients

3.1. Substances

Hazardous components

CAS No	Chemical name			Quantity
	EC No	Index No	REACH No	
	Classification according to Regulation (EC) No. 1272/2008 [CLP]			
67774-74-7	Benzene, C10-13-alkyl derivs.			100 %
	267-051-0			
	Asp. Tox. 1; H304			

Full text of H and EUH statements: see section 16.

SECTION 4: First aid measures

4.1. Description of first aid measures

General information

In case of accident or unwellness, seek medical advice immediately (show directions for use or safety data sheet if possible).

After inhalation

In case of accident by inhalation: remove casualty to fresh air and keep at rest. In all cases of doubt, or when symptoms persist, seek medical advice.



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After contact with skin

After contact with skin, wash immediately with plenty of water and soap. Take off immediately all contaminated clothing. In case of skin irritation, consult a physician.

After contact with eyes

Rinse immediately carefully and thoroughly with eye-bath or water. In case of troubles or persistent symptoms, consult an ophthalmologist.

After ingestion

Do NOT induce vomiting. Rinse mouth thoroughly with water. Let water be drunken in little sips (dilution effect). Observe risk of aspiration if vomiting occurs. Never give anything by mouth to an unconscious person or a person with cramps. When in doubt or if symptoms are observed, get medical advice.

4.2. Most important symptoms and effects, both acute and delayed

If swallowed or in the event of vomiting, risk of entering the lungs.

4.3. Indication of any immediate medical attention and special treatment needed

Treat symptomatically.

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media

Sand. Foam. Carbon dioxide (CO2). Extinguishing powder. In case of major fire and large quantities: Water spray jet. Water mist.

Unsuitable extinguishing media

Full water jet

5.2. Special hazards arising from the substance or mixture

Burning produces heavy smoke.

Can be released in case of fire: Carbon monoxide Carbon dioxide (CO2) Sulphur dioxide (SO2) Nitrogen oxides (NOx)

5.3. Advice for firefighters

In case of fire and/or explosion do not breathe fumes. In case of fire: Wear self-contained breathing apparatus.

Additional information

Collect contaminated fire extinguishing water separately. Do not allow entering drains or surface water. Co-ordinate fire-fighting measures to the fire surroundings.

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

Wear personal protection equipment (refer to section 8). Ventilate affected area.

Special danger of slipping by leaking/spilling product.

6.2. Environmental precautions

Do not allow to enter into surface water or drains. Prevent spread over a wide area (e.g. by containment or oil barriers). Do not allow to enter into soil/subsoil.

6.3. Methods and material for containment and cleaning up

Absorb with liquid-binding material (e.g. sand, diatomaceous earth, acid- or universal binding agents). Treat the recovered material as prescribed in the section on waste disposal. Clean contaminated articles and floor according to the environmental legislation.

6.4. Reference to other sections

No information available.

SECTION 7: Handling and storage



according to Regulation (EC) No 1907/2006

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7.1. Precautions for safe handling

Advice on safe handling

Wear suitable protective clothing. (See section 8.) Avoid formation of oil dust.

Advice on protection against fire and explosion

Usual measures for fire prevention. Keep away from sources of ignition - No smoking. Fire class B

Further information on handling

Do not breathe vapour/aerosol. Avoid contact with eyes and skin. Advices on general occupational hygiene: See section 8.

7.2. Conditions for safe storage, including any incompatibilities

Requirements for storage rooms and vessels

Keep container tightly closed in a cool, well-ventilated place. Only use containers specifically approved for the substance/product.

Advice on storage compatibility

Do not store together with: Gas. Explosives. Radioactive substances. Infectious substances

Further information on storage conditions

Temperature control required. Protect from light. Keep container tightly closed. Do not allow contact with air.

7.3. Specific end use(s)

refer to chapter 1.

SECTION 8: Exposure controls/personal protection

8 1 Control parameter

DNEL/DMEL values

CAS No	Substance			
DNEL type		Exposure route	Effect	Value
67774-74-7	7 Benzene, C10-13-alkyl derivs.			
Worker DNEL,	long-term	inhalation	systemic	7 mg/m³
Worker DNEL,	long-term	inhalation	local	7 mg/m³
Worker DNEL,	long-term	dermal	systemic	9,6 mg/kg bw/day
Consumer DNE	EL, long-term	inhalation	systemic	1,8 mg/m³
Consumer DNE	EL, long-term	inhalation	local	1,8 mg/m³
Consumer DNE	EL, long-term	dermal	systemic	4,8 mg/kg bw/day
Consumer DNE	EL, long-term	oral	systemic	0,5 mg/kg bw/day



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PNEC values

CAS No	Substance				
Environmental	compartment	Value			
67774-74-7	Benzene, C10-13-alkyl derivs.				
Freshwater		0,001 mg/l			
Freshwater (int	ermittent releases)	0 mg/l			
Marine water		0 mg/l			
Freshwater sec	liment	1,65 mg/kg			
Marine sedime	nt	0,165 mg/kg			
Micro-organism	ns in sewage treatment plants (STP)	14,2 mg/l			
Soil		0,329 mg/kg			

Additional advice on limit values

Air limit values:: Possibility of exposure to Aerosol Limit value = 5 mg/ m3 - Source: ACGIH

8.2. Exposure controls







Appropriate engineering controls

Provide adequate ventilation.

Protective and hygiene measures

Clean skin thoroughly after working. Do not put any product-impregnated cleaning rags into your trouser pockets. When using do not eat, drink or smoke.

Eye/face protection

Safety goggles with side protection. In case of increased risk add protective face shield. DIN EN 166

Hand protection

Use safety gloves of following materials: NBR (nitrile) / neopren / viton (permeationslevel 5 - 6), Cat. II according to norm EN 347/EN 388.

The quality of the protective gloves resistant to chemicals must be chosen as a function of the specific working place concentration and quantity of hazardous substances.

For special purposes, it is recommended to check the resistance to chemicals of the protective gloves mentioned above together with the supplier of these gloves.

Skin protection

Oil-resistant and hardly inflammable protective clothing.

Respiratory protection

With correct and proper use, and under normal conditions, breathing protection is not required.

Respiratory protection necessary at:

-aerosol or mist formation

-exceeding exposure limit values

Suitable respiratory protection apparatus: Respiratory equipment in case of nebulosity or aerosol: Use a mask with a filter type A2, A2/P2 or ABEK.

The filter class must be suitable for the maximum contaminant concentration (gas/vapour/aerosol/particulates) that may arise when handling the product. If the concentration is exceeded, self-contained breathing apparatus must be used.



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Environmental exposure controls

No information available.

SECTION 9 Phy ical and chemical propertie

9.1. Information on basic physical and cher	nical properties		
Physical state:	Liquid		
Colour:	colourless		
Odour:	characteristic		
			Test method
pH-Value:	No inforr	nation available.	
Changes in the physical state			
Melting point:		-39 °C	
Initial boiling point and boiling range:		>260 °C	
Sublimation point:	No inforr	nation available.	
Softening point:	No inforr	nation available.	
Pour point:		> -60 °C	ASTM D 97-66
Flash point:		>130 °C	ASTM D 93
Sustaining combustion:	Ν	lo data available	
Flammability			
Solid:	No inforr	nation available.	
Gas:	No inforr	nation available.	
Explosive properties none			
Lower explosion limits:	No inforr	nation available.	
Upper explosion limits:	No inforr	nation available.	
Ignition temperature:	No inforr	nation available.	
Auto-ignition temperature			
Solid:	No inforr	nation available.	
Gas:	No inforr	nation available.	
Decomposition temperature:	No inforr	nation available.	
Oxidizing properties			
none			
Vapour pressure: (at 25 °C)		0,013 hPa	ASTM D 323
Vapour pressure: (at 50 °C)	No inforr	nation available.	
Density:		0,85-0,88 g/cm ³	ASTM D 1298
Bulk density:	No inforr	nation available.	
Water solubility:		Immiscible	
Solubility in other solvents No information available.			
Partition coefficient:	No inforr	nation available.	
Viscosity / dynamic:	No inforr	nation available.	
Viscosity / kinematic: (at 40 °C)		4,0-4,5 mm²/s	ASTM D 445



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T 3788 Revision date: 08.05.2018 Product code: HURBV947130TGE Page 7 of 12 No information available. Flow time: No information available. Vapour density: No information available. Evaporation rate: Solvent separation test: No information available. No information available. Solvent content: 9.2. Other information No information available. Solid content:

SECTION 10 Stability and reactivity

10.1. Reactivity

No information available.

10.2. Chemical stability

Stable at ambient temperature.

10.3. Possibility of hazardous reactions

No hazardous reactions known.

10.4. Conditions to avoid

No information available.

10.5. Incompatible materials

Oxidising agent, strong

10.6. Hazardous decomposition products

No hazardous decomposition products known.

SECTION 11: Toxicological information

11.1. Information on toxicological effects

Toxicocinetics, metabolism and distribution

No information available.

Acute toxicity

Based on available data, the classification criteria are not met.

CAS No	Chemical name				
	Exposure route	Dose	Species	Source	Method
67774-74-7	Benzene, C10-13-alkyl de	erivs.			
	oral	LD50 > 5000 mg/kg	Rat	ECHA Dossier	EEC Directive 67/548
	dermal	LD50 > 2000 mg/kg	Rat	ECHA Dossier	OECD Guideline 402

Irritation and corrosivity

Based on available data, the classification criteria are not met.

Sensitising effects

Based on available data, the classification criteria are not met. May cause sensitisation especially in sensitive humans.

Carcinogenic/mutagenic/toxic effects for reproduction



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Based on available data, the classification criteria are not met.

Reproductive toxicity:

Method: OECD Guideline 416 (Two-Generation Reproduction Toxicity Study)

Species: Rat

Result: NOEL = 50 mg/kg (P0), 50 mg/kg (F1), 50 mg/kg (F2); Literature information: ECHA Dossier Developmental toxicity/teratogenicity: Method: OECD Guideline 414 (Prenatal Developmental Toxicity Study); Species: Rat; Result: NOAEL = 125 mg/kg (embryotoxicity); Literature information: ECHA Dossier; Reproductive toxicity:

STOT-single exposure

Based on available data, the classification criteria are not met.

STOT-repeated exposure

Ba ed on available data, the cla ification criteria are not met

A piration hazard

May be fatal if wallowed and enter airway (Benzene, C10 13 alkyl deriv)

Practical experience

Other observations

Frequent contact specially if dried out may cause skin and eye irritations.

SECTION 12: Ecological information

12.1. Toxicity

If this product contains phenol, dodecyl, branched (EC No. 310-154-3), this product is not to be classified as dangerous for the environment. Raw materials containing this substance have not been classified by our suppliers as hazardous to the environment on the basis of test data, expert judgement or analogy assessments.

CAS No	Chemical name						
	Aquatic toxicity	Dose		[h] [d]	Species	Source	Method
67774-74-7	Benzene, C10-13-alkyl de	erivs.					
	Acute algae toxicity	ErC50 mg/l	>0,1*	72 h	Desmodesmus subspicatus	ECHA Dossier	*The substance is not soluble in water OECD Guideline 201
	Acute crustacea toxicity	EC50 mg/l	> 0,041*	48 h	Daphnia magna	ECHA Dossier	*The substance is not soluble in water EU Method C.2
	Fish toxicity	NOEC 8* mg/l	>0,0577	21 d	Danio rerio	ECHA Dossier	*The substance is not soluble in water OECD Guideline 203
	Crustacea toxicity	NOEC mg/l	>0,007*	21 d	Daphnia magna	ECHA Dossier	*The substance is not soluble in water.

12.2. Persistence and degradability

The product is slightly soluble in water. It can be largely eliminated from the water by abiotic processes, e.g. mechanical separation.



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CAS No	Chemical name			
	Method	Value	d	Source
	Evaluation			·
67774-74-7	Benzene, C10-13-alkyl derivs.			
	OECD Guideline 301 F	64%	28	ECHA Dossier
	Easily biodegradable (concerning to the criteria of the OECD)		

12.3. Bioaccumulative potential

No indication of bioaccumulation potential.

Partition coefficient n-octanol/water

CAS No	Chemical name	Log Pow
67774-74-7	Benzene, C10-13-a kyl derivs.	6,4

BCF				
CAS No	Chemical name	BCF	Species	Source
67774-74-7	Benzene, C10-13-alkyl derivs.	35		Environmental Toxico

12.4. Mobility in soil

No information available.

12.5. Results of PBT and vPvB assessment

This substance does not meet the PBT/vPvB criteria of REACH, Annex XIII.

12.6. Other adverse effects

No information available.

SECTION 13 Di po al con ideration

13.1. Waste treatment methods

Advice on disposal

Dispose of waste according to applicable legislation. Consult the appropriate local waste disposal expert about waste disposal. Non-contaminated packages may be recycled. The allocation of waste identity numbers/waste descriptions must be carried out according to the EEC, specific to the industry and process.

Waste disposal number of contaminated packaging

150110 WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED; packaging (including separately collected municipal packaging waste); packaging containing residues of or contaminated by hazardous substances; hazardous waste

Contaminated packaging

Handle contaminated packages in the same way as the substance itself.

SECTION 14: Transport information

Land transport (ADR/RID)

<u>14.1. UN number:</u>	No dangerous good in sense of this transport regulation.
14.2. UN proper shipping name:	No dangerou good in en e of thi tran port regulation
14.3. Transport hazard class(es):	No dangerou good in en e of thi tran port regulation
14.4. Packing group:	No dangerou good in en e of thi tran port regulation
Inland waterways transport (ADN)	
<u>14.1. UN number:</u>	No dangerous good in sense of this transport regulation.
14.2. UN proper shipping name:	No dangerous good in sense of this transport regulation.
14.3. Transport hazard class(es):	No dangerous good in sense of this transport regulation.



according to Regulation (EC) No 1907/2006

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14.4. Packing group:	No dangerous good in sense of this transport regulation.	
Marine transport (IMDG)		
<u>14.1. UN number:</u>	No dangerous good in sense of this transport regulation.	
14.2. UN proper shipping name:	No dangerous good in sense of this transport regulation.	
14.3. Transport hazard class(es):	No dangerous good in sense of this transport regulation.	
14.4. Packing group:	No dangerous good in sense of this transport regulation.	
Air transport (ICAO-TI/IATA-DGR)		
<u>14.1. UN number:</u>	No dangerous good in sense of this transport regulation.	
14.2. UN proper shipping name:	No dangerous good in sense of this transport regulation.	
14.3. Transport hazard class(es):	No dangerous good in sense of this transport regulation.	
14.4. Packing group:	No dangerous good in sense of this transport regulation.	
14.5. Environmental hazards		
ENVIRONMENTALLY HAZARDOUS:	no	
14.6. Special precautions for user		
Information for afe handling ee ch	napter 7	
•	•	
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Changes

Rev. : 1,0 - 08.05.2018

Abbreviations and acronyms

ADR: Accord européen sur le transport des marchandises dangereuses par Route



according to Regulation (EC) No 1907/2006

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CAS Chemical Abstracts Service DNEL: Derived No Effect Level IARC: INTERNATIONAL AGENCY FOR RESEARCH ON CANCER IMDG: International Maritime Code for Dangerous Goods IATA: International Air Transport Association IATA-DGR: Dangerous Goods Regulations by the "International Air Transport Association" (IATA) ICAO: International Civil Aviation Organization ICAO-TI: Technical Instructions by the "International Civil Aviation Organization" (ICAO) GHS: Globally Harmonized System of Classification and Labelling of Chemicals GefStoffV: Gefahrstoffverordnung (Ordinance on Hazardous Substances, Germany) LOAEL: Lowest observed adverse effect level LOAEC: Lowest observed adverse effect concentration LC50: Lethal concentration. 50 percent LD50: Lethal dose, 50 percent NOAEL: No observed adverse effect level NOAEC: No observed adverse effect level NTP: National Toxicology Program N/A: not applicable OSHA: Occupational Safety and Health Administration PNEC: predicted no effect concentration PBT: Persistent bioaccumulative toxic RID: Règlement international concernant le transport des marchandises dangereuses par chemin de fer (Regulations Concerning the International Transport of Dangerous Goods by Rail) SARA: Superfund Amendments and Reauthorization Act SVHC: substance of very high concern TRGS Technische Regeln fuerGefahrstoffe TSCA: Toxic Substances Control Act VOC: Volatile Organic Compounds VwVwS: Verwaltungsvorschrift wassergefaehrdender Stoffe WGK: Wassergefaehrdungsklasse Relevant H and EUH statements (number and full text) H304 May be fatal if swallowed and enters airways.

Further Information

Classification according to Regulation (EC) No 1272/2008 [CLP] - Classification procedure: Health hazards: Calculation method.; H304: On basis of test data.

Environmental hazards: Calculation method.

Physical hazards: On basis of test data.

The above information describes exclusively the safety requirements of the product and is based on our present-day knowledge. The information is intended to give you advice about the safe handling of the product named in this safety data sheet, for storage, processing, transport and disposal. The information cannot be transferred to other products. In the case of mixing the product with other products or in the case of processing, the information on this safety data sheet is not necessarily valid for the new made-up material.



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Identified uses

No	Short title	LCS	SU	PC	PROC	ERC	AC	TF	Specifica ion
	Industrial use of intermediates.	-	0	-	2	6a	-	-	
	Formulation & (re)packing of substances and mixtures - Industrial uses	F	0	-	1, 3, 4, 5, 8a, 8b, 9, 15	2	-	-	

LCS: Life cycle stages PC: Product categories SU: Sectors of use

PROC: Process categories AC: Article categories

ERC: Environmental release categories TF: Technical functions

TF. Technical functions

GB - EN

Material Name	Shell Diala Cable Oil			
Uses Product Code	: Insulating oil. : 001D8369			
	. 00120303			
Manufacturer/Supplier	: Shell UK Oil Products Limited			
	PO BOX 3 Ellesmere Port			
	CH65 4HB			
	United Kingdom			
Telephone	: +44 (0) 151-350-4000			
Fax	: +44 (0) 151-350-4000			
Email Contact for	: If you have any enquiries about the content of this MSDS			
MSDS	please email lubricantSDS@shell.com			
Emergency Telephone	: +44-(0) 151-350-4595			
Number				
AZARDS IDENTIFICATION				
EC Classification	: Harmful.			
Health Hazards	: Repeated exposure may cause skin dryness or cracking.			
	Harmful: may cause lung damage if swallowed.			
Signs and Symptoms	: If material enters lungs, signs and symptoms may include			
	coughing, choking, wheezing, difficulty in breathing, chest			
	congestion, shortness of breath, and/or fever. The onset of			
	respiratory symptoms may be delayed for several hours after exposure. Defatting dermatitis signs and symptoms may			
	include a burning sensation and/or a dried/cracked			
	appearance. Ingestion may result in nausea, vomiting and/or			
	diarrhoea.			
Safety Hazards Environmental Hazards	Not classified as flammable but will burn.Not classified as dangerous for the environment.			
COMPOSITION/INFORMATIO	ON ON INGREDIENTS			
Proposition Departmention				
Preparation Description	: Alkyl benzene.			
Hazardous Components				
Chemical Identity CAS	EINECS Symbol(s) R-phrase(s) Conc.			
Benzene, C10- 67774-74	-7 267-051-0 Xn R65; R66 90.00 - 100.00 %			
C13 alkyl derivitives				

4. FIRST AID MEASURES	
Inhalation	 No treatment necessary under normal conditions of use. If symptoms persist, obtain medical advice.
Skin Contact	Remove contaminated clothing. Flush exposed area with water and follow by washing with soap if available. If persistent irritation occurs, obtain medical attention.
Eye Contact	 Flush eye with copious quantities of water. If persistent irritation occurs, obtain medical attention.
Ingestion	If swallowed, do not induce vomiting: transport to nearest medical facility for additional treatment. If vomiting occurs spontaneously, keep head below hips to prevent aspiration. If any of the following delayed signs and symptoms appear within the next 6 hours, transport to the nearest medical facility: fever greater than 101° F (37° C), shortness of breath, chest congestion or continued coughing or wheezing.
Advice to Physician	 Treat symptomatically. Potential for chemical pneumonitis. Consider: gastric lavage with protected airway, administration of activated charcoal. Call a doctor or poison control center for guidance.

5. FIRE FIGHTING MEASURES

Clear fire area of all non-emergency personnel.

Specific Hazards	:	Hazardous combustion products may include: A complex mixture of airborne solid and liquid particulates and gases (smoke). Carbon monoxide. Unidentified organic and inorganic compounds.
Suitable Extinguishing Media Unsuitable Extinguishing	:	Foam, water spray or fog. Dry chemical powder, carbon dioxide, sand or earth may be used for small fires only. Do not use water in a jet.
Media Protective Equipment for Firefighters	:	Proper protective equipment including breathing apparatus must be worn when approaching a fire in a confined space.

6. ACCIDENTAL RELEASE MEASURES

Avoid contact with spilled or released material. For guidance on selection of personal protective equipment see Chapter 8 of this Material Safety Data Sheet. See Chapter 13 for information on disposal. Observe the relevant local and international regulations.

Protective measures	: Avoid contact with skin and eyes. Use appropriate containment to avoid environmental contamination. Prevent from spreading or entering drains, ditches or rivers by using sand, earth, or other appropriate barriers.
Clean Up Methods	: Slippery when spilt. Avoid accidents, clean up immediately. Prevent from spreading by making a barrier with sand, earth or other containment material. Reclaim liquid directly or in an absorbent. Soak up residue with an absorbent such as clay, sand or other suitable material and dispose of properly.
Additional Advice	: Local authorities should be advised if significant spillages

	cannot be contained.
7. HANDLING AND STORAGE	
General Precautions	: Use local exhaust ventilation if there is risk of inhalation of vapours, mists or aerosols. Properly dispose of any contaminated rags or cleaning materials in order to prevent fires. Use the information in this data sheet as input to a risk assessment of local circumstances to help determine appropriate controls for safe handling, storage and disposal of this material.
Handling	: Avoid prolonged or repeated contact with skin. Avoid inhaling vapour and/or mists. When handling product in drums, safety footwear should be worn and proper handling equipment should be used.
Storage	 Keep container tightly closed and in a cool, well-ventilated place. Use properly labelled and closeable containers. Storage Temperature: 0 - 50°C / 32 - 122°F The storage of this product may be subject to the Control of Pollution (Oil Storage) (England) Regulations. Further guidance maybe obtained from the local environmental agency office.
Recommended Materials	: For containers or container linings, use mild steel or high density polyethylene.
Unsuitable Materials	: PVC.
Additional Information	 Polyethylene containers should not be exposed to high temperatures because of possible risk of distortion. Exposure to this product should be reduced as low as reasonably practicable. Reference should be made to the Health and Safety Executive's publication "COSHH Essentials".

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

If the American Conference of Governmental Industrial Hygienists (ACGIH) value is provided on this document, it is provided for information only.

Occupational Exposure Limits

Exposure Controls	The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Select controls based on a risk assessment of local circumstances. Appropriate measures include: Adequate ventilation to control airborne concentrations. Where material is heated, sprayed or mist formed, there is greater potential for airborne concentrations to be generated.
Personal Protective Equipment Respiratory Protection	Personal protective equipment (PPE) should meet recommended national standards. Check with PPE suppliers. No respiratory protection is ordinarily required under normal conditions of use. In accordance with good industrial hygiene practices, precautions should be taken to avoid breathing of material. If engineering controls do not maintain airborne

Hand Protection	:	concentrations to a level which is adequate to protect worker health, select respiratory protection equipment suitable for the specific conditions of use and meeting relevant legislation. Check with respiratory protective equipment suppliers. Where air-filtering respirators are suitable, select an appropriate combination of mask and filter. Select a filter suitable for combined particulate/organic gases and vapours [boiling point >65 °C (149 °F)] meeting EN141. Where hand contact with the product may occur the use of gloves approved to relevant standards (e.g. Europe: EN374, US: F739) made from the following materials may provide suitable chemical protection: PVC, neoprene or nitrile rubber gloves. Suitability and durability of a glove is dependent on usage, e.g. frequency and duration of contact, chemical resistance of glove material, glove thickness, dexterity. Always seek advice from glove suppliers. Contaminated gloves should be replaced. Personal hygiene is a key element of effective hand care. Gloves must only be worn on clean hands. After using gloves, hands should be washed and dried thoroughly.
Eye Protection	:	Application of a non-perfumed moisturizer is recommended. Wear safety glasses or full face shield if splashes are likely to
Protective Clothing	:	occur. Approved to EU Standard EN166. Skin protection not ordinarily required beyond standard issue work clothes. It is good practice to wear chemical resistant gloves.
Monitoring Methods	:	Monitoring of the concentration of substances in the breathing zone of workers or in the general workplace may be required to confirm compliance with an OEL and adequacy of exposure controls. For some substances biological monitoring may also be appropriate.
Environmental Exposure Controls	:	Minimise release to the environment. An environmental assessment must be made to ensure compliance with local environmental legislation.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance Odour pH Initial Boiling Point and	 Colourless. Liquid at room temperature. Slight hydrocarbon. Not applicable. > 280 °C / 536 °F estimated value(s)
Boiling Range Pour point	: < -60 °C / -76 °F Data not available
Flash point	: Typical 140 °C / 284 °F (PMCC / ASTM D93)
Upper / lower Flammability	: Typical 1 - 10 %(V)
or Explosion limits Auto-ignition temperature	: > 320 °C / 608 °F
Vapour pressure	< 0.5 Pa at 20 °C / 68 °F (estimated value(s))
Density	: Typical 857 kg/m3 at 20 °C / 68 °F
Water solubility	: Negligible.
n-octanol/water partition coefficient (log Pow)	: > 6 (based on information on similar products)
Kinematic viscosity	: Typical 4.2 mm2/s at 40 °C / 104 °F
Vapour density (air=1) Evaporation rate (nBuAc=1)	: > 1 (estimated value(s)): Data not available

10. STABILITY AND REACTIVIT	Ŷ
Stability Conditions to Avoid Materials to Avoid Hazardous Decomposition Products	 Stable. Extremes of temperature and direct sunlight. Strong oxidising agents. Hazardous decomposition products are not expected to form during normal storage.
11. TOXICOLOGICAL INFORM	ATION
Basis for Assessment	 Information given is based on data on the components and the toxicology of similar products.
Acute Oral Toxicity	: Expected to be of low toxicity: LD50 > 5000 mg/kg , Rat Aspiration into the lungs when swallowed or vomited may cause chemical pneumonitis which can be fatal.
Acute Dermal Toxicity Acute Inhalation Toxicity	 Expected to be of low toxicity: LD50 > 5000 mg/kg , Rabbit Not considered to be an inhalation hazard under normal conditions of use.
Skin Irritation	: Expected to be slightly irritating. Repeated exposure may cause skin dryness or cracking.
Eye Irritation	: Expected to be slightly irritating.
Respiratory Irritation	: Inhalation of vapours or mists may cause irritation.
Sensitisation	: Not expected to be a skin sensitiser.
Repeated Dose Toxicity	: Not expected to be a hazard.
Mutagenicity	: Not considered a mutagenic hazard.
Carcinogenicity	: Components are not known to be associated with carcinogenic effects.
Reproductive and Developmental Toxicity	: Not expected to be a hazard.
Additional Information	: Used oils may contain harmful impurities that have accumulated during use. The concentration of such impurities will depend on use and they may present risks to health and the environment on disposal. ALL used oil should be handled with caution and skin contact avoided as far as possible.

12. ECOLOGICAL INFORMATION

Ecotoxicological data have not been determined specifically for this product. Information given is based on a knowledge of the components and the ecotoxicology of similar products.

Acute Toxicity	:	Poorly soluble mixture. May cause physical fouling of aquatic organisms. Expected to be practically non toxic: LL/EL/IL50 > 100 mg/l (to aquatic organisms) (LL/EL50 expressed as the nominal amount of product required to prepare aqueous test extract).
Mobility	:	Liquid under most environmental conditions. Floats on water. If it enters soil, it will adsorb to soil particles and will not be mobile.
Persistence/degradability Bioaccumulation	:	Expected to be inherently biodegradable. Has the potential to bioaccumulate.
Other Adverse Effects	:	Product is a mixture of non-volatile components, which are not

expected to be released to air in any significant quantities. Not expected to have ozone depletion potential, photochemical ozone creation potential or global warming potential.

13. DISPOSAL CONSIDERATIONS

Material Disposal	: Recover or recycle if possible. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste classification and disposal methods in compliance with applicable regulations. Do not dispose into the environment, in drains or in water courses.
Container Disposal	: Dispose in accordance with prevailing regulations, preferably to a recognised collector or contractor. The competence of the collector or contractor should be established beforehand.
Local Legislation	 Disposal should be in accordance with applicable regional, national, and local laws and regulations. EU Waste Disposal Code (EWC): 13 03 08 synthetic insulating and heat transmission oils. Classification of waste is always the responsibility of the end user. Hazardous Waste (England and Wales) Regulations 2005.

14. TRANSPORT INFORMATION

ADR

This material is not classified as dangerous under ADR regulations.

RID

This material is not classified as dangerous under RID regulations.

ADNR

This material is not classified as dangerous under ADNR regulations.

IMDG

This material is not classified as dangerous under IMDG regulations.

IATA (Country variations may apply)

This material is not classified as dangerous under IATA regulations.

15. REGULATORY INFORMATION

The regulatory information is not intended to be comprehensive. Other regulations may apply to this material.

EC Classification	:	Harmful.
EC Symbols	:	Xn Harmful.
EC Risk Phrases	:	R65 Harmful: may cause lung damage if swallowed.
		R66 Repeated exposure may cause skin dryness or cracking.
EC Safety Phrases	:	S62 If swallowed, do not induce vomiting: seek medical advice
		immediately and show this container or label.

Chemical Inventory Status EINECS TSCA Classification triggering components	:	All components listed or polymer exempt. All components listed. Contains alkyl benzene derivatives.
Other Information	:	Environmental Protection Act 1990 (as amended). Health and Safety at Work Act 1974. Consumers Protection Act 1987. Control of Pollution Act 1974. Environmental Act 1995. Factories Act 1961. Carriage of Dangerous Goods by Road and Rail (Classification, Packaging and Labelling) Regulations. Chemicals (Hazard Information and Packaging for Supply) Regulations 2002. Control of Substances Hazardous to Health Regulations 1994 (as amended). Road Traffic (Carriage of Dangerous Substances in Packages) Regulations. Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations. Road Traffic (Carriage of Dangerous Substances in Road Tankers in Tank Containers) Regulations. Road Traffic (Training of Drivers of Vehicles Carrying Dangerous Goods) Regulations. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations. Health and Safety (First Aid) Regulations 1981. Personal Protective Equipment (EC Directive) Regulations 1992. Personal Protective Equipment at Work Regulations 1992.

16. OTHER INFORMATION

R-phrase(s)

R65 R66	Harmful: may cause lung damage if swallowed. Repeated exposure may cause skin dryness or cracking.		
MSDS Version	Number	:	1.0
MSDS Effective	e Date	:	16.09.2010
MSDS Revision			A vertical bar () in the left margin indicates an amendment from the previous version.
MSDS Regulat MSDS Distribu			Regulation 1907/2006/EC The information in this document should be made available to all who may handle the product.
Disclaimer		:	This information is based on our current knowledge and is intended to describe the product for the purposes of health, safety and environmental requirements only. It should not therefore be construed as guaranteeing any specific property of the product.