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ESB Networks Historic Cable Fluid Losses: Preliminary Site Assessment

Location 58: East Wall Road – Fairview 38 kV April 2004

Prepared for

ESB Networks

Engineering & Major Projects One Dublin Airport Central Dublin Airport Cloghran Co. Dublin

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EXECUTIVE SUMMARY

This report presents a preliminary site assessment (PSA) of the potential environmental impacts associated with the historic loss of cable fluid from a section of underground cable located adjacent to East Wall Road, East Wall, Dublin 3. ESB records indicate that 29,164 litres of cable fluid (a mixture of linear alkyl benzenes, refined mineral oil and additives) leaked into the ground from the subject section of cable over a period of twenty-six months between March 2002 and April 2004.

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 on East Wall Road close to the intersection with East Road;
- The River Tolka lies approximately 400m north-west of the leak location, and the River Tolka Estuary, which is a designated SPA, lies approximately 500m to the north-east. Land use in the vicinity is predominantly commercial with some residential land use to the west and an area of vacant land immediately north of the leak location. The closest residential building is approximately 60m west of the leak location;
- The topography in the vicinity of the leak location is flat;
- The key receptors potentially at risk of impact from the subject leak are considered to be the bedrock aquifer underlying the area, the River Tolka and River Tolka Estuary SPA, and flora and fauna dependent on these water bodies. The potential for cable fluid (or some of its constituent compounds) to permeate buried water mains located close to the leak location (if present) and to 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.

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 Tolka & its estuary (a SPA); Ecosystems dependent on the above water bodies	Moderate	There is evidence of a former river channel within the Tolka River estuary situated circa 100m north-east of the leak location, that now lies under reclaimed land. This former channel appears to be located too far from the leak location for cable fluid from the subject leak to have reached it. However, the volume of cable fluid lost was relatively large and there may be other preferential pathways closer to the leak location that were not identified during the PSA.
		It is understood that ESB has received no reports of pollution of the River Tolka estuary that could be linked to the subject loss of cable fluid.
Water mains/ Water supply	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 constituents of it to permeate water pipes. However, the low solubility of these compounds and the expected low rate of permeation are such that they are unlikely to impact water quality in the pipes.
Bedrock aquifer	Low	The bedrock is classified as a "locally important" aquifer. Vulnerability rating is "low" close to the leak location. In addition, the water table in the overburden is expected to be shallow and the glacial till to have low permeability, both reducing the potential for downward migration of cable fluid to the bedrock aquifer.
		No preferential pathways potentially linking the leak location to the aquifer have been identified.

More detailed assessment of the risk to the River Tolka and River Tolka Estuary SPA close to the leak location, and their associated ecosystems, is required to refine the level of risk. 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), which relates to the potential environmental impacts associated with the historic loss of cable fluid from a section of fluid-filled cable located adjacent to East Wall Road in East Wall, Dublin 3. The alignment of the subject section of cable and the approximate location of the historic loss of cable fluid are illustrated in Figure 1.

The PSA was completed in accordance with Geosyntec proposal reference 190607 dated June 2019 and was authorised by the ESB as an extension to the original project scope on 15th October 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 29,164 litres of cable fluid leaked into the ground from the cable over a period of twenty-six months between March 2002 and April 2004.

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 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;
- Environmental Protection Agency (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 17th October 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 29,164 litres of cable fluid leaked into the ground from the cable over a period of twenty-six months between March 2002 and April 2004. The type of fluid that was present in the cable is identified in ESB records as a mixture of linear alkyl benzenes, refined mineral oil and additives.

2.2 Properties of Cable Fluid

The properties of the fluids 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 (SDSs) provided by ESB, are as follows:

Property	Linear Alkyl Benzenes	Refined Mineral Oils
Boiling Point	280°C	Not stated
Flash Point	>135°C	145°C
Flammability	Non flammable	Non flammable
Explosive properties	Not explosive	Not stated
Vapour pressure	<0.02 kPA at 20°C	<0.01 kPA at 20°C
Density	0.86 g/cm³ at 20°C	0.89 g/cm ³ at 20°C
Solubility in water	Negligible	Negligible
Kinematic Viscosity	4.2 mm ² /s typical	8.5 mm ² /s at 40°C

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 and mineral oil, 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. The classification of mineral-oil based cable fluid is not clear based on the information currently available.

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 blend of alkyl benzenes and mineral oil that makes up the cable fluid is less dense than water;
- The cable fluid has a low water solubility (< 1 mg/l);
- The compounds in the cable fluid are semi or 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 silt or clay
 at the base of the cable trench (if present).
- The cable fluid will tend to spread laterally whilst:
 - o There is a driving head provided by leakage of further cable fluid;
 - o 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 designated ecologically sensitive areas. The River Tolka estuary lies approximately 500m north-east of the leak location and it forms part of the South Dublin Bay and River Tolka Estuary Special Protection Area (SPA - site code 004024).

3.2 Surrounding Land Use & Field Observations

The leak location is situated on the north side of East Wall Road (which runs in a north-west to south-easterly direction) close to the intersection with East Road, Dublin 3 (refer to Figure 1). The River Tolka is located approximately 400m north-west of the leak location and is tidal at this point. The river discharges to Dublin Bay approximately 500m north-east of the leak location.

Land use in the vicinity of the leak location is mixed commercial/residential. To the north-east of the leak location and adjacent to East Wall Road is an area of vacant land, beyond which is the control centre for the Dublin Port Tunnel. Beyond East Wall Road to the south is St. Joseph's Co-Educational National School, adjacent to which are commercial properties. To the west of the leak location along East Wall Road is an area of residential housing. The closest house is approximately 60m west of the leak location.

The earliest historic map of the area available from the OSI's website is dated 1837 – 1842. On this map, the leak location is situated adjacent to East Wall Road and on the southern bank of the River Tolka estuary. Extending across the area to the north-east is the River Tolka estuary. The lands to the south of the leak location beyond East Wall Road appear to be divided into fields for agricultural use.

The historic map dated 1888 – 1913, some buildings including residential housing, a school and a timber yard are present in the area to the south. The area to the north is still part of the River Tolka estuary on this map.

The earliest aerial image available from OSI's website (other than 19th century historical maps) is dated 1995. This image shows that the areas to the north and east of the leak location have been reclaimed from the River Tolka estuary and buildings within Eastpoint Business Park are under construction. This image shows both the residential and commercial developments near the leak location on the south-west side of East Wall Road.

Based on information from the EPA's and NWCPO's websites there are five 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. These facilities are as follows:

- Cahill Printers Ltd., East Wall Road, Dublin 3 (EPA licence reg no. P0298-01);
- Brooks Thomas Ltd. Upper Mayor Street, Dublin 1 (EPA license reg no. P0345-01);
- Everlac Paint Ltd., 8 Hanover Quay, Dublin 2 (EPA licence reg no P0468-01);
- Leech Paper, Shamrock Place, Dublin 1 (WFP-DC-10-0017-02);
- Sunflower Recycling, Shamrock Terrace, Dublin 1 (WFP-DC-19-0048-01);

All three EPA licensed facilities appear to have closed several years ago. There are no recent records for either facility on the EPA's website.

3.3 Topography & Surface Water

The leak location lies at an elevation of approximately 5 metres above Ordnance Datum within an area of relatively level ground.

The closest water course to the leak location is the River Tolka, which lies approximately 400m north-west of the leak location. This stretch of the River Tolka is tidal and is classified by the EPA as a "transitional" water body. Under the WFD classification system this section of the river is currently listed as being "at risk" of not meeting WFD objectives and water quality (for the period 2010 – 2015) was classified as "moderate".

Historic maps show an old River Tolka channel running adjacent to the leak location which could have acted as a preferential pathway (Appendix B). This former river channel runs generally to the south-east and under an area that now forms part of Dublin Port, and is shown to discharge to a former river channel within the River Liffey estuary.

The leak location is not in an area that is indicated by the OPW as being at risk of fluvial flooding.

3.4 Geology & Hydrogeology

The bedrock geology underling the leak location is mapped by the GSI as dark limestones and shale (known as 'Calp' limestone). Near-surface overburden deposits are indicated by the GSI to comprise urban deposits (i.e. made ground), which are inferred to overlie gravelly alluvium associated with the River Tolka. These deposits typically extend to a depth of several metres and are underlain by low-permeability glacial till.

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 which is moderately productive only in local zones". Groundwater flow direction in the bedrock aquifer (and also in the overburden) can be expected to be generally towards the north-east in the vicinity of the leak location.

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The vulnerability of the bedrock aquifer in the vicinity of the leak location is classified by the GSI as "low" which suggests that bedrock is relatively deep in the vicinity of the leak location.

A search of the GSI's online database indicated that there are no recorded bedrock wells within a 1 km radius of the leak location.

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

4 CONCEPTUAL SITE MODEL

4.1 Introduction

For the purposes of this PSA, 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 selected excavated material.

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

- Granular fill materials associated with historical development and/or land raises in the vicinity of the cable route (potentially including the former channel of the Tolka River to the northeast);
- Granular fill materials associated with trench backfill for other underground services that intersect the route of the fluid filled cable, and/or;
- Gravelly alluvium associated with the River Tolka and Tolka Estuary.

4.2 Source & Potential Migration Pathways

Based on the expected nature of overburden material and/or fill 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 within the cable trench, and also potentially radially into the surrounding fill material or natural soil, assuming this material is predominantly granular in nature.

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 silt or clay soils, which can be expected at the subject location.

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- As outlined above, assuming the cable trench passes through predominantly granular material in the vicinity of the leak location, a radial spreading of the cable fluid can be expected. If a 0.2m deep soil zone is impacted with a LNAPL saturation of 40% then the theoretical radius of cable fluid LNAPL impact away from the release would be 24 m. Based on the local topography and expected shallow groundwater flow direction, there is potential for the migration of cable fluid under this scenario to be preferentially towards the north-east. This suggests that the cable fluid lost to ground could have migrated towards the River Tolka estuary but that it would not have reached the river or estuary. Under this scenario the cable fluid would also not be expected to reach the infilled former channel of the Tolka River which is shown on historical maps circa 100m northeast of the leak location;
- In the case where the cable trench passes through lower permeability material (which does not appear to be likely), the cable fluid can be expected to migrate preferentially along the line of the cable trench, within the sand bedding and surround material. In this case, if (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 cable fluid does not migrate into the overlying back-fill material, the theoretical length of trench impacted by LNAPL migration is 947m. Given that the ground elevations along the line of the cable are relatively level, there appears to be potential for cable fluid to migrate along the sand bedding in both directions from the leak location (i.e. generally to the north-west and south-east);
- Considering a variation of the previous case, where 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 the back-fill material above the sand bedding layer, but only if it is sufficiently permeable. The thickness of LNAPL-saturated soils will likely be less under this scenario than that outlined above, but the cable fluid may spread further. If a 40% residual cable fluid saturation is assumed in relatively permeable backfill material over a 0.2m thickness, this would lead a theoretical length of trench impacted by cable fluid of 1,657m;
- The cable fluid may have some semi-volatile components (alkyl benzenes) and as such will
 generate a modest vapour pressure. However, given the absence of potential confined
 spaces in the vicinity of the leak location, this is not considered a viable exposure pathway;
- 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. Given the absence of buildings in the vicinity of the leak location, there is no need to assess this pathway in the subject case.

In addition to the above scenarios, the following potential migration pathways were considered as part of the 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 underlying bedrock aquifer, the River Tolka and its nearby estuary (which is a SPA) and ecosystems dependent on these water bodies 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 close to the leak location (if present) and impact water quality in the water mains also needs to be considered.

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.

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Table 1: Classification of Consequence

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. 			

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

Table 2: Classification of Probability

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.

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.

Table 3: Risk Matrix

		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 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.



Table 5: Preliminary Risk Assessment for Location 50

Source	Potential Pathway	Receptor	Consequence	Probability	Risk Category	Comment
Loss of cable fluid (linear alkyl benzenes, refined mineral oil and additives) over a twenty-six-month period during the period March 2002 – April 2004 (estimated 29,164 litres).	Predominantly lateral migration of cable fluid from the leak location along the cable trench, and/or through granular lenses within the overburden or infill material, potentially followed by migration along other preferential pathways (e.g. other infilled services trenches that intersect the cable trench).	River Tolka & its estuary (a SPA); Ecosystems dependent on the above water bodies	Medium	Low likelihood	Moderate	There is evidence of a former river channel within the Tolka River estuary situated circa 100m north-east of the leak location, that now lies under reclaimed land. This former channel appears to be located too far from the leak location for cable fluid from the subject leak to have reached it. However, the volume of cable fluid lost was relatively large and there may be other preferential pathways closer to the leak location that were not identified during the PSA. It is understood that ESB has received no reports of pollution of the River Tolka estuary that could be linked to the subject loss of cable fluid.
	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 (if present). 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 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 constituents of it to permeate water pipes. However, the low solubility of these compounds and the expected low rate of permeation are such that they are unlikely to impact water quality in the pipes.

Final 14 March 2020



Table 5: Preliminary Risk Assessment for Location 50

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 infilled 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" close to the leak location. In addition, the water table in the overburden is expected to be shallow and the glacial till to have low permeability, both reducing the potential for downward migration of cable fluid to the bedrock aquifer. No preferential pathways potentially linking the leak location to the aquifer have been identified.

Final 15 March 2020

6 CONCLUSIONS

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

- The leak location is on East Wall Road close to the intersection with East Road in East Wall, Dublin 3;
- The River Tolka lies approximately 400m north-west of the leak location, and the River Tolka Estuary, which is a designated SPA, lies approximately 500m to the north-east. Land use in the vicinity is mixed commercial/residential with an area of disused land adjacent to the leak location to the north, a school to the south beyond East Wall Road, and some residential housing to the west. The closest residential building is approximately 60m west of the leak location;
- The topography in the vicinity of the leak location is flat;
- The key receptors potentially at risk of impact from the subject leak are considered to be the bedrock aquifer underlying the area, and water mains in the vicinity of the leak location (if present), the River Tolka and River Tolka Estuary SPA, and flora and fauna dependent on these water bodies;
- 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:

o River Tolka - Moderate

River Tolka Estuary SPA - Moderate

o Water mains - Low

o Bedrock aquifer - Low

More detailed assessment of the risk to the River Tolka and River Tolka Estuary SPA close to the leak location, and their associated ecosystems, is required to refine the level of risk. Further investigation of the risk to water mains and the bedrock aquifer, is not considered necessary.

* * * * * * *

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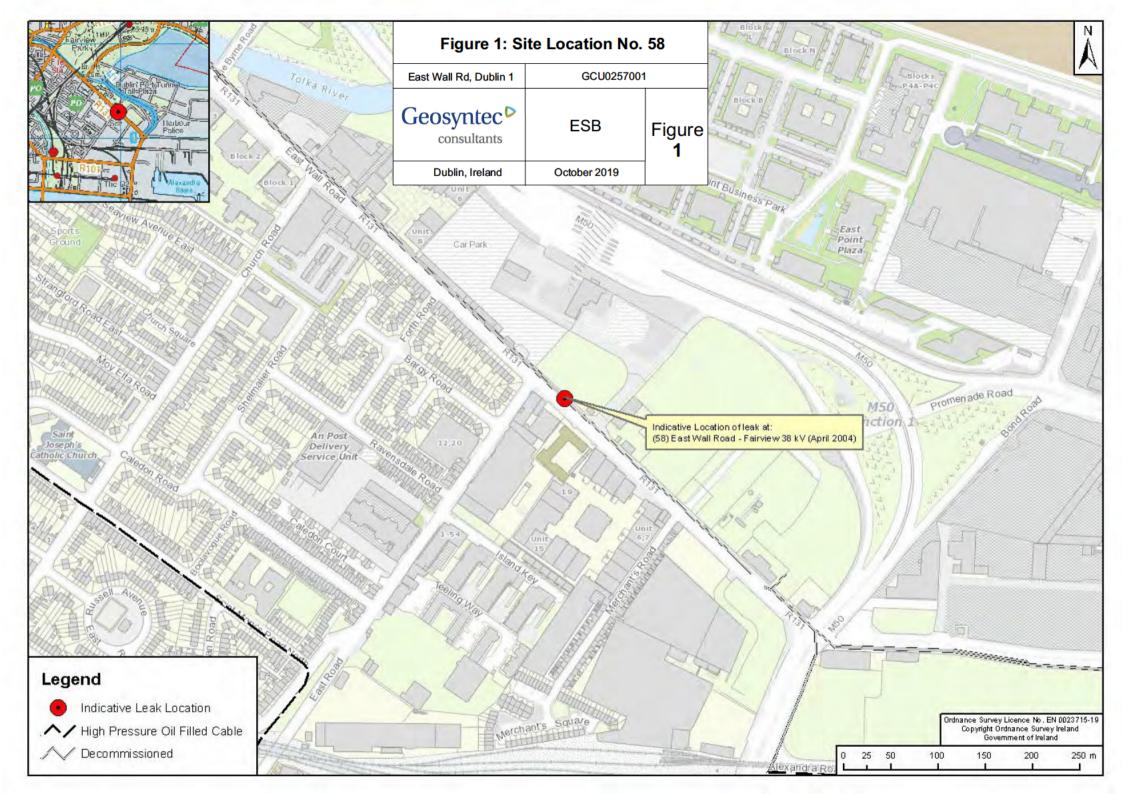
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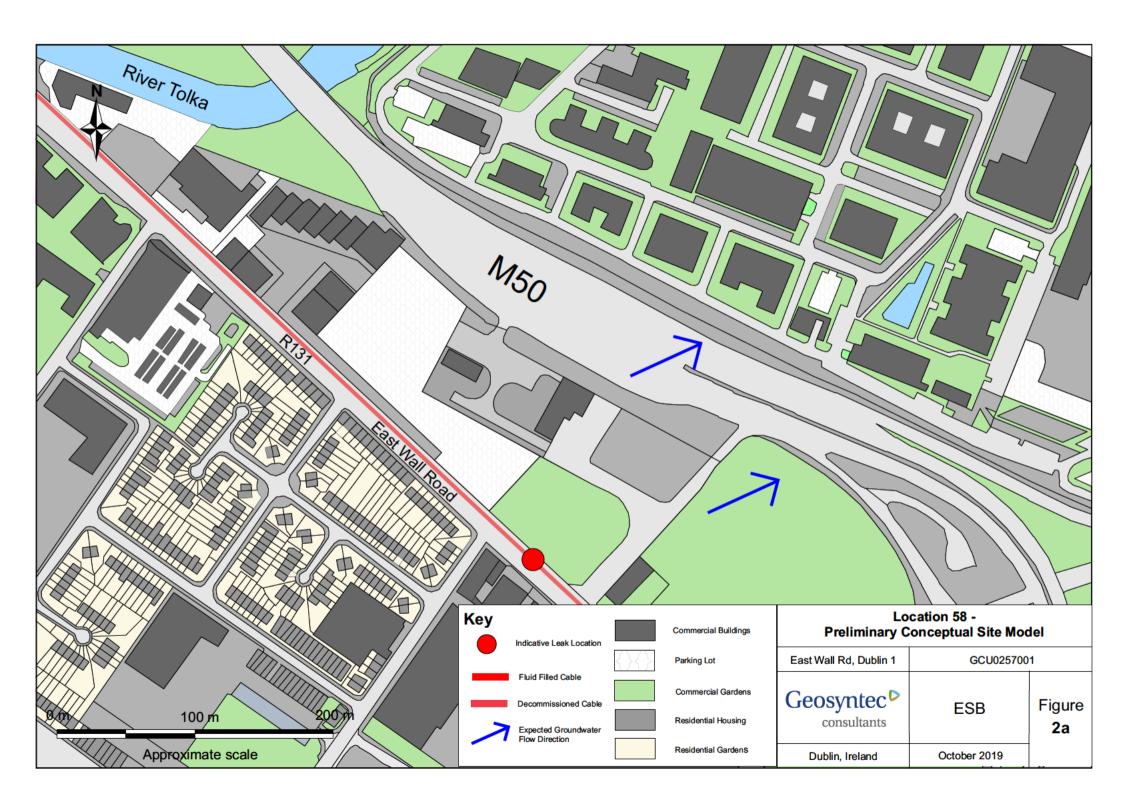
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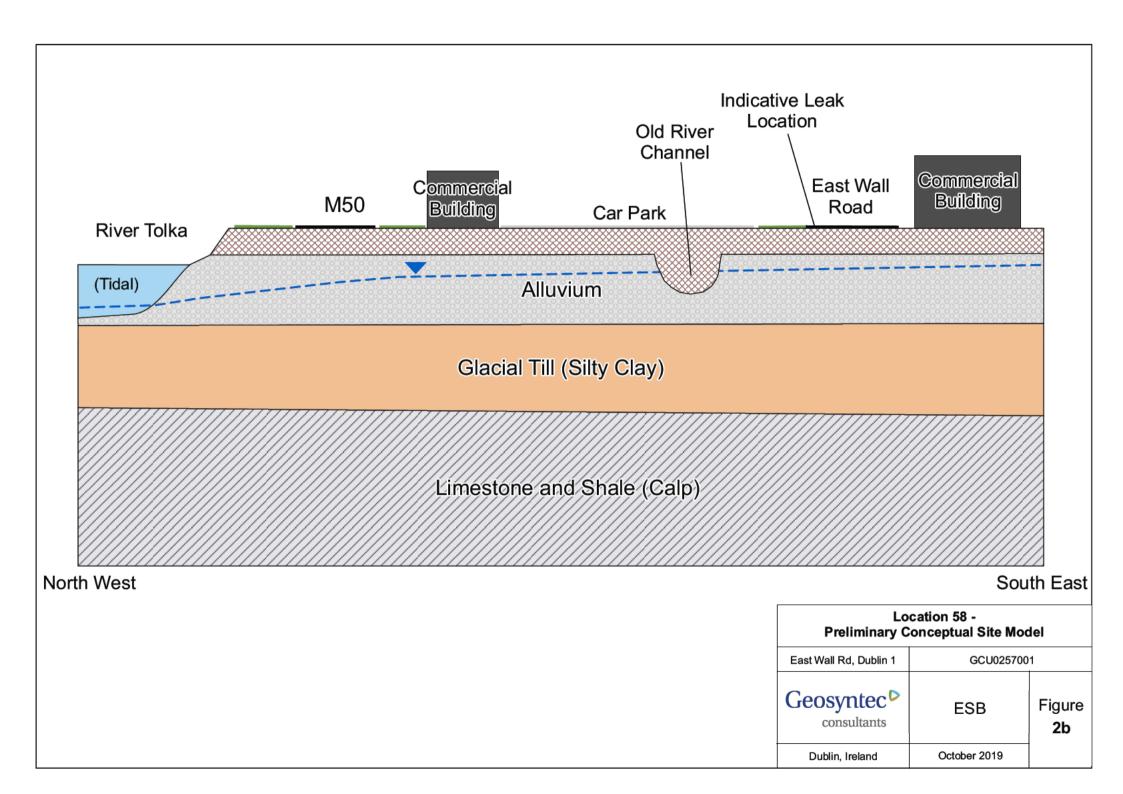
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Appendix A - Photolog

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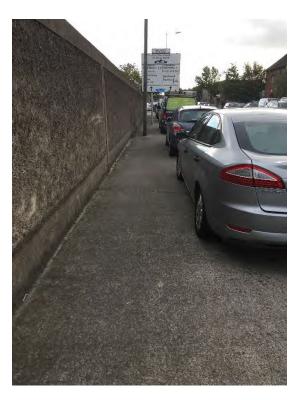
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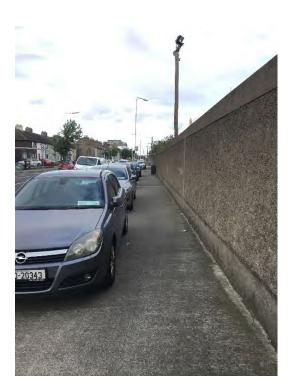
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Photograph 1 – Leak location looking south-east



Photograph 2 – Leak location looking north-west





Photograph 3 – Leak location looking towards East Road



Photograph 4 – National school south of leak location

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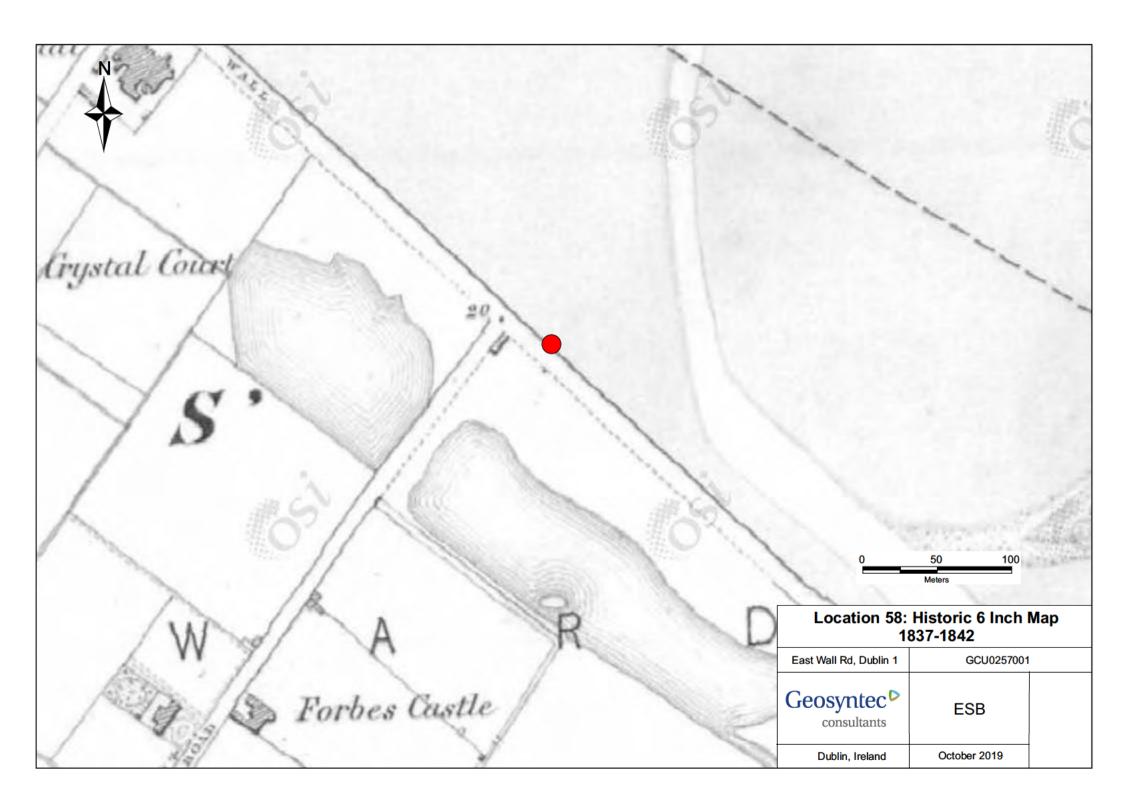
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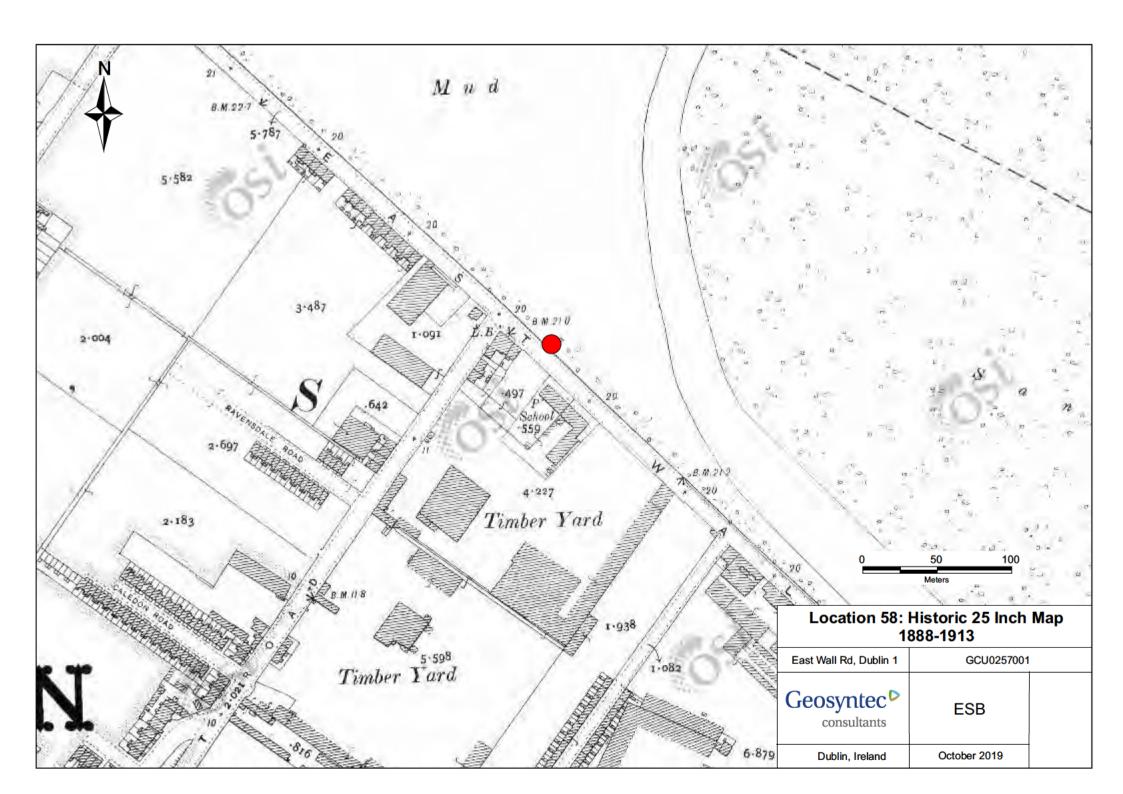
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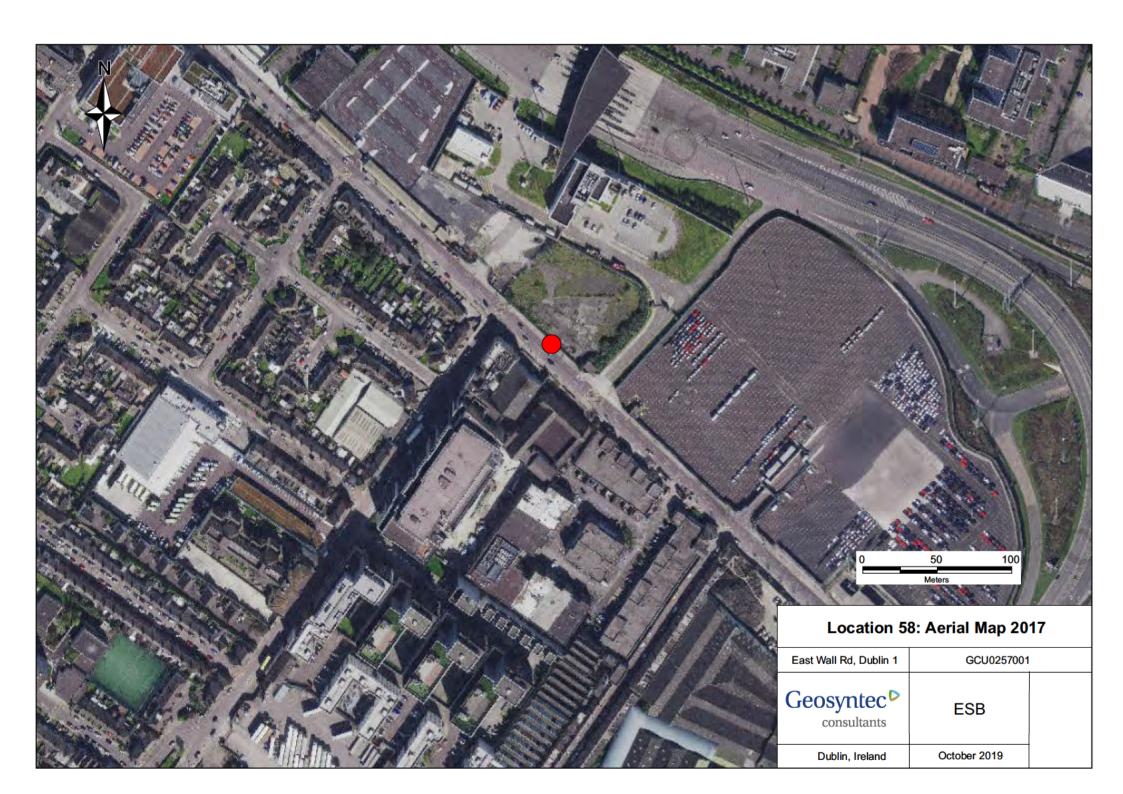
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Appendix C - Safety Data Sheet for Cable Fluid

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according to Regulation (EC) No 1907/2006

T 3788

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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

DDOC 2: Chamical production or refinent

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

Place: GB-DY4 8EH Tipton, West Midlands

Telephone: +441215220100 Telefax: +441215220116

e-mail: info.uk@hur.com

Responsible Department: Technical/Commercial Enquiries



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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						
	EC No Index No REACH No						
	Classification according to Regulation (EC) No. 1272/2008 [CLP]						
67774-74-7	Benzene, C10-13-alkyl derivs.						
	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 iet. 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	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 DNEL, long-term		inhalation	local	1,8 mg/m³					
Consumer DNEL, long-term		dermal	systemic	4,8 mg/kg bw/day					
Consumer DNEL, long-term		oral	systemic	0,5 mg/kg bw/day					



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PNEC values

CAS No	Substance	
Environmenta	compartment	Value
67774-74-7	Benzene, C10-13-alkyl derivs.	
Freshwater		0,001 mg/l
Freshwater (in	termittent releases)	0 mg/l
Marine water		0 mg/l
Freshwater se	diment	1,65 mg/kg
Marine sedime	ent	0,165 mg/kg
Micro-organisi	ms 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.



according to Regulation (EC) No 1907/2006

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Environmental exposure controls

No information available.

SECTION 9 Phy ical and chemical propertie

9.1. Information on basic physical and chemical properties

Physical state: Liquid
Colour: colourless
Odour: characteristic

Test method

pH-Value: No information available.

Changes in the physical state

Melting point:

Initial boiling point and boiling range:

Sublimation point:

No information available.

No information available.

Pour point: > -60 °C ASTM D 97-66

Flash point: >130 °C ASTM D 93

Sustaining combustion: No data available

Flammability

Solid: No information available.

Gas: No information available.

Explosive properties

none

Lower explosion limits:

Upper explosion limits:

No information available.

No information available.

No information available.

Auto-ignition temperature

Solid: No information available.
Gas: No information available.
Decomposition temperature: No information available.

Oxidizing properties

none

Vapour pressure: 0,013 hPa ASTM D 323

(at 25 °C)

Vapour pressure: No information available.

(at 50 °C)

Density: 0,85-0,88 g/cm³ ASTM D 1298

Bulk density:

Water solubility:

Immiscible

Solubility in other solvents

No information available.

Partition coefficient: No information available.

Viscosity / dynamic: No information available.

Viscosity / kinematic: 4,0-4,5 mm²/s ASTM D 445

(at 40 °C)



according to Regulation (EC) No 1907/2006

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Flow time:

Vapour density:

Evaporation rate:

No information available.

9.2. Other information

Solid content: No information available.

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 derivs.								
	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 derivs.									
	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)

14.1. UN number: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 regulation14.3. Transport hazard class(es):No dangerou good in en e of thi tran port regulation14.4. Packing group:No dangerou good in en e of thi tran port regulation

Inland waterways transport (ADN)

14.1. UN number: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.



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14.4. Packing group: No dangerous good in sense of this transport regulation.

Marine transport (IMDG)

14.1. UN number: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)

14.1. UN number: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 chapter 7

Information for per onal protective equipment ee chapter 8

14.7. Transport in bulk according to Annex II of Marpol and the IBC Code

not relevant

SECTION 15: Regulatory information

15.1. Safety, health and environmental regulations/legislation specific for the substance or mixture

EU regulatory information

2010/75/EU (VOC): No information available 2004/42/EC (VOC): No information available.

Information according to 2012/18/EU Not ubject to 2012/18/EU (SEVESO III)

(SEVESO III):

Additional information

Observe in addition any national regulations!

National regulatory information

Employment restrictions: Observe restrictions to employment for juvenils according to the 'juvenile

work protection guideline' (94/33/EC). 1 - slightly water contaminating

Water contaminating class (D):

Additional information

none

15.2 Chemical Safety Assessment

not applicable.

15.2. Chemical safety assessment

For this substance a chemical safety assessment has been carried out.

SECTION 16: Other information

Changes

Rev.: 1,0 - 08.05.2018

Abbreviations and acronyms

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



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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.



according to Regulation (EC) No 1907/2006

T 3788

Revision date: 08.05.2018 Product code: HURBV947130TGE Page 12 of 12

Identified uses

No	Short title	LCS	SU	PC	PROC	ERC	AC	TF	Specifica ion
	Industrial use of intermediates.	ı	0	ı	2	6a	ı	-	
	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

ERC: Environmental release categories

TF: Technical functions

SU: Sectors of use PROC: Process categories

AC: Article categories

Material Safety Data Sheet

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND COMPANY/UNDERTAKING

Material Name : Shell Diala Cable Oil

Uses: Insulating oil.Product Code: 001D8369

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

Number

: +44-(0) 151-350-4595

2. HAZARDS 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 : Not classified as flammable but will burn.

Environmental Hazards : Not classified as dangerous for the environment.

3. COMPOSITION/INFORMATION ON INGREDIENTS

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

Additional Information : Refer to chapter 16 for full text of EC R-phrases.

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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

Foam, water spray or fog. Dry chemical powder, carbon dioxide, sand or earth may be used for small fires only.

Unsuitable Extinguishing

Media

Do not use water in a jet.

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

Material Safety Data Sheet

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 Additional Information

PVC.

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

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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.

Hand Protection : 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. Application of a non-perfumed moisturizer is recommended.

Eye Protection : Wear safety glasses or full face shield if splashes are likely to

occur. Approved to EU Standard EN166.

Protective Clothing : 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 : Colourless. Liquid at room temperature.

Odour : Slight hydrocarbon. pH : Not applicable.

Initial Boiling Point and : > 280 °C / 536 °F estimated value(s)

Boiling Range

Pour point : $< -60 \, ^{\circ}\text{C} / -76 \, ^{\circ}\text{F}$ 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 : > 6 (based on information on similar products) coefficient (log Pow)

Kinematic viscosity : Typical 4.2 mm2/s at 40 $^{\circ}$ C / 104 $^{\circ}$ F

Vapour density (air=1) : > 1 (estimated value(s)) Evaporation rate (nBuAc=1) : Data not available

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10. STABILITY AND REACTIVITY

Stability : Stable.

Conditions to Avoid : Extremes of temperature and direct sunlight.

Materials to Avoid : Strong oxidising agents.

Hazardous : Hazardous decomposition products are not expected to form

Decomposition Products during normal storage.

11. TOXICOLOGICAL INFORMATION

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 : Expected to be of low toxicity: LD50 > 5000 mg/kg , Rabbit Acute Inhalation Toxicity : 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 : Expected to be inherently biodegradable.

Bioaccumulation : Has the potential to bioaccumulate.

Other Adverse Effects : Product is a mixture of non-volatile components, which are not

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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.

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Chemical Inventory Status

EINECS : All components

listed or polymer

exempt.

TSCA : All components

listed.

Classification triggering

components

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 Harmful: may cause lung damage if swallowed.

R66 Repeated exposure may cause skin dryness or cracking.

MSDS Version Number : 1.0

MSDS Effective Date : 16.09,2010

MSDS Revisions : A vertical bar (|) in the left margin indicates an amendment

from the previous version.

MSDS Regulation : Regulation 1907/2006/EC

MSDS Distribution : 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.

(93/112/EC)

Date of edition: October 1995



1. Identification of Substance/Preparation and Company

Product name:

Masse 106

Supplier:

FELTEN & GUILLEAUME Energietechnik AG

Schanzenstraße 24-30

51063 Köln

Emergency telephone number: 0221/676-3333

Composition/Information on Ingredients

Blend of highly refined mineral oils and additives.

On the basis of available information, the components of this preparation are not expected to impart hazardous properties to this product.

3. Hazards Identifikation

Human Health Hazards

If swallowed, aspiration into the lungs may cause chemical pneumonitis.

Prolonged or repeated exposure may give rise to dermatitis.

No specific hazards under normal use conditions.

Safet / hazards

The preparation contains mineral oil, for which an exposure limit for oil mist applies.

Environmental hazards

Av id spillage.

The poduct is not readily biodegradable.

4. First Aid Measures

Inhaistion

Remove to fresh air.

If 3 eathing but unconscious, place in the recovery position.

If breathing has stopped, apply artificial respiration.

Medical attention is to be obtained immediately.

Skin

Remove contaminated clothing and wash affected skin with soap and water.

If high pressure injection injuries occur, obtain medical attention immediately.

Eve

Riuse immediately with plenty of water for ar least 10 minutes and seek medical advice.

Ingestion

Do not induce vomiting.

Assiration into the lungs may occur directly or following ingestion. This can cause chemical oneumonitis which may be fatal.

If creathing but unconscious, place in the recovery position.

If breathing has stopped, apply artificial respiration.

Medical attention is to be obtained immediately.

Advice to physicians

Treat symptomatically

5. Fire Fighting Measures

Extinguishing media

Foam, dry chemical powder, carbon dioxide, sand or earth.

(93/112/EC)





Date of edition: October 1995

Product name: Masse 106

Fire Fighting Measures (continued)

Unsuitable extinguishing media

Do not use water in a jet

Specific hazards

Combustion is likely to give rise to a complex mixture of gases and airborne particulates, including carbon monoxide, oxides of sulphur and unidentified organic and inorganic compounds.

6. Accidental Release Measures

Personal precautions

Ventilate contaminated area thoroughly.

Minimise contact with skin.

Environmental precautions

Prevent further leakage or spillage and prevent from entering drains.

Prevent from spreading or entering into drains, ditches or rivers by using sand, earth or other appropriate barriers.

Clean-up methods

Absorb or contain liquid with sand, earth or spill control material.

Shovel into a suitable, clearly marked container for disposal or reclamation in accordance with local regulations.

7. Handing and Storage

Handing

When using do not eat or drink.

When handling product in drums, safety footwear should be worn and proper handling equipment should be used

Prevent spillages.

Storage

Keep container tightly closed and in a well ventilated place. Avoid direct sunlight, heat sources and strong oxidising agents.

Other information

Recommended materials: mild steel, high density polyethylene for containers or container linings.

8. Exposure Controls/Personal Protection

Engineering control measures

Use only in well ventilated areas.

Occupational exposure standards

Con ponent name Limit type Value/Unit

Oil mist 8 h TWA 5 mg/m3 ACGIH ACGIH 10 mg/m3

10 min STEL

Respiratory Protection

No cormally required. If a mist cannot be controlled, a respirator fitted with an organic vapour cartrige combined with a par culate prefilter should be used.

Hand Protection

PVC or nitril rubber gloves if splashes are likely to occur and if applicable.

Eye P otection

Safety spectacles

Body Protection

Minimise all forms of skin contact.

(93/112/EC)



Date of edition: October 1995

Product name: Masse 106

8. Exposure Controls and Personal Protection (continued)

Hygiene measures

Don't keep oily rags in your pockets.

Wash hands before eating and drinking.

9. Physical and Chemical Properties

form	liquid				
colour	yellow				
pourpoint	<-60°C	DIN ISO 3016			
flashpeint	145°C	DIN 51758			
flamm: bility - lower limit (vol%)	0,6				
flammability - upper limit (vol%)	6,5				
vapour pressure (20°C)	< 0,01 hPa				
density (15°C)	888 kg/m³	DIN 51757			
solubili y in water (20°C)	negligible				
n-octano./water partition coeff.	na				
kinematic viscosity (40°C)	8,5 mm ² /s	DIN 51562			

10. Stabil ty/Reactivity

Stability

stable under normal use conditions

Materials to avoid

strong oxidising agents

Hazardous decomposition products

Ha ardous decomposition products are not expected to form during normal storage.

11. Toxicological Information

Toxicological Data:

Acute toxicity - oral

LD 10 is expected to be > 2000 mg/kg.

Irritation of skin, irritation of eye

The product is expected to be slightly irritant.

Sensitisation of skin

The produkt is not expected to be a skin sensitiser.

Prolonged and/or repeated contact

Prolonged/repeated contact may cause defatting of the skin, which can lead to dermatitis and may make the skin more susceptible to irritation and penetration by other materials.

Carcinogenicity

Product is based on mineral oils of types shown to be non-carcinogenic in animal skin-painting studies. Other components are not known to be associated with carcinogenic effects.

Other information

Aspiration into the lungs may occur directly or following ingestion. This can cause chemical meumonitis which may be fatal.

Information given is based on a knowledge of the toxicology of similar products.

(93/112/EC)

Date of edition: October 1995

Product name: Masse 106

12. Ecological Information

Basis for assessment

Information given is based on data on the components and the ecotoxicology of similar products.

Product floats on water. It is liquid under most environmental conditions.

If it enters soil, it will be adsorbed to soil particles and will not be mobile.

Product has the potential to bioaccumulate.

Ecotoxicity

Product is expected to be practically non-toxic to aquatic organisms, LC/EC50 > 100 mg/L.

13. Disposal Considerations

Product

Precautions: Dispose to licensed disposal contractor.

Waste disposal Nr. (D): 54106

Container disposal

Drain container thoroughly.

Dispose to licensed disposal contractor.

Recomanded cleaning procedure

Cleaning by disposal contractor

Transport Information

Productis not dangerous for conveyance under UN, IMO, ADR/RID and IATA/ICAO codes. (According ADR/ ...D regulations from 1.1.1995)

15. Regulatory Information

Classification

The Product is not classified as dangerous under EC criteria.

16. Other Information

Additional informations

Concawe Report 5/87 Health Aspects of Lubricants.

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 therefore not be construed as guaranteeing any specific property of the product.