

Appendix E

Community Air Monitoring Plan (CAMP)

Prepared for:
National Grid
Brooklyn, New York

Community Air Monitoring Plan

Metropolitan Former MGP Site
Brooklyn, New York
NYSDEC Site No.: 224046
Order on Consent Index #: A2-0552-0606

AECOM, Inc.
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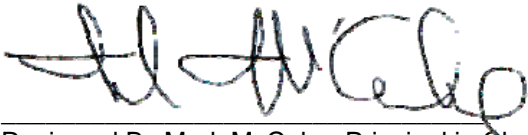
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Prepared By Peter S. Cox, Project Manager



Reviewed By Mark McCabe, Principal in Charge

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1.0 Introduction

This document provides the Community Air Monitoring Plan (CAMP) that will be implemented during the Remedial Investigation (RI) of the Metropolitan former manufactured gas plant (MGP) site located at 124 - 136 2nd Avenue in Brooklyn, New York. This site, known as the Metropolitan former MGP Site, was the former location of a manufactured gas plant (MGP) that was operated by Brooklyn Union Gas Company (BUG), a predecessor company to National Grid USA (National Grid) from the late 1880s until approximately 1938. This CAMP has been prepared by AECOM Environment (AECOM) on behalf of National Grid to present the methods and procedures that will be used to evaluate air quality in the immediate vicinity of investigation activities and provide protection to potential off-site receptors.

The Metropolitan former MGP site is located at 124 – 136 2nd Avenue, Brooklyn, Kings County, New York 11215, east of the Gowanus Canal, between the Gowanus Expressway (Highway 278) and the New York City Transit train bridge and associated subway rail line. A portion of the site was the subject of previous extensive remedial/redevelopment activities undertaken by independent third parties with NYSDEC oversight. The investigation associated with this CAMP is intended to address those portions of the site that were not addressed by the previous remedial/redevelopment activities, i.e. the “Current Site”. These areas are generally bounded to the north and west by the Gowanus Canal, to the east by a parcel of land occupied by the Lowe’s Supply store (part of the previous remediation) and 2nd Avenue, and to the south by 13th Street.

The RI fieldwork proposed for the Current Site is described in *Remedial Investigation Work Plan, Metropolitan Former MGP Site, Brooklyn, New York, NYSDEC Site No.: 224046* dated May 2009. The field investigation involves subsurface soil borings, the installation of monitoring wells, the collection of soil and groundwater samples, and collection of indoor air and soil gas samples.

The objectives of this CAMP are to:

- Ensure that the airborne concentrations of constituents of concern (COC) are minimized to protect human health and the environment
- Provide an early warning system so that potential emissions can be controlled on site at the source
- Measure and document the concentrations of airborne COC to confirm compliance with regulatory limits

The community air monitoring will be performed around the site perimeter, and will measure the concentrations of organic vapors and dust during all ground-intrusive activities (soil boring, well installations, test pitting, and ex-situ soil dewatering study).

This CAMP is a companion document to AECOM’s site-specific Health and Safety Plan (HASP). The HASP is a separate document and is directed primarily toward protection of on-site workers within the designated work zones.

2.0 Constituents of concern and action levels

The former MGP site is known to have subsurface impacts dating from the site's historical use as a MGP. As such, the constituents of concern are volatile and semi-volatile organic compounds (VOCs and SVOCs). The primary VOCs of concern are benzene, ethylbenzene, toluene, and xylene (BTEX compounds). VOCs are more volatile than SVOCs and are generally of greater concern when monitoring the air quality during MGP site investigations.

Airborne dust is also a concern and must be monitored and controlled due to its ability to co-transport adsorbed constituents and because of its nuisance properties.

Odors, though not necessarily indicative of high constituent concentrations, could create a nuisance (especially when working within or in close proximity to existing buildings and building entrances) and will be monitored and controlled to the extent practicable.

State and federal regulatory agencies have provided action levels for many of these constituents. The action levels are the allowable airborne concentrations above which respiratory protection or other health and safety controls are required. For work at the former MGP site, the following levels should not be exceeded for more than 15 consecutive minutes at the downwind perimeter of the site:

- Benzene 1 part per million (ppm).
- Total VOCs 5 ppm.
- Dust 100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

The action levels cited here are above (in addition to) the background ambient (upwind) concentration.

3.0 Air monitoring equipment and methods

Air quality monitoring will be performed for total VOCs, benzene, and dust as outlined below.

Two perimeter locations will be established each day and an air monitoring technician will check the instrumentation at each of these locations frequently during the work. Typically there will be monitoring locations at one upwind site perimeter location and one downwind perimeter locations. Upwind concentrations will be measured at the start of each workday and periodically thereafter to establish background conditions. Field personnel will be prepared to monitor multiple locations in the event that there is little wind or if the wind direction changes frequently.

The monitoring instruments will be calibrated at the start of each workday, and again during the day if the performance of an instrument is in question.

3.1 Volatile organic compounds and benzene monitoring

3.1.1 Ambient air monitoring

VOC monitoring will be performed using three field photoionization detectors (PIDs) (RAE Systems MiniRAE or equivalent). The monitoring instruments will be checked by a technician every 15 minutes, and the real-time measurements recorded. The PIDs will be equipped with an audible alarm to indicate exceedance of the action level.

If requested by the New York State Department of Environmental Conservation (NYSDEC), 15-minute running average concentrations may be calculated, which can then be compared to the action levels. If real-time measurements of total VOCs indicate that the action level is exceeded, the benzene concentration will also be determined at that location using constituent-specific colorimetric tubes.

PID measurements will be made at one upwind and one downwind location around the work area. The locations of the instruments may be changed during the day to adapt to changing wind directions.

3.2 Particulate (dust) monitoring

Particulate (dust) monitoring will be performed during intrusive activity (drilling, test pitting) at the Site. Two particulate monitors (TSI DustTrak or equivalent) will be used for continuous real-time dust monitoring. The monitoring instruments will be checked by a technician every 15 minutes, and the real-time measurements recorded. If requested by the on-site NYSDEC representative, a 15-minute average concentration may be determined.

In addition, fugitive dust migration will be visually assessed during all work activities, and the observations recorded.

Measurements will be made at one upwind and one downwind location around the work area. The locations of the instruments may be changed during the day to adapt to changing wind directions.

4.0 Emission control plan

4.1 Ambient air

Odor, vapor, and dust control will be required for this project due to the close proximity of commercial buildings and public roadways and sidewalks. Table 1 provides a response chart for the monitoring and control of vapor emissions. Table 2 provides a list of emergency contacts.

- If the ambient air concentration of total VOC levels at the downwind perimeter of the work area or exclusion zone exceeds 5 ppm (or the benzene level exceeds 1 ppm) above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the total organic vapor levels readily decreases (per instantaneous readings) below 5 ppm (and the benzene level drops below 1 ppm) over background, work activities can resume with continued monitoring.
- If total VOC levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm (or the benzene level persists over 1 ppm) over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions until the concentrations drop below the action levels, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shutdown.

Site perimeter particulate concentrations will also be monitored continuously. In addition, dust migration will be visually assessed during all work activities.

- If the downwind particulate level is $100 \mu\text{g}/\text{m}^3$ greater than the background (upwind perimeter) level for a 15-minute period, or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work may continue with dust suppression techniques provided that downwind particulate levels do not exceed $150 \mu\text{g}/\text{m}^3$ above the upwind level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind particulate levels are greater than $150 \mu\text{g}/\text{m}^3$ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind particulate concentration to within $150 \mu\text{g}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

Typical emission control measures may include:

- Apply water for dust suppression;
- Relocate operations, if applicable; and
- Reassess the existing control measures.

Table 1 Vapor Emission Response Chart

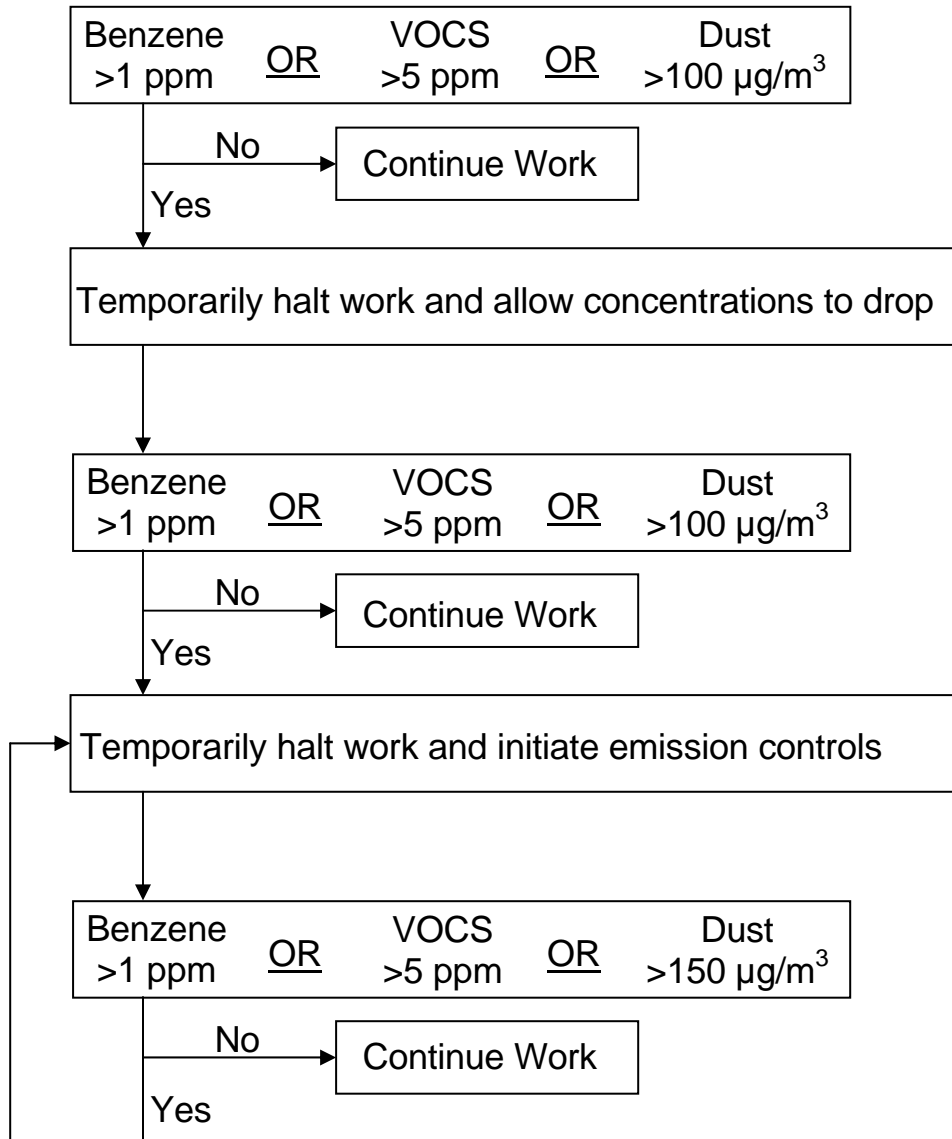


Table 2 Emergency Contacts and Telephone Numbers

Fire:	911
Police:	911
Ambulance:	911
AECOM Environment Contacts	Pete Cox (978) 764-4257 cell Kevin Kachel (610) 639-8860 cell
National Grid Contacts	Donald Campbell (973) 715-8447 cell Andrew Prophete (516) 790-1654 cell

5.0 Odor control procedures

This section outlines the procedures to be used to control odors that may be generated during the RI field activities. The investigation program will be conducted using two principal remedial investigation techniques that may generate odors: test pit excavations and subsurface soil borings/monitoring well installations. The remainder of this section is intended to provide site managers, representatives of NYSDEC and New York State Department of Health (NYSDOH), and the public with information summarizing typical odor control options, and to provide some guidance for their implementation. A description of potential sources of odors and methods to be used for odor control is presented in the following sections.

5.1 Potential sources of odors

Generally, the residuals encountered at former MGP sites are well defined. They are related to residual coal tar-like materials and petroleum, and principally contain VOCs, polynuclear aromatic hydrocarbons (PAHs), and a number of inorganic constituents, including metal-complexed cyanide compounds, and metals. Constituents of MGP tar or petroleum products can produce odor emissions during investigation activities when they are unearthed during in backhoe test pits and soil borings/well installations. When this occurs, VOCs and light-end SVOCs can volatilize into the ambient air. Some MGP residuals can cause distinctive odors that are similar to mothballs, roofing tar, or asphalt driveway sealer. However, the constituent concentrations generally associated with these odors are typically significantly less than levels that might pose a potential health risk. It is important to note that the CAMP will provide for continual monitoring of VOCs and dust during the fieldwork to monitor for any potential release of constituents which may pose a threat to health.

5.2 Odor monitoring

The field investigation personnel will record observations of odors generated during the implementation of the RI. When odors attributable to the uncovering of impacted media are generated in the work area during intrusive activities such as soil borings or excavation of test pits, observations will also be made at the down-wind limit of the former MGP site, in order to assess the potential for off-site odors. The down-wind odor monitoring will be performed in conjunction with the RI and dust monitoring program described in this CAMP.

Upon detection of odors at the site perimeter, site controls, starting in the work area, will be implemented. The site controls described in the following sections will be used to assist with odor mitigation to minimize, and to prevent where practicable, the off-site migration of odors. Due to the short distances between any work area at the site and the property line or nearby potential receptors, site controls will be implemented proactively when odors are detected in the breathing zone at any work area.

5.3 General site controls

Several general excavation or drilling procedure site controls that will be implemented include:

- Every effort will be made to minimize the amount of time that impacted material is exposed to ambient air at the site.
- For the test pit excavations, it may be possible to move some amount of soil around within the footprint of the test pit excavation in order to minimize the amount of soil removal and subsequent stockpiling of impacted soil at the ground surface. The use of in-excavation stockpiling of test pit soil will be evaluated on a case-by-case basis, and will only be performed with the approval of the NYSDEC field representative, and will be completed only if it does not impede the collection of subsurface soils or the full delineation of the subsurface features being investigated.

- Drill cuttings from the soil borings will be containerized as soon as possible during completion of each soil boring.
- Loading of excavated debris or soil that has been found by the site manager to be unsuitable material to return to test pits may generate odors. Every effort will be made to complete this work as quickly as possible and to keep these materials covered at all times.
- Meteorological conditions are also a factor in the generation and migration of odors. Some site activities may be limited to times when specific meteorological conditions prevail, such as when winds are blowing away from a specific receptor.

5.4 Secondary site controls

If substantial odors still present an issue following implementation of the above procedures, secondary controls will be enacted. The AECOM field representative will work through the applicable list of secondary controls until the perimeter odor issues are resolved. The AECOM field representative will work closely with National Grid and NYSDEC during this task if present. Final selection of controls will be dependent on field conditions encountered. Secondary controls include the following:

- For stockpiled impacted soil, temporary tarps or polyethylene covers will be used to control odors.
- The placement of portable barriers close to small active source areas (test pits) can elevate the discharge point of emissions to facilitate dispersion and minimize the effect on downwind receptors. The barriers can be constructed using materials such as plastic "Jersey barriers", or fence poles and visual barrier fabric/plastic. The barriers are placed as temporary two or three-sided structures around active test pit or other intrusive investigation areas, oriented such that the barriers are placed on the upwind and downwind sides of the source. If only one side of the source can be accessed, then the barrier should be placed on the downwind side.
- Two agents that can be sprayed over impacted soil have been determined to be effective in controlling emissions. They include odor suppressant solution (BioSolve™), and hydro-mulch. These agents may be used where tarps cannot be effectively deployed over the source material, or where tarps are ineffective in controlling odors:
 - BioSolve™ can provide immediate, localized control of odor emissions. Information regarding the preparation and use of BioSolve™ is provided in Appendix A.
 - Hydromulch - Although it is unlikely that it will be necessary, a modified hydromulch slurry may be used to cover inactive sources for extended periods of time (up to several days). The hydromulch, typically cellulose fibers (HydroSealR) is modified by mixing a tackifier (glue) with the mulch and water to form a slurry. It is applied using a standard hydroseed applicator to a thickness of ¼ inch. The material forms a sticky, cohesive, and somewhat flexible cover. Reapplication may be necessary if the applied layer becomes desiccated or begins to crack.

5.5 Record keeping and communication

Similar to readings recorded during the monitoring specified in the CAMP, all odor monitoring results will be recorded in the field log book or other air monitoring forms, and be available for review by the agencies.

The AECOM field representative, in consultation with National Grid, will also provide information on odor monitoring and odor management to residents of the neighborhood should they inquire. In the event that odors persist after these efforts, work will be temporarily discontinued until a mutually agreeable solution with National Grid, NYSDEC, and NYSDOH staff can be worked out which allows the work to be completed while minimizing the off-site transport of nuisance odors.

6.0 Documentation and reporting

Data generated during perimeter air monitoring will be recorded in field logs and summarized daily in spreadsheets. The electronic measurements from the PIDs and dust meters will be downloaded each day, reviewed, and archived. Exceedances of the action levels, if any, and the actions to be taken to mitigate the situations, will be discussed immediately with the on-site representatives. Summaries of all air monitoring data will be provided to NYSDEC as requested.

Appendix A

Vapor Suppression Information



VAPOR SUPPRESSION / ODOR CONTROL

BioSolve[®] offers a relatively simple and cost effective method of suppressing Odors and VOC release from soils, during excavation, loading, stockpiling, etc. The following guidelines will apply to the most common situations encountered on site.

In most cases a 3% BSW solution (1 part **BioSolve**[®] concentrate to 33 parts water) will be adequate to keep vapor emissions within acceptable limits and control fugitive odor problems on contact. Although, some sites may only require a 2% solution, up to a 6% solution may be recommended on sites with elevated levels or particularly difficult/ mixed stream contaminants are present.

The **BioSolve**[®] solution should be applied evenly to the soil surface in sufficient quantity to saturate the surface area. As a general rule, use 1-3 litres of **BioSolve**[®] solution to 1 square metre of surface area. (1 gallon of **BioSolve**[®] per solution will cover approximately 4-sq. yd. of soil surface area) **BioSolve**[®] is a water-based surfactant that will apply like water.

BioSolve[®], in its concentrated form, is a viscous liquid material that must be diluted with water. A fluorescent red tracing dye is present in the formula allowing **BioSolve**[®] to be detected during application. Once diluted, **BioSolve**[®] can be applied with virtually any equipment that can spray water. **BioSolve**[®] will not harm equipment or clog pipes. For large sites, applicators such as water truck, portable agricultural sprayers, foam inductors & pressure sprayers can be used. For smaller jobs, garden sprayers, water extinguishers or a garden hose with a fertiliser attachment on the nozzle can be used effectively. This characteristic makes **BioSolve**[®] very adaptable and much most convenient to use in almost any situation. **BioSolve**[®] is equally effective when used with all types of water (soft, hard, salt or potable).

On stockpiled soil or other soil that will be left undisturbed, a single application of **BioSolve**[®] to the exposed surfaces may last up to 10 to 14 days or more (depending on environmental conditions). **BioSolve**[®], when applied, will form a "cap" of clean soil. If the soil is not disturbed, via weather, movement, etc. this "cap" will remain functional. During excavation, loading or other movement of the soil, it may be required to spray an additional amount of **BioSolve**[®] to the freshly exposed surface area to keep emissions at an acceptable level.

In case of an extremely high level of emissions, or if the soil is heavily contaminated, it may be necessary to increase the strength of the **BioSolve**[®] solution or apply more solution per square metre to reduce emissions adequately. It is important that the site be monitored regularly and that the **BioSolve**[®] solution be reapplied if and when necessary to insure that VOC emissions and odors remain under control.

BioSolve[®] is packaged and readily available in 55 gallon (208 liter) drums, 5 gallon (19 liter) pails and in 4X1 gallon (3.8 liter X 4) cases. Contact The Westford Chemical Corporation[®] Toll Free @ 1-800-225-3909, via e-mail at info@biosolve.com or your Local BioSolve distributor for pricing.

BioSolve[®] *should only be used in accordance with all regulatory rules and regulations.*

This material is made available or use by professionals or persons having technical skill to be used at the own discretion and risk. These protocols are guidelines only and may need to be modified to site specific conditions. Nothing included herein is a warrantee or to be taken as a license to use **BioSolve** without the proper permits, approvals, etc. of the appropriate regulatory agencies, nor are the protocols provided as instructions for any specific application of **BioSolve**.



SOIL VAPOR SUPPRESSION UTILIZING BIOSOLVE

BioSolve is being utilized by numerous environmental consultants, response contractors, and fire departments to suppress VOC's & LEL's as well as problem odors. BioSolve encapsulates the source of the vapor rather than temporarily blanketing it like a foam or other physical barrier. Vapor reduction is so fast and effective that BioSolve is used to comply with the tough emission standards regulated by each State.

BioSolve offers a relatively simple and cost effective method of suppressing VOC vapor release from soils during excavation, loading, stockpiling... The following guidelines will apply to the most common situations encountered on site.

In most cases a 3% solution of BioSolve will be adequate to keep vapor emissions within acceptable limits. Dilute BioSolve concentrate with water at a ratio of 1 part BioSolve to 33 parts water to make a 3% solution.

The BioSolve solution should be applied evenly to the soil surface in sufficient quantity to dampen the surface well, (as a general rule, 1 gallon of BioSolve solution will cover approximately 4 sq. yd. of soil surface area). BioSolve is not a foam, it is a surfactant based product that will apply like water. The solution may be applied with a hand sprayer, high pressure power sprayer, water truck, etc., whichever method best suits the site and/or conditions.

NOTE: In the case of extremely high emission levels and/or very porous soil it may be necessary to increase the strength of the BioSolve solution (6%) or apply more per sq. yd. to reduce emissions adequately. On stockpiled soil or other soil that will be undisturbed, a single application of BioSolve to the exposed surfaces may last 10-14 days or more. During excavation, loading, or other movement of soil it may be necessary or required to spray each freshly exposed surface to keep emissions below acceptable

levels. It is important that the site be monitored regularly and the BioSolve solution be reapplied if/when necessary to insure that vapor emissions remain at or below acceptable standards.

MATERIAL SAFETY DATA SHEET

THE WESTFORD CHEMICAL CORPORATION®

P.O. Box 798

Westford, Massachusetts 01886 USA

Ref. No.: 2001

Date: 1/1/2002

Phone: (978) 392-0689

Phone: (508) 878-5895

Emergency Phone-24 Hours: 1-800-225-3909

Fax: (978) 692-3487

Web Site: <http://www.BioSolve.com>

E-Mail: info@BioSolve.com

SECTION I - IDENTITY

Name: **BioSolve®**
CAS #: 138757-63-8
Formula: Proprietary
Chemical Family: Water Based, Biodegradable, Wetting Agents & Surfactants
HMIS Code: Health 1, Fire 0, Reactivity 0
HMIS Key: 4 = Extreme, 3 = High, 2 = Moderate, 1 = Slight, 0 = Insignificant

SECTION II - HAZARDOUS INGREDIENTS

Massachusetts Right to Know Law or 29 C.F.R. (Code of Federal Regulations) 1910.1000 require listing of hazardous ingredients.

This product does not contain any hazardous ingredients as defined by CERCLA, Massachusetts Right to Know Law and California's Prop. 65.

SECTION III - PHYSICAL - CHEMICAL CHARACTERISTICS

Boiling Point	: 265°F	Specific Gravity	: 1.00 +/- .01
Melting Point	: 32°F	Vapor Pressure mm/Hg	: Not Applicable
Surface Tension- 6% Solution	: 29.1 Dyne/cm at 25°C	Vapor Density Air = 1	: Not Applicable
Reactivity with Water	: No	Viscosity - Concentrate	: 490 Centipoise
Evaporation Rate	: >1 as compared to Water	Viscosity - 6% Solution	: 15 Centipoise
Appearance	: Clear Liquid unless Dyed	Solubility in Water	: Complete
Odor	: Pleasant Fragrance	pH	: 9.1 +/- .3
Pounds per Gallon	: 8.38		

SECTION IV - FIRE AND EXPLOSION DATA

Special Fire Fighting Procedures : None
Unusual Fire and Explosion Hazards : None
Solvent for Clean-Up : Water
Flash Point : None
Flammable Limit : None
Auto Ignite Temperature : None
Fire Extinguisher Media : Not Applicable

SECTION V - SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Precautions to be taken in Handling and Storage: Use good normal hygiene.

Precautions to be taken in case of Spill or Leak -

Small spills, in an undiluted form, contain. Soak up with absorbent materials.

Large spills, in an undiluted form, dike and contain. Remove with vacuum truck or pump to storage/salvage vessel. Soak up residue with absorbent materials.

Waste Disposal Procedures -

Dispose in an approved disposal area or in a manner which complies with all local, state, and federal regulations.

SECTION VI - HEALTH HAZARDS

Threshold Limit Values: Not applicable

Signs and Symptoms of Over Exposure-

Acute : Moderate eye irritation. Skin: Causes redness, edema, drying of skin.

Chronic: Pre-existing skin and eye disorders may be aggravated by contact with this product.

Medical Conditions Generally Aggravated by Exposure: Unknown

Carcinogen: No

Emergency First Aid Procedures -

Eyes: Flush thoroughly with water for 15 minutes. Get medical attention.

Skin: Remove contaminated clothing. Wash exposed areas with soap and water.

Wash clothing before reuse. Get medical attention if irritation develops.

Ingestion: Get medical attention.

Inhalation: None considered necessary.

SECTION VII - SPECIAL PROTECTION INFORMATION

Respiratory Protection	: Not necessary	Local Exhaust Required	: No
Ventilation Required	: Normal	Protective Clothing	: Gloves, safety glasses Wash clothing before reuse.

SECTION VIII - PHYSICAL HAZARDS

Stability	: Stable	Incompatible Substances	: None Known
Polymerization	: No	Hazardous Decomposition Products	: None Known

SECTION IX - TRANSPORT & STORAGE

DOT Class	: Not Regulated/Non Hazardous	Storage	: 35°F-120°F
Freeze Temperature	: 28°F	Shelf Life	: Unlimited Unopened
Freeze Harm	: None (thaw & stir)		

SECTION X - REGULATORY INFORMATION

The Information on this Material Safety Data Sheet reflects the latest information and data that we have on hazards, properties, and handling of this product under the recommended conditions of use. Any use of this product or method of application, which is not described on the Product label or in this Material Safety Data Sheet, is the sole responsibility of the user. This Material Safety Data Sheet was prepared to comply with the OSHA Hazardous Communication Regulation and Massachusetts Right to Know Law.