

Thornton & Roshon Properties, Inc.
3010 Columbus-Lancaster Road
Lancaster, OH 43130

February 2, 1999

Mr. Daniel C. Bolger, P.E.
Emergency Planning Council
109 N. Broad St., 1st Floor
Lancaster, OH 43130

RE: Your letter of January 4, 1999, Regarding
"Release into Hocking River tributary 12/21/98"

Dear Mr. Bolger:

Thank you for your kind attention to the above related matter. We appreciate the professionalism with which you addressed this matter. Please allow this letter to serve as the property owner's response to your letter.

The property owner understands your letter to request a "written follow-up to releases or discharges of regulated materials". You kindly provided us with a copy of three pages relating to "Release Reporting of a Hazardous Substance" which you took from some manual or publication in your possession. We will endeavor to address each of the items covered in these materials. Please note, that we are laymen when it comes to such matters. We will provide as much information to you as possible, but certainly do not claim to have technical expertise.

To begin, we have some confusion over the need for this report at all. The first page of your materials seem to be concerned with and limit the need for such a written report to three types of releases (i.e. "Extremely hazardous substances, hazardous substances, and oil). The product that was accidentally released was a very diluted amount of "Mirror Grind 5414" (diluted to less than 2% by well water). Page three of the Mirror Grind 5414 MSDS provided to us by the manufacturer (and provided to Mr. Baker of your office by us - and copy attached) states that "this product when spilled or disposed of is a non-hazardous waste as defined in RCRA regulations (40 CFR 261)". The MSDS also states that spills should be absorbed or flushed. From our lay perspective, the MSDS suggests that the spill (although regrettable) was not in any way dangerous or hazardous, and that the natural dilution of the already diluted product by the stream fully flushed the product. Therefore, you may wish to disregard this letter as unnecessary.

In keeping with our complete desire to be fully cooperative, we will address each of the requested items, even though they seem unnecessary.

When

We first became aware of the release on the morning of December 21, 1998 when we were approached by Mr. Baker of your office and a representative of the local fire department (whose name escapes us). We did not note the exact time that these gentlemen came to the facility. We immediately went to our maintenance department and discovered that they had accidentally connected a pipe to the storm drain instead of the waste drain. They were not sure just when this happened, but thought it had happened several days prior. We immediately had them move the pipe to the correct drain (the actual work took about an hour, during which time the waste water was shut off). The Ohio EPA has advised us that they gave this release Spill # 9812-23-4979.

Location

The release occurred at the property located at 3010 Columbus-Lancaster Road, Lancaster, Greenfield Township, Fairfield County, Ohio. We do not know the longitude or latitude of the property. The actual release occurred into the stream that runs along the west side of the property.

Product Release

The release consisted of water used to cool the glass grooving machines. The release was our well water mixed with "Mirror Grind 5414" (MSDS attached). The Mirror Grind 5414 should have consisted of less than 2% of the content of the release. We estimate that the total release of Mirror Grind 5414 (over the entire time) probably did not exceed more than a couple gallons.

Environmental Impact

Based upon our review of the MSDS it appears that the release had no environmental impact. The release went into a small stream and appeared to be fully diluted and dissipated within 20 or 30 feet of the point of discharge. We are not aware of any damage to wildlife or vegetation. Likewise, we are not aware of any impact to human health or safety, nor the need for any medical treatment for any individual.

Monitoring and Detection

The release was detected because the Mirror Grind 5414 has a yellow/green color and caused the released water mixture to be slightly colored. This caused a slightly cloudy appearance to the stream. The only detection and monitoring were visual.

Mitigation, Containment Action

All of the release was neutralized by dilution with the well and stream water. No other action was appropriate or called for.

Prevention Measures

The company's maintenance department has rerouted the drain pipe which was accidentally connected to the storm drain. To prevent future accidental connections, each member of the maintenance department has been instructed not to change any drain plumbing without the express review and approval of the owner.

Health Risks

Page 2 of the attached MSDS contains the health information provided by the manufacturer of the Mirror Grind 5414. It appears that in the extremely diluted form that was released that no health risks were present.

Permit Numbers

We know of no applicable permits.

Chronology

We became aware of the release on the morning of December 21, 1998 when we were visited by a representative of the local fire department. That same morning Mr. Baker of your office visited us. On the same day the problem was rectified. On January 6, 1999 we received your letter. This letter is our requested response. We are not aware of any other communications regarding this matter.

Documentation

Besides your letter and this letter, we are not aware of any reports or other documents relating to this matter.

Causes

The release occurred because a maintenance worker accidentally ran a machine cooling waste drain to a storm drain. We purchased this building 4 years ago at a foreclosure sale. The building had been severely vandalized including much of the plumbing, and we have no accurate plumbing plans. The maintenance worker simply failed to realize that what he thought was a waste drain actually was a roof drain. We now know that the building roof is drained, in part, by stacks that run down inside the building (in addition to those on the outside of the building), and that these stacks feed into the parking lot storm drains.

Economic Impact

No economic impact is known to us.

We hope that this information is helpful and concludes this matter. Obviously, we stand ready to assist you in any way possible.

Sincerely,



G. Thomas Thornton
President

cc: Ohio EPA DERR-ER

Page: 1

MATERIAL SAFETY DATA SHEET
MIRROR GRIND 5414 (PT-0554-14)

10/26/94

Prepared: 10/25/94

SECTION I - PRODUCT IDENTIFICATION

Manufacturer: Associated Chemists, Inc. Telephone : (503) 659-1708
4401 S. E. Johnson Creek Blvd. Emergency Tel. : (800) 535-5053

Product Use : Portland OR 97222
Product Name : WATERBASE LUBRICANT
MSDS Code : MIRROR GRIND 5414
C.A.S. Number: PT-0554-14
T.D.G. Classification: NONE
T.D.G. Shipping Name: NA
Packing Group: NA
Other Names : NONE
WHMIS Class(es) : D2B

Hazard Ratings:
none -> extreme Health - 1
0 -> 4 Fire - 1
Reactivity - 0

Personal Protection - E
UN #: NONE

Molecular Wt: NA

SECTION II - HAZARDOUS INGREDIENTS

Ingredients	CAS #	Weight %	LD50 mg/kg	LC50 4 hr	Exposure Limits ACGIH/TLV	OSHA/PEL
TRIETHANOLAMINE	102-71-6	5-10	8680	N/AV	5 mg/M3	X N.E.
BORIC ACID				STEL = X	N.E.	X N.E.
SODIUM BORATE	10043-35-3	1-5	2660	N/AV	10 mg/M3	15 mg/M
	1330-43-4	.5-1.5	3400	N/AV	5 mg/M3	5 mg/M
				STEL = 6		

*** ALL Ingredients in this product are listed in the T.S.C.A. Inventory.

N.E. = Not Established

N/AV = Not Available

SECTION III - PHYSICAL DATA

Boiling Range: 212 F
Evap. Rate: Unavailable
Volatile vol %: 0
Vapour Pr. mm Hg: 17
Freeze Pt : 32
pH : 10.17
Odour : MILD
Appearance : YELLOW/GREEN LIQUID, MILD ODOR
V.O.C. : NONE

Wgt %: N/AV

Vapour Density: Non Volatile
Odour Threshold: NA

Sp.Gravity: 1.04
Coef. Water/Oil: NA
Physical State : LIQUID

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flash Point: >220 F
Flammability Class: IIIB
Auto-ignition Pt (Deg C): NA

LEL (vol. %) : NONE
UEL (vol. %) : NONE

SECTION IV - FIRE AND EXPLOSION HAZARD DATA (cont.)

-EXTINGUISHING MEDIA

Water spray, dry chemical, chemical foam, or carbon dioxide.

-SPECIAL FIREFIGHTING PROCEDURES:

Use self-contained breathing apparatus with full facepiece.

-UNUSUAL FIRE & EXPLOSION HAZARDS:

Never use welding or cutting torch on or near drum, even empty, because product or residue can ignite explosively.

SECTION V - HEALTH HAZARD DATA

-PERMISSIBLE EXPOSURE LEVEL:

None established for product.

This product does not contain any substance(s) listed as a Carcinogen by NTP, IARC, or OSHA.

PRIMARY ROUTES OF ENTRY: Ingestion and/or inhalation.

-EFFECTS OF OVEREXPOSURE:

(Acute/ Short Term): FOR PRODUCT

EYES: Causes severe irritation.

SKIN: Causes slight irritation.

BREATHING: Inhalation of vapors or mists could cause pulmonary irritation, dizziness, and nausea.

SWALLOWING: Ingestion may cause nausea, vomiting, diarrhea.

(Chronic/Long Term): FOR PRODUCT OR COMPONENTS

Prolonged or repeated breathing of sprays, mists, or dusts in excess of the suggested TLV may cause nasal and respiratory irritations.

-FIRST AID:

IF IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

IF ON SKIN: Remove contaminated clothing and wash affected skin area with soap and water.

IF SWALLOWED: INDUCE vomiting. Call a physician at once. Give large quantities of water. Never give anything orally to an unconscious or convulsing person.

IF BREATHED: Remove person to Fresh air. If not breathing, apply artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Contact a physician immediately.

SECTION VI - REACTIVITY DATA

STABILITY: [] Unstable [x] Stable

-INCOMPATIBILITY:

Acids, strong oxidizing agents.

Page: 3

Associated Chemists, Inc.
Material Safety Data Sheet for: MIRROR GRIND 5414(PT-0554-14)-----
SECTION VI - REACTIVITY DATA (cont.)

-CONDITIONS TO AVOID:

Acids, strong oxidizing agents.

-HAZARDOUS DECOMPOSITION PRODUCTS

Carbon monoxide and/or carbon dioxide.
-----SECTION VII - SPILL OR LEAK PROCEDURES

-STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

SMALL SPILLS: Use an inert material (sawdust, kitty litter, sand ETC.) to absorb spilled product. Flush spill area with plenty of water.

LARGE SPILLS: Use caution, spilled material may be extremely slippery. Contain spilled material immediately and prevent from entering the sewer system. Use an inert material to absorb spilled product.

-WASTE DISPOSAL METHOD:

Product must be disposed of properly under Federal and State regulations for industrial waste.

This product when spilled or disposed of is a non-hazardous waste as defined in RCRA regulations (40 CFR 261).
-----SECTION VIII - SPECIAL PROTECTION INFORMATION:

-RESPIRATORY PROTECTION:

None normally required.

-VENTILATION:

Use adequate ventilation to keep airborne concentrations below the exposure standard.

-PROTECTIVE GLOVES:

Neoprene rubber gloves are recommended.

-EYE PROTECTION:

Wear approved splashproof chemical goggles.

-OTHER PROTECTIVE EQUIPMENT:

None normally required.
-----SECTION IX - SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:

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

-OTHER PRECAUTIONS:

PLEASE NOTE! This product contains alkanolamines. DO NOT ADD solutions containing SODIUM NITRITE to this material. AMINES MAY REACT WITH NITRITES TO FORM NITROSAMINES. SOME NITROSAMINES HAVE BEEN SHOWN TO CAUSE CANCER IN LAB ANIMALS.

SECTION X - ADDITIONAL REGULATORY INFORMATION

-SARA TITLE III SECTION 313:

This product does NOT contain toxic chemicals subject to the reporting requirements of section 313 of the Emergency Planning and Community Right to Know Act of 1986 and of 40 CFR 372:

CAS#	Chemical Name	Percent by Weight
	None	

-PROP 65 (CARCINOGEN):

This product does NOT contain a chemical known to the state of California to cause cancer.

CAS#	Chemical Name
	None

P 65 (TERATOGENIC)

This product does NOT contain a chemical known to the state of California to cause birth defects or other reproductive harm.

CAS#	Chemical Name
	None

-PROP 65 (BOTH CARCINOGEN AND TERATOGENIC):

This product does NOT contain a chemical known to the state of California to cause cancer or birth defects or other reproductive harm.

CAS#	Chemical Name
	None

SECTION XI - SECTION XI

-SECTION XI SUBSECTION 1

Physical Characteristics

Specifications

Color	Yellow
pH	10.1 ± 0.2
Cloud Point	> 110°F
Density	8.69 ± 0.20 lb/gal

Regulatory Compliance

Mirror Grind 5414 does not contain, nor is it manufactured using ozone-depleting substances as listed under Section 611 of the Clean Air Act. This product does not contain any chemicals regulated under SARA Title III reporting requirements or under California Proposition 65.

Safety

In its concentrated form, Mirror Grind 5414 can cause severe eye irritation. If it should come into contact with the eyes, they should be flushed out with potable water. Mirror Grind 5414 contains alkanolamines - do not add solutions containing sodium nitrite to this material. *Before using this product, please read Material Safety Data Sheet Number PT0554-14 for Mirror Grind 5414 and follow the recommended safety instructions.*

Waste Disposal

Mirror Grind 5414 is not considered a hazardous waste under current RCRA regulations. Dispose of all wastes in conjunction with federal, state and local laws governing non-hazardous materials. For spills and other emergency situations occurring after normal business hours, please call our 24 hour hot line (505) 293-7763 or Infotrac Emergency Center (800) 535-5053.

OTHER MIRROR GRIND PRODUCTS
<i>5429 Mirror Grind</i> performs the hardest glass-grinding jobs even when diluted up to 100:1 with water. Best suited for small systems with regular sump clean-out.
<i>Mirror Grind 5424</i> features additional protection from microbiological degradation for extended coolant life and decreased coolant system costs. Swarf handling is optimized with quite time for maximum settling.
<i>Mirror Grind 5421</i> is designed with reduced foaming properties and is especially useful in areas where soft water is used for coolant dilution.

**EMERGENCY PLANNING COUNCIL
OF
FAIRFIELD COUNTY**

**109 North Broad St., P.O. Box 626, Lancaster, OH 43130-0626
Emergency Operations Center: 342 W. Wheeling Street
(740) 654-4357 Phone - 653-5690 Fax**

*Vera Coutant - Chairperson
Steven Sells - Vice Chairperson
Daniel Bolger, P.E. - Coordinator
Michelle Dille - Secretary*

Emergency 740/653-5223

*County Commissioners
Allan Reid
Lisa M. Kessler
Judith K. Shupe*

January 21, 1999

Tobin Mann
Thornton Industries
P.O. Box 2605
Lancaster, OH 43130

RE: Release into Hocking River tributary 12/21/98

Dear Mr. Mann:

Ohio and Federal regulations require a written follow-up to releases or discharges of regulated materials within thirty days of the incident. Details are spelled out in the highlighted sections of the enclosed sheets.

Your response is to be mailed to my attention at the Fairfield County LEPC, 109 N. Broad Street (1st floor), Lancaster, OH 43130. Also send a copy to Ohio EPA DERR-ER, Attention SERC Records Management, Lazarus Government Center, 122 Front Street, Columbus, OH 43215.

If you have any questions about completion, please call me.

Very truly yours,

Daniel C. Bolger, P.E.