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P.O. Box 1110
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May 22, 2025

Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition No. 1654 - Tunnel BESS LLC petition for a declaratory ruling pursuant to Conn. Gen. Stat. §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 16.02 megawatt (MW) AC battery energy storage facility and associated equipment to replace the existing approximately 17-MW kerosene-fueled Tunnel Jet electric generating facility and associated equipment located adjacent to FirstLight Power, Inc.'s Tunnel Hydroelectric Generating Station, 72 Roosevelt Avenue Extension, Preston, Connecticut, and associated electrical interconnection

Dear Attorney Bachman:

On behalf of Tunnel BESS LLC (the "Petitioner"), we hereby submit to the Connecticut Siting Council the original and fifteen (15) copies of Petitioner's Responses to Council's Interrogatories – Set Two for the above-referenced Petition. Electronic copies of these Responses will also be provided as of today's date.

Please contact me if you have any questions regarding this submission.

Very truly yours,



Janie L. McDermott

JLMC/vab
Enclosures

Petition No. 1654
Tunnel BESS, LLC
72 Roosevelt Avenue Extension, Preston, Connecticut

Interrogatories to Petitioner – Set Two
May 2, 2025

71. Referencing response to interrogatory 2, bullet point 4, were there any further discussions on fire water supply alternatives? If yes, provide any updates on potential fire water sources and the approximate distance(s) from such sources and the proposed battery energy storage facility (BESF). Is a dry stand pipe required due to risk of freezing?

TBL Response: Discussions with the Town of Preston regarding fire water supply alternatives were limited to those identified in interrogatory 2, bullet point 4. The Quinebaug River is an adequate water resource for the fire department to use in case of a fire at the proposed BESF and is equally efficient as a dry standpipe, which would not be required. The closest BESF segment from the Quinebaug River is 132 feet away.

72. Submit a plume analysis for the proposed facility that examines potential battery vent gas release scenarios from a thermal runaway event.

TBL Response: The Petitioner expects the plume analysis to be completed on or before June 20, 2025, and requests an extension of time to respond to this interrogatory.

73. Identify the general equipment in a battery container, e.g. batteries, HVAC system.

TBL Response: The primary components of a battery container are lithium-ion battery modules, racking equipment and associated electrical connects; a battery management system; a liquid-cooling HVAC system; and a fire detection and suppression system featuring gas venting and explosion prevention. The container also includes communication devices used to interface with the site controllers and human-machine interfaces.

74. Would all of the battery storage units be dispatched simultaneously and respond together to keep battery degradation equal across all of the units?

TBL Response: Yes. Typically, the desired discharge capacity is distributed evenly among the battery units such that the cycling and degradation remains even throughout the system.

75. Identify the type(s) of lighting for the proposed facility. Where would the lighting be installed, and when would lighting operate?

TBL Response: The type of lighting for the proposed facility is Downward Facing Motion Activated Light, which would be installed throughout the equipment pads. The lighting is triggered by motion and would operate during normal operations in the dark.

76. Would the facility have heat and gas sensors connected to a fire alarm system that could notify the fire department? Explain.

TBL Response: Yes. The battery containers would have cell monitoring that detects heat voltage and gases. The alarm system would notify the fire department when smoke is detected.

77. Referencing response to interrogatory 41, in the event that the battery management system detects a parameter outside of normal expected values, would only that individual battery (cell) with unusual conditions be disconnected from service or would the entire battery enclosure be disconnected from service until the issue is resolved? Explain.

TBL Response: The scope of a battery disconnection would depend on the nature and severity of the alarm. Certain alarms, like gas detection, will trigger a disconnect of an entire container. Less urgent alarms (e.g., undervoltage) may only trigger the disconnection of a single cell or module.

78. Referencing response to Council interrogatory 42, what was the duration of the September 2024 BESF fire in Escondido, California (Escondido Fire)?

TBL Response: New Leaf Energy and FirstLight do not have any insider knowledge about the Escondido Fire. Publicly available online reports suggest that the Escondido Fire was limited to a single BESF container and that the event lasted about 13 hours. See the following link: <https://www.energy-storage.news/california-sdge-battery-fire-was-well-managed-caused-minimal-impact/>

79. Would each battery unit have fuses and/or circuit breakers that would isolate a battery unit during an abnormal event? Would the facility be remotely monitored with the ability to disconnect a given battery unit or the entire facility from the grid if necessary?

TBL Response: The battery system features multiple layers of overcurrent protection and disconnection, including fusing and circuit breakers. Each battery container would include container level disconnects, rack level disconnects, and module level fusing. Disconnects can be remotely operated to sectionalize and disconnect components of the system at both, the rack and container levels. Additionally, the site can be sectionalized on the AC side via the switchgear.

80. If the proposed facility is disconnected from the grid, would the battery containers still be energized and a shock hazard?

TBL Response: Yes, even when disconnected from the grid, batteries may remain energized and pose a potential hazard. The battery system should only be serviced by certified professionals with the appropriate training.

81. Referencing response to interrogatory 56, as a visual comparison, provide the approximate maximum height above grade of the existing Tunnel facility (e.g. height to top of exhaust stack).

TBL Response: The approximate maximum height above grade of the existing Tunnel Facility is 70 feet. See attached.

82. Referencing response to Council interrogatory 61, R-410a would be used by the HVAC system. Is the refrigerant toxic/hazardous? Is there a low-level detection system and/or alarm? Would the refrigerant be topped off in the event of a leak?

TBL Response: MSDS sheets for the refrigerant are attached. Yes, the HVAC system would include a detection system for low-pressure / low-level. An alarm would prompt the operator to investigate the situation to repair any potential leaks.

83. Has a geotechnical study been completed for the site to determine if site conditions could support the overall Project design? If so, summarize the results. If not, has the Petitioner anticipated and designed the Project with assumed subsurface conditions? What are these assumed conditions?

TBL Response: A geotechnical study has not been completed yet. The anticipated completion date for this work is August 2025. The Project is designed with a USDA websoil survey assuming Hinckley loamy sand, Pootatuck fine sandy loam, and Udorthents-Urban land complex on site. See attached.

84. Do the battery units have hermetic seals? If yes, please respond to the following:

TBL Response: The modules are IP67 (dust and water ingress resistant) rated. Please see below.

- a) Are the battery unit hermetic seals inspected after shipment/installation at the site? Who verifies that the equipment is not damaged?

The modules are IP67 (dust and water ingress resistant) rated, and every single one is tested at end of line. The modules are then placed inside the container during integration and every container is spray tested at end of line according to its specification (IP55). The battery unit owner/recipient is responsible for verification that the equipment is not damaged upon receipt.

- b) What is the expected lifespan of the battery unit hermetic seals?

The lifetime of the seal is expected to be greater than 25 years.

- c) If the seals are damaged or deteriorated, is the entire battery unit replaced, or are the seals replaced?

Upon delivery of the containers at the site, the owner must notify the manufacturer of any damage identified. If the module and/or the integrity of the seal is damaged, the module must be replaced. After installation and commissioning, the seal should not be subject to damage as the module is generally not handled unless maintenance has to be performed on that specific module.

85. Referencing Petition, Attachment 16, Operations and Maintenance Plan, Section 2 – Equipment Maintenance, would the proposed BESF be taken out of service during the annual preventative maintenance?

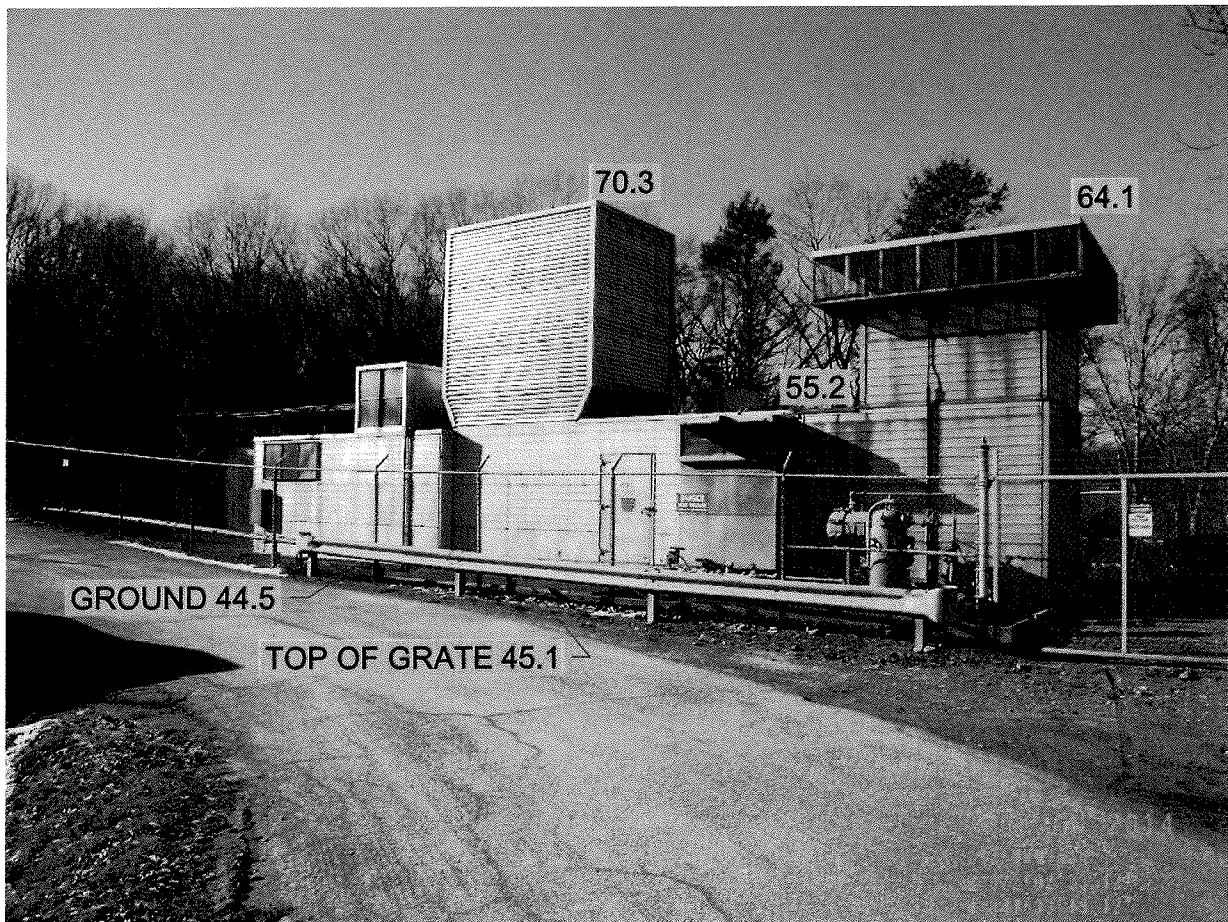
TBL Response: The proposed BESF would be powered off during all preventative maintenance, which would range from 160 minutes to 325 minutes based on an allocation of two (2) full-time workers to complete the required maintenance work.

ATTACHMENT TO TBL RESPONSE

81

Stack Height Existing Tunnel Hydro Gas Turbine Preston, CT

10



THE EXISTING VERTICAL PLANT DATUM IS NGVD1929. IT WAS CONFIRMED USING STATIC GPS OBSERVATIONS ON KNOWN SURVEY CONTROL, WHICH WERE POST PROCESSED USING OPUS AND CONVERTED FROM NAVD1988 USING U.S.G.S. CORPSCON SOFTWARE. THE OBSERVED ELEVATIONS AGREED WITHIN ~0.1 FEET.

TOP OF STACK ELEVATION:

NGVD1929 = 70.3 FEET

NAVD1988 = 69.5 FEET



FIRSTLIGHT POWER RESOURCES
LAND RECORD DRAWING NO. 22599
SURVEY 2014-393



North by Northeast
Survey and Mapping Consultants
Cheshire Connecticut

www.nbyne.com

Stack Height
Tunnel Hydro Gas Turbine
Town of Preston
State of Connecticut

January 10, 2014

ATTACHMENT TO TBL RESPONSE

82

**MSDS Sheets for Glysantin® G30® pink also
suitable for electric vehicles**



We create chemistry

Safety data sheet

Page: 1/16

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Date / Revised: 11.11.2022

Version: 6.0

Date previous version: 26.04.2021

Previous version: 5.0

Date / First version: 08.01.2003

Product: GLYSANTIN® G30® pink also suitable for electric vehicles

(ID no. 30279144/SDS_GEN_EU/EN)

Date of print 12.11.2022

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

GLYSANTIN® G30® pink also suitable for electric vehicles

UFI: HD7F-706Y-100D-JV5N

1.2. Relevant identified uses of the substance or mixture and uses advised against

Relevant identified uses: engine coolant

1.3. Details of the supplier of the safety data sheet

Company:

BASF SE

67056 Ludwigshafen

GERMANY

Fuel and Lubricant Solutions

Telephone: +49 621 60-42178

E-mail address: RegXcellenceFuelLubes@basf.com

1.4. Emergency telephone number

International emergency number:

Telephone: +49 180 2273-112

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SECTION 2: Hazards Identification

2.1. Classification of the substance or mixture

For the classification of the mixture the following methods have been applied: extrapolation on the concentration levels of the hazardous substances, on basis of test results and after evaluation of experts. The methodologies used are mentioned at the respective test results.

According to Regulation (EC) No 1272/2008 [CLP]

| | |
|---------------------|--|
| Acute Tox. 4 (oral) | H302 Harmful if swallowed. |
| STOT RE 2 | H373 May cause damage to organs (Kidney) through prolonged or repeated exposure. |

For the classifications not written out in full in this section the full text can be found in section 16.

2.2. Label elements

According to Regulation (EC) No 1272/2008 [CLP]

Pictogram:



Signal Word:

Warning

Hazard Statement:

| | |
|------|---|
| H302 | Harmful if swallowed. |
| H373 | May cause damage to organs (Kidney) through prolonged or repeated exposure. |

Precautionary Statements (Prevention):

| | |
|------|---|
| P260 | Do not breathe dust/gas/mist/vapours. |
| P270 | Do not eat, drink or smoke when using this product. |

Precautionary Statements (Response):

| | |
|-------------|--|
| P314 | Get medical advice/attention if you feel unwell. |
| P301 + P312 | IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell. |
| P330 | Rinse mouth |

Precautionary Statements (Disposal):

| | |
|------|---|
| P501 | Dispose of contents and container to hazardous or special waste collection point. |
|------|---|

Hazard determining component(s) for labelling: ethanediol

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2.3. Other hazards

According to Regulation (EC) No 1272/2008 [CLP]

If applicable information is provided in this section on other hazards which do not result in classification but which may contribute to the overall hazards of the substance or mixture.

SECTION 3: Composition/Information on Ingredients

3.1. Substances

Not applicable

3.2. Mixtures

Chemical nature

ethanediol
inhibitors

Regulatory relevant ingredients

ethanediol

| | |
|---|---|
| Content (W/W): $\geq 75\%$ - $\leq 100\%$ | Acute Tox. 4 (oral) STOT RE (Kidney) 2 H302, H373 |
| CAS Number: 107-21-1 | |
| EC-Number: 203-473-3 | |
| REACH registration number: 01-2119456816-28 | |
| INDEX-Number: 603-027-00-1 | |

Disodium sebacate

| | |
|---|---------------------------|
| Content (W/W): $\geq 3\%$ - $< 5\%$ | Eye Dam./Irrit. 2 H319 |
| CAS Number: 17265-14-4 | |
| EC-Number: 241-300-3 | |
| REACH registration number: 01-2120762063-61 | |

Methyl-1H-benzotriazole

| | |
|---------------------------------------|---|
| Content (W/W): $\geq 0\%$ - $< 0.2\%$ | Acute Tox. 4 (oral) Aquatic Chronic 2 Repr. 2 (unborn child) H302, H361d, H411 |
| CAS Number: 29385-43-1 | |
| EC-Number: 249-596-6 | |

Sodium 4(or 5)-methyl-1H-benzotriazolide

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| | |
|---|-------------------------|
| Content (W/W): $\geq 0.1\%$ - $< 0.2\%$ | Acute Tox. 4 (oral) |
| CAS Number: 64665-57-2 | Skin Corr./Irrit. 1B |
| EC-Number: 265-004-9 | Aquatic Chronic 2 |
| REACH registration number: 01-2119980062-42 | Repr. 2 (unborn child) |
| | H314, H302, H361d, H411 |

For the classifications not written out in full in this section, including the hazard classes and the hazard statements, the full text is listed in section 16.

SECTION 4: First-Aid Measures

4.1. Description of first aid measures

Immediately remove contaminated clothing. If the patient is likely to become unconscious, place and transport in stable sideways position (recovery position).

If inhaled:

Keep patient calm, remove to fresh air, seek medical attention.

On skin contact:

Wash thoroughly with soap and water. Seek medical attention.

On contact with eyes:

Wash affected eyes for at least 15 minutes under running water with eyelids held open.

On ingestion:

Immediately rinse mouth and then drink 200-300 ml of water, seek medical attention. Administer 50 ml of pure ethanol in a drinkable concentration.

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

Symptoms: Information, i.e. additional information on symptoms and effects may be included in the GHS labeling phrases available in Section 2 and in the Toxicological assessments available in Section 11., (Further) symptoms and / or effects are not known so far

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

Treatment: Symptomatic treatment (decontamination, vital functions).

Antidote: Administer ethanol.

SECTION 5: Fire-Fighting Measures

5.1. Extinguishing media

Suitable extinguishing media:

water spray, dry powder, alcohol-resistant foam

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5.2. Special hazards arising from the substance or mixture

Endangering substances: harmful vapours

Advice: Evolution of fumes/fog. The substances/groups of substances mentioned can be released in case of fire.

5.3. Advice for fire-fighters

Special protective equipment:

Wear a self-contained breathing apparatus.

Further information:

The degree of risk is governed by the burning substance and the fire conditions. Contaminated extinguishing water must be disposed of in accordance with official regulations.

SECTION 6: Accidental Release Measures

6.1. Personal precautions, protective equipment and emergency procedures

Use personal protective clothing.

6.2. Environmental precautions

Contain contaminated water/firefighting water. Do not discharge into drains/surface waters/groundwater.

6.3. Methods and material for containment and cleaning up

For large amounts: Pump off product.

For residues: Pick up with suitable absorbent material. Dispose of absorbed material in accordance with regulations.

6.4. Reference to other sections

Information regarding exposure controls/personal protection and disposal considerations can be found in section 8 and 13.

SECTION 7: Handling and Storage

7.1. Precautions for safe handling

Ensure thorough ventilation of stores and work areas. Shut containers immediately after taking product because product takes up the humidity of air.

Protection against fire and explosion:

No special precautions necessary.

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Exposure estimate and reference to its source

Provide extract ventilation to points where emissions occur (LEV).

7.2. Conditions for safe storage, including any incompatibilities

Further information on storage conditions: Containers should be stored tightly sealed in a dry place. Storage in galvanized containers is not recommended.

7.3. Specific end use(s)

For the relevant identified use(s) listed in Section 1 the advice mentioned in this section 7 is to be observed.

SECTION 8: Exposure Controls/Personal Protection

8.1. Control parameters

Components with occupational exposure limits

107-21-1: ethanediol

Skin Designation (OEL (EU))

The substance can be absorbed through the skin.

STEL value 104 mg/m³ ; 40 ppm (OEL (EU))

indicative

TWA value 52 mg/m³ ; 20 ppm (OEL (EU))

indicative

124-04-9: adipic acid

1310-58-3: potassium hydroxide

1310-73-2: sodium hydroxide

PNEC

No hazard identified.

DNEL

Data refer to the lead substance

Components with DNEL

107-21-1: ethanediol

worker: Long-term exposure - local effects, Inhalation: 35 mg/m³

worker: Long-term exposure- systemic effects, dermal: 106 mg/kg

consumer: Long-term exposure - local effects, Inhalation: 7 mg/m³

consumer: Long-term exposure- systemic effects, dermal: 53 mg/kg

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8.2. Exposure controls

Personal protective equipment

Respiratory protection:

Respiratory protection in case of vapour/aerosol release. Combination filter for gases/vapours of organic compounds and solid and liquid particles (f.e. EN 14387 Type A-P2)

Hand protection:

Chemical resistant protective gloves (EN ISO 374-1)

Suitable materials also with prolonged, direct contact (Recommended: Protective index 6, corresponding > 480 minutes of permeation time according to EN ISO 374-1):

nitrile rubber (NBR) - 0.4 mm coating thickness

Manufacturer's directions for use should be observed because of great diversity of types.

Eye protection:

Safety glasses with side-shields (frame goggles) (e.g. EN 166)

Body protection:

Body protection must be chosen depending on activity and possible exposure, e.g. apron, protecting boots, chemical-protection suit (according to EN 14605 in case of splashes or EN ISO 13982 in case of dust).

General safety and hygiene measures

Do not inhale gases/vapours/aerosols. Handle in accordance with good industrial hygiene and safety practice. Wearing of closed work clothing is required additionally to the stated personal protection equipment. Handle in accordance with good industrial hygiene and safety practice.

SECTION 9: Physical and Chemical Properties

9.1. Information on basic physical and chemical properties

State of matter: liquid
Form: liquid
Colour: pink
Odour: product specific
Odour threshold:

not determined

solidification temperature: < -18 °C

(DIN ISO 3016)

Boiling point: > 160 °C

(ASTM D1120)

Flammability: hardly combustible

Lower explosion limit:

For liquids not relevant for classification and labelling., The lower explosion point may be 5 - 15 °C below the flash point.

Upper explosion limit:

For liquids not relevant for classification and labelling.

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| | | |
|--|---|-------------|
| Flash point: | > 124 °C | (ISO 2719) |
| Auto-ignition temperature: | 420 °C | (DIN 51794) |
| Thermal decomposition: | No decomposition if correctly stored and handled. | |
| pH value: | 8.2 - 8.6 | |
| Viscosity, kinematic: | 20 - 30 mm ² /s | (DIN 51562) |
| | (20 °C) | |
| Thixotropy: | not thixotropic | |
| Solubility in water: | miscible | |
| Solubility (qualitative) solvent(s): | polar solvents | |
| | soluble | |
| Partitioning coefficient n-octanol/water (log K _{ow}): | Study scientifically not justified. | |
| Vapour pressure: | 0.2 mbar | |
| | (20 °C) | |
| | 13 mbar | |
| | (50 °C) | |
| Density: | 1.124 g/cm ³ | |
| | (20 °C) | |
| Relative vapour density (air): | > 1 | (estimated) |
| | (20 °C) | |
| | Heavier than air. | |

Particle characteristics

Particle size distribution: The substance / product is marketed or used in a non solid or granular form. -

9.2. Other information

Information with regard to physical hazard classes

Explosives

Explosion hazard: not explosive

Oxidizing properties

Fire promoting properties: not fire-propagating

Other safety characteristics

Miscibility with water:

miscible in all proportions

Other Information: If necessary, information on other physical and chemical parameters is indicated in this section.

Evaporation rate:

not determined

SECTION 10: Stability and Reactivity

10.1. Reactivity

No hazardous reactions if stored and handled as prescribed/indicated.

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10.2. Chemical stability

The product is stable if stored and handled as prescribed/indicated.

10.3. Possibility of hazardous reactions

No hazardous reactions when stored and handled according to instructions.

10.4. Conditions to avoid

No conditions to avoid anticipated.

10.5. Incompatible materials

Substances to avoid:

strong oxidizing agents, alkali metal hydroxides

10.6. Hazardous decomposition products

Hazardous decomposition products:

No hazardous decomposition products if stored and handled as prescribed/indicated.

SECTION 11: Toxicological Information

11.1. Information on hazard classes as defined in Regulation (EC) No 1272/2008

Acute toxicity

Assessment of acute toxicity:

Of moderate toxicity after single ingestion. Of low toxicity after short-term skin contact.

Experimental/calculated data:

LD (human) (oral): approx. 1,600 mg/kg

Irritation

Experimental/calculated data:

Skin corrosion/irritation

rabbit: non-irritant

Serious eye damage/irritation

rabbit: non-irritant

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Respiratory/Skin sensitization

Assessment of sensitization:

Skin sensitizing effects were not observed in animal studies. Human data do not fully exclude a skin sensitizing potential.

Germ cell mutagenicity

Assessment of mutagenicity:

Based on the ingredients, there is no suspicion of a mutagenic effect.

Carcinogenicity

Assessment of carcinogenicity:

The whole of the information assessable provides no indication of a carcinogenic effect.

Reproductive toxicity

Assessment of reproduction toxicity:

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

Developmental toxicity

Assessment of teratogenicity:

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

Information on: ethanediol

Assessment of teratogenicity:

Developmental toxicity was observed after oral ingestion of high doses in studies with rats and mice, but this effect was not seen in a study with rabbits. Mechanistic studies show that the rabbit is the relevant species for the classification for human health. As such, and since ethylene glycol is not a developmental toxicant in the rabbit, no classification is warranted.

Specific target organ toxicity (single exposure)

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

Repeated dose toxicity and Specific target organ toxicity (repeated exposure)

Assessment of repeated dose toxicity:

Repeated exposure may affect certain organs.

Information on: ethanediol

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Assessment of repeated dose toxicity:

The substance may cause damage to the kidney after repeated ingestion. The substance may cause damage to the kidney after repeated skin contact with high doses.

Aspiration hazard

No aspiration hazard expected.

Interactive effects

No data available.

11.2. Information on other hazards

Endocrine disrupting properties

Product does not contain a substance above legal limits included in the list established in accordance with Article 59(1) of Regulation (EC) No 1907/2006 for having endocrine disrupting properties or is identified to have endocrine disrupting properties in accordance with the criteria set out in Commission Delegated Regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605.

Other information

Other relevant toxicity information

The product has not been tested. The statements on toxicology have been derived from the properties of the individual components.

SECTION 12: Ecological Information

12.1. Toxicity

Assessment of aquatic toxicity:

There is a high probability that the product is not acutely harmful to aquatic organisms.

Microorganisms/Effect on activated sludge:

Inhibition of degradation activity in activated sludge is not to be anticipated during correct introduction of low concentrations.

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Date / Revised: 11.11.2022

Version: 6.0

Date previous version: 26.04.2021

Previous version: 5.0

Date / First version: 08.01.2003

Product: **GLYSANTIN® G30® pink also suitable for electric vehicles**

(ID no. 30279144/SDS_GEN_EU/EN)

Date of print 12.11.2022

12.2. Persistence and degradability

Elimination information:

> 70 % DOC reduction (28 d) (OECD 301 A (new version)) Readily biodegradable.

12.3. Bioaccumulative potential

Assessment bioaccumulation potential:

Accumulation in organisms is not to be expected.

12.4. Mobility in soil

Assessment transport between environmental compartments:

Adsorption in soil: No data available.

12.5. Results of PBT and vPvB assessment

According to Annex XIII of Regulation (EC) No.1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH): The product does not contain a substance fulfilling the PBT (persistent/bioaccumulative/toxic) criteria or the vPvB (very persistent/very bioaccumulative) criteria.

12.6. Endocrine disrupting properties

Product does not contain a substance above legal limits included in the list established in accordance with Article 59(1) of Regulation (EC) No 1907/2006 for having endocrine disrupting properties or is identified to have endocrine disrupting properties in accordance with the criteria set out in Commission Delegated Regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605.

12.7. Other adverse effects

The product does not contain substances that are listed in Regulation (EC) 1005/2009 on substances that deplete the ozone layer.

12.8. Additional information

Adsorbable organically-bound halogen (AOX):

This product contains no organically-bound halogen.

Other ecotoxicological advice:

The product has not been tested. The statement has been derived from the properties of the individual components.

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Do not release untreated into natural waters.

SECTION 13: Disposal Considerations

13.1. Waste treatment methods

Must be disposed of or incinerated in accordance with local regulations.

The waste codes are manufacturer's recommendations based on the designated use of the product. Other use and special waste disposal treatment on customer's location may require different waste-code assignments.

Waste key:

16 01 14⁺ antifreeze fluids containing hazardous substances

Contaminated packaging:

Uncontaminated packaging can be re-used.

Packs that cannot be cleaned should be disposed of in the same manner as the contents.

SECTION 14: Transport Information

Land transport

ADR

Not classified as a dangerous good under transport regulations

UN number or ID number: Not applicable

UN proper shipping name: Not applicable

Transport hazard class(es): Not applicable

Packing group: Not applicable

Environmental hazards: Not applicable

Special precautions for user: None known

RID

Not classified as a dangerous good under transport regulations

UN number or ID number: Not applicable

UN proper shipping name: Not applicable

Transport hazard class(es): Not applicable

Packing group: Not applicable

Environmental hazards: Not applicable

Special precautions for user: None known

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Inland waterway transport

ADN

Not classified as a dangerous good under transport regulations

UN number or ID number: Not applicable

UN proper shipping name: Not applicable

Transport hazard class(es): Not applicable

Packing group: Not applicable

Environmental hazards: Not applicable

Special precautions for user: None known

Transport in inland waterway vessel

Not evaluated

Sea transport

IMDG

Not classified as a dangerous good under transport regulations

UN number or ID number: Not applicable

UN proper shipping name: Not applicable

Transport hazard class(es): Not applicable

Packing group: Not applicable

Environmental hazards: Not applicable

Special precautions for user: None known

Air transport

IATA/ICAO

Not classified as a dangerous good under transport regulations

UN number or ID number: Not applicable

UN proper shipping name: Not applicable

Transport hazard class(es): Not applicable

Packing group: Not applicable

Environmental hazards: Not applicable

Special precautions for user: None known

14.1. UN number or ID number

See corresponding entries for "UN number or ID number" for the respective regulations in the tables above.

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14.2. UN proper shipping name

See corresponding entries for "UN proper shipping name" for the respective regulations in the tables above.

14.3. Transport hazard class(es)

See corresponding entries for "Transport hazard class(es)" for the respective regulations in the tables above.

14.4. Packing group

See corresponding entries for "Packing group" for the respective regulations in the tables above.

14.5. Environmental hazards

See corresponding entries for "Environmental hazards" for the respective regulations in the tables above.

14.6. Special precautions for user

See corresponding entries for "Special precautions for user" for the respective regulations in the tables above.

14.7. Maritime transport in bulk according to IMO instruments

Maritime transport in bulk is not intended.

SECTION 15: Regulatory Information

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

Prohibitions, Restrictions and Authorizations

Annex XVII of Regulation (EC) No 1907/2006: Number on List: 3

If other regulatory information applies that is not already provided elsewhere in this safety data sheet, then it is described in this subsection.

15.2. Chemical Safety Assessment

Assessment of safe use has been performed for the mixture and the result is documented in section 7 and 8 of the SDS

SECTION 16: Other Information

Assessment of the hazard classes according to UN GHS criteria (most recent version)

Acute Tox. 4 (oral)

STOT RE (Kidney) 2

Acute Tox.

Acute toxicity

STOT RE

Specific target organ toxicity — repeated exposure

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| | |
|-------------------|---|
| Eye Dam./Irrit. | Serious eye damage/eye irritation |
| Aquatic Chronic | Hazardous to the aquatic environment - chronic |
| Repr. | Reproductive toxicity |
| Skin Corr./Irrit. | Skin corrosion/irritation |
| H302 | Harmful if swallowed. |
| H373 | May cause damage to organs (Kidney) through prolonged or repeated exposure. |
| H319 | Causes serious eye irritation. |
| H361d | Suspected of damaging the unborn child. |
| H411 | Toxic to aquatic life with long lasting effects. |
| H314 | Causes severe skin burns and eye damage. |

Abbreviations

ADR = The European Agreement concerning the International Carriage of Dangerous Goods by Road.
 ADN = The European Agreement concerning the International Carriage of Dangerous Goods by Inland waterways. ATE = Acute Toxicity Estimates. CAO = Cargo Aircraft Only. CAS = Chemical Abstract Service. CLP = Classification, Labelling and Packaging of substances and mixtures. DIN = German national organization for standardization. DNEL = Derived No Effect Level. EC50 = Effective concentration median for 50% of the population. EC = European Community. EN = European Standards. IARC = International Agency for Research on Cancer. IATA = International Air Transport Association. IBC-Code = Intermediate Bulk Container code. IMDG = International Maritime Dangerous Goods Code. ISO = International Organization for Standardization. STEL = Short-Term Exposure Limit. LC50 = Lethal concentration median for 50% of the population. LD50 = Lethal dose median for 50% of the population. TLV = Threshold Limit Value. MARPOL = The International Convention for the Prevention of Pollution from Ships. NEN = Dutch Norm. NOEC = No Observed Effect Concentration. OEL = Occupational Exposure Limit. OECD = Organization for Economic Cooperation and Development. PBT = Persistent, Bioaccumulative and Toxic. PNEC = Predicted No Effect Level. PPM = Parts per million. RID = The European Agreement concerning the International Carriage of Dangerous Goods by Rail. TWA = Time Weight Average. UN-number = UN number at transport. vPvB = very Persistent and very Bioaccumulative.

The data contained in this safety data sheet are based on our current knowledge and experience and describe the product only with regard to safety requirements. This safety data sheet is neither a Certificate of Analysis (CoA) nor technical data sheet and shall not be mistaken for a specification agreement. Identified uses in this safety data sheet do neither represent an agreement on the corresponding contractual quality of the substance/mixture nor a contractually designated use. It is the responsibility of the recipient of the product to ensure any proprietary rights and existing laws and legislation are observed.

Vertical lines in the left hand margin indicate an amendment from the previous version.

ATTACHMENT TO TBL RESPONSE

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





















Hydrologic Soil Group Web Soil Survey

Hydrologic Soil Group—State of Connecticut
(Property Lines)



Hydrologic Soil Group—State of Connecticut
(Property Lines)

MAP LEGEND

| | | | | |
|---|---|---|---|-----|
| Area of Interest (AOI) |  | Area of Interest (AOI) |  | C |
| Soils | | |  | C/D |
| Soil Rating Polygons | | |  | D |
|  | A |  | Not rated or not available | |
|  | A/D | Water Features | | |
|  | B |  | Streams and Canals | |
|  | B/D | Transportation | | |
|  | C |  | Rails | |
|  | C/D |  | Interstate Highways | |
|  | D |  | US Routes | |
|  | Not rated or not available |  | Major Roads | |
| Soil Rating Lines | |  | Local Roads | |
|  | A | Background | | |
|  | A/D |  | Aerial Photography | |
|  | B | | | |
|  | B/D | | | |
|  | C | | | |
|  | C/D | | | |
|  | D | | | |
|  | Not rated or not available | | | |
| Soil Rating Points | | | | |
|  | A | | | |
|  | A/D | | | |
|  | B | | | |
|  | B/D | | | |

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:12,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: State of Connecticut
Survey Area Data: Version 22, Sep 12, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Data not available.

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Hydrologic Soil Group

| Map unit symbol | Map unit name | Rating | Acres in AOI | Percent of AOI |
|------------------------------------|---|--------|--------------|----------------|
| 38C | Hinckley loamy sand, 3 to 15 percent slopes | A | 2.1 | 63.9% |
| 102 | Pootatuck fine sandy loam | B | 0.1 | 3.9% |
| 306 | Udorthents-Urban land complex | B | 1.0 | 31.4% |
| W | Water | | 0.0 | 0.7% |
| Totals for Area of Interest | | | 3.3 | 100.0% |

Description

Hydrologic soil groups are based on estimates of runoff potential. Soils are assigned to one of four groups according to the rate of water infiltration when the soils are not protected by vegetation, are thoroughly wet, and receive precipitation from long-duration storms.

The soils in the United States are assigned to four groups (A, B, C, and D) and three dual classes (A/D, B/D, and C/D). The groups are defined as follows:

Group A. Soils having a high infiltration rate (low runoff potential) when thoroughly wet. These consist mainly of deep, well drained to excessively drained sands or gravelly sands. These soils have a high rate of water transmission.

Group B. Soils having a moderate infiltration rate when thoroughly wet. These consist chiefly of moderately deep or deep, moderately well drained or well drained soils that have moderately fine texture to moderately coarse texture. These soils have a moderate rate of water transmission.

Group C. Soils having a slow infiltration rate when thoroughly wet. These consist chiefly of soils having a layer that impedes the downward movement of water or soils of moderately fine texture or fine texture. These soils have a slow rate of water transmission.

Group D. Soils having a very slow infiltration rate (high runoff potential) when thoroughly wet. These consist chiefly of clays that have a high shrink-swell potential, soils that have a high water table, soils that have a claypan or clay layer at or near the surface, and soils that are shallow over nearly impervious material. These soils have a very slow rate of water transmission.

If a soil is assigned to a dual hydrologic group (A/D, B/D, or C/D), the first letter is for drained areas and the second is for undrained areas. Only the soils that in their natural condition are in group D are assigned to dual classes.

Rating Options

Aggregation Method: Dominant Condition

Component Percent Cutoff: None Specified

Tie-break Rule: Higher