MATERIAL SAFETY DATA SHEET
TOWER OIL & TECHNOLOGY COMPANY
205 WEST RANDOLPH STREET
CHICAGO, ILLINOIS 60606

PRODUCT NAME: TOWERDRAW TC-39
CHEMICAL NAME: N/A
CHEMICAL FAMILY: EMULSIFIED OIL
FORMULA: N/A
INFORMATION PHONE: 1-312-346-0562
EMERGENCY PHONE: 1-800-424-9300 (CHEMTREC)

I. PHYSICAL DATA

BOILING POINT: N/A
VAPOR PRESSURE: N/A mm Hg
SOLUBILITY IN WATER: Emulsifiable
EVAPORATION RATE: N/A (BA = 1)
SPECIFIC GRAVITY: 0.94 (WATER = 1)
PERCENT VOLATILE BY VOLUME: N/A (CONTAINS NO VOC's)
APPEARANCE: Cream colored paste
ODOR: Mild petroleum
VIScosity: 360,000-500,000 CPS @ 70°F
VAPOR DENSITY: N/A (AIR = 1)

II. HAZARDOUS INGREDIENTS

<table>
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<tr>
<th>MATERIAL</th>
<th>%</th>
<th>ACGIH TLV</th>
<th>OSHA PEL</th>
<th>CAS #</th>
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III. FIRE AND EXPLOSION DATA

FLASH POINT: 315°F (157°C) COC, when heated beyond evaporation of contained moisture.

FLAMMABLE LIMITS -
LOWER: 0.9% (DRY)  UPPER: 7.0% (DRY)

EXTINGUISHING MEDIA:
Foam, carbon dioxide, dry chemicals, water spray or fog.

SPECIAL FIRE FIGHTING PROCEDURES:
Use cold water to cool containers and prevent rupture. If a spill has not ignited, use water spray to disperse vapors. Minimize breathing fumes. Employ supplied-air breathing equipment in confined areas.

UNUSUAL FIRE AND EXPLOSION HAZARDS:
Treat as oil fire.
IV. REACTIVITY DATA

STABILITY: Stable

CONDITIONS TO AVOID: N/A

INCOMPATIBILITY: Strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:
Oxides of carbon and phosphorus upon combustion.

HAZARDOUS POLYMERIZATION: Will not occur.

CONDITIONS TO AVOID: N/A

V. HEALTH HAZARD DATA

TLV (Threshold Limit Value): 5 mg/m³ as oil mist in air.

CARCINOGENICITY:
None of the constituents of this product have been identified as possible or proven carcinogens by NTP, IARC, or OSHA.

-EFFECTS OF OVEREXPOSURE-

ACUTE:
Possible skin and transient eye irritation. Low order of oral toxicity.

CHRONIC:
Prolonged or repeated skin contact may tend to remove natural oils, resulting in development of dermatitis.

-EMERGENCY FIRST AID PROCEDURES-

INHALATION: If overcome by fumes from hot product, move to fresh air. Call MD.

INGESTION: Do not induce vomiting. Get medical attention.

EYE CONTACT: Flush with water for 15 minutes or until irritation subsides.

SKIN CONTACT: Wash with warm water and mild soap. Remove contaminated clothing.

VI. SPILL AND LEAK PROCEDURES

IF MATERIAL IS RELEASED OR SPILLED:
Contain spill, scoop up, and place in suitable containers. If spill enters sewer, notify Authorities.

WASTE DISPOSAL:
Disposal procedure must be in accordance with LOCAL, STATE & FEDERAL REGULATIONS.
VII. SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Not normally required.

PROTECTIVE GLOVES: Chemical and oil resistant.

EYE PROTECTION: Splash goggles. Face shield.

OTHER PROTECTIVE EQUIPMENT: Impervious apron if needed to avoid prolonged or repeated skin contact.

-VENTILATION-

LOCAL EXHAUST: N/A SPECIAL: N/A
MECHANICAL (GENERAL): N/A OTHER: N/A

VIII. SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:
Keep containers closed when not in use. Do not handle or store near ignition sources. Protect from freezing temperatures. This product should not be mixed with nitrite-containing materials, as it may form nitrosamines.

PERSONAL HYGIENE - Minimize breathing vapors. Avoid prolonged or repeated skin contact. Wash thoroughly before meals and at end of work periods. Launder or dry-clean soiled clothing before reuse.

IX. ENVIRONMENTAL REGULATIONS/FEDERAL EPA

SARA III (Superfund Amendment and Reauthorization Act of 1986)

Sections 302, 304 and 40 CFR Part 355 - Extremely Hazardous Substances:
COMPONENT % RQ (lbs.) TFQ (lbs.) CAS #
NONE

Sections 311, 312 and 40 CFR Part 355 - Hazard Categories:
ACUTE (IMMEDIATE HEALTH HAZARD): YES FIRE HAZARD: YES
CHRONIC (DELAYED HEALTH HAZARD): NO REACTIVE HAZARD: NO
SUDDEN PRESSURE RELEASE: NO

Section 313 and 40 CFR Part 372 - Toxic Chemicals:
COMPONENT % CAS #
NONE

CERCLA (Comprehensive Environmental Response, Compensation and Liability Act)
Section 102 and 40 CFR Part 302 - Hazardous Substances:
COMPONENT % RQ (lbs.) CAS #
NONE

CLEAN WATER ACT
Under section 311 (b) (4) of this act, contamination of surface waters by petroleum products must be reported immediately to the National Response Center. SECTION 311 (b) (4) DOES APPLY TO TOWERDRAW TC-89.
X. STATE RIGHT-TO-KNOW

TSCA (Toxic Substances Control Act) Status
All components of this formula are included in the TSCA inventory.

HMIS/NFPA HAZARD: 4 = SEVERE  3 = SERIOUS  2 = MODERATE  1 = SLIGHT  0 = MINIMAL

N/D = NOT DETERMINED  N/A = NOT APPLICABLE  < = LESS THAN  > = GREATER THAN

The information appearing in this document is based upon data obtained from raw material manufacturers and/or recognized technical sources. While this information is believed to be correct, TOWER OIL & TECHNOLOGY makes no representations as to its accuracy, or sufficiency, usage, or the hazards connected with the use of this material. Since this product may be applied under conditions unfamiliar to us or beyond our control, we claim no responsibility for the results of its use, and users are responsible for the verification of this information under their own operating conditions to determine whether the product is suitable for their particular purposes, and these users assume all risks of their use, handling, and disposal of the product. This information relates only to the product designated above and does not relate to its use in combination with any other material in any other process.

TOWER OIL & TECHNOLOGY CO.

January 7, 2002