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FRESNO, CALIF.

MODUS, INC.
Post Office Box 1809
Porterville, CA. 93258-1809
(559) 781-6862

May 9, 2016

Mr. Ronald Holcomb
Central Valley Water Board
1685 E. Street
Fresno, CA. 93706

RE: Certified Mail 7015 1730 0000 9937 4046, received May 5, 2016; Order/California Water Code section 13267

Mr. Holcomb;

Please find attached documentation that is required under the above referenced order.

Attachments:

1. **Spreadsheet identified as: Modus, Inc. total volume of produced water provided for irrigation since 1 January of 2014**

2. **Material Safety Data Sheets provided Modus, Inc. by Terra Chem for the two chemicals/additives used in petroleum production, treatment and transportation processes that generate produced water that is used for irrigation of crops.**

2a. A description of the purpose of each chemical or additive can be found in the above Material Safety Data Sheets.

2b. The chemicals or additives are injected into the production fluid stream.

2c. The frequency of use: daily

2d. The total volumes of each chemical or additive used during each quarter from 1 January 2014 to this present day: See the attached spreadsheet previously identified above, (Attachment 1).

Per the provided delineated words for submittal of "Certification", I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely;

Mary E. Filippi

Mary E. Filippi
Modus, Inc.

Modus, Inc.
total volume of produced water provided for Irrigation since 1 January of 2014

Yr.	Quarter	Total Produced Water Barrels	Total Produced Water Gallons	Total Produced Water Available For Irrigation	Total Produced Water Used For Irrigation	Chemical Water Clarifier WC 4984 Gallons	Chemical Emulsion Breaker EB 527 Gallons
2014	Jan-March	307,123	12,899,166	9,674,375	0	22.5	11.25
2014	April-June	308,030	12,937,260	9,702,945	0	22.75	16.375
2014	July-Sept.	275,833	11,584,986	8,688,739	3,823,045	23	11.5
2014	Oct-Dec.	216,747	9,103,374	6,827,530	3,004,113	23	11.5
2015	Jan-March	154,655	6,495,510	4,871,632	0	15.75	7.875
2015	April-June	0	0	0	0	0	0
2015	July-Sept.	0	0	0	0	0	0
2015	Oct-Dec.	0	0	0	0	0	0
2016	Jan-March	0	0	0	0	0	0
2016	April-May 9	0	0	0	0	0	0

TerraChem
INNOVATIVE CHEMICAL SOLUTIONS

TerraChem, Inc.
26868 Henry Rd.
Fellows, Ca. 93224
Office Phone: (661) 769-9091
Chemical Emergency 24 Hours
Info Trac 1-800-535-5053

HMIS Health:	2
HMIS Flammability:	3
HMIS Physical Hazard:	0
HMIS Personal Protection:	G

EB 527

Date Effective 09/18/2014

Emulsion Breaker

Section One: Product Identification

Trade Name	EB 527
Chemical Family	Emulsion Breaker
Chemical Formula	Confidential
CAS Number	Proprietary Blend

Section Two: Composition Information on Hazardous Ingredients

CAS Number	Component Common Name	TWA	STEL	PEL	Weight Percent
1330-20-7	Xylene	100ppm	150ppm	100ppm	40-60%
100-41-4	Ethyl Benzene	100ppm	125ppm	100ppm	10-20%
Confidential	Proprietary Ingredients	NE	NE	NE	20-40%

Section Three: Hazards Identification

Routes of Entry	Skin contact, eye contact, inhalation, ingestion.
Potential Health Effects	This product may cause eye, skin, or respiratory irritation.
Carcinogenicity (NTP)	This product is not believed to be carcinogenic.
Carcinogenicity (IARC)	IARC has classified ethylbenzene a possible human carcinogen (group 2B)
Carcinogenicity (OSHA)	This product is not believed to be carcinogenic.

Section Four: First Aid Measures

Eyes	Flush eyes with water for at least 15 minutes. Seek medical attention.
Skin	Remove contaminated clothing. Flush skin with water.
Ingestion	Drink 3-4 glasses of water. Do not induce vomiting. Seek medical help immediately.
Inhalation	Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen and call a physician.

Section Five: Fire Fighting Measures

Flammable Limits, Flash Point	<100° F, PMCC
Flammable Limits in Air - LEL	ND
Flammable Limits in Air – UEL	ND
Auto Ignition Temperature	Not available.
General Hazards	None known.
Extinguishing Media	Foam, dry chemical, carbon dioxide, water spray to cool containers.
Fire Fighting Equipment	Wear self-contained breathing apparatus and protective clothing.
Fire and Explosion Hazards	Containers may explode from internal pressure if confined to fire.
Hazardous Combustion Products	Not available.
Sensitivity to Mechanical Impact	Not expected.
Sensitivity to Static Discharge	Not expected.
Additional Information	No additional information available.

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HMIS Flammability:	3
HMIS Physical Hazard:	0
HMIS Personal Protection:	G

EB 527
Date Effective 09/18/2014

Emulsion Breaker

Section Six: Accidental Release Measures

Accidental Release Measures	Avoid sparks or open flames. Contain spill and salvage as much material as possible. Then pick up the remaining with absorbent and store as hazardous waste.

Section Seven: Handling and Storage

Handling and Storage Guidelines	Keep container tightly closed. Do not consume food, drink, or tobacco in areas where they may become contaminated by this material. Use proper grounding/bonding techniques when transferring material.

Section Eight: Exposure Control/Personal Protection

Personal Protective Equipment	Wear appropriate equipment to prevent probability of exposure.
Eye Protection	Goggles or glasses with side shields.
Skin Protection	Wear impervious gloves as a standard handling procedure.
Respiratory Protection	Use NIOSH approved respiratory protection where exposure levels exceed regulatory limits.
Engineering Controls	Do not aerosolize.
Mechanical Exhaust	Required in confined spaces.
Local Exhaust	Recommended to keep fumes from concentrating.
Emergency Response Protection	No additional specialized equipment should be required.

Section Nine: Physical and Chemical Properties

Physical Form	Liquid
Color	Clear to Dark Amber
Odor	Solvent
Boiling Point	>250° F
Melting Point	NA
Freezing Point	<10° F
Specific Gravity	0.89-0.90 (+/- 0.02)
Bulk Density	7.4 lbs. / gallon
pH	NA (5% in IPA/Water)
Solubility in Water	Insoluble
Evaporation Rate	NA (n-Butyl Acetate = 1)
Vapor Pressure	NA (mm Hg @ 68° F)
Vapor Density	>1 (Air = 1)
Volatile Organic(s)	NA

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EB 527
Date Effective 09/18/2014

Emulsion Breaker

Section Ten: Stability and Reactivity

Stability	Stable at normal temperatures and operating conditions.
Incompatibilities	Strong acids and oxidizing agents.
Decomposition	None
Polymerization	Polymerization will not occur.

Section Eleven: Toxicological Information

Eye Irritation	Eye contact may be painful and irritating.
Skin Irritation	Prolonged and repeated skin exposure may be painful and irritating.
Inhalation Toxicity	Inhalation of this product during manufacturing may be irritating.
Sensitization	Not evaluated.
Chronic/Carcinogenicity	IARC has classified ethylbenzene a possible human carcinogen (group 2B)
Reproduction	Not evaluated.
Mutagenicity	Not evaluated.
Acute Oral Effects	Not evaluated.
Acute Dermal Toxicity	Not evaluated.
Additional Information	Not evaluated.

Section Twelve: Ecological Information

Ecotoxicity	Not evaluated.
Biological Oxygen Demand (BOD^5)	Not evaluated.
Chemical Oxygen Demand	Not evaluated.
Activated Sludge Respiration Inhibition Test	Not evaluated.
Additional Information	No additional information available.

Section Thirteen: Disposal Considerations

Container Disposal Management	Dispose of in accordance with local, state, and federal regulations.
RCRA Hazard Class	Possible classes include but not limited to: D001-Ingnitability, U239-Xylenes. Under RCRA, it is the responsibility of the user to determine, at the time of disposal, whether the material meets RCRA criteria for hazardous waste.
Waste Disposal Method	Dispose of in accordance with local, state, and federal regulations.

Section Fourteen: Transport Information

DOT Hazard Class	Flammable Liquid
DOT Proper Shipping Name	RQ, UN1993, Flammable Liquid, N.O.S., (contains Ethyl Benzene, & Xylene), 3, PG III
Packaging Group	PG III
UN Number	UN1993
NA Number	NA
Packaging Size	Carboys/Pails, Drums, and Bulk.

Disclaimer For further information, please contact the manufacturer listed above. This information and recommendations contained herein are based upon data believed to be correct. However, no guarantee or warranty of any kind expressed or implied is made with respect to the information contained herein. This Material Safety Data Sheet was prepared to comply with OSHA Hazardous Communication Standard (29 CFR 1910.1200) and the Workplace Hazardous Materials Information System (WHIMS).

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HMIS Health:	2
HMIS Flammability:	3
HMIS Physical Hazard:	0
HMIS Personal Protection:	G

EB 527
Date Effective 09/18/2014

Emulsion Breaker

Section Fifteen: Regulatory Information

SARA 302/304 RQ	Yes, Xylene has an RQ of 100 lbs.
SARA 302/304 TPQ	NA
SARA 311/312 Acute	Yes
SARA 311/312 Chronic	Yes
SARA 311/312 Fire	Yes
SARA 311/312 Pressure	NA
SARA 311/312 Reactivity	NA
SARA 313 List	Xylene
CERCLA RQ	Yes, Xylene has an RQ of 100 lbs
TSCA Status	All components are registered on TSCA inventory.
CAA	Yes
CWA	Yes
Additional Information	No additional information available.

Section Sixteen: Other Information

HMIS Hazard Classification	Health	Flammability	Physical Hazard	Personal Protection
Classification Code	2	3	0	G
NFPA Hazard Classification	**Health**	**Flammability**	**Instability**	**Special Hazards**
Classification Code or Markings	2	3	0	

Explanation of NFPA Special Symbols

OX	Oxidizer; a chemical that can increase the rate of combustion or fire.
W	Reactive with water; avoid using water when fighting a fire involving material.
	Corrosive material(s); can be corrosive in either an acid or alkaline state.
	Poison or highly toxic material(s).
	Explosive material(s); redundant notation of instability.
	Radioactive material(s); extremely harmful to handle or inhale.

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HMIS Health:	1
HMIS Flammability:	0
HMIS Physical Hazard:	0
HMIS Personal Protection:	D

WC 4984

Date Effective 09/02/2014

Water Clarifier

Section One: Product Identification

Trade Name	WC 4984
Chemical Family	Cationic Brine Dispersion Polymer
Chemical Formula	Confidential
CAS Number	Proprietary Blend

Section Two: Composition Information on Hazardous Ingredients

CAS Number	Component Common Name	TWA	STEL	PEL	Weight Percent
12125-02-9	Ammonium Chloride	10 mg/m3	20 mg/m3	10 mg/m3	<1%
64-19-7	Acetic Acid	10 ppm	15 ppm	10 ppm	<1%
9005-65-6	Sorbitan Mono-9-Octadecenoate	NE	NE	NE	<1%
64114-46-1	Polyamine	NE	NE	NE	< 10%
Confidential	Proprietary	NE	NE	NE	<10%

Section Three: Hazards Identification

Routes of Entry	Skin contact, eye contact, inhalation, ingestion.
Potential Health Effects	This product may cause eye, skin, or respiratory irritation.
Carcinogenicity (NTP)	This product is not believed to be carcinogenic.
Carcinogenicity (IARC)	This product is not believed to be carcinogenic.
Carcinogenicity (OSHA)	This product is not believed to be carcinogenic.

Section Four: First Aid Measures

Eyes	Flush eyes with water for at least 15 minutes. Seek medical attention.
Skin	Remove contaminated clothing. Flush skin with water.
Ingestion	Drink 3-4 glasses of water. Do not induce vomiting. Seek medical help immediately.
Inhalation	Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen and call a physician.

Section Five: Fire Fighting Measures

Flammable Limits, Flash Point	>200° F, PMCC
Flammable Limits in Air - LEL	ND
Flammable Limits in Air – UEL	ND
Auto Ignition Temperature	Does not ignite
General Hazards	This product would not be expected to burn unless all the water is boiled away. The remaining organics may be ignitable.
Extinguishing Media	Dry chemical, carbon dioxide, water spray.
Fire Fighting Equipment	Wear self contained breathing apparatus and protective clothing.
Fire and Explosion Hazards	No unusual hazards expected.
Hazardous Combustion Products	Not available.

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HMIS Health:	1
HMIS Flammability:	0
HMIS Physical Hazard:	0
HMIS Personal Protection:	D

WC 4984
Date Effective 09/02/2014

Water Clarifier

Sensitivity to Mechanical Impact	Not expected.
Sensitivity to Static Discharge	Not expected.
Additional Information	No additional information available.

Section Six: Accidental Release Measures

Accidental Release Measures	Contain spill and salvage as much material as possible. Then pick up the remaining with absorbent.

Section Seven: Handling and Storage

Handling and Storage Guidelines	Keep container tightly closed. Do not consume food, drink, or tobacco in areas where they may become contaminated by this material.

Section Eight: Exposure Control/Personal Protection

Personal Protective Equipment	Wear appropriate equipment to prevent probability of exposure.
Eye Protection	Goggles or safety glasses with side shields.
Skin Protection	Wear impervious gloves as a standard handling procedure.
Respiratory Protection	Use NIOSH approved respiratory protection where exposure levels exceed regulatory limits.
Engineering Controls	Do not aerosolize.
Mechanical Exhaust	Required in confined spaces.
Local Exhaust	Recommended to keep fumes from concentrating.
Emergency Response Protection	No additional specialized equipment should be required.

Section Nine: Physical and Chemical Properties

Physical Form	Liquid
Color	Clear to Hazy emulsion
Odor	Mild, Vinegar-like
Boiling Point	>212° F
Melting Point	NA
Freezing Point	<32 F
Specific Gravity	1.01 (+/- 0.02)
Bulk Density	8.4 / gallon
pH	3.5 – 4.5
Solubility in Water	Dispersible
Evaporation Rate	ND (n-Butyl Acetate = 1)
Vapor Pressure	ND (mm Hg @ 68° F)
Vapor Density	NA (Air = 1)
Volatile Organic(s)	ND

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HMIS Health:	1
HMIS Flammability:	0
HMIS Physical Hazard:	0
HMIS Personal Protection:	D

WC 4984
Date Effective 09/02/2014

Water Clarifier

Section Ten: Stability and Reactivity

Stability	Stable at normal temperatures and operating conditions.
Incompatibilities	Strong Oxidizing agents.
Decomposition	Decomposition yields carbon dioxide.
Polymerization	Polymerization will not occur.

Section Eleven: Toxicological Information

Eye Irritation	Eye contact may be irritating; rinse with water and do not rub.
Skin Irritation	Skin contact may be irritating; wash affected area.
Inhalation Toxicity	Inhalation of this product during manufacturing may be irritating.
Sensitization	Not evaluated.
Chronic/Carcinogenicity	Not evaluated
Reproduction	Not evaluated.
Mutagenicity	Not evaluated.
Acute Oral Effects	Not evaluated
Acute Dermal Toxicity	Not evaluated.
Additional Information	None

Section Twelve: Ecological Information

Ecotoxicity	Not evaluated.
Biological Oxygen Demand (BOD^5)	Not evaluated
Chemical Oxygen Demand	Not evaluated
Activated Sludge Respiration Inhibition Test	Not evaluated.
Additional Information	No additional information available.

Section Thirteen: Disposal Considerations

Container Disposal Management	Dispose of in accordance with local, state, and federal regulations.
RCRA Hazard Class	Under RCRA, It is the responsibility of the user to determine, at the time of disposal, whether the material meets RCRA criteria for hazardous waste.
Waste Disposal Method	Dispose of in accordance with local, state, and federal regulations.

Section Fourteen: Transport Information

DOT Hazard Class	Not Regulated.
DOT Proper Shipping Name	DOT Not Regulated
Packaging Group	NA
UN Number	NA
NA Number	NA
Packaging Size	Carboys/Pails, Drums, and Bulk.

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HMIS Health:	1
HMIS Flammability:	0
HMIS Physical Hazard:	0
HMIS Personal Protection:	D

WC 4984
Date Effective 09/02/2014

Water Clarifier

Section Fifteen: Regulatory Information

SARA 302/304 RQ	NA
SARA 302/304 TPQ	NA
SARA 311/312 Acute	Yes
SARA 311/312 Chronic	NA
SARA 311/312 Fire	NA
SARA 311/312 Pressure	NA
SARA 311/312 Reactivity	NA
SARA 313 List	Ammonium Chloride, <1% by weight
CERCLA RQ	NA
TSCA Status	All components are registered on TSCA inventory.
CAA	Acetic Acid, Section 111
CWA	Ammonium Chloride & Acetic Acid, Section 311
Additional Information	Ammonium Chloride and Acetic Acid each has an RQ of 5000 lbs.; each at 5% max. places the RQ at 100,000 lbs. of product.

Section Sixteen: Other Information

HMIS Hazard Classification	Health	Flammability	Reactivity	Personal Protection
Classification Code	1	0	0	D
NFPA Hazard Classification	**Health**	**Flammability**	**Instability**	**Special Hazards**
Classification Code or Markings	1	0	0	

Explanation of NFPA Special Symbols

OX	Oxidizer; a chemical that can increase the rate of combustion or fire.
W	Reactive with water; avoid using water when fighting a fire involving material.
	Corrosive material(s); can be corrosive in either an acid or alkaline state.
	Poison or highly toxic material(s).
	Explosive material(s); redundant notation of instability.
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