

From: [Jason Snyder](#)
To: [Atkins, Wendy](#)
Subject: Letter of Support
Date: Monday, April 28, 2025 4:01:16 PM

[External Email - Use Caution]

Good Afternoon,

I am reaching out today as a resident of Angwin for the last nine years to express the need this community has for our local Chevron. I believe that the plans that have been submitted to rebuild after the devastating loss from the fire a couple years back will bring back lost revenue and jobs to the area and will help continue growth for community. I implore that you allow the design plans for the mini mart and car wash to be approved so that the community can move on from that horrendous accident. Both of those businesses would bring in thousands of dollars in revenue and multiple job openings that would propel Angwin further than it has ever been.

Thanks,

Jason Snyder

From: [Spencer Young](#)
To: [Atkins, Wendy](#)
Subject: PUC/ANGWIN Carwash
Date: Monday, April 28, 2025 3:48:50 PM

[External Email - Use Caution]

Hello Wendy,

My fellow Angwin resident Kellie Anderson gave me your email address.

I have been a resident of Angwin for the past 13 years and I would like to voice my **strong support** of the renovation of Chevron and addition of an automated car wash. *This will be a great benefit to the community and to the College which so generously supports the community for over a hundred years.* While there is a small number of my fellow residents who are very vocal about their displeasure at the car wash, I would like to point out that the average decibel of an air impact wrench used all day long in a mechanic shop is FAR louder than the modern drying fans of a car wash. There was no issue with the mechanic shops of the past, and similarly, there are very loud agricultural fans in town with no complaints. I look forward to being able to keep my car clean and shiny soon!

Thank you for the opportunity to comment on this matter

Spencer Young

From: [BETH BROWN](#)
To: [Atkins, Wendy](#)
Subject: Angwin Car Wash Proposal
Date: Wednesday, April 30, 2025 5:44:00 PM

[External Email - Use Caution]

Hello,

While I am happy that the Angwin Chevron, heavily damaged by arson a few years ago, is scheduled to be rebuilt, I am opposed to the inclusion of a car wash in the new build.

A car wash will be a noise nuisance for the surrounding residents and is unnecessary. I understand that Pacific Union College needs funds and is looking for new revenue sources, but a car wash is a bad idea for our quiet community.

Thank you for recording my opposition.

Beth Brown

From: [Dale Withers](#)
To: [Atkins, Wendy](#)
Subject: Chevron Station
Date: Thursday, May 1, 2025 2:05:10 PM

[External Email - Use Caution]

Hi Wendy,

I just wanted to show my support for the Chevron Station and the Car Wash.

Technology has come so far on car washes that they are one of the cleanest things we can do for the environment. Anyone that has been in any kind of water treatment knows it is technically illegal to wash your car at home. Almost all of the water in a car wash is recycle and used over and over. This is truly a need in Angwin and one I know I would use if it was available.

Furthermore in six more weeks the Chevron will have been down for three long years. This is a major point of service for our community and those using the lake. We need this back up and running. A lot of people depend on this gas station being up and running. I appreciate any help you can give us on making this happen.

Dale Withers

You don't stop laughing because you grow old. You grow old because you stop laughing.

- Michael Pritchard

From: [Ryan E. Smith](#)
To: [Atkins, Wendy](#)
Subject: Car Wash in Angwin
Date: Friday, May 2, 2025 11:23:54 AM

[External Email - Use Caution]

Hi Wendy,

My name is Ryan Smith and I live in Angwin. I see that there is a potential vote on having a car wash in Angwin. I wanted you to know that as a resident of Angwin, I support this project. Having a car wash in the area will provide us with an amenity that we would have to drive to Napa to get. Saint Helena has a “do it yourself” car wash, but not an automatic car wash.

Thank you and please let me know if you need any additional information.

My best,
Ryan E. Smith



WATER AUDIT CALIFORNIA

A PUBLIC BENEFIT CORPORATION

952 SCHOOL STREET #316 NAPA CA 94559

VOICE: (707) 681-5111

EMAIL: GENERAL@WATERAUDITCA.ORG

May 2, 2025

To Napa County Planning Commission

Sent via email to: meetingclerk@countyofnapa.org

RE May 7, 2025

Agenda Item 7.B Sam Heier, Pacific Union College / C-Store Replacement and New Carwash / Use Permit Major Modification No. P23-00300-MOD ("Application")

To whom it may concern:

Water Audit California ("Water Audit") is a public benefit corporation with a mission to protect the public trust. The following comments are submitted on its own behalf, and in the public interest.

Water Audit does not oppose this project *per se*, but does insist that the Conditions of Approval shall do no harm to the environment. Planning staff have conflated its CEQA determination with a public trust review. That is not a proper application of the law, but it need not be a source of controversy here.

We note a significant omission from the application. Not in the agenda packet but found on County website County Significant Streams GIS and Current Project Map, the project parcel borders on a tributary to Conn Creek, and is within 1500 feet of Conn Creek. (see attached)

There is no adjoining property owner list, and therefore no proof of notice being given to adjacent properties. There is no assessor property page, and no completed Business Plan, the latter being a critical omission of commitment by the Applicant to a protocol for hazardous materials handling and storage. See more discussion below.

These are all technical objections that could be easily remedied before the hearing, or the hearing can be continued to allow supplementation of the record.

The Conditions of Approval do not include biological mitigation measures. Because the project filed CEQA Notice of Exemption, CDFW has not reviewed the Applicant's limited biological assessment "CNDD Owl Habitat Call Reports 2022 2023 NSO PUC Survey Report for CALFIRE" (packet page 689/90.) The one-page Letter reports three visits and no owl activity. The letter has no signature. Even with a lax attitude to proper judicial procedure, there is nothing to distinguish this from any anonymous report on the same subject. Locational ambiguity indicates substandard practices. (see attached)

Unrevealed in the Application is that Conn Creek is known habitat for protected salmonids, with a reported persisting population of protected threatened and protected *Oncorhynchus mykiss* immediately adjacent to the project site. CDFW has not been consulted regarding the potential injury to salmonids from operational or inadvertent discharge of toxic chemicals from this proposed operation. Similarly, there is no evidence of notice being given to the City of Napa of potential discharge into a source of the City's potable water.

These can be remedied by inserting as a condition of approval the opportunity to review and approve, reject or acquiesce by both state agencies and the City *after* the Applicant has determinatively made a critical operating decision. While these approvals may be deferred, it is respectfully submitted that public trust duties require that the topic not be ignored. Staff memos are habitually separated from the Conditions of Approval they support. Commitments must be continued through the process.

Specifically, with regard to the SWRCB, a Condition of Approval should be that before the project can be built, the Applicant must first submit a new Report of Waste Discharge (or permit application) to detail the proposed change, including a wastewater characterization, demonstration via an updated water balance that the existing ponds can adequately handle the increased flow, and that the existing treatment system can adequately treat the expected contaminants in the new waste stream (and any other changes to the existing permit that would be necessary). The adequacy of treatment logically follows the determination of the chemicals sought to be used.

The Use Permit application includes email correspondence from the Applicant to staff claiming that the chemicals proposed to be used are not hazardous to the environment. (see packet page 550.) At best this is disingenuous. Note that there is no *commitment* to a vendor or chemical proposed to be used:

"We've selected Istobal Vehicle Wash & Care as our preferred vendor at this time, though no contractual agreements or terms have been entered yet, given the early stage of the project...Nothing they provide in terms of chemicals will be hazardous to the environment... They use basic detergent (iFoam Detergent 100 for vehicle care), and a drying agent (iDrying Agent 200 for vehicle care) in all of their setups..."

Not in the agenda packet but found online, Istobal website has no chemical products sharing either name represented in the email. (Link to Istobal https://istobal.com/inter/car-wash-machines.html?srsId=AfmBOoqt0MaNLcVZBxMj6H8Uch5CogvFd10x2WpGVRQ_5LSymKW2L29).

In the CHEMICAL PRODUCTS tab, there are products that appear to be similar in purpose.

ISTOBAL Surfaces Cleaning Detergent (<https://istobal.com/inter/surfaces-cleaning-detergent>) The ecological toxicity statement reports at page 8 " The experimental information related to the eco-toxicological properties of the product itself is not available" (see attached)

ISTOBAL Drying Aid (<https://istobal.com/inter/drying-aid>) The ecological toxicity statement reports at page 8 ""The experimental information related to the ecological properties of the product itself is not available" (see attached)

A finding that CEQA is inapplicable does not satisfy County public trust duties.

In *San Francisco Baykeeper, Inc. v. State Lands Com.*, 242 Cal. App. 4th 202, the Court held that CEQA compliance does not necessarily satisfy public trust obligations, and that the record must affirmatively demonstrate that the public trust doctrine was considered. CEQA review alone is insufficient if public trust duties are not adequately considered in the process. Brushing the issue aside cannot be considered "adequate." While a CEQA review can be incorporated into a public trust analysis, it does not automatically fulfill the agency's obligations under the public trust doctrine. The adequacy of the CEQA review in addressing public trust duties depends on the specific

circumstances and the evidence in the record. In this matter the assessment is simple: no public trust review has been conducted on the basis that no CEQA review is required. That conclusion is in error.

Conclusion

As stated above, Water Audit is not opposed to the project *per se but* wishes to highlight to the Commission the critical omitted data and ensure that the findings of fact and conditions of approval adequately protect the public interest.

Respectfully,



William McKinnon
General Counsel
Water Audit California

JAMES L. ABLE
FORESTRY CONSULTANTS, INC.
1410 Second Street
Eureka, CA 95501
(707) 445-4130

June 7, 2023

Review Team Chair
California Department of Forestry
135 Ridgeway Ave.
Santa Rosa, CA 95401

Re: NSO Survey Information 1-96NTMP-015 NAP (Pacific Union College)

To Review Team Chair,

The survey summary for the 2022 and 2023 seasons are attached. Three visits, in total, were performed for the NTMP in 2022 as well as in 2023 on the property and the surrounding area, depending on access. The Activity Center associated with this NTMP are monitored by Pacific Union College. Surveys have been ongoing in this area and on this property for many years, and were initiated in the 1992 calling season. The previous surveys met the USFWS protocol, in place, at the time of surveys.

There is one documented activity center within 0.7 miles of the NTMP area (NAP00029). The activity center is within the property. No NSO responses occurred during the 2022 or 2023 survey seasons. The habitat for the activity center is addressed in the NTMP. No timber harvesting is proposed within 1,000' of this documented activity center.

I have attached the 2022 and 2023 survey information that has taken place within 0.7 miles of the NTMP. I have also included a map indicating calling station locations, location of associated Activity Center, and a copy of the CNDDB Map with known NSO in the area.

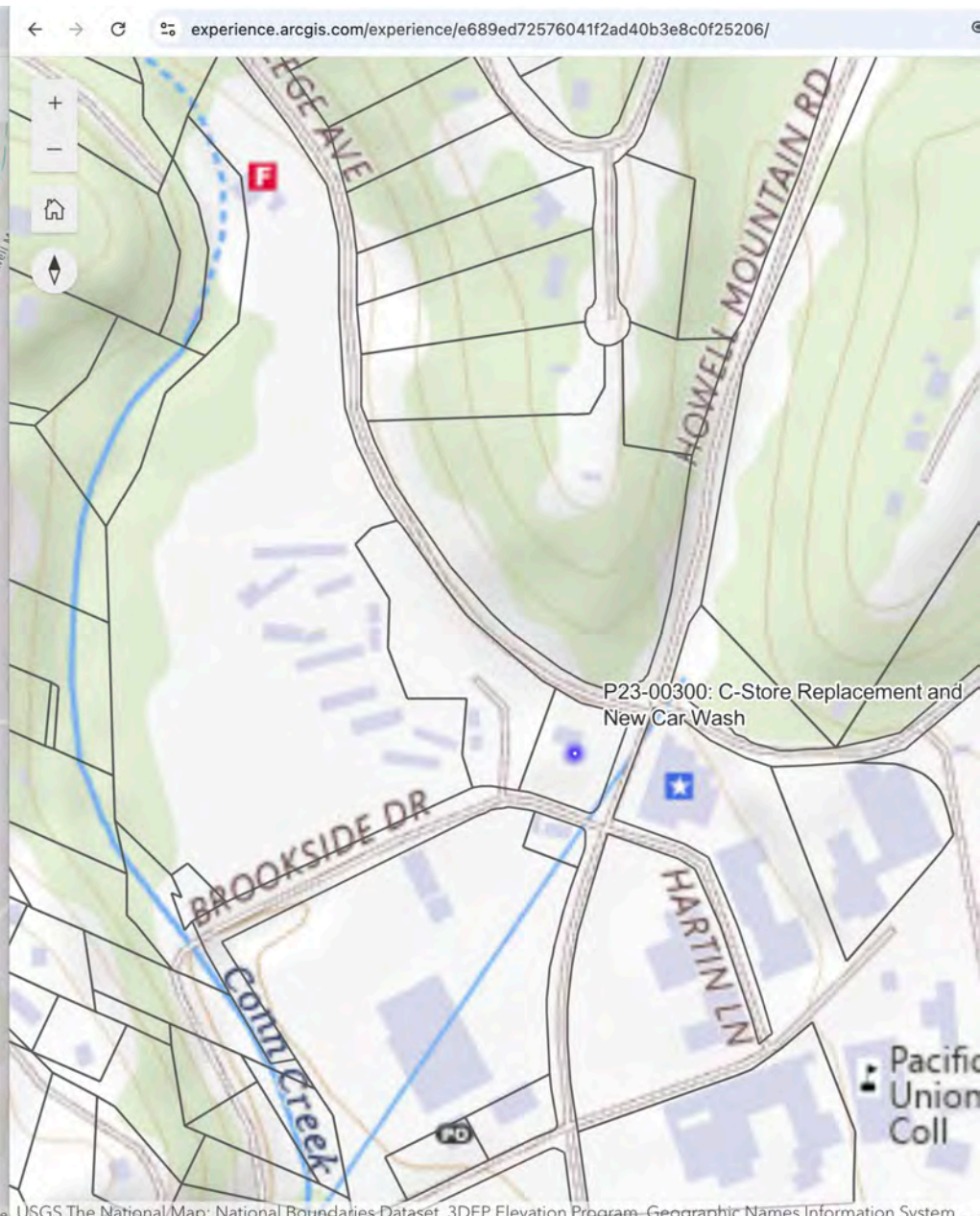
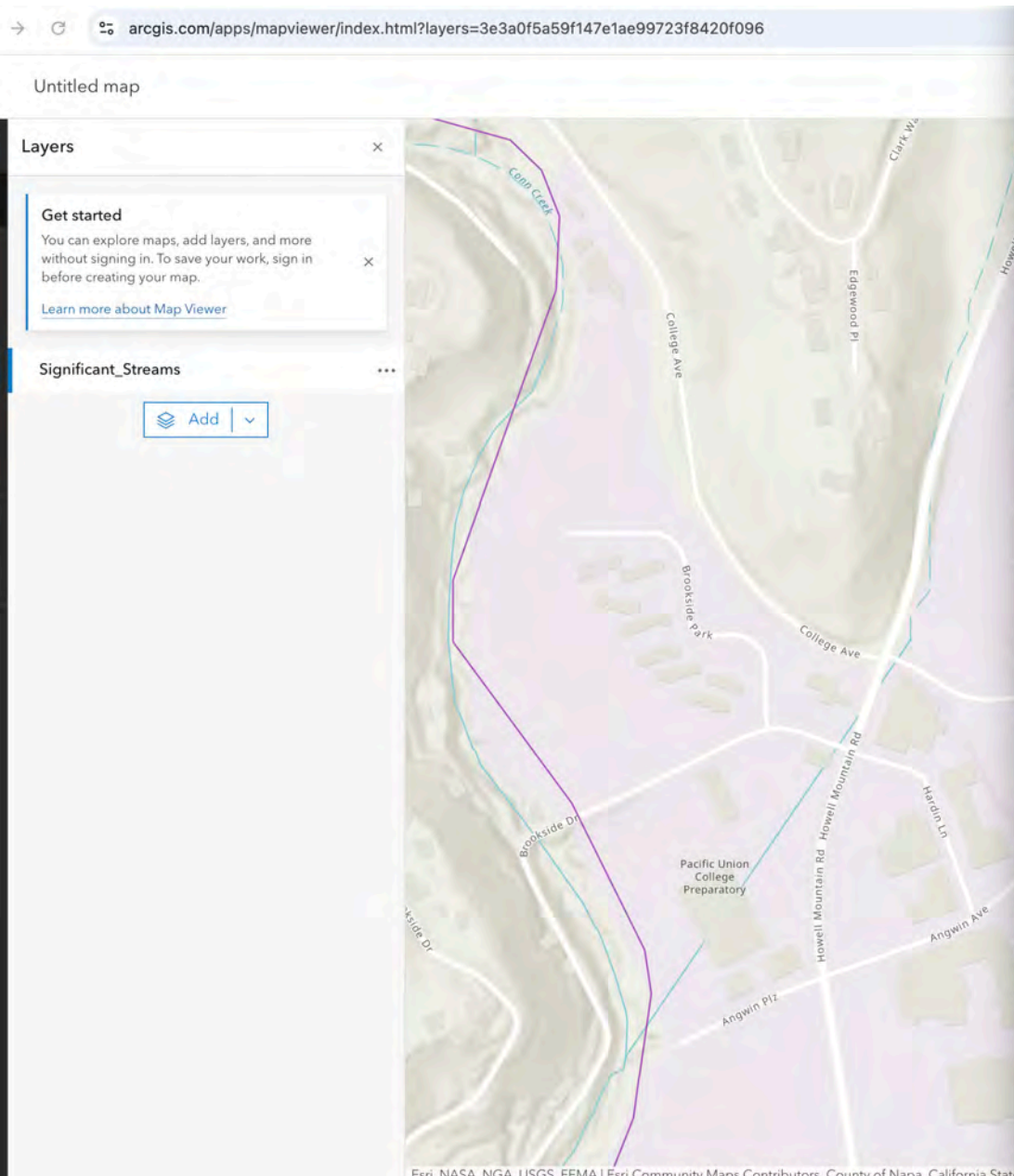
A walk-through visual search of the NTMP area has been done in conjunction with regular and ongoing management of the property and no additional NSO have been observed. Northern Spotted Owl habitat exists on the property but no additional activity centers were observed on or within 1,000 feet of the plan. **There are no operational changes to the NTMP for the Northern Spotted Owl at this time. It is believed that with the current and historic survey information, the operations as proposed and the location of known NSO Ac's in the area, take of the Northern Spotted Owl will be avoided.**

This plan is located within the Burton Creek, Moore Creek, Conn Creek, and Upper Maxwell Creek Planning Watersheds (CalWater ver. 2.2). The habitat is a stand of mixed conifer/hardwood, predominantly Redwood, Douglas-fir, Ponderosa pine, and Coulter pine with hardwoods (tanoak, true oaks, and madrone) and brush.

If you have any questions please feel free to give me a call. Your assistance in this matter will be greatly appreciated.

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Sincerely,



53197XX_DRYING AID

Date of compilation: 01/08/2022

Version: 1

SECTION 1: IDENTIFICATION OF THE SUBSTANCE/MIXTURE AND OF THE COMPANY/UNDERTAKING

- 1.1 Product identifier:** 53197XX_DRYING AID
Other means of identification:
UFI: A2W7-NA7V-QG0T-M8XE
- 1.2 Relevant identified uses of the substance or mixture and uses advised against:**
Relevant uses: Wax polish. For professional users/industrial user only.
Uses advised against: All uses not specified in this section or in section 7.3
- 1.3 Details of the supplier of the safety data sheet:**
ISTOBAL, S.A
AVDA. CONDE DEL SERRALLO, Nº10
46250 L'ALCUDIA - VALENCIA - ESPAÑA
Phone: +34 96 299 79 40 - Fax: +34 96 299 79 91
istobal@istobal.com
<https://www.istobal.com>

Imported in UK by: ISTOBAL UK Ltd
107 Mill Rd,
Stourport-on-Severn DY13 9BL,
United Kingdom
T: +44 (0) 1299826967
- 1.4 Emergency telephone number:** UK: Call NHS 111 or a doctor
EU: +32 3 575 55 55

SECTION 2: HAZARDS IDENTIFICATION

- 2.1 Classification of the substance or mixture:**
CLP Regulation (EC) No 1272/2008:
The product is not classified as hazardous according to CLP Regulation (EC) No 1272/2008.
- 2.2 Label elements:**
CLP Regulation (EC) No 1272/2008:
Hazard statements:
Non-applicable
Precautionary statements:
P101: If medical advice is needed, have product container or label at hand.
P102: Keep out of reach of children.
P501: Dispose of the contents/containers in accordance with the current legislation on waste treatment
Supplementary information:
EUH210: Safety data sheet available on request.
UFI: A2W7-NA7V-QG0T-M8XE
- 2.3 Other hazards:**
Product fails to meet PBT/vPvB criteria

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

- 3.1 Substance:**
Non-applicable
- 3.2 Mixture:**
Chemical description: Aqueous mixture composed of alcohols, colourants, glycol ethers and tensoactives
Components:
In accordance with Annex II of Regulation (EC) No 1907/2006 (point 3), the product contains:

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SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS (continued)

Identification	Chemical name/Classification	Concentration
CAS: 111-76-2 EC: 203-905-0 Index: 603-014-00-0 REACH: 01-2119475108-36-XXXX	2-butoxyethanol <input type="checkbox"/> ¹ <input type="checkbox"/> ATP ATP15 Regulation 1272/2008 Acute Tox. 4: H302+H332; Eye Irrit. 2: H319; Skin Irrit. 2: H315 - Warning 	2,5 - <5 %
CAS: Non-applicable EC: Non-applicable Index: Non-applicable REACH: 01-2119472309-33-XXXX	Fatty acids, C18 unsatd. reaction products with triethanolamine, di-Me sulfate-quaternized <input type="checkbox"/> ¹ <input type="checkbox"/> Self-classified Regulation 1272/2008 Eye Irrit. 2: H319; Skin Irrit. 2: H315 - Warning 	2,5 - <5 %

☐ ¹ ☐ Substances presenting a health or environmental hazard which meet criteria laid down in Regulation (EU) No. 2015/830

To obtain more information on the hazards of the substances consult sections 11, 12 and 16.

SECTION 4: FIRST AID MEASURES
4.1 Description of first aid measures:

The symptoms resulting from intoxication can appear after exposure, therefore, in case of doubt, seek medical attention for direct exposure to the chemical product or persistent discomfort, showing the SDS of this product.

By inhalation:

This product is not classified as hazardous through inhalation. However, in case of intoxication symptoms it is recommended to remove the person affected from the area of exposure, provide clean air and keep at rest. Request medical attention if symptoms persist.

By skin contact:

This product is not classified as hazardous when in contact with the skin. However, in case of skin contact it is recommended to remove contaminated clothes and shoes, rinse the skin or if necessary shower the affected person thoroughly with cold water and neutral soap. In case of serious reaction consult a doctor.

By eye contact:

Rinse eyes thoroughly with water for at least 15 minutes. If the injured person uses contact lenses, these should be removed unless they are stuck to the eyes, in which case removal could cause further damage. In all cases, after cleaning, a doctor should be consulted as quickly as possible with the SDS for the product.

By ingestion/aspiration:

Do not induce vomiting, but if it does happen keep the head down to avoid aspiration. Keep the person affected at rest. Rinse out the mouth and throat, as they may have been affected during ingestion.

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

Acute and delayed effects are indicated in sections 2 and 11.

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

Non-applicable

SECTION 5: FIREFIGHTING MEASURES
5.1 Extinguishing media:
Suitable extinguishing media:

Product is non-flammable under normal conditions of storage, handling and use. In the case of combustion as a result of improper handling, storage or use preferably use polyvalent powder extinguishers (ABC powder), in accordance with the Regulation on fire protection systems.

Unsuitable extinguishing media:

Non-applicable

5.2 Special hazards arising from the substance or mixture:

As a result of combustion or thermal decomposition reactive sub-products are created that can become highly toxic and, consequently, can present a serious health risk.

5.3 Advice for firefighters:

Depending on the magnitude of the fire it may be necessary to use full protective clothing and self-contained breathing apparatus (SCBA). Minimum emergency facilities and equipment should be available (fire blankets, portable first aid kit,...) in accordance with Directive 89/654/EC.

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SECTION 5: FIREFIGHTING MEASURES (continued)

Additional provisions:

Act in accordance with the Internal Emergency Plan and the Information Sheets on actions to take after an accident or other emergencies. Eliminate all sources of ignition. In case of fire, cool the storage containers and tanks for products susceptible to combustion, explosion or BLEVE as a result of high temperatures. Avoid spillage of the products used to extinguish the fire into an aqueous medium.

SECTION 6: ACCIDENTAL RELEASE MEASURES

6.1 Personal precautions, protective equipment and emergency procedures:

For non-emergency personnel:

Isolate leaks provided that there is no additional risk for the people performing this task. Personal protection equipment must be used against potential contact with the spilt product (See section 8). Evacuate the area and keep out those who do not have protection.

For emergency responders:

See section 8.

6.2 Environmental precautions:

This product is not classified as hazardous to the environment. Keep product away from drains, surface and ground water.

6.3 Methods and material for containment and cleaning up:

It is recommended:

Absorb the spillage using sand or inert absorbent and move it to a safe place. Do not absorb in sawdust or other combustible absorbents. For any concern related to disposal consult section 13.

6.4 Reference to other sections:

See sections 8 and 13.

SECTION 7: HANDLING AND STORAGE

7.1 Precautions for safe handling:

A.- General precautions for safe use

Comply with the current legislation concerning the prevention of industrial risks with regards manually handling weights. Maintain order, cleanliness and destroy using safe methods (section 6).

B.- Technical recommendations for the prevention of fires and explosions

Product is non-flammable under normal conditions of storage, handling and use. It is recommended to transfer at slow speeds to avoid the generation of electrostatic charges that can affect flammable products. Consult section 10 for information on conditions and materials that should be avoided.

C.- Technical recommendations on general occupational hygiene

Do not eat or drink during the process, washing hands afterwards with suitable cleaning products.

D.- Technical recommendations to prevent environmental risks

It is recommended to have absorbent material available at close proximity to the product (See subsection 6.3)

7.2 Conditions for safe storage, including any incompatibilities:

A.- Technical measures for storage

Minimum Temp.: 5 °C
Maximum Temp.: 45 °C
Maximum time: 12 Months

B.- General conditions for storage

Avoid sources of heat, radiation, static electricity and contact with food. For additional information see subsection 10.5

7.3 Specific end use(s):

Except for the instructions already specified it is not necessary to provide any special recommendation regarding the uses of this product.

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SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

8.1 Control parameters:

Substances whose occupational exposure limits have to be monitored in the workplace (European OEL, not country-specific legislation):

Directive (EU) 2000/39, Directive 2004/37/EC, Directive (EU) 2006/15, Directive (EU) 2009/161, Directive (EU) 2017/164, Directive (EU) 2019/1831:

Identification	Occupational exposure limits		
2-butoxyethanol CAS: 111-76-2 EC: 203-905-0	IOELV (8h)	20 ppm	98 mg/m ³
	IOELV (STEL)	50 ppm	246 mg/m ³

DNEL (Workers):

Identification		Short exposure		Long exposure	
		Systemic	Local	Systemic	Local
2-butoxyethanol CAS: 111-76-2 EC: 203-905-0	Oral	Non-applicable	Non-applicable	Non-applicable	Non-applicable
	Dermal	89 mg/kg	Non-applicable	125 mg/kg	Non-applicable
	Inhalation	1091 mg/m ³	246 mg/m ³	98 mg/m ³	Non-applicable
Fatty acids, C18 unsatd. reaction products with triethanolamine, di-Me sulfate-quaternized CAS: Non-applicable EC: Non-applicable	Oral	Non-applicable	Non-applicable	Non-applicable	Non-applicable
	Dermal	Non-applicable	Non-applicable	312,5 mg/kg	Non-applicable
	Inhalation	Non-applicable	Non-applicable	44 mg/m ³	Non-applicable

DNEL (General population):

Identification		Short exposure		Long exposure	
		Systemic	Local	Systemic	Local
2-butoxyethanol CAS: 111-76-2 EC: 203-905-0	Oral	Non-applicable	Non-applicable	6,3 mg/kg	Non-applicable
	Dermal	89 mg/kg	Non-applicable	75 mg/kg	Non-applicable
	Inhalation	426 mg/m ³	147 mg/m ³	59 mg/m ³	Non-applicable
Fatty acids, C18 unsatd. reaction products with triethanolamine, di-Me sulfate-quaternized CAS: Non-applicable EC: Non-applicable	Oral	Non-applicable	Non-applicable	7,5 mg/kg	Non-applicable
	Dermal	Non-applicable	Non-applicable	187,5 mg/kg	Non-applicable
	Inhalation	Non-applicable	Non-applicable	13 mg/m ³	Non-applicable

PNEC:

Identification				
2-butoxyethanol CAS: 111-76-2 EC: 203-905-0	STP	463 mg/L	Fresh water	8,8 mg/L
	Soil	2,33 mg/kg	Marine water	0,88 mg/L
	Intermittent	26,4 mg/L	Sediment (Fresh water)	34,6 mg/kg
	Oral	0,02 g/kg	Sediment (Marine water)	3,46 mg/kg
Fatty acids, C18 unsatd. reaction products with triethanolamine, di-Me sulfate-quaternized CAS: Non-applicable EC: Non-applicable	STP	2,96 mg/L	Fresh water	0,002 mg/L
	Soil	0,115 mg/kg	Marine water	0 mg/L
	Intermittent	0,019 mg/L	Sediment (Fresh water)	0,58 mg/kg
	Oral	Non-applicable	Sediment (Marine water)	0,058 mg/kg

8.2 Exposure controls:

A.- Individual protection measures, such as personal protective equipment

As a preventative measure it is recommended to use basic Personal Protective Equipment, with the corresponding <<CE marking>> in accordance with Regulation (EU) 2016/425. For more information on Personal Protective Equipment (storage, use, cleaning, maintenance, class of protection,...) consult the information leaflet provided by the manufacturer. For more information see subsection 7.1. All information contained herein is a recommendation which needs some specification from the labour risk prevention services as it is not known whether the company has additional measures at its disposal.

B.- Respiratory protection

The use of protection equipment will be necessary if a mist forms or if the occupational exposure limits are exceeded.

C.- Specific protection for the hands



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SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION (continued)



Pictogram	PPE	Labelling	CEN Standard	Remarks
 Mandatory hand protection	Protective gloves against minor risks			Replace gloves in case of any sign of damage. For prolonged periods of exposure to the product for professional users/industrials, we recommend using CE III gloves in line with standards EN 420:2004+A1:2010 and EN ISO 374-1:2016+A1:2018

As the product is a mixture of several substances, the resistance of the glove material can not be calculated in advance with total reliability and has therefore to be checked prior to the application.



D.- Eye and face protection

Pictogram	PPE	Labelling	CEN Standard	Remarks
 Mandatory face protection	Panoramic glasses against splash/projections.		EN 166:2002 EN ISO 4007:2018	Clean daily and disinfect periodically according to the manufacturer's instructions. Use if there is a risk of splashing.

E.- Body protection

Pictogram	PPE	Labelling	CEN Standard	Remarks
	Work clothing			Replace before any evidence of deterioration. For periods of prolonged exposure to the product for professional/industrial users CE III is recommended, in accordance with the regulations in EN ISO 6529:2013, EN ISO 6530:2005, EN ISO 13688:2013, EN 464:1994.
	Anti-slip work shoes		EN ISO 20347:2012	Replace before any evidence of deterioration. For periods of prolonged exposure to the product for professional/industrial users CE III is recommended, in accordance with the regulations in EN ISO 20345:2012 y EN 13832-1:2007

F.- Additional emergency measures

Emergency measure	Standards	Emergency measure	Standards
 Emergency shower	ANSI Z358-1 ISO 3864-1:2011, ISO 3864-4:2011	 Eyewash stations	DIN 12 899 ISO 3864-1:2011, ISO 3864-4:2011

Environmental exposure controls:

In accordance with the community legislation for the protection of the environment it is recommended to avoid environmental spillage of both the product and its container. For additional information see subsection 7.1.D

Volatile organic compounds:

With regard to Directive 2010/75/EU, this product has the following characteristics:

V.O.C. (Supply):	5,04 % weight
V.O.C. density at 20 °C:	50,2 kg/m ³ (50,2 g/L)
Average carbon number:	5,87
Average molecular weight:	116,36 g/mol

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES
9.1 Information on basic physical and chemical properties:

For complete information see the product datasheet.

Appearance:

Physical state at 20 °C:	Liquid
Appearance:	Transparent
Colour:	 Yellow
Odour:	Characteristic

*Not relevant due to the nature of the product, not providing information property of its hazards.

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SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES (continued)

Odour threshold:	Non-applicable *
Volatility:	
Boiling point at atmospheric pressure:	102 °C
Vapour pressure at 20 °C:	2331 Pa
Vapour pressure at 50 °C:	12279,71 Pa (12,28 kPa)
Evaporation rate at 20 °C:	Non-applicable *
Product description:	
Density at 20 °C:	986 - 1006 kg/m ³
Relative density at 20 °C:	0,986 - 1,006
Dynamic viscosity at 20 °C:	Non-applicable *
Kinematic viscosity at 20 °C:	Non-applicable *
Kinematic viscosity at 40 °C:	Non-applicable *
Concentration:	Non-applicable *
pH:	2,3 - 3,3 (at 100 %)
Vapour density at 20 °C:	Non-applicable *
Partition coefficient n-octanol/water 20 °C:	Non-applicable *
Solubility in water at 20 °C:	Non-applicable *
Solubility properties:	Water-soluble
Decomposition temperature:	Non-applicable *
Melting point/freezing point:	Non-applicable *
Flammability:	
Flash Point:	69 °C
Flammability (solid, gas):	Non-applicable *
Autoignition temperature:	238 °C
Lower flammability limit:	Non-applicable *
Upper flammability limit:	Non-applicable *
Particle characteristics:	
Median equivalent diameter:	Non-applicable

9.2 Other information:

Information with regard to physical hazard classes:

Explosive properties:	Non-applicable *
Oxidising properties:	Non-applicable *
Corrosive to metals:	Non-applicable *
Heat of combustion:	Non-applicable *
Aerosols-total percentage (by mass) of flammable components:	Non-applicable *

Other safety characteristics:

Surface tension at 20 °C:	Non-applicable *
Refraction index:	Non-applicable *

*Not relevant due to the nature of the product, not providing information property of its hazards.

SECTION 10: STABILITY AND REACTIVITY

10.1 Reactivity:

No hazardous reactions are expected because the product is stable under recommended storage conditions. See section 7.

10.2 Chemical stability:

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SECTION 10: STABILITY AND REACTIVITY (continued)

Chemically stable under the indicated conditions of storage, handling and use.

10.3 Possibility of hazardous reactions:

Under the specified conditions, hazardous reactions that lead to excessive temperatures or pressure are not expected.

10.4 Conditions to avoid:

Applicable for handling and storage at room temperature:

Shock and friction	Contact with air	Increase in temperature	Sunlight	Humidity
Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

10.5 Incompatible materials:

Acids	Water	Oxidising materials	Combustible materials	Others
Not applicable	Not applicable	Not applicable	Not applicable	Avoid alkalis or strong bases

10.6 Hazardous decomposition products:

See subsection 10.3, 10.4 and 10.5 to find out the specific decomposition products. Depending on the decomposition conditions, complex mixtures of chemical substances can be released: carbon dioxide (CO₂), carbon monoxide and other organic compounds

SECTION 11: TOXICOLOGICAL INFORMATION

11.1 Information on toxicological effects:

The experimental information related to the toxicological properties of the product itself is not available

Contains glycols. It is recommended not to breathe the vapours for prolonged periods of time due to the possibility of effects that are hazardous to the health.

Dangerous health implications:

In case of exposure that is repetitive, prolonged or at concentrations higher than the recommended occupational exposure limits, adverse effects on health may result, depending on the means of exposure:

A- Ingestion (acute effect):

- Acute toxicity : Based on available data, the classification criteria are not met, however, it contains substances classified as dangerous for consumption. For more information see section 3.
- Corrosivity/Irritability: Based on available data, the classification criteria are not met. However, it does contain substances classified as hazardous for this effect. For more information see section 3.

B- Inhalation (acute effect):

- Acute toxicity : Based on available data, the classification criteria are not met. However, it contains substances classified as hazardous for inhalation. For more information see section 3.
- Corrosivity/Irritability: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.

C- Contact with the skin and the eyes (acute effect):

- Contact with the skin: Based on available data, the classification criteria are not met. However, it contains substances classified as hazardous for skin contact. For more information see section 3.
- Contact with the eyes: Based on available data, the classification criteria are not met. However, it does contain substances classified as hazardous for this effect. For more information see section 3.

D- CMR effects (carcinogenicity, mutagenicity and toxicity to reproduction):

- Carcinogenicity: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for the effects mentioned. For more information see section 3.
IARC: 2-butoxyethanol (3)
- Mutagenicity: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.
- Reproductive toxicity: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.

E- Sensitizing effects:

- Respiratory: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous with sensitising effects. For more information see section 3.
- Skin: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.

F- Specific target organ toxicity (STOT) - single exposure:

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SECTION 11: TOXICOLOGICAL INFORMATION (continued)

Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.

G- Specific target organ toxicity (STOT)-repeated exposure:

- Specific target organ toxicity (STOT)-repeated exposure: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.
- Skin: Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.

H- Aspiration hazard:

Based on available data, the classification criteria are not met, as it does not contain substances classified as hazardous for this effect. For more information see section 3.

Other information:

Non-applicable

Specific toxicology information on the substances:

Identification	Acute toxicity		Genus
2-butoxyethanol	LD50 oral	1200 mg/kg	Rat
CAS: 111-76-2	LD50 dermal	3000 mg/kg	Rabbit
EC: 203-905-0	LC50 inhalation	11 mg/L (ATEi)	

SECTION 12: ECOLOGICAL INFORMATION

The experimental information related to the eco-toxicological properties of the product itself is not available

12.1 Toxicity:

Acute toxicity:

Identification	Concentration		Species	Genus
2-butoxyethanol	LC50	1490 mg/L (96 h)	Lepomis macrochirus	Fish
CAS: 111-76-2	EC50	1815 mg/L (48 h)	Daphnia magna	Crustacean
EC: 203-905-0	EC50	911 mg/L (72 h)	Pseudokirchneriella subcapitata	Algae

Chronic toxicity:

Identification	Concentration		Species	Genus
2-butoxyethanol	NOEC	100 mg/L	Danio rerio	Fish
CAS: 111-76-2 EC: 203-905-0	NOEC	100 mg/L	Daphnia magna	Crustacean

12.2 Persistence and degradability:

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SECTION 12: ECOLOGICAL INFORMATION (continued)

Identification	Degradability		Biodegradability	
2-butoxyethanol	BOD5	0,71 g O ₂ /g	Concentration	100 mg/L
CAS: 111-76-2	COD	2,2 g O ₂ /g	Period	14 days
EC: 203-905-0	BOD5/COD	0,32	% Biodegradable	96 %

12.3 Bioaccumulative potential:

Identification	Bioaccumulation potential	
2-butoxyethanol	BCF	3
CAS: 111-76-2	Pow Log	0.83
EC: 203-905-0	Potential	Low

12.4 Mobility in soil:

Identification	Absorption/desorption		Volatility	
2-butoxyethanol	Koc	8	Henry	1,621E-1 Pa·m ³ /mol
CAS: 111-76-2	Conclusion	Very High	Dry soil	No
EC: 203-905-0	Surface tension	2,729E-2 N/m (25 °C)	Moist soil	Yes

12.5 Results of PBT and vPvB assessment:

Product fails to meet PBT/vPvB criteria

12.6 Other adverse effects:

Not described

SECTION 13: DISPOSAL CONSIDERATIONS
13.1 Waste treatment methods:

Code	Description	Waste class (Regulation (EU) No 1357/2014)
20 01 30	detergents other than those mentioned in 20 01 29	Non dangerous

Type of waste (Regulation (EU) No 1357/2014):

Non-applicable

Waste management (disposal and evaluation):

Consult the authorized waste service manager on the assessment and disposal operations in accordance with Annex 1 and Annex 2 (Directive 2008/98/EC). As under 15 01 (2014/955/EC) of the code and in case the container has been in direct contact with the product, it will be processed the same way as the actual product. Otherwise, it will be processed as non-dangerous residue. Waste should not be disposed of to drains. See paragraph 6.2.

Regulations related to waste management:

In accordance with Annex II of Regulation (EC) No 1907/2006 (REACH) the community or state provisions related to waste management are stated

Community legislation: Directive 2008/98/EC, 2014/955/EU, Regulation (EU) No 1357/2014

SECTION 14: TRANSPORT INFORMATION

This product is not regulated for transport (ADR/RID,IMDG,IATA)

SECTION 15: REGULATORY INFORMATION
15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture:

Candidate substances for authorisation under the Regulation (EC) No 1907/2006 (REACH): Non-applicable

Substances included in Annex XIV of REACH ("Authorisation List") and sunset date: Non-applicable

Regulation (EC) No 1005/2009, about substances that deplete the ozone layer: Non-applicable

Article 95, REGULATION (EU) No 528/2012: Non-applicable

REGULATION (EU) No 649/2012, in relation to the import and export of hazardous chemical products: Non-applicable

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SECTION 15: REGULATORY INFORMATION (continued)

Seveso III:

Non-applicable

Limitations to commercialisation and the use of certain dangerous substances and mixtures (Annex XVII REACH, etc):

Non-applicable

Specific provisions in terms of protecting people or the environment:

It is recommended to use the information included in this safety data sheet as a basis for conducting workplace-specific risk assessments in order to establish the necessary risk prevention measures for the handling, use, storage and disposal of this product.

Relevant instructions for use:

Recommended dosing for jet wash areas is 10 ml/min approximately. Recommended dosing for rollovers and tunnels is 15 ml/min approximately.

Other legislation:

The product could be affected by sectorial legislation

15.2 Chemical safety assessment:

The supplier has not carried out evaluation of chemical safety.

SECTION 16: OTHER INFORMATION

Legislation related to safety data sheets:

The SDS shall be supplied in an official language of the country where the product is placed on the market. This safety data sheet has been designed in accordance with ANNEX II-Guide to the compilation of safety data sheets of Regulation (EC) No 1907/2006 (Regulation (EC) No 2015/830).

Modifications related to the previous Safety Data Sheet which concerns the ways of managing risks.:

Non-applicable

Texts of the legislative phrases mentioned in section 3:

The phrases indicated do not refer to the product itself; they are present merely for informative purposes and refer to the individual components which appear in section 3

CLP Regulation (EC) No 1272/2008:

Acute Tox. 4: H302+H332 - Harmful if swallowed or if inhaled.

Eye Irrit. 2: H319 - Causes serious eye irritation.

Skin Irrit. 2: H315 - Causes skin irritation.

Classification procedure:

Non-applicable

Advice related to training:

Training is recommended in order to prevent industrial risks for staff using this product and to facilitate their comprehension and interpretation of this safety data sheet, as well as the label on the product.

Principal bibliographical sources:

<http://echa.europa.eu>

<http://eur-lex.europa.eu>

Abbreviations and acronyms:

ADR: European agreement concerning the international carriage of dangerous goods by road

IMDG: International maritime dangerous goods code

IATA: International Air Transport Association

ICAO: International Civil Aviation Organisation

COD: Chemical Oxygen Demand

BOD5: 5day biochemical oxygen demand

BCF: Bioconcentration factor

LD50: Lethal Dose 50

LC50: Lethal Concentration 50

EC50: Effective concentration 50

LogPOW: Octanolwater partition coefficient

Koc: Partition coefficient of organic carbon

UFI: unique formula identifier

IARC: International Agency for Research on Cancer

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Safety data sheet

This SDS is an English translation of Regulation (EU) n° 2015/830, without any country-specific legislation

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The information contained in this safety data sheet is based on sources, technical knowledge and current legislation at European and state level, without being able to guarantee its accuracy. This information cannot be considered a guarantee of the properties of the product, it is simply a description of the security requirements. The occupational methodology and conditions for users of this product are not within our awareness or control, and it is ultimately the responsibility of the user to take the necessary measures to obtain the legal requirements concerning the manipulation, storage, use and disposal of chemical products. The information on this safety data sheet only refers to this product, which should not be used for needs other than those specified.

- END OF SAFETY DATA SHEET -

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SECTION 1: IDENTIFICATION OF THE SUBSTANCE/MIXTURE AND OF THE COMPANY/UNDERTAKING

- 1.1 Product identifier:** 53031XX_CLEAN SURFACES
Other means of identification:
UFI: JWWR-S8H2-CG0R-WDPF
- 1.2 Relevant identified uses of the substance or mixture and uses advised against:**
 Relevant uses: Crystal cleaner. For professional users only.
 Uses advised against: All uses not specified in this section or in section 7.3
- 1.3 Details of the supplier of the safety data sheet:**
 ISTOBAL, S.A
 AVDA. CONDE DEL SERRALLO, Nº10
 46250 L'ALCUDIA - VALENCIA - ESPAÑA
 Phone: +34 96 299 79 40 - Fax: +34 96 299 79 91
 istobal@istobal.com
<https://www.istobal.com>
- 1.4 Emergency telephone number:** +32 (0)3 575 03 30

SECTION 2: HAZARDS IDENTIFICATION

- 2.1 Classification of the substance or mixture:**
CLP Regulation (EC) No 1272/2008:
 Classification of this product has been carried out in accordance with CLP Regulation (EC) No 1272/2008.
 Eye Irrit. 2: Eye irritation, Category 2, H319
- 2.2 Label elements:**
CLP Regulation (EC) No 1272/2008:
Warning

Hazard statements:
 Eye Irrit. 2: H319 - Causes serious eye irritation.
Precautionary statements:
 P101: If medical advice is needed, have product container or label at hand.
 P102: Keep out of reach of children.
 P264: Wash thoroughly after handling.
 P280: Wear protective gloves/protective clothing/eye protection/protective footwear.
 P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
 P337+P313: If eye irritation persists: Get medical advice/attention.
 P501: Dispose of contents/container according to the separated collection system used in your municipality.
UFI: JWWR-S8H2-CG0R-WDPF
- 2.3 Other hazards:**
 Product fails to meet PBT/vPvB criteria

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

- 3.1 Substance:**
 Non-applicable
- 3.2 Mixture:**
Chemical description: Aqueous solution based on alcohols, surfactants and perfume.
Components:
 In accordance with Annex II of Regulation (EC) No 1907/2006 (point 3), the product contains:

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SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS (continued)

Identification	Chemical name/Classification	Concentration
CAS: 160875-66-1 EC: 605-233-7 Index: Non-applicable REACH: Non-applicable	Fatty alcohol ethoxylated <input type="checkbox"/> ¹ <input type="checkbox"/> Regulation 1272/2008 Acute Tox. 4: H302; Eye Dam. 1: H318 - Danger 	Self-classified 1 - <2,5 %

☐ ¹ Substances presenting a health or environmental hazard which meet criteria laid down in Regulation (EU) No. 2015/830

To obtain more information on the hazards of the substances consult sections 11, 12 and 16.

SECTION 4: FIRST AID MEASURES

4.1 Description of first aid measures:

The symptoms resulting from intoxication can appear after exposure, therefore, in case of doubt, seek medical attention for direct exposure to the chemical product or persistent discomfort, showing the SDS of this product.

By inhalation:

This product does not contain substances classified as hazardous for inhalation, however, in case of symptoms of intoxication remove the person affected from the exposure area and provide with fresh air. Seek medical attention if the symptoms get worse or persist.

By skin contact:

In case of contact it is recommended to clean the affected area thoroughly with water and neutral soap. In case of changes to the skin (stinging, redness, rashes, blisters,...), seek medical advice with this Safety data Sheet

By eye contact:

Rinse eyes thoroughly with lukewarm water for at least 15 minutes. Do not allow the person affected to rub or close their eyes. If the injured person uses contact lenses, these should be removed unless they are stuck to the eyes, in which case this could cause further damage. In all cases, after cleaning, a doctor should be consulted as quickly as possible with the SDS of the product.

By ingestion/aspiration:

Do not induce vomiting, but if it does happen keep the head down to avoid aspiration. Keep the person affected at rest. Rinse out the mouth and throat, as they may have been affected during ingestion.

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

Acute and delayed effects are indicated in sections 2 and 11.

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

Non-applicable

SECTION 5: FIREFIGHTING MEASURES

5.1 Extinguishing media:

Suitable extinguishing media:

Product is non-flammable under normal conditions of storage, handling and use. In the case of combustion as a result of improper handling, storage or use preferably use polyvalent powder extinguishers (ABC powder), in accordance with the Regulation on fire protection systems.

Unsuitable extinguishing media:

Non-applicable

5.2 Special hazards arising from the substance or mixture:

As a result of combustion or thermal decomposition reactive sub-products are created that can become highly toxic and, consequently, can present a serious health risk.

5.3 Advice for firefighters:

Depending on the magnitude of the fire it may be necessary to use full protective clothing and self-contained breathing apparatus (SCBA). Minimum emergency facilities and equipment should be available (fire blankets, portable first aid kit,...) in accordance with Directive 89/654/EC.

Additional provisions:

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SECTION 5: FIREFIGHTING MEASURES (continued)

Act in accordance with the Internal Emergency Plan and the Information Sheets on actions to take after an accident or other emergencies. Eliminate all sources of ignition. In case of fire, cool the storage containers and tanks for products susceptible to combustion, explosion or BLEVE as a result of high temperatures. Avoid spillage of the products used to extinguish the fire into an aqueous medium.

SECTION 6: ACCIDENTAL RELEASE MEASURES**6.1 Personal precautions, protective equipment and emergency procedures:****For non-emergency personnel:**

Isolate leaks provided that there is no additional risk for the people performing this task. Personal protection equipment must be used against potential contact with the spilled product (See section 8). Evacuate the area and keep out those who do not have protection.

For emergency responders:

See section 8.

6.2 Environmental precautions:

This product is not classified as hazardous to the environment. Keep product away from drains, surface and ground water.

6.3 Methods and material for containment and cleaning up:

It is recommended:

Absorb the spillage using sand or inert absorbent and move it to a safe place. Do not absorb in sawdust or other combustible absorbents. For any concern related to disposal consult section 13.

6.4 Reference to other sections:

See sections 8 and 13.

SECTION 7: HANDLING AND STORAGE**7.1 Precautions for safe handling:****A.- Precautions for safe manipulation**

Comply with the current legislation concerning the prevention of industrial risks. Keep containers hermetically sealed. Control spills and residues, destroying them with safe methods (section 6). Avoid leakages from the container. Maintain order and cleanliness where dangerous products are used.

B.- Technical recommendations for the prevention of fires and explosions

Product is non-flammable under normal conditions of storage, handling and use. It is recommended to transfer at slow speeds to avoid the generation of electrostatic charges that can affect flammable products. Consult section 10 for information on conditions and materials that should be avoided.

C.- Technical recommendations to prevent ergonomic and toxicological risks

Do not eat or drink during the process, washing hands afterwards with suitable cleaning products.

D.- Technical recommendations to prevent environmental risks

It is recommended to have absorbent material available at close proximity to the product (See subsection 6.3)

7.2 Conditions for safe storage, including any incompatibilities:**A.- Technical measures for storage**

Minimum Temp.: 0 °C
Maximum Temp.: 45 °C
Maximum time: 12 Months

B.- General conditions for storage

Avoid sources of heat, radiation, static electricity and contact with food. For additional information see subsection 10.5

7.3 Specific end use(s):

Except for the instructions already specified it is not necessary to provide any special recommendation regarding the uses of this product.

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SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

8.1 Control parameters:

Substances whose occupational exposure limits have to be monitored in the workplace (European OEL, not country-specific legislation):

There are no occupational exposure limits for the substances contained in the product

DNEL (Workers):

Non-applicable

DNEL (General population):

Non-applicable

PNEC:

Non-applicable

8.2 Exposure controls:



A.- Individual protection measures, such as personal protective equipment

As a preventative measure it is recommended to use basic Personal Protective Equipment, with the corresponding <<CE marking>> in accordance with Regulation (EU) 2016/425. For more information on Personal Protective Equipment (storage, use, cleaning, maintenance, class of protection,...) consult the information leaflet provided by the manufacturer. For more information see subsection 7.1. All information contained herein is a recommendation which needs some specification from the labour risk prevention services as it is not known whether the company has additional measures at its disposal.

B.- Respiratory protection



The use of protection equipment will be necessary if a mist forms or if the occupational exposure limits are exceeded.

C.- Specific protection for the hands



Pictogram	PPE	Labelling	CEN Standard	Remarks
 Mandatory hand protection	Protective gloves against minor risks			Replace gloves in case of any sign of damage. For prolonged periods of exposure to the product for professional users/industrials, we recommend using CE III gloves in line with standards EN 420:2004+A1:2010 and EN ISO 374-1:2016+A1:2018

As the product is a mixture of several substances, the resistance of the glove material can not be calculated in advance with total reliability and has therefore to be checked prior to the application.



D.- Ocular and facial protection

Pictogram	PPE	Labelling	CEN Standard	Remarks
 Mandatory face protection	Panoramic glasses against splash/projections.		EN 166:2002 EN ISO 4007:2018	Clean daily and disinfect periodically according to the manufacturer's instructions. Use if there is a risk of splashing.

E.- Body protection

Pictogram	PPE	Labelling	CEN Standard	Remarks
	Work clothing			Replace before any evidence of deterioration. For periods of prolonged exposure to the product for professional/industrial users CE III is recommended, in accordance with the regulations in EN ISO 6529:2013, EN ISO 6530:2005, EN ISO 13688:2013, EN 464:1994.
	Anti-slip work shoes		EN ISO 20347:2012	Replace before any evidence of deterioration. For periods of prolonged exposure to the product for professional/industrial users CE III is recommended, in accordance with the regulations in EN ISO 20345:2012 y EN 13832-1:2007

F.- Additional emergency measures

Emergency measure	Standards	Emergency measure	Standards
 Emergency shower	ANSI Z358-1 ISO 3864-1:2011, ISO 3864-4:2011	 Eyewash stations	DIN 12 899 ISO 3864-1:2011, ISO 3864-4:2011

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SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION (continued)

Environmental exposure controls:

In accordance with the community legislation for the protection of the environment it is recommended to avoid environmental spillage of both the product and its container. For additional information see subsection 7.1.D

Volatile organic compounds:

With regard to Directive 2010/75/EU, this product has the following characteristics:

V.O.C. (Supply):	0,57 % weight
V.O.C. density at 20 °C:	5,72 kg/m ³ (5,72 g/L)
Average carbon number:	3,9
Average molecular weight:	71,87 g/mol

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

9.1 Information on basic physical and chemical properties:

For complete information see the product datasheet.

Appearance:

Physical state at 20 °C:	Liquid
Appearance:	Transparent
Colour:	 Green
Odour:	Characteristic
Odour threshold:	Non-applicable *

Volatility:

Boiling point at atmospheric pressure:	100 °C
Vapour pressure at 20 °C:	2354 Pa
Vapour pressure at 50 °C:	12400,07 Pa (12,4 kPa)
Evaporation rate at 20 °C:	Non-applicable *

Product description:

Density at 20 °C:	1000 kg/m ³
Relative density at 20 °C:	1
Dynamic viscosity at 20 °C:	Non-applicable *
Kinematic viscosity at 20 °C:	Non-applicable *
Kinematic viscosity at 40 °C:	Non-applicable *
Concentration:	Non-applicable *
pH:	7,6 (at 100 %)
Vapour density at 20 °C:	Non-applicable *
Partition coefficient n-octanol/water 20 °C:	Non-applicable *
Solubility in water at 20 °C:	Non-applicable *
Solubility properties:	Non-applicable *
Decomposition temperature:	Non-applicable *
Melting point/freezing point:	Non-applicable *

Flammability:

Flash Point:	Non Flammable (>60 °C)
Flammability (solid, gas):	Non-applicable *
Autoignition temperature:	255 °C
Lower flammability limit:	Non-applicable *
Upper flammability limit:	Non-applicable *

*Not relevant due to the nature of the product, not providing information property of its hazards.

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SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES (continued)

Particle characteristics:

Median equivalent diameter: Non-applicable

9.2 Other information:
Information with regard to physical hazard classes:

Explosive properties: Non-applicable *

Oxidising properties: Non-applicable *

Corrosive to metals: Non-applicable *

Heat of combustion: Non-applicable *

Aerosols-total percentage (by mass) of flammable components: Non-applicable *

Other safety characteristics:

Surface tension at 20 °C: Non-applicable *

Refraction index: Non-applicable *

*Not relevant due to the nature of the product, not providing information property of its hazards.

SECTION 10: STABILITY AND REACTIVITY

10.1 Reactivity:

No hazardous reactions are expected because the product is stable under recommended storage conditions. See section 7.

10.2 Chemical stability:

Chemically stable under the conditions of storage, handling and use.

10.3 Possibility of hazardous reactions:

Under the specified conditions, hazardous reactions that lead to excessive temperatures or pressure are not expected.

10.4 Conditions to avoid:

Applicable for handling and storage at room temperature:

Shock and friction	Contact with air	Increase in temperature	Sunlight	Humidity
Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

10.5 Incompatible materials:

Acids	Water	Oxidising materials	Combustible materials	Others
Avoid strong acids	Not applicable	Not applicable	Not applicable	Avoid alkalis or strong bases

10.6 Hazardous decomposition products:

See subsection 10.3, 10.4 and 10.5 to find out the specific decomposition products. Depending on the decomposition conditions, complex mixtures of chemical substances can be released: carbon dioxide (CO₂), carbon monoxide and other organic compounds.

SECTION 11: TOXICOLOGICAL INFORMATION

11.1 Information on toxicological effects:

The experimental information related to the toxicological properties of the product itself is not available

Dangerous health implications:

In case of exposure that is repetitive, prolonged or at concentrations higher than the recommended occupational exposure limits, adverse effects on health may result, depending on the means of exposure:

A- Ingestion (acute effect):

- Acute toxicity : Based on available data, the classification criteria are not met, however, it contains substances classified as dangerous for consumption. For more information see section 3.
- Corrosivity/Irritability: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.

B- Inhalation (acute effect):

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SECTION 11: TOXICOLOGICAL INFORMATION (continued)

- Acute toxicity : Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for inhalation. For more information see section 3.
- Corrosivity/Irritability: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.
- C- Contact with the skin and the eyes (acute effect):
 - Contact with the skin: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for skin contact. For more information see section 3.
 - Contact with the eyes: Produces eye damage after contact.
- D- CMR effects (carcinogenicity, mutagenicity and toxicity to reproduction):
 - Carcinogenicity: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for the effects mentioned. For more information see section 3.
IARC: propan-2-ol (3); Coumarin (3); (r)-p-mentha-1,8-diene (3)
 - Mutagenicity: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.
 - Reproductive toxicity: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.
- E- Sensitizing effects:
 - Respiratory: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous with sensitising effects. For more information see section 3.
 - Cutaneous: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.
- F- Specific target organ toxicity (STOT) - single exposure:

Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.
- G- Specific target organ toxicity (STOT)-repeated exposure:
 - Specific target organ toxicity (STOT)-repeated exposure: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.
 - Skin: Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.
- H- Aspiration hazard:

Based on available data, the classification criteria are not met, as it does not contain substances classified as dangerous for this effect. For more information see section 3.

Other information:

Non-applicable

Specific toxicology information on the substances:

Identification	Acute toxicity		Genus
Fatty alcohol ethoxylated	LD50 oral	500 mg/kg (ATEi)	
CAS: 160875-66-1	LD50 dermal	Non-applicable	
EC: 605-233-7	LC50 inhalation	Non-applicable	

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SECTION 12: ECOLOGICAL INFORMATION

The experimental information related to the eco-toxicological properties of the product itself is not available

12.1 Toxicity:

Not available

12.2 Persistence and degradability:

Not available

12.3 Bioaccumulative potential:

Not available

12.4 Mobility in soil:

Not available

12.5 Results of PBT and vPvB assessment:

Product fails to meet PBT/vPvB criteria

12.6 Other adverse effects:

Not described

SECTION 13: DISPOSAL CONSIDERATIONS

13.1 Waste treatment methods:

Code	Description	Waste class (Regulation (EU) No 1357/2014)
20 01 30	detergents other than those mentioned in 20 01 29	Non dangerous

Type of waste (Regulation (EU) No 1357/2014):

Non-applicable

Waste management (disposal and evaluation):

Consult the authorized waste service manager on the assessment and disposal operations in accordance with Annex 1 and Annex 2 (Directive 2008/98/EC). As under 15 01 (2014/955/EC) of the code and in case the container has been in direct contact with the product, it will be processed the same way as the actual product. Otherwise, it will be processed as non-dangerous residue. We do not recommended disposal down the drain. See paragraph 6.2.

Regulations related to waste management:

In accordance with Annex II of Regulation (EC) No 1907/2006 (REACH) the community or state provisions related to waste management are stated

Community legislation: Directive 2008/98/EC, 2014/955/EU, Regulation (EU) No 1357/2014

SECTION 14: TRANSPORT INFORMATION

Transport of dangerous goods by land:

With regard to ADR 2021 and RID 2021:

14.1 UN number: Non-applicable

14.2 UN proper shipping name: Non-applicable

14.3 Transport hazard class(es): Non-applicable

Labels: Non-applicable

14.4 Packing group: Non-applicable

14.5 Environmental hazards: No

14.6 Special precautions for user

Special regulations: Non-applicable

Tunnel restriction code: Non-applicable

Physico-Chemical properties: see section 9

Limited quantities: Non-applicable

14.7 Transport in bulk according to Annex II of Marpol and the IBC Code: Non-applicable

Transport of dangerous goods by sea:

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SECTION 14: TRANSPORT INFORMATION (continued)

With regard to IMDG 39-18:

- | | |
|---|----------------|
| 14.1 UN number: | Non-applicable |
| 14.2 UN proper shipping name: | Non-applicable |
| 14.3 Transport hazard class(es): | Non-applicable |
| Labels: | Non-applicable |
| 14.4 Packing group: | Non-applicable |
| 14.5 Marine pollutant: | No |
| 14.6 Special precautions for user | |
| Special regulations: | Non-applicable |
| EmS Codes: | |
| Physico-Chemical properties: | see section 9 |
| Limited quantities: | Non-applicable |
| Segregation group: | Non-applicable |
| 14.7 Transport in bulk according to Annex II of Marpol and the IBC Code: | Non-applicable |

Transport of dangerous goods by air:

With regard to IATA/ICAO 2021:

- | | |
|---|----------------|
| 14.1 UN number: | Non-applicable |
| 14.2 UN proper shipping name: | Non-applicable |
| 14.3 Transport hazard class(es): | Non-applicable |
| Labels: | Non-applicable |
| 14.4 Packing group: | Non-applicable |
| 14.5 Environmental hazards: | No |
| 14.6 Special precautions for user | |
| Physico-Chemical properties: | see section 9 |
| 14.7 Transport in bulk according to Annex II of Marpol and the IBC Code: | Non-applicable |

SECTION 15: REGULATORY INFORMATION

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

Candidate substances for authorisation under the Regulation (EC) No 1907/2006 (REACH): Non-applicable

Substances included in Annex XIV of REACH ("Authorisation List") and sunset date: Non-applicable

Regulation (EC) No 1005/2009, about substances that deplete the ozone layer: Non-applicable

Article 95, REGULATION (EU) No 528/2012: Non-applicable

REGULATION (EU) No 649/2012, in relation to the import and export of hazardous chemical products: Non-applicable

Regulation (EC) No 648/2004 on detergents:

In accordance with this regulation the product complies with the following:

The tensoactives contained in this mixture comply with the biodegradability criteria stipulated in Regulation (EC) n°648/2004 on detergents. The information to prove this is available to the relevant authorities of the Member States and will be shown to them by direct request or the request of a detergent manufacturer.

Relevant instructions for use:

Ready to use, aplicar el producto directamente en la superficie a limpiar.

Labelling for contents:

Component	Concentration interval
Non-ionic surfactants	% (w/w) < 5
Anionic surfactants	% (w/w) < 5
perfumes	

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SECTION 15: REGULATORY INFORMATION (continued)

Cleanright (www.cleanright.eu) © A.I.S.E.:



Keep away from children.



Keep away from eyes. If product gets into eyes rinse thoroughly with water.



Rinse hands after use.



People with sensitive or damaged skin should avoid prolonged contact with the product.

Seveso III:

Non-applicable

Limitations to commercialisation and the use of certain dangerous substances and mixtures (Annex XVII REACH, etc):

Shall not be used in:

- ornamental articles intended to produce light or colour effects by means of different phases, for example in ornamental lamps and ashtrays,
- tricks and jokes,
- games for one or more participants, or any article intended to be used as such, even with ornamental aspects.

Specific provisions in terms of protecting people or the environment:

It is recommended to use the information included in this safety data sheet as a basis for conducting workplace-specific risk assessments in order to establish the necessary risk prevention measures for the handling, use, storage and disposal of this product.

Other legislation:

The product could be affected by sectorial legislation

- Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products
- Regulation (EC) No 648/2004 of the European Parliament and of the Council of 31 March 2004 on detergents
- Commission Regulation (EC) No 907/2006 of 20 June 2006 amending Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents, in order to adapt Annexes III and VII
- Commission Regulation (EC) No 551/2009 of 25 June 2009 amending Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents, in order to adapt Annexes V and VI thereto (surfactant derogation)

15.2 Chemical safety assessment:

The supplier has not carried out evaluation of chemical safety.

SECTION 16: OTHER INFORMATION

Legislation related to safety data sheets:

The SDS shall be supplied in an official language of the country where the product is placed on the market. This safety data sheet has been designed in accordance with ANNEX II-Guide to the compilation of safety data sheets of Regulation (EC) No 1907/2006 (Regulation (EC) No 2015/830).

Modifications related to the previous Safety Data Sheet which concerns the ways of managing risks.:

Non-applicable

Texts of the legislative phrases mentioned in section 2:

H319: Causes serious eye irritation.

Texts of the legislative phrases mentioned in section 3:

The phrases indicated do not refer to the product itself; they are present merely for informative purposes and refer to the individual components which appear in section 3

CLP Regulation (EC) No 1272/2008:

Acute Tox. 4: H302 - Harmful if swallowed.

Eye Dam. 1: H318 - Causes serious eye damage.

Classification procedure:

Eye Irrit. 2: Calculation method

Advice related to training:

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SECTION 16: OTHER INFORMATION (continued)

Minimal training is recommended in order to prevent industrial risks for staff using this product and to facilitate their comprehension and interpretation of this safety data sheet, as well as the label on the product.

Principal bibliographical sources:

<http://echa.europa.eu>

<http://eur-lex.europa.eu>

Abbreviations and acronyms:

ADR: European agreement concerning the international carriage of dangerous goods by road

IMDG: International maritime dangerous goods code

IATA: International Air Transport Association

ICAO: International Civil Aviation Organisation

COD: Chemical Oxygen Demand

BOD5: 5day biochemical oxygen demand

BCF: Bioconcentration factor

LD50: Lethal Dose 50

LC50: Lethal Concentration 50

EC50: Effective concentration 50

LogPOW: Octanolwater partition coefficient

Koc: Partition coefficient of organic carbon

UFI: unique formula identifier

IARC: International Agency for Research on Cancer

The information contained in this safety data sheet is based on sources, technical knowledge and current legislation at European and state level, without being able to guarantee its accuracy. This information cannot be considered a guarantee of the properties of the product, it is simply a description of the security requirements. The occupational methodology and conditions for users of this product are not within our awareness or control, and it is ultimately the responsibility of the user to take the necessary measures to obtain the legal requirements concerning the manipulation, storage, use and disposal of chemical products. The information on this safety data sheet only refers to this product, which should not be used for needs other than those specified.

- END OF SAFETY DATA SHEET -

The Public Trust

The public trust is evergreen; every new day of injury or violation creates a new cause of action. “Public rights cannot be lost nor the public trust as to their administration and exercise be destroyed either by adverse possession or by laches or other negligence on the part of the agents of the state or municipality who may from time to time be invested with the duty of their protection and administration.” (*San Diego v. Cuyamaca Water Co.* (1930) 209 Cal. 105, 109.) Public agencies have a ministerial duty to consider the public trust interest, and mitigate harm when feasible, when making its daily decisions to divert water, by the operations and/or permitting of well extractions that impact the Napa River. (See *Envtl. Law Found. v. State Water Res. Control Bd.* (“*Envtl. Law Found.*”) (2018) 26 Cal.App.5th 844, 852.)

Once an appropriation is approved, “the public trust imposes a duty of continuing supervision over the taking and use of the appropriated water.” (*Nat’l Audubon Soc’y v. Superior Court* (“*Audubon*”) (1983) 33 Cal.3d 419, 424.) A public agency is “not confined by past allocation decisions that may be incorrect in light of current knowledge or inconsistent with current needs [and] accordingly has the power to reconsider allocation decisions even though those decisions were made after due consideration of their effect on the public trust.” (*Audubon*, supra, 33 Cal.3d 419, 424; see also *Cal. Trout v. State Water Res. Control Bd.* (1989) 207 Cal.App.3d 585, 629, stating that “the rule in section 5946 pertains to a public trust interest no private right in derogation of that rule can be founded upon the running of a statute of limitations, for the same reasons that one may not acquire an interest in public lands by means of adverse possession.”.)

[T]he determinative fact is the impact of the activity on the public trust resource. If the public trust doctrine applies to constrain fills which destroy navigation and other public trust uses in navigable waters, it should equally apply to constrain the extraction of water that destroys navigation and other public interests. Both actions result in the same damage to the public trust. The distinction between diversion and extraction is, therefore, irrelevant. The analysis begins and ends with whether the challenged activity harms a navigable waterway and thereby violates the public trust.

(*Envtl. Law Found.*, supra, 26 Cal.App.5th 844.)

Tributaries to navigable waterways are also subject to the public trust doctrine. For example, see Fish and Game Code section 711.7. (a) which states in part “The fish and wildlife resources are held in trust for the people of the state ...”

The public trust doctrine imposes independent and unavoidable obligations on trustee agencies overseeing groundwater extraction. California precedent makes clear that subdivisions of the state¹ have “a duty to consider the public trust interest² when making decisions impacting water that is imbued with the public trust,”³ and merely complying with CEQA does not discharge that duty.⁴

The public trust requires reconsideration of past or ongoing water use decisions where those decisions were made “without any consideration of the impact upon the public trust.”⁵ Thus, compliance with public trust duties is not discretionary, it is obligatory.

As Napa County is a legal subdivision of the state, it must deal with the trust property for the beneficiary’s⁶ benefit. No trustee can properly act for only some of the beneficiaries – for example the trustee must represent them all, taking into account any differing interests of the beneficiaries, or the trustee cannot properly represent any of them. (*Bowles v. Superior Court* (1955) 44 C2d 574.) This principle is in accord with the equal protection provisions of the Fourteenth Amendment to the US Constitution.

Furthermore, there can be no vested rights in water use that harm the public trust. Regardless of the nature of the water right in question, no water user in the State “owns” any water. Instead, a water right grants the holder thereof only the right to use water, a “usufructuary right”. The owner of “legal title” to all water is the State in its capacity as a trustee for the benefit of the public. Both riparian and appropriative rights are usufructuary only and confer no right of private ownership in the watercourse, which belongs to the State. (*People v. Shirokow* (1980) 26 Cal.3d 301 at 307.)

If at any time the trustee determines that a use of water other than the then current use would better serve the public trust, the State has the power and the obligation to reallocate that water in accordance with the public's interest. Even if the water at issue has been put to beneficial use (and relied upon) for decades, it can be taken from one user in favor of another need or use. The public trust doctrine therefore means that no water rights in California are “vested” in the traditional sense of property rights.

¹ *Env't L. Found. (ELF) v. State Water Res. Control Bd.* (SWRCB) (2018), 26 Cal. App. 5th 844, 868 (“Although the state as sovereign is primarily responsible for administration of the trust, the county, as a subdivision of the state, shares responsibility for administering the public trust and may not approve of destructive activities without giving due regard to the preservation of those resources.”) (internal quotation marks omitted).

² The Napa River and its tributaries, and the fish within those water ways, are protected public trust resources.

³ *Id.* at 863.

⁴ *Id.* at 868.

⁵ *Nat'l Audubon Soc'y v. Superior Ct.* (1983) 33 Cal. 3d 419, 426.

⁶ i.e. people of California

Fish & Game Code, section 1600 provides:

The Legislature finds and declares that the protection and conservation of the fish and wildlife resources of this state are of utmost public interest. Fish and wildlife are the property of the people and provide a major contribution to the economy of the state, as well as providing a significant part of the people's food supply; therefore their conservation is a proper responsibility of the state.

The California Department of Fish & Wildlife (CDFW):

... is California's Trustee Agency for the State's fish, wildlife, and plant resources. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitats necessary for biologically sustainable populations of those species. For the purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.
(<https://wildlife.ca.gov/Conservation/Environmental-Review/CEQA>.)

From: [ruralangwin](#)
To: [Atkins, Wendy](#)
Subject: Comments PUC C Store Car Wash Planning Commission agenda
Date: Sunday, May 4, 2025 12:44:51 PM

[External Email - Use Caution]

To Megan Dameron , Chair Napa County Planning Commission
& Napa County Planning Commissioners
1195 Third St.
Napa CA 94559

From: Kellie Anderson
Angwin CA

Dear Chair Dameron,

Pacific Union College provides many services in the Angwin community. Residents are welcome to use the pool, tennis courts, hiking trails and enjoy many on campus sponsored events such as Lunch and Learn and Yoga in partnership with Rianda House. In addition, PUC offers device charging stations, cooling stations and is the go to location for the PG& E PSPS Resource Center during power outages.

With respect to the importance of PUC and the public services it provides the Angwin community, please accept my comments on the proposed Pacific Union College convenience store replacement and new car wash major modification P23-00300-MOD. My comments are offered to provide suggested changes for an improved project outcome and to insure watershed health and respect for the unique community character of the Village of Angwin.

#1 Aesthetics and Community Character

The construction of the proposed 7-11 style convenience store and new car wash in Angwin, at the location of the burned gas station is out of keeping with the aesthetics and values of the Angwin community. While the rebuild of the gas station is long over due, the proposed plan puts a basic box full of snack foods squarely in the heart of funky little Angwin. The Community Character element of the General Plan notes "The mountains , hills and valleys in the eastern portion on the county have their own distinctive character." Located in the eastern mountains, Angwin has an ethereal, forested, nature based, village charm and construction as proposed, with vacuums and trash receptacles front and center is definitely not a positive step that residents, visitors or Napa County Planners will be proud of. The elevation sheets do not show the full project including the vacuum stations and pump stations. Elevations showing all structures from Howell Mountain Rd. must be prepared.

We can do better. Consider the gas station and small store in Yountville called Honor Market as a starting point for what this necessary gas station revisioning could be. Obviously the trash receptacles and vacuums must be relocated away from the front of the building. A condition of approval should be to retain and protect all trees during construction (fence) to the south and west that currently exist on the parcel. The

car wash should be deleted from the plan entirely. It's obviously too much in too small a parcel.

#2 Car Wash Waste Water Disposal

The project proposes to dispose of the car wash waste water in the existing PUC waste water treatment facility. Order # 91-162 Water Reclamation Requirements for Pacific Union College issued by the San Francisco Bay Regional Water Quality Control Board require that PUC (the discharger) notify the board in writing at least 60 days before making any material change in character or volume of waste water treatment and volume or disposal practices.

The PUC waste water treatment system serves not only the campus, market, dormitories, laundry and gas station but private homes off campus NOT owned by PUC. While most homes in Angwin are service by individual septic systems, any disruptions to the PUC wastewater system puts the Village of Angwin at risk and would constitute an environmental emergency as Conn Creek and hence Lake Hennessy are adjacent and down stream from the sewer ponds. It's a known fact to recreational users of the Linda Falls Land Trust Preserve that sewer odor and odd colored water is frequently observed during the rainy season in Conn Creek just down stream of the sewer treatment pond. What impacts will treated, recycled car wash effluent have on the sewer treatment system?

Despite the recycling of water and use of biodegradable soaps, the project is completely lacking in specifics on car wash water's ultimate fate in the Conn Creek Watershed (the water source for Lake Hennessy, City of Napa water reservoir.)

What are the other contaminants in car wash waste water such as grease, oil, hydrocarbon residues, heavy metals and potentially pesticides and fertilizers from washing farm trucks? Are these potential contaminants even discussed in the project documents? How will the change in character of the effluent with the additional burden of industrial wastes affect the bio digestion system? How will the addition of unknown car wash wastes affect the agricultural spray fields where wastes are discharged? How might these unknown industrial wastes affect soil microorganisms? How could this impact ground water wells upon which PUC depends? How might these chemicals potentially leach into nearby Conn Creek and Moore Creek? The project is silent on the watersheds into which these spray fields are located.

When was the last year that the agricultural spray fields were used as sewage disposal sites? Have the areas designated as agricultural spray fields in Order 91-162 been reduced in size by development of a vineyard?

Who will monitor the waste water for contamination which could change from day to day depending on the vehicles washed? Please provide a map of entire waste water treatment system, including spray fields and current 91-162 requirements and self monitoring program.

The project provides no specifics on the products used in the car wash and should include material safety data sheets (MSDS) and manufacturer's information for full evaluation of impacts of soaps and drying agents etc. to waste water treatment system operations.

The project documents should give specifics on the car wash recycled water storage and process tanks. Where are these tanks located? What are the details on the tie in to the waste water system? The tanks should be shown on the plan. Please note the storm drain system under the gas station is actually a culvert carrying the flow from a fork of Conn Creek, a relic of another time when putting a headwaters stream in a pipe under a gas station was considered progress!

Is this worth the risk to our watershed?

#3 Categorical Exemption is not supported

The project is not categorically exempt under class 2 as the car wash is a NEW PURPOSE and CAPACITY. NOT simply a reconstruction or replacement of the existing commercial structure. The project documents and even the title of the project all describe the project as a convenience store replacement and a NEW CAR WASH.

The project is NOT categorically exempt under Class 3 as it is unknown if the new car wash will involve use of a 'significant amounts of hazardous materials.' Project documents are silent on the chemicals used in car wash operations, its maintenance and upkeep, and potential chemicals contained in rinsate. Indeed the rinsate from vehicle washing may have different contaminants on a day to day basis.

#4 Noise.

Angwin is an amazing place where residents enjoy an incredible abundance of silence. Visitors often ask "What is that sound?" only to learn the sound is the wind in the trees! This precious quiet is an intangible quality of life in the Village of Angwin and is a quality we all very much seek to preserve.

You have all driven thru a car wash tunnel with vacuums whining out on the pavement. It's loud, it's unpleasant and it's definitely not something people should be exposed to 50 times a day up to 9 pm at night.

The project should be required to do a mock up of the sound impacts to sensitive receptors including private homes and the Brookside Park Apartments. Additionally the Planning Commissioners should be aware the project would impact the affordable housing site identified in the Napa County Housing Element, certified by HCD. Hundreds of new residents could be exposed to car wash noise should housing be built as planned. The noise mitigations have not been demonstrated adequately.

#5 The Project lacks meaningful effort to reduce Green House Emissions and appears to sidestep "green building" design.

The Voluntary Best Management Practices Checklist is left nearly blank! Construction of a new discretionary project in Napa County should have made some honest effort to reduce climate impacts which seem to be entirely lacking here. What are the expected cumulative contributions to green house gas from the project? How about an electric vehicle charging station? Solar Panels?

#6 Public Notice

Development projects in Angwin are unfortunately not noticed to the neighbors and interested community most likely impacted, due to the large amount of land owned by PUC. Nonetheless, neighbors will be impacted by this project who were not in the required 1,000 footnotice radius.

#7 Ground Water

Should a water availability analysis be provided as the new car wash relies on increased ground water extraction?

What does the General Plansay about rural ground water extraction and use? Please see General Plan Policy Con-51 and Con- 53.

Please accept these comments with the goal of developing a project thatuplifts Pacific Union College in financial sustainability while offering theAngwin community appropriately scaled services meeting our uniquecommunity needs.

This project can not be found to be categorically exempt and lacks necessary analysis of waste water discharge in effected watersheds. The project is oversized for the needs of the community and the car washshould be eliminated as the impacts are incompatible with the quaint,forested landscape of the Village of Angwin.

I urge the Planning Commission to deny the project and urge the applicant to develop a project in keeping with realistic local needs long standing community identity.

Kellie Anderson
Save Rural Angwin Steering Committee Member

5 May 2025

TO: Megan Dameron, Chair Napa County Planning Commission

TO: Napa County Planning Commissioners

1195 Third Street, Suite 210

Napa, CA 94559

SUBJECT: Objection to Proposed Angwin Car Wash Project (P23-00300-MOD)

Dear Chair Dameron,

Many cities and large urban areas have correctly viewed new car wash projects as what they truly are. The washing of trucks and cars using large, loud robotic machinery is an industrial process that should be relegated to industrial zones or very large commercial developments away from residential areas. Yes, there is a convenience to filling up and then pressing the YES button for a wash, but whining servo motors, high pressure pumps and spray, whirling brushes, 40HP dryer/blowers, vacuums and odors are in direct conflict with the goals and policies outlined throughout the Napa County General Plan and especially as it relates to Angwin. One person's convenience should not be another person's ever present and everlasting inconvenience. This is Golden Rule stuff.

So as longtime residents of Angwin, we write again to oppose the proposed car wash project directly adjacent to our home and within earshot of many others. For the eight years we have lived at 155 Edgewood Place we have cherished the tranquility of our hillside property overlooking Howell Mountain's forests and vineyards. This project threatens not only the peaceful enjoyment of our home and property, but the rural character that defines Angwin - a community the 2008 General Plan explicitly protects as a 'fundamental tenant' of Napa County's vision.

Presented below are the most significant failings of the applicant's proposal and our objections. For these reasons alone, the project should be denied, and we respectfully request the commission to do so.

1: Project is Grossly Mischaracterized:

Pacific Union College's stated purpose of this project masquerades as a "replacement C-store." The primary use of this building, right up until the day it was damaged by fire, has always been automotive repair and maintenance with its five large bays – a service far more in need than the current plans. The southeast corner had an approximately 150 sq. ft. office/counter for the fuel attendant between the hours of 7:00 am and 6:00 pm, closing earlier on Friday, closed Saturday. This small space also contained one small freestanding ice cream freezer, one free standing beverage cooler, one shelf with snacks, and a thermos to dispense coffee. A better

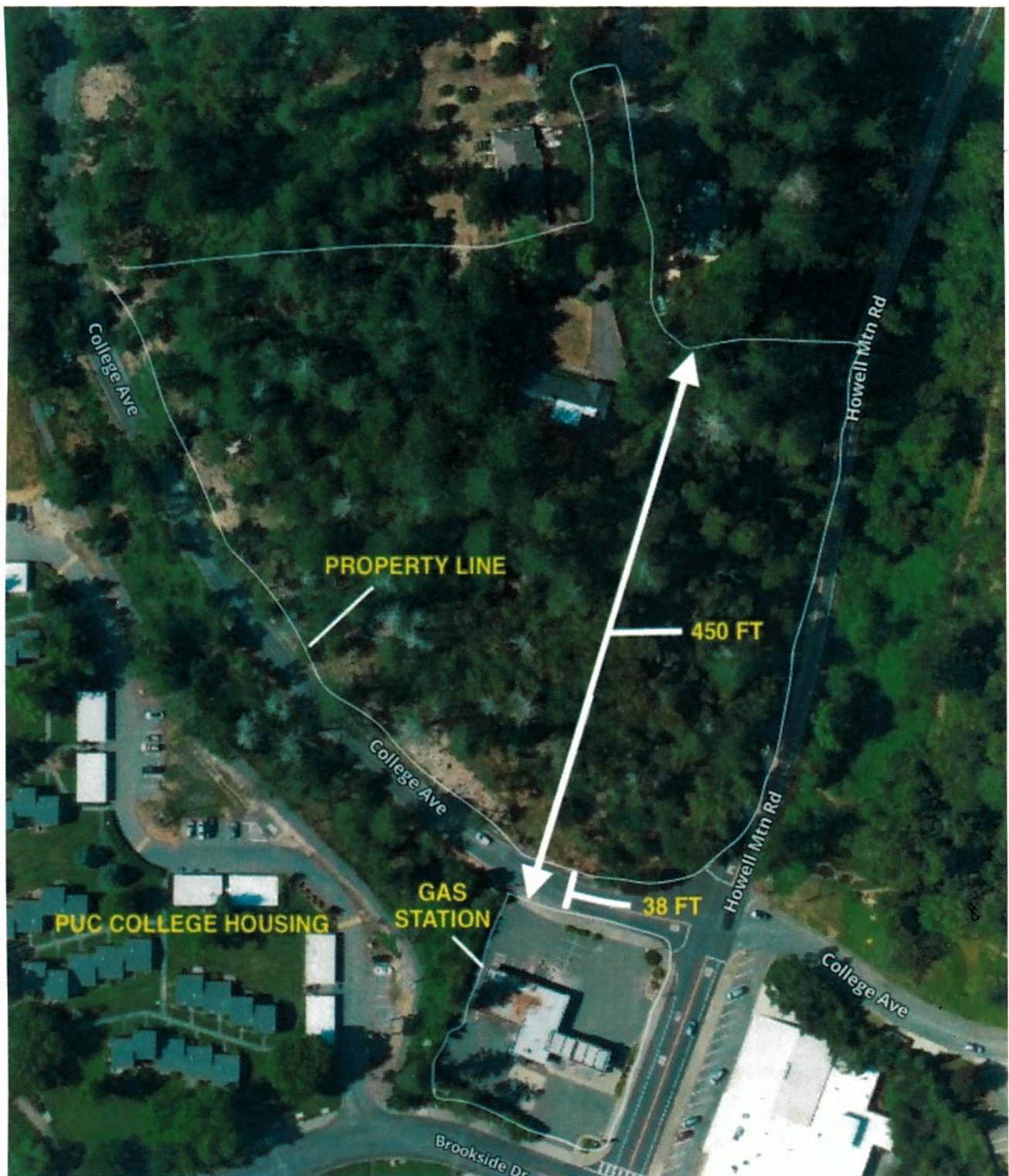
description would be a vending machine without the machine. The proposed 2,234 sq. ft. store constitutes nearly a **1,400% increase in floor area** from what was improperly characterized as a store in order to create a brand new (not addition to) facility – essentially a smaller version of PUC’s market just a stone’s throw away – a market that has plenty of easy parking. If this project was characterized correctly, would it be eligible to be exempt from CEQA review?

2: Residential Noise (primarily our residence):

In May 2024, we met with the college president to express our general objections. Long story short, while he acknowledged he “wouldn’t want a car wash this near his home either,” the college proceeded with plans. Several months later, we requested Wendy Atkins share any document submittals that could be made public. Ms. Atkins emailed PUC’s Acoustical Assessment dated September 9, 2024. Conspicuously, our property was all but omitted from the assessment which focused only on locations to the east, south, and west. In December, we submitted a letter of objection to Napa County then several months went by with no updates to the county’s project page. In a phone conversation, Ms. Atkins stated to me that all was quiet and the applicant was working on revisions to their application. On April 24th of this year, we were noticed of the public hearing. Applicants document package now includes a modified Acoustical Assessment dated April 15, 2025. This version now includes our home and estimates the noise levels at 49.1 dBA-a mere 0.9 decibel below Napa County’s 50 dBA daytime limit for rural residential areas. Also, important to note is the earlier assessment places the measurement location used at 425ft from the boundary and the revised assessment pushes it out to 450ft, perhaps to get the numbers to work.

But the analysis has two fundamental and fatal flaws:

First, Kimley-Horn, describes in its document how it measures a sensitive receptor on Page 8, Table 4 as “project site boundary to the sensitive receptor property line.” This method is consistent with Napa Code of Ordinances Section 8.16.070 A.4,5. This code (and other city codes county wide) is quite clear on measurement standards. Measurements to the two properties owned by the college appear to be accomplished using the correct method. Kimley-Horn then notes the distance to the single-family residence (ours) at 450ft from the project boundary. Curiously, this is closer to the location of the property line between our home and the neighbor to our north. The true distance from the project boundary to our property line is 38 feet give or take. SEE PHOTO NEXT PAGE



Secondly, adjustment for tonal/type noise must be applied to the noise limits: County code mandates a 5dBA reduction to the limit for steady, audible tones as well as intrusive noise (e.g., machinery hum at various octaves, on again/off-again noise). Automated car washes, drying fans, vacuums, commercial refrigeration and conditioning units produce these types of

industrial noise. The document ignores this requirement, and again attempts to minimize projected impacts to achieve a “no mitigation required” finding.

ESTIMATED CORRECTION: After making the -5dBA correction for the daytime noise category, the limit is now 45dbA - measured at the property line. Using Kimley-Horn’s stated noise levels and estimating methods, the blower noise level at the property line will likely be close to 70dBA - a limit exceedance of 25dBA. Keeping in mind that each 10 decibels represent a 10-fold increase in noise, it is obvious that much mitigation will be necessary for this project to be approved. This standard is also applicable to the vacuums, mechanical noise from the industrial robotic carwash, high pressure water spray, climate control system, and the roof mounted commercial refrigeration units. Each of these devices should be analyzed and tested individually and together in all practical combinations that could exist.

NOTE: Because our property sits on the hillside just above the gas station, special consideration will be required to ensure noise level limits are maintained at the property lines vertical projection.

3: Angwin’s Unique Local Acoustics

Most of the ambient noise in Angwin is generated by PUC. A cogeneration plant that provides electricity and steam to the campus produces an ever-present hum. Understanding that this is a brilliant solution for the needs of the college and because we knew it was there before we bought our present home – it would never occur to us to complain about this noise. For us, complaining about this noise, the infrequent airport noise, the refrigeration units atop the market and on other nearby college buildings, would be akin to complaining about vineyard wind machines. We don’t and will not. We are however vehemently opposed to adding new, very loud and obnoxious noise that by no definition serves any essential needs of the greater community. And remember, a few hundred feet away, PUC operates a market that more than serves the needs of the local population.

But aside from our very personal impacts from the proposed project, we are also long-standing members of the greater community of Angwin and share in the concerns many others have about this project and other unwanted noise. Angwin has unique acoustical characteristics that are likely due to being surrounded by steep slopes, reflectivity from the many college structures, and other environmental factors. From our house, for instance, on clear mornings we can hear the whacking of tennis balls on the campus courts 700+ yards away. Around 600 yards to the east the corals where cattle are fed, we hear the mooing loudly. We can sometimes hear the laughter on the campus and when very quiet, we can just hear normal conversation at the gas station. There is also abundant wildlife to be heard on Howell Mountain. We mention these things to illustrate how quiet Angwin is normally. In the past few years, with powerline and tree crews ever present, coupled now with undergrounding efforts, Angwin is very busy and noisy during the day. Presumably, this work will one day be completed, and quiet life will resume.

Takeaway: Angwin is normally quiet. Angwin has unique acoustical elements that must not be overlooked. If a car wash is approved, many homes and many college students living in PUC housing will be negatively affected by the noise.

4. Incompatibility with Community Character

The 2008 General Plan's Community Character Element prioritizes preserving Angwin's "rural, agriculture-based" identity. As Kellie Anderson has outlined in her objections, this project aligns more with urban Napa than a village surrounded by protected watersheds and vineyards. The monolithic building as currently modeled is better suited for an off-ramp fueling station on Interstate 5. It will stick out like a sore thumb.

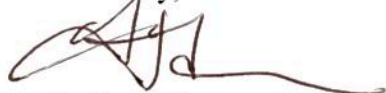
Request for Action

We urge the Commission to:

1. Reject the current noise study's findings as non-compliant with County Code §§8.16.060–8.16.080 and suspend or deny approval until applicant plans to engineer, demonstrate, and verify compliance.
2. Deny the project as currently submitted as not compliant with the spirit of Napa County's General Plan, Community Character Goals and Policies, and urge the applicant to develop a project in keeping with local needs and Angwin's community values.

Our family's quiet future and Angwin's rural soul hang in the balance. There are numerous factors to this project and short notice to cover them all. We therefore incorporate our 12/31/24 letter (attached) and the points raised in Kellie Anderson's comments to our position. The common thread we share: We all want the college to thrive but a large convenience store and car wash are flat out wrong for Angwin.

Sincerely,



Andrew Greene



Michele Parr

155 Edgewood Place, Angwin, CA 94508

Attachment: Letter to Planning Department, 31 DEC 24

CONVENIENCE STORE

1. PUC already operates a market/convenience store several hundred yards from the proposed site with plenty of parking.
2. The proposed store will have new industrial/commercial roof mounted refrigeration units that will add additional noise to the area. We and others in our neighborhood whose homes are above the proposed store will be impacted most.
3. Additional traffic to/from the store will create additional noise that is new. This will come in the form of increased accelerations, decelerations, door slamming, and other general noise.

The potential for noise pollution related to this proposal is particularly troubling. Studies have shown that sustained noise levels from car washes can exceed acceptable limits, leading to detrimental health effects and decreased property values. Courts have ruled against proposed car wash facilities due to excessive noise levels that would negatively impact nearby residential areas. Rulings have emphasized the need for local governments to consider community health and well-being when approving such developments. Moreover, the odors associated with the chemicals used in car washes can significantly detract from the residential character of any neighborhood. The California Environmental Quality Act (CEQA) mandates that local governments assess the potential impact of such facilities on nearby communities, including air quality and odors.

Lastly, a car wash is not an essential requirement for daily life. While we understand the *desire* for modern conveniences, if PUC believes that an automated car wash is essential for its students and the community, it has several locations on its property that would have far less impact on us and others. PUC has stated to us that its only profitable commercial operation is fuel sales and they've been told that car washes are typically profitable. This seems a poor reason to approve a project that will have only negative effects on us and others if built in this location.

Given these concerns, we strongly urge the Planning Division to reconsider the location of this automated car wash. Such facilities are more appropriately situated in industrial zones where noise and odor will have minimal impact on a small residential community.

We reserve the right to raise additional objections as they become known. We are also currently exploring any legal remedies to protect the peaceful enjoyment of our property and interests. Please inform us of any new submissions by the applicant and intentions of your office so we may respond. We are able to discuss our concerns at your convenience.

We hope you will take these concerns into serious consideration.

Sincerely,

Two handwritten signatures in blue ink. The first signature is on the left, and the second is on the right.

Andrew Greene and Michele Parr Greene, 155 Edgewood Place, Angwin, CA 94508

Planning, Building & Environmental Services - Napa County
1195 Third Street, Suite 210
Napa, CA 94559
Attn: Wendy Atkins, Planner II
SENT BY: USPS and email (wendy.atkins@countyofnapa.org)

DATE: DECEMBER 31, 2024

SUBJECT: P23-00300-MOD; C-Store Replacement and New Car Wash
111 Howell Mountain Road, Angwin, CA: APN 024-400-001

We have received the New Project Submittal Courtesy Notice (October 21, 2024) and write to you to formally object to this project and request you that deny the application as currently proposed for the following reasons:

CAR WASH

1. The proposed car wash introduces *several new sources* of noise near sensitive receptors including housing, rural residential, and wildlife. The industrial nature of this type of equipment will create nuisance conditions that did not exist with the former site uses. The magnitude of this new noise will be intensified by local landscape as hilly topography attenuates noise differently than plain topography.
2. The starting and stopping of car wash rinse, wash, mechanical noise and in particular dryer/blower noise will create intermittent and repeated nuisance noise throughout the day. These nuisance conditions will be very noticeable and disturbing.
3. Many residents will be impacted by the noise including residents in PUC housing, residents on Brookside Ave, but none so severe as our home and property. We are located directly across College Avenue, roughly 350 feet to the north and approximately 100 feet in elevation above the site.
4. The noise will impact the quiet nature of Angwin for no reason other than small financial benefit to PUC. PUC already contributes most of the noise to Angwin with its steam plant, commercial refrigeration, and in recent years the addition of a co-generation plant. All of these steady noise sources contribute to a low, but distinguishable hum heard from numerous locations throughout the area.
5. The hillside directly across from the site is home to fox, deer, bobcat, and other animal life. Owls and many species of birds are also present. This habitat should be protected from unnecessary noise.
6. PUC proposes two vacuum stations. These notoriously emit loud, high pitched and obnoxious noise. The location of these vacuum units are even closer to our home than the car wash.

Just when we had begun to reconcile ourselves to the eyesore of the scorched, blackened, boarded-up Chevron Station at College and Howell Mountain Road, we learned that Pacific Union College hopes to remodel and expand the gas station site by adding a large convenience store and a tunnel carwash. Certainly we are not against improvement of the site, which at present qualifies as an incongruous example of urban blight. However, we hope that the County will make a very careful examination of the possible adverse effects of a new and larger business at that location.

We have looked over the graphics and the estimates of noise and traffic effects provided by the applicants. We ourselves are not qualified to judge whether these are complete or accurate. We hope that this can be a profitable enterprise serving the Angwin community, but we do have some misgivings.

First, noise. The reports show no problem found with possible harmful noise effects, but levels of noise predicted are quite close to levels considered beyond acceptable limits. We wonder if qualified personnel measured whether noise and increased exhaust would rise up the hillside across College Avenue, disturbing residents and reducing property values not very far uphill from the proposed carwash. The vacuum cleaning machines are set to be located right at the foot of that hill. Could they be moved elsewhere? In addition, the car waiting area and the mouth of the carwash tunnel face that same hill.

Second, although we understand that the chemical effluents and oil residues scrubbed in recycling from the carwash wastewater will be handled by Pacific Union College's wastewater treatment plant, we don't feel fully confident that the treatment plant is capable of handling any new burdens. Like other longtime Angwin residents, we have long

suspected that the plant is already overloaded. There is often overflow in the rainy season, and residents have complained of unpleasant odors and discoloration of water in Conn Creek and even at Linda Falls. It could be that improvements have been made to the wastewater treatment plant in recent years, but we would all feel more comfortable if there could be a more comprehensive investigation than the short blurb in the County report seems to show. (p. 3, item #8)

Finally, the planned hours of operation don't seem to fit our community. Early morning noise is especially annoying, and, in addition, the convenience store being open until 10 PM could possibly end in the store being a magnet for unwanted outsiders congregating at night. Angwin is a rural community and it is usual for the whole area around the college to be practically deserted after 8 or 9 PM. We can see the stars in the night sky and we are not willing to give that up for "convenience" or cleaner cars.

In closing, we wish the College well and hope that this project can move forward with proper vetting and concern for the Angwin community.

Sincerely,
John and Marsa Tully
Howell Mountain Road
Angwin

From: [MeetingClerk](#)
To: [Atkins, Wendy](#); [Parker, Michael](#); [Gallina, Charlene](#); [Anderson, Laura](#)
Cc: [Ramirez Vega, Angelica](#)
Subject: FW: Comment for Pacific Union College car wash proposal
Date: Monday, May 5, 2025 4:54:03 PM
Attachments: [image001.png](#)

Hi Wendy,

Please find public comment for C-Store below.

Kindly,



Alexandria Quackenbush
Administrative Secretary II
Planning, Building, & Environmental Services
Napa County
Phone: (707) 253-4417
1195 Third Street, Suite 210
Napa, CA 94559
www.countyofnapa.org

From: Dameron, Megan <megan.dameron@countyofnapa.org>
Sent: Monday, May 5, 2025 4:27 PM
To: MeetingClerk <MeetingClerk@countyofnapa.org>
Subject: Fw: Comment for Pacific Union College car wash proposal

FYI

Get [Outlook for iOS](#)

From: mike hackett <mhackett54@gmail.com>
Sent: Monday, May 5, 2025 11:59:05 AM
To: www.clerkoftheboard@countyofnapa.org <www.clerkoftheboard@countyofnapa.org>;
Dameron, Megan <megan.dameron@countyofnapa.org>
Subject: Comment for Pacific Union College car wash proposal

[External Email - Use Caution]

I will not repeat that which has already been written to you about the project regarding noise, the aesthetics, the GHG of an expanded facility from gasoline sales, etc., but the

one most important and salient point that must be included in the Conditions of Approval is missing from the packet.

The new enterprise will likely be successful and an important factor is the traffic to/from Lake Berryessa. This facility and its car wash will entertain fluids beyond the dirt on any automobile. All kinds of toxic materials will be washed off the boats and trailers and vehicles utilizing this car wash. WITHOUT DOCUMENTATION FROM THE REGULATORY AGENCY, THE REGIONAL WATER QUALITY CONTROL BOARD, THIS CANNOT BE APPROVED.

I am personally appalled that this most important aspect has been ignored. The cleaning materials mentioned that will be used is far too generic and the fish in Conn Creek deserve to keep their habitat clean and clear. When the regulatory agency chimes in with their concerns and mandated procedures, then and only then can this move forward.

Help us keep Angwin's waterway clean as it eventually flows into the reservoir that supplies the City of Napa with up to 60% of its drinking water. The County is the lead agency, not the regulatory agency and without comment from CDFW and WQCB, this project is not ready for approval.

Mike Hackett
282 White Cottage Rd. S
Angwin, Ca. 94508
707 738-0273

From: [MeetingClerk](#)
To: [Atkins, Wendy](#); [Parker, Michael](#); [Anderson, Laura](#); [Morrison, Dana](#)
Cc: [Ramirez Vega, Angelica](#)
Subject: FW: Re Pacific Union College Use Permit P23 00300 MOD
Date: Monday, May 5, 2025 1:46:00 PM

Hi Wendy,

Please see below public comment.

Napa
County – Meeting Clerk – AQ
Planning, Building, &
Environmental Services
Napa County

Phone: (707) 253-4417
Email: meetingclerk@countyofnapa.org

1195 Third Street, Suite
210
Napa, CA 94559

www.countyofnapa.org

-----Original Message-----

From: Randy Dunn <randy@dunnvineyards.com>
Sent: Monday, May 5, 2025 1:02 PM
To: MeetingClerk <MeetingClerk@countyofnapa.org>
Subject: Re Pacific Union College Use Permit P23 00300 MOD

[External Email - Use Caution]

As a 45year resident of Angwin, I thought that you should be aware that there is a blue line creek, Conn Creek, about 300 yards down from this proposed project. There are trout in this creek and have been since we moved to Angwin. I have spoken with Mr Heier and he has assured me that contamination of the water way will not happen. Just be forewarned.

Randall Dunn
805 White Cottage Rd
Angwin
Sent from my iPad