Product: FLOWSEAL EPW CLEAR BASE A Date Printed: 08/07/2021

Safety Data Sheet according to Regulation (EC) 'No. 2015/830















SECTION 1: Identification of the Substance/Mixture and the Company/Undertaking

FLOWSEAL EPW CLEAR BASE A **Revision Date:** 08/07/2021 1.1 Product Identifier

Supersedes Date: 20/09/2018 Flowseal EPW Clear Base A **Product Name:**

G252-70E2-5005-FNAV **UFI Code:**

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

Component of multicomponent coatings - Professional use only. Coatings and paints, thinners, paint removers. Manual activities involving hand contact. Widespread use leading to inclusion into/onto article (indoor). Widespread use leading to inclusion into/onto article (outdoor). For use by appropriately trained applicators. Roller application or brushing. Advised against: Home DIY applications. Advised against: Spray application, because of the additional hazards.

1.3 Details of the supplier of the safety data sheet

> Flowcrete Polska Sp. z o. o. Manufacturer:

UI. Marywilska 34 03-228 Warszawa

Polska

Tel: +48 22 879 8907 Fax: +48 22 879 8918 ehs.uk@flowcrete.com www.flowcrete.com.pl/

ehs.uk@flowcrete.com **Datasheet Produced by:**

1.4 Emergency telephone number: CHEMTREC +1 703 5273887 (Outside US)

Giftinformasjonen: +47 22 59 13 00

SECTION 2: Hazard Identification

2.1 Classification of the substance or mixture

Classification according to Classification, Labeling & Packaging Regulation (EC) 1272/2008

HAZARD STATEMENTS

Other EU extensions	EUH205
Skin Irritation, category 2	H315
Skin Sensitizer, category 1	H317
Hazardous to the aquatic environment, Chronic, category 3	H412

2.2 Label elements

Date Printed: 08/07/2021

Symbol(s) of Product



Signal Word

Warning

Named Chemicals on Label

Formaldehyde, oligomeric reaction product with 1-chloro-2,3-epoxypropane and phenol, Reaction product: bisphenol-A-(epichlorhydrin) epoxy resin (number average molecular weight ≤ 700)

HAZARD STATEMENTS

Other EU extensions	EUH205	Contains epoxy constituents. May produce an allergic reaction.
Skin Irritation, category 2	H315	Causes skin irritation.
Skin Sensitizer, category 1	H317	May cause an allergic skin reaction.
Hazardous to the aquatic environment, Chronic, category 3	H412	Harmful to aquatic life with long lasting effects.
PRECAUTION PHRASES		
	P261	Avoid breathing dust/fume/gas/mist/vapours/spray.
	P273	Avoid release to the environment.
	P280	Wear protective gloves/protective clothing/eye protection/ face protection.
	P302+352	IF ON SKIN: Wash with plenty of soap and water.
	P305+351+338	IF IN EYES: Rinse cautiously with water for several minutes.
		Remove contact lenses, if present and easy to do so.
		Continue rinsing.
	P333+313	If skin irritation or rash occurs: Get medical advice/attention.
	P391	Collect spillage.

2.3 Other hazards

Ingestion may cause irritation to mucous membranes.

Results of PBT and vPvB assessment:

The product does not meet the criteria for PBT/VPvB in accordance with Annex XIII.

SECTION 3: Composition/Information On Ingredients

3.2 Mixtures

Lozor	daula	inara	dianta
Hazar	uous	iligre	uienis

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Name According to EEC	EINEC No.	CAS-No.	<u>%</u>	<u>Classifications</u>	
Reaction product: bisphenol-A- (epichlorhydrin) epoxy resin (number average molecular weight ≤ 700)	500-033-5	25068-38-6	2.5 - <10	H315-317-319-411	Aquatic Chronic 2, Eye Irrit. 2, Skin Irrit. 2, Skin Sens. 1
1-Methoxy-2-propanol	203-539-1	107-98-2	2.5 - <10	H226-336	Flam. Liq. 3, STOT SE 3 NE
Benzyl alcohol	202-859-9	100-51-6	2.5 - <10	H302-332	Acute Tox. 4 Inhalation, Acute Tox. 4 Oral
Formaldehyde, oligomeric reaction product with 1- chloro-2,3- epoxypropane and phenol	500-006-8	9003-36-5	2.5 - <10	H315-317-411	Aquatic Chronic 2, Skin Irrit. 2, Skin Sens. 1

CAS-No.	M-Factors	REACH Reg No.
25068-38-6		01-2119456619-26
107-98-2		01-2119457435-35
100-51-6		01-2119492630-38
9003-36-5		01-2119454392-40

Additional Information: The text for CLP Hazard Statements shown above (if any) is given in Section 16.

SECTION 4: First-aid Measures

4.1 Description of First Aid Measures

GENERAL NOTES: When symptoms persist or in all cases of doubt seek medical advice. Show this safety data sheet to the doctor in attendance.

AFTER INHALATION: Remove person to fresh air. If signs/symptoms continue, get medical attention.

AFTER SKIN CONTACT: Use a mild soap if available. Do not use solvent or thinners to clean skin. Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. If skin irritation persists, call a physician. **AFTER EYE CONTACT:** Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Remove contact lenses. If eye irritation persists, consult a specialist.

AFTER INGESTION: Consult a physician. Gently wipe or rinse the inside of the mouth with water. Give small amounts of water to drink. Never give anything by mouth to an unconscious person. If swallowed, DO NOT induce vomiting unless directed to do so by medical personnel.

Self protection of the first aider:

Date Printed: 08/07/2021

No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

4.2 Most important symptoms and effects, both acute and delayed

May cause sensitization by skin contact. Irritating to eyes and skin.

4.3 Indication of any immediate medical attention and special treatment needed

Treat symptomatically. No information available on clinical testing and medical monitoring. Specific toxicological information on substances, if available, can be found in section 11.

SECTION 5: Fire-fighting Measures

5.1 Extinguishing Media:

Carbon Dioxide, Dry Chemical, Foam, Water Fog

FOR SAFETY REASONS NOT TO BE USED: Do not use a solid water stream as it may scatter and spread fire. Alcohol, Alcohol based solutions, any other media not listed above.

5.2 Special hazards arising from the substance or mixture

In case of fire hazardous decomposition products may be produced such as: Carbon monoxide, carbon dioxide and unburned hydrocarbons (smoke).

5.3 Advice for firefighters

Keep containers and surroundings cool with water spray. In the event of fire, wear self-contained breathing apparatus. Do not use a solid water stream as it may scatter and spread fire. Hazardous decomposition products formed under fire conditions. Collect contaminated fire extinguishing water separately. This must not be discharged into drains.

SECTION 6: Accidental Release Measures

6.1 Personal precautions, protective equipment and emergency procedures

Avoid contact with skin, eyes and clothing. For personal protection see section 8.2. Ensure adequate ventilation. Keep people away from and upwind of spill/leak.

6.2 Environmental precautions

Discharge into the environment must be avoided. Do not allow material to contaminate ground water system. Prevent product from entering drains. Local authorities should be advised if significant spillages cannot be contained. May cause long-term adverse effects in the aquatic environment.

6.3 Methods and material for containment and cleaning up

Prevent further leakage or spillage if safe to do so. Contain spillage, soak up with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and transfer to a container for disposal according to local / national regulations (see section 13).

6.4 Reference to other sections

FURTHER INSTRUCTIONS: Please refer to EU disposal requirements or country specific disposal requirements for this material. See Section 13 for further information. Refer to protective measures listed in sections 7 and 8.

SECTION 7: Handling and Storage

7.1 Precautions for safe handling

People handling epoxy products must have received special training according to guidelines from the National Occupational Health and Safety Board. Wear personal protective equipment. Avoid contact with skin and eyes. Apply technical measures to comply with the occupational exposure limits (see section 8).

Repeated or prolonged skin contact may cause skin irritation and/or dermatitis and sensitization of susceptible persons. In the case of sensitisation to any of the ingredients, it is inadvisable to work with the product. Handle in accordance with good industrial hygiene and safety practice. Keep working clothes separately. Keep away from food, drink and animal feedingstuffs. Wash hands before breaks and at the end of workday. When using, do not eat, drink or smoke.

7.2 Conditions for safe storage, including any incompatibilities

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CONDITIONS TO AVOID: Avoid temperatures above 40 °C, direct sunlight and contact with sources of heat. Do not freeze. **STORAGE CONDITIONS:** Keep out of the reach of children. Keep at temperatures between 10 and 25 °C. Keep container tightly closed in a dry and well-ventilated place. Keep away from food, drink and animal feeding stuffs.

7.3 Specific end use(s)

Component of multicomponent coatings. The mixing and application to be in accordance with the technical data sheets.

SECTION 8: Exposure Controls/Personal Protection

8.1 Control parameters

Ingredients with Occupational Exposure Limits (UK WELS)

<u>Name</u>	CAS-No.	LTEL ppm	STEL ppm	STEL mg/m3	LTEL mg/m3
Reaction product: bisphenol-A- (epichlorhydrin) epoxy resin (number average molecular weight ≤ 700)	25068-38-6				
1-Methoxy-2-propanol	107-98-2	100	150	560	375
Benzyl alcohol	100-51-6				
Formaldehyde, oligomeric reaction product with 1-chloro-2,3-epoxypropane and phenol	9003-36-5				

<u>Name</u>	CAS-No.	OEL Note
Reaction product: bisphenol-A- (epichlorhydrin) epoxy resin (number average molecular weight ≤ 700)	25068-38-6	
1-Methoxy-2-propanol	107-98-2	Can be absorbed through the skin.
Benzyl alcohol	100-51-6	
Formaldehyde, oligomeric reaction product with 1-chloro-2,3-epoxypropane and phenol	9003-36-5	

FURTHER ADVICE: Refer to the regulatory exposure limits for the workforce enforced in each country. Some components may not have been classified under the EU CLP Regulation.

8.2 Exposure controls

Personal Protection

RESPIRATORY PROTECTION: No personal respiratory protective equipment normally required. In case of insufficient ventilation wear suitable respiratory equipment, filter A.

EYE PROTECTION: Eye wash bottle with pure water. Safety glasses with side-shields conforming to EN 166.

HAND PROTECTION: Protective gloves complying with EN 374: Nitrile rubber. Butyl rubber. PVA. Gloves should be discarded and replaced if there is any indication of degradation or chemical breakthrough. Take note of the information given by the producer concerning permeability and break through times, and of special workplace conditions (mechanical strain, duration of contact). Be aware that in daily use the durability of a chemical resistant protective glove can be notably shorter than the break through time measured according to EN 374, due to the numerous outside influences (e.g. temperature). Long sleeved clothing. Remove and wash contaminated clothing before re-use.

OTHER PROTECTIVE EQUIPMENT: Ensure that eyewash stations and safety showers are close to the workstation location.

ENGINEERING CONTROLS: Ensure adequate ventilation, especially in confined areas.

Chemical Name:

Reaction product: bisphenol-A-(epichlorhydrin) epoxy resin (number average molecular weight ≤ 700)

EC No.: CAS-No.: 500-033-5 25068-38-6

DNELs - Derived no effect level

	Workers				Consumers			
Route of	Acute effect	Acute effects	Chronic effects	Chronic effects	Acute effect	Acute effects	Chronic effects	Chronic effects
Exposure	local	systemic	local	systemic	local	systemic	local	systemic
Oral	Not required				0.75 mg/kg		0.75 mg/kg	
Inhalation		12.25 mg/m ³		12.25 mg/m ³				
Dermal		8.33 mg/kg		8.33 mg/kg		3.571 mg/kg		3.571 mg/kg

PNEC's - Predicted no effect concentration

Environmental protection target	PNEC
Fresh water	0.006 mg/l
Fresh water sediments	0.996 mg/kg
Marine water	0.0006 mg/l
Marine sediments	0.0996 mg/kg
Food chain	
Microorganisms in sewage treatment	10 mg/l
soil (agricultural)	0.196 mg/kg
Air	

Chemical Name:

1-Methoxy-2-propanol

EC No.: CAS-No.: 203-539-1 107-98-2

DNELs - Derived no effect level

		Wo	rkers		Consumers			
Route of	Acute effect	Acute effects	Chronic effects	Chronic effects	Acute effect	Acute effects	Chronic effects	Chronic effects
Exposure	local	systemic	local	systemic	local	systemic	local	systemic
Oral	Not required						33 mg/kg	
Inhalation	533.5 mg/m3	533.5 mg/m3		369 mg/m3				43.9 mg/m3
Dermal		-		183 mg/kg				78 mg/kg

PNEC's - Predicted no effect concentration

Environmental protection target	PNEC
Fresh water	10 mg/l
Fresh water sediments	52.3 mg/kg
Marine water	1 mg/l
Marine sediments	5.2 mg/kg
Food chain	
Microorganisms in sewage treatment	100 mg/l
soil (agricultural)	2.47 mg/kg
Air	

Chemical Name:

Benzyl alcohol

EC No.: CAS-No.: 202-859-9 100-51-6

DNELs - Derived no effect level

		Wo	rkers		Consumers			
Route of	Acute effect	Acute effects	Chronic effects	Chronic effects	Acute effect	Acute effects	Chronic effects	Chronic effects
Exposure	local	systemic	local	systemic	local	systemic	local	systemic
Oral	Not required				20 mg/kg bw/d		4 mg/kg bw/d	
Inhalation	-	110 mg/m ³	-	22 mg/m³	-	27 mg/m ³	-	5.4 mg/m ³
Dermal	-	40 mg/kg bw/d	-	8 mg/kg bw/d	-	20 mg/kg bw/d	-	4 mg/kg bw/d

PNEC's - Predicted no effect concentration

Environmental protection target	PNEC
Fresh water	1 mg/l
Fresh water sediments	5.27 mg/kg
Marine water	0.1 mg/l
Marine sediments	0.527 mg/kg
Food chain	
Microorganisms in sewage treatment	39 mg/l
soil (agricultural)	0.456 mg/kg
Air	

Chemical Name:

Formaldehyde, oligomeric reaction product with 1-chloro-2,3-epoxypropane and phenol

EC No.: CAS-No.: 500-006-8 9003-36-5

DNELs - Derived no effect level

	Workers		Consumers					
Route of	Acute effect	Acute effects	Chronic effects	Chronic effects	Acute effect	Acute effects	Chronic effects	Chronic effects
Exposure	local	systemic	local	systemic	local	systemic	local	systemic
Oral	Not required					6.25 mg/kg bw/d		
Inhalation				29.39 mg/m ³				8.7 mg/m ³
Dermal				104.15 mg/kg				62.5 mg/kg bw/d
				bw/d				

PNEC's - Predicted no effect concentration

Environmental protection target	PNEC
Fresh water	0.003 mg/l
Fresh water sediments	0.294 mg/kg
Marine water	0.0003 mg/l
Marine sediments	0.0294 mg/kg
Food chain	
Microorganisms in sewage treatment	10 mg/l
soil (agricultural)	0.237 mg/kg
Air	

SECTION 9: Physical and Chemical Properties

9.1 Information on basic physical and chemical properties Appearance: white

Physical State Liquid
Odor slight

Odor threshold Not determined

pH 7-9

Melting point / freezing point (°C)

Boiling point/range (°C)

100 - N.D.

Flash Point, (°C)

>100

Evaporation rate Not determined

Flammability (solid, gas) Not determined

Upper/lower flammability or explosive

limits

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999 - 0

Vapour Pressure Not determined
Vapour density Not determined

Relative density ca. 1.1

Solubility in / Miscibility with water Soluble

Partition coefficient: n-octanol/water

Auto-ignition temperature (°C)

Not determined

Not determined

Not determined

Not determined

Viscosity

ca. 110-150 (cP)

Explosive properties

Not explosive

Oxidising properties

Not Applicable

9.2 Other information

VOC Content g/l: <60

Specific Gravity (g/cm3) 0.120

SECTION 10: Stability and Reactivity

10.1 Reactivity

No reactivity hazards known under recommended storage and use conditions.

10.2 Chemical stability

No decomposition if stored and applied as directed.

10.3 Possibility of hazardous reactions

Amines cause exothermic reactions.

10.4 Conditions to avoid

Avoid temperatures above 40 °C, direct sunlight and contact with sources of heat. Do not freeze.

10.5 Incompatible materials

Oxidizing agents. Acids and bases.

10.6 Hazardous decomposition products

In case of fire **hazardous decomposition products** may be produced such as: Carbon monoxide, carbon dioxide and unburned hydrocarbons (smoke). No decomposition if stored and applied as directed.

SECTION 11: Toxicological Information

11.1 Information on toxicological effects

Acute Toxicity:

Oral LD50: No Information

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Inhalation LC50: No Information

Irritation: Irritating to eyes and skin.

Corrosivity: No information available.

Sensitization: Prolonged or repeated skin contact may result in allergic eczema.

Repeated dose toxicity: No information available.

Carcinogenicity: No information available.

Mutagenicity: No information available.

Toxicity for reproduction: No information available.

STOT-single exposure: No information available.

STOT-repeated exposure: No information available.

Aspiration hazard: No information available.

If no information is available above under Acute Toxicity then the acute effects of this product have not been tested. Data on individual components are tabulated below:

CAS-No.	Name According to EEC	Oral LD50	Dermal LD50	Vapor LC50	Gas LC50	Dust/Mist LC50
25068-38-6	Reaction product: bisphenol- A-(epichlorhydrin) epoxy resin (number average molecular weight ≤ 700)	>5000 mg/kg (rat)	2001 mg/kg (rat) OECD 402	>20 mg/l	0.000	>5 mg/l
107-98-2	1-Methoxy-2-propanol	5180 mg/kg (rat)	>13000 mg/kg (rabbit)		0.000	0.000
100-51-6	Benzyl alcohol	1620 mg/kg (rat)	2001 mg/kg (rabbit)	>20 (N/A)	>20000 (N/A)	>4 mg/l (4 h, rat)
9003-36-5	Formaldehyde, oligomeric reaction product with 1-chloro-2,3-epoxypropane and phenol	>5000 mg/kg (rat) OECD 401	>2000 mg/kg (rat) OECD 402		0.000	0.000

Additional Information:

In the case of sensitisation to any of the ingredients, it is inadvisable to work with the product. Ingestion may cause irritation to mucous membranes. Irritating to eyes and skin. May cause allergic skin reaction.

SECTION 12: Ecological Information

12.1 Toxicity:

EC50 48hr (Daphnia):

IC50 72hr (Algae):

No information

No information

No information

12.2 Persistence and degradability: No information

12.3 Bioaccumulative potential: No information

12.4 Mobility in soil: No information

12.5 Results of PBT and vPvB The product does not meet the criteria for PBT/VPvB in accordance with Annex XIII.

assessment:

12.6 Other adverse effects: No information

CAS-No.	Name According to EEC	EC50 48hr	IC50 72hr	LC50 96hr
25068-38-6	Reaction product: bisphenol-A- (epichlorhydrin) epoxy resin (number average molecular weight ≤ 700)	1.7 mg/l OECD 202	13.81 mg/l (Pseudokirchneriella subcapitata) OECD 201	1.5 mg/l (Oncorhynchus mykiss) OECD 203
107-98-2	1-Methoxy-2-propanol	23300 mg/l	No information	6812 mg/l
100-51-6	Benzyl alcohol	230 mg/l	770 mg/l (Pseudokirchneriella)	460 mg/l (Pimephales promelas)
9003-36-5	Formaldehyde, oligomeric reaction product with 1-chloro-2,3-epoxypropane and phenol	1.6 mg/l	1.8 mg/l (Pseudokirchnerella subcapitata) OECD 201	0.55 mg/l

SECTION 13: Disposal Considerations

13.1 WASTE TREATMENT METHODS: Dispose of waste material at an approved hazardous waste treatment/disposal facility in accordance with applicable local state, and federal regulations. Do not dispose of waste with normal garbage, or to sewer systems. Contaminated packaging to be disposed of as product. Fully drained containers which are drop- and scrape-free can be treated as industrial waste, and can possibly be recycled. Empty containers should be taken to an approved waste handling site for recycling or disposal. The product should not be allowed to enter drains, water courses or the soil.

European Waste Code: 080119* Packaging Waste Code: 150110

SECTION 14: Transport Information

14.1 UN number Not applicable

14.2 UN proper shipping name NOT DANGEROUS GOODS

Technical name

14.3 Transport hazard class(es)
Subsidiary shipping hazard

Not applicable
Not applicable
Packing group
Not applicable
Not applicable
Not applicable
Not applicable
Not applicable
Not applicable
EmS-No.:
Not applicable

14.7 Transport in bulk according to Annex II of

MARPOL 73/78 and the IBC code

Not applicable

SECTION 15: Regulatory Information

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

National Regulations:

Denmark Product Registration Number: PR-nr. 1272834

Danish MAL Code: 1-5 (1993)

Danish MAL Code - Mixture: Not available

Sweden Product Registration Number: Not available

Norway Product Registration Number: 24434

Germany WGK Class: Not available

Directive 2004/42/CE : <60

Covered by Directive 2012/18/EC (Seveso III): Not applicable

Restrictions to product or to substances according

to Annex XVII, Regulation (CE) 1907/2006: Not applicable

Annex XIV - Authorisation List:

CAS-No. Name According to EEC

Not Applicable

SVHC - Substances of very high concern (Candidate List):

CAS-No. Name According to EEC

Not Applicable

15.2 Chemical Safety Assessment:

No Chemical Safety Assessment has been carried out for this substance/mixture by the supplier.

SECTION 16: Other Information

Text for CLP Hazard Statements shown in Section 3 describing each ingredient:

H226	Flammable liquid and vapour.
H302	Harmful if swallowed.
H315	Causes skin irritation.
H317	May cause an allergic skin reaction.
H319	Causes serious eye irritation.
H332	Harmful if inhaled.
H336	May cause drowsiness or dizziness.
H411	Toxic to aquatic life with long lasting effects.

Reasons for revision

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Substance and/or Product Properties Changed in Section(s):

01 - Identification

02 - Hazard Identification

08 - Exposure Controls/Personal Protection

11 - Toxicological Information

12 - Ecological Information

14 - Transportation Information

15 - Regulatory Information

Substance CAS Number Changed

Revision Statement(s) Changed
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List of References:

This Safety Data Sheet was compiled with data and information from the following sources:

The Ariel Regulatory Database provided by the 3E Corporation in Copenhagen, Denmark; European Union Commission Regulation No. 1907/2006 on REACH as amended within Commission Regulation (EU) 2015/830;

European Union (EC) Regulation No. 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation) and subsequent technical progress adaptations (ATP); EU Council Decision 2000/532/EC and its Annex entitled "List of Wastes".

Acronym & Abbreviation Key:

CLP Classification, Labeling & Packaging Regulation

EC European Commission EU European Union US United States

CAS Chemical Abstract Service

EINECS European Inventory of Existing Chemical Substances

Registration, Evaluation, Authorization of Chemicals Regulation REACH

Globally Harmonized System of Classification and Labeling of Chemicals GHS

LTEL Long term exposure limit Short term exposure limit STEL OEL Occupational exposure limit

Parts per million ppm

Milligrams per cubic meter mq/m3 Threshold Limit Value TLV

ACGIH American Conference of Governmental Industrial Hygienists

Occupational Safety & Health Administration OSHA

PET. Permissible Exposure Limits VOC Volatile organic compounds

Grams per liter g/l

Milligrams per kilogram mq/kq

N/A Not applicable Lethal dose at 50% LD50

LC50 Lethal concentration at 50%

Half maximal effective concentration EC50 Half maximal inhibitory concentration IC50 Persistent bioaccumulative toxic chemical PBT Very persistent and very bioaccumulative vPvB

European Economic Community EEC

International Transport of Dangerous Goods by Road ADR International Transport of Dangerous Goods by Rail RTD

United Nations UU

International Maritime Dangerous Goods Code IMDG IATA International Air Transport Association

International Convention for the Prevention of Pollution From Ships, 1973 as

modified by the Protocol of 1978

International Bulk Container IBC RTI Respiratory Tract Irritation

NENarcotic Effects

For further information, please contact: Technical Services Department

The information on this sheet corresponds to our present knowledge. It is not a specification and it does not guarantee specific properties. The information is intended to provide general guidance as to health and safety based upon our knowledge of the handling, storage, and use of the product. It is not applicable to unusual or non-standard uses of the product or where instructions and recommendations are not followed.