# SAFETY DATA SHEET

### 1. Identification

Product identifier PROZAP INSECT GUARD

Other means of identification

SDS number 194.19

**Product registration** 

number

5481-533-47000

Recommended use Insecticide

**Recommended restrictions** No other uses are advised.

Keep out of the Reach of Children!

**EPA Registration number** EPA: 5481-533-47000 **Manufacturer/Importer/Supplier/Distributor information** 

Manufacturer

Company name AMVAC Chemical Corporation

Address 4695 MacArthur Court

Suite 1200

Newport Beach, CA 92660

**United States** 

**Telephone** AMVAC Chemical Corp 949-260-1200

AMVAC Chemical Corp 949-260-6270(FAX)

E-mail CustServ@Amvac-Chemical.com

Emergency phone number Medical 888-681-4261

CHEMTREC® 800-424-9300

(USA+Canada)

Product Use 888-462-6822 CHEMTREC® (Outside 1+703-527-3887

USA)

### 2. Hazard(s) identification

Physical hazards Not classified.

Health hazards Acute toxicity, oral Category 4

Acute toxicity, inhalation

Category 4

Skin corrosion/irritation

Category 2

Serious eye damage/eye irritation

Category 2B

Sensitization, skin

Category 1

Carcinogenicity

Category 2

Environmental hazards Not classified.

OSHA defined hazards Not classified.

Label elements



Signal word Warning

Harmful if swallowed. Causes skin irritation. May cause an allergic skin reaction. Causes eye

irritation. Suspected of causing cancer.

Harmful if inhaled.

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### **Precautionary statement**

Prevention Do not handle until all safety precautions have been read and understood. Avoid breathing

dust/fume/gas/mist/vapors/spray. Wash thoroughly after handling. Do not eat, drink or smoke when using this product. Wear protective gloves.

Response

If exposed or concerned: Get medical advice/attention. If skin irritation or rash occurs: Get

medical advice/attention. If eye irritation persists: Get medical advice/attention. Take off

contaminated clothing and wash before reuse.

Storage

Store in original unopened package until ready to use. Protect from extreme temperatures.

**Disposal** 

Dispose of contents/container in accordance with local/regional/national/international regulations.

Hazard(s) not otherwise classified (HNOC)

Very toxic to aquatic life.

Supplemental information

Very toxic to aquatic life with long lasting effects.

80% of the mixture consists of component(s) of unknown acute oral toxicity. 80% of the mixture consists of component(s) of unknown acute dermal toxicity. 80% of the mixture consists of component(s) of unknown acute hazards to the aquatic environment. 100% of the mixture consists of component(s) of unknown long-term hazards to the aquatic environment. This is a pesticide product registered by the United States Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets (SDS), and for workplace labels of non-pesticide chemicals. The hazard information required on the pesticide label is reproduced in section 15. The pesticide label also includes other important information, including directions for use.

# 3. Composition/information on ingredients

#### **Mixtures**

Chemical name	Common name and synonyms	CAS number	%
Dichlorvos (DDVP)	DDVP, Nuvan, Vapona, Dimethyl 2,2-dichlorovinyl phosphate	62-73-7	18.6 - < 20

#### **Composition comments**

All concentrations are in percent by weight.

#### 4. First-aid measures

Inhalation

Move to fresh air. Call a physician if symptoms develop or persist.

Skin contact

Remove contaminated clothing immediately and wash skin with soap and water. In case of eczema or other skin disorders: Seek medical attention and take along these instructions. Wash

contaminated clothing before reuse.

Eye contact

Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention if irritation develops and persists.

Ingestion

Rinse mouth. If vomiting occurs, keep head low so that stomach content doesn't get into the lungs.

Get medical advice/attention if you feel unwell.

Most important symptoms/effects, acute and

delayed

This product is a Cholinesterase Inhibitor. Preexisting skin or respiratory disorders may be aggravated by exposure to components of this product. Preexisting conditions which lower cholinesterase levels increase vulnerability to cholinesterase depression. these include: (for plasma) chronic alcoholism; malnutrition; dermatomyositis; existing toxicity from exposure to carbon disulfide; benzalkonium salts, organic mercury compounds, ciquatoxins or solanines; and (for RBC) hemolytic anemia. Acute cholinesterase depression may be evidenced by headache, nausea, vomiting, diarrhea, abdominal cramps, excessive sweating, salivation and tearing, constricted pupils, blurred vision, tightness in chest, weakness, muscle twitching and confusion; in extreme cases, unconsciousness, convulsions, severe respiratory depression and death may occur. Product may cause slight but temporary irritation to the eyes and may cause irritation of the skin.

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Indication of immediate medical attention and special treatment needed

Treat symptomatically. Note to physicians:

This product contains an Organophosphate (OP) Insecticide. However, it is the opinion of the manufacturer/supplier, and their Occupational medical consultant, that any significant exposure to this OP insecticide is highly unlikely. Based upon the formulation of the pest strip the individual's contact with the OP is extremely limited by design. Therefore the examining physician should exercise prudent judgment in determining the causation of the patient's symptoms - taking care to not overlook multiple other etiologies of the patient's symptoms. Contact a local or national poison control center for more information. If it is established that OP poisoning has occurred, the following steps are recommended. Establish airway and oxygenation. IV Atropine sulfate is the antidote of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, Atropine Sulfate should be injected at 10 minutes intervals in doses of 1 to 2 milligrams until complete atropinization has occurred. Pralidoxime chloride (2-PAM chloride) may also be used as an effective antidote in addition to and while maintaining full atropinization. In adults, an initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion, in 250 cc of saline over a 15 to 20 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5% solution in water over not less than 2 minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if muscle weakness has not been relieved. For infants and children, the dose of 2-PAM is 0.25 grams. Avoid morphine, aminophylline, phenothiazine, reserpine, furosemide and ethacrynic acid. Člear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. Repeated exposure to cholinesterase inhibitors may without warning cause prolonged susceptibility very small doses of any cholinesterase inhibitor. Allow no further exposure until time for cholinesterase regeneration has been attained as determined by a blood test. Bathe and shampoo contaminated skin and hair. If ingested, empty stomach; activated charcoal is useful to further to further limit absorption. If victim is alert, Syrup of Ipecac (2 tablespoons in adults, 1 tablespoon in small children) is indicated. If symptoms such as loss of gag reflex, convulsions, or unconsciousness occur before emesis, gastric lavage should be considered following intubation with a cuffed endotracheal tube.

#### **General information**

IF exposed or concerned: Get medical advice/attention. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Show this safety data sheet to the doctor in attendance. Wash contaminated clothing before reuse.

#### 5. Fire-fighting measures

Suitable extinguishing media

Unsuitable extinguishing media

Specific hazards arising from the chemical

Special protective equipment and precautions for firefighters

Fire fighting

equipment/instructions

Specific methods

General fire hazards

Water spray. Foam. Powder. Carbon dioxide (CO2).

None known.

Hydrogen chloride, carbon oxides and unidentified organic compounds may be formed when it is heated excessively or burned.

Self-contained breathing apparatus and full protective clothing must be worn in case of fire.

Evacuate area. Use water spray to cool unopened containers. Water runoff can cause environmental damage. Dike and collect extinguishing water.

Use standard firefighting procedures and consider the hazards of other involved materials.

No unusual fire or explosion hazards noted.

# 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Wear appropriate protective equipment and clothing during clean-up. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.

Methods and materials for containment and cleaning up

Prevent entry into waterways, sewer, basements or confined areas.

Large Spills: Dike the spilled material, where this is possible. Absorb in vermiculite, dry sand or earth and place into containers. Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Put material in suitable, covered, labeled containers. For waste disposal, see section 13 of the SDS. Pick up strips for reuse or disposal. Wash thoroughly with soap and water after handling the strip.

Avoid discharge into drains, water courses or onto the ground.

#### 7. Handling and storage

**Environmental precautions** 

Precautions for safe handling

Do not taste or swallow. Avoid contact with eyes, skin, and clothing. Avoid prolonged exposure. When using, do not eat, drink or smoke. Provide adequate ventilation. Use personal protective equipment as required. Wash hands thoroughly after handling. Read label before use.

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Store in tightly closed container. Store away from incompatible materials (see Section 10 of the SDS). Store in original sealed package until use.

# 8. Exposure controls/personal protection Occupational exposure limits

The following constituents are the only constituents of the product which have a PEL, TLV or other recommended exposure limit. At this time, the other constituents have no known exposure limits.

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components Value **Type** Dichlorvos (DDVP) (CAS **PEL** 1 mg/m3 62-73-7)

**US. ACGIH Threshold Limit Values** 

Form Components Value Type Dichlorvos (DDVP) (CAS **TWA** 0.1 mg/m3 Inhalable fraction and 62-73-7) vapor.

No biological exposure limits noted for the ingredient(s).

**US. NIOSH: Pocket Guide to Chemical Hazards** Components Type

Dichlorvos (DDVP) (CAS **TWA** 1 mg/m3 62-73-7)

**Biological limit values** 

**Exposure guidelines US ACGIH Threshold Limit Values: Skin designation** 

> Dichlorvos (DDVP) (CAS 62-73-7) Can be absorbed through the skin.

US NIOSH Pocket Guide to Chemical Hazards: Skin designation

Dichlorvos (DDVP) (CAS 62-73-7) Can be absorbed through the skin.

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Dichlorvos (DDVP) (CAS 62-73-7) Can be absorbed through the skin.

Appropriate engineering

controls

Provide eyewash station and safety shower. Applicable for industrial settings only: Use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below recommended exposure limits.

Value

Individual protection measures, such as personal protective equipment

Eye/face protection If contact is likely, safety glasses with side shields are recommended.

Skin protection

Hand protection For prolonged or repeated skin contact use suitable protective gloves. Nitrile, butyl rubber or

neoprene gloves are recommended.

Wear appropriate chemical resistant clothing. Use of an impervious apron is recommended. Other

Respiratory protection No personal respiratory protective equipment normally required.

Thermal hazards Not applicable.

General hygiene considerations

Observe any medical surveillance requirements. Keep away from food and drink. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Contaminated work clothing should not be allowed out of the workplace.

#### 9. Physical and chemical properties

**Appearance** 

Physical state Solid.

**Form** Rectangular plastic strip.

Color Yellow or Blue Mild chemical odor Odor

Odor threshold Not available. Not applicable Melting point/freezing point Not available. Initial boiling point and boiling Not applicable

range

Material name: PROZAP INSECT GUARD

Flash point Not available.

10 - 100 mg/day of DDVP **Evaporation rate** 

Flammability (solid, gas) Not available. Upper/lower flammability or explosive limits Flammability limit - lower Not available.

Flammability limit - upper

(%)

Not available.

Explosive limit - lower (%) Not available. Explosive limit - upper (%) Not available.

1.00E-02 mm Hg (DDVP) Vapor pressure

Heavier than air Vapor density

Relative density 1.26

Solubility(ies)

Negligible Solubility (water)

Solubility (other) This product is softened in aromatic and chlorinated solvents.

**Auto-ignition temperature** Not available. Not available. **Decomposition temperature Viscosity** Not available.

Other information

68.66 lb/ft3 **Density Explosive properties** Not explosive. Not oxidizing. **Oxidizing properties** Percent volatile 18.6 % v/v

# 10. Stability and reactivity

The product is stable and non-reactive under normal conditions of use, storage and transport. Reactivity

Material is stable under normal conditions. Chemical stability

Possibility of hazardous

reactions

No dangerous reaction known under conditions of normal use.

Conditions to avoid Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. Contact with

incompatible materials.

Strong acids. Strong bases. Oxidizing agents. Incompatible materials Hazardous decomposition

products

No hazardous decomposition products are known.

### 11. Toxicological information

Information on likely routes of exposure

Harmful if inhaled. Inhalation

Skin contact Causes skin irritation. May cause an allergic skin reaction.

Causes eye irritation. Eye contact Harmful if swallowed. Ingestion

Symptoms related to the physical, chemical and toxicological characteristics This product is a Cholinesterase Inhibitor. Preexisting skin or respiratory disorders may be aggravated by exposure to components of this product. Preexisting conditions which lower cholinesterase levels increase vulnerability to cholinesterase depression. These include: (for plasma) chronic alcoholism; malnutrition; dermatomyositis; existing toxicity from exposure to carbon disulfide; benzalkonium salts, organic mercury compounds, ciguatoxins or solanines; and (for RBC) hemolytic anemia.

Acute cholinesterase depression may be evidenced by headache, nausea, vomiting, diarrhea, abdominal cramps, excessive sweating, salivation and tearing, constricted pupils, blurred vision,

tightness in chest, weakness, muscle twitching and confusion; in extreme cases,

unconsciousness, convulsions, severe respiratory depression and death may occur. Product may

cause slight but temporary irritation to the eyes and may cause irritation of the skin.

Repeated exposures to small doses of organophosphates may lower the cholinesterase to levels where the above symptoms of acute overexposure are observed.

### Information on toxicological effects

Acute toxicity Harmful if swallowed. Harmful if inhaled.

Product Species Test Results

PROZAP INSECT GUARD

<u>Acute</u>

**Dermal** 

LD50 Rabbit 27400 mg/kg (intact abdominal skin)

Oral

LD50 female rat 382 mg/kg male rat 679 mg/kg

**Skin corrosion/irritation** Causes skin irritation.

**Irritation Corrosion - Skin** 

PROZAP INSECT GUARD Result: Irritant

Species: Rabbit

Serious eye damage/eye

Eve

irritation

Causes eye irritation.

PROZAP INSECT GUARD

Result: Irritant Species: Rabbit

Respiratory or skin sensitization

**ACGIH** sensitization

DICHLORVOS (DDVP), INHALABLE FRACTION AND Dermal sensitization

VAPOR (CAS 62-73-7)

**Respiratory sensitization** Not a respiratory sensitizer.

**Skin sensitization** May cause an allergic skin reaction.

Sensitization

PROZAP INSECT GUARD Result: Possible sensitizer

Species: Guinea pig

**Germ cell mutagenicity**No data available to indicate product or any components present at greater than 0.1% are

mutagenic or genotoxic.

**Carcinogenicity** Suspected of causing cancer.

IARC Monographs. Overall Evaluation of Carcinogenicity

Dichlorvos (DDVP) (CAS 62-73-7)

2B Possibly carcinogenic to humans.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1052)

Not regulated.

US. National Toxicology Program (NTP) Report on Carcinogens

Not listed.

**Reproductive toxicity**This product is not expected to cause reproductive or developmental effects.

Specific target organ toxicity -

single exposure

Not classified.

Specific target organ toxicity -

repeated exposure

Not classified.

**Aspiration hazard** Not likely, due to the form of the product.

**Chronic effects** Prolonged inhalation may be harmful. Prolonged exposure may cause chronic effects.

12. Ecological information

**Ecotoxicity** This product is toxic to fish, birds, and other wildlife. Keep out of any body of water. Do not

contaminate water when disposing of equipment washwaters or wastes.

Components Species Test Results

Dichlorvos (DDVP) (CAS 62-73-7)

Aquatic

Crustacea EC50 Water flea (Daphnia pulex) 0 - 0.0001 mg/l, 48 hours
Fish LC50 Cutthroat trout (Oncorhynchus clarki) 0.141 - 0.321 mg/l, 96 hours

Persistence and degradability N

No data is available on the degradability of any ingredients in the mixture.

**Bioaccumulative potential** 

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Mobility in soil No data available. Other adverse effects None known.

# 13. Disposal considerations

**Disposal instructions** Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Dispose of

contents/container in accordance with local/regional/national/international regulations. Dispose of product and packaging in the trash. Wrap the strip in paper and place in a sealed plastic bag

before putting it in the trash.

Dispose in accordance with all applicable regulations. Local disposal regulations

Hazardous waste code Not applicable.

Waste from residues / unused

products

Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions). Unused products can typically be disposed in the trash.

Contaminated packaging

Empty containers should be taken to an approved waste handling site for recycling or disposal. As a household waste, the spent strip should be wrapped in paper, placed in a sealed plastic bag, and put into the trash. If large numbers of strips are to be discarded the local authorities or the EPA should be contacted to find out the current regulations. The empty package can be placed in

the trash.

### 14. Transport information

DOT

UN3077 **UN number** 

UN proper shipping name Transport hazard class(es) Environmentally hazardous substances, solid, n.o.s. (Dichlorvos), MARINE POLLUTANT

Class 9 Subsidiary risk Label(s) 9 Packing group Ш

**Environmental hazards** 

Yes Marine pollutant

Special precautions for user Read safety instructions, SDS and emergency procedures before handling.

8, 146, 335, A112, B54, IB8, IP3, N20, T1, TP33 **Special provisions** 

Packaging exceptions 155 Packaging non bulk 213 Packaging bulk 240

IATA

UN3077 **UN number** 

**UN proper shipping name** Transport hazard class(es) Environmentally hazardous substance, solid, n.o.s. (Dichlorvos)

Class 9 Subsidiary risk Ш Packing group **Environmental hazards** No. **ERG Code** 9L

Other information

Special precautions for user Read safety instructions, SDS and emergency procedures before handling.

Passenger and cargo

aircraft

Allowed with restrictions.

Cargo aircraft only

Allowed with restrictions.

Read safety instructions, SDS and emergency procedures before handling.

**IMDG** 

**UN number** UN3077

ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (Dichlorvos), MARINE **UN proper shipping name** 

**POLLUTANT** 

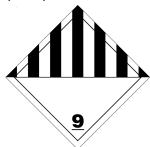
Transport hazard class(es)

Class 9 Subsidiary risk **Packing group** Ш **Environmental hazards** 

Yes Marine pollutant **EmS** F-A, S-F Special precautions for user Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Special precautions for user Read safety instructions, SDS and emergency procedures before handling. nsport in bulk according to Not applicable.

**DOT: IATA: IMDG** 



### Marine pollutant



**General information** 

IMDG Regulated Marine Pollutant. DOT Regulated Marine Pollutant.

This product is not regulated when shipped by highway, rail, or air in non-bulk packaging (maximum capacity of 450 L (119 gallons) or less. When shipped by vessel or in bulk packaging this product is regulated according to the data shown.

### 15. Regulatory information

# **US federal regulations**

This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

This product is registered under EPA/FIFRA Regulations. It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read and follow all label directions. This product is excluded from listing requirements under EPA/TSCA.

This is a pesticide product registered by the United States Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets (SDS), and for workplace labels of non-pesticide chemicals. The hazard information required on the pesticide label is reproduced below. The pesticide label also includes other important information, including directions for use.

HAZARD TO HUMANS AND DOMESTIC ANIMALS.

### WARNING

May be fatal if swallowed. Do not taste or swallow. Harmful if inhaled. Causes moderate eye irritation. Avoid breathing vapors. Avoid contact with eyes. Avoid contact with clothing. After prolonged storage, a small amount of liquid may form on strip. Do not get liquid in eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum using tobacco, or using the toilet.. Do not use in hospitals or clinic rooms, such as patient rooms, wards, nurseries, operating or emergency areas. Remove and wash contaminated clothing before reuse. Within homes, use only in closets, wardrobes and cupboards. Do not use in closets and wardrobes of rooms where infants, children and the sick or aged are or will be present for any extended period of confinement. Do not use in any area of the home where people will be present for extended periods of time. Do not use in kitchens (except cupboards), restaurants or areas where food is prepared or served. Not to be taken internally by humans or animals.

# TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

#### **CERCLA Hazardous Substance List (40 CFR 302.4)**

Dichlorvos (DDVP) (CAS 62-73-7)

SARA 304 Emergency release notification

Dichlorvos (DDVP) (CAS 62-73-7) 10 LBS

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1052)

Not regulated.

#### Superfund Amendments and Reauthorization Act of 1986 (SARA)

SARA 302 Extremely hazardous substance

Chemical name **CAS** number Reportable **Threshold** Threshold **Threshold** quantity planning quantity planning quantity, planning quantity, (pounds) (pounds) lower value upper value (pounds) (pounds)

Listed.

62-73-7 Dichlorvos (DDVP) 10 1000 Yes

SARA 311/312 Hazardous

chemical

Classified hazard categories

Acute toxicity (any route of exposure)

Skin corrosion or irritation

Serious eve damage or eve irritation Respiratory or skin sensitization

Carcinogenicity

SARA 313 (TRI reporting)

Chemical name **CAS** number % bv wt. Dichlorvos (DDVP) 62-73-7 18.6 - < 20

#### Other federal regulations

#### Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Dichlorvos (DDVP) (CAS 62-73-7)

#### Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act

Not regulated.

(SDWA)

#### **US state regulations**

# California Proposition 65

United States & Puerto Rico



WARNING: This product can expose you to Dichlorvos (DDVP), which is known to the State of California to

cause cancer. For more information go to www.P65Warnings.ca.gov.

# California Proposition 65 - CRT: Listed date/Carcinogenic substance

Dichlorvos (DDVP) (CAS 62-73-7) Listed: January 1, 1989

# **International Inventories**

Country(s) or region Inventory name On inventory (yes/no)\*

No

\*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

Toxic Substances Control Act (TSCA) Inventory

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

# 16. Other information, including date of preparation or last revision

Apr-10-2018 Issue date Jul-02-2018 **Revision date** 

Version # 2.0 **HMIS®** ratings Health: 2\*

Flammability: 1

Physical hazard: 0 NFPA ratings Health: 2

Flammability: 1 Instability: 0

Material name: PROZAP INSECT GUARD

SDS US

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#### **Disclaimer**

**Revision information** 

AMVAC Chemical Corporation cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

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CHEMTREC is a trademark of the American Chemistry Council, Inc.

HMIS is a trademark of the American Coatings Association.

NFPA is a trademark of the National Fire Protection Association, Inc.

Product and Company Identification: Product and Company Identification

Exposure controls/personal protection: Appropriate engineering controls