

FW-BAV N&A Bavarian Cream Flavor

Flavor West Manufacturing, LLC.

Version No: **1.1**Safety Data Sheet according to OSHA HazCom Standard (2012) requirements

Chemwatch Hazard Alert Code: 2

Issue Date: 04/29/2021
Print Date: 04/29/2021
Initial Date: 04/29/2021
L.GHS.USA.EN

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

Product Identifier

Product name	FW-BAV N&A Bavarian Cream Flavor
Synonyms	Not Available
Other means of identification	Not Available

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

Relevant identified	Use according to manufacturer's directions.
uses	Cool docording to manufacturor of directions.

Details of the manufacturer/importer

Registered company name	Flavor West Manufacturing, LLC.
Address	29400 Hunco Way, Lake Elsinore CA 92530 United States
Telephone	(951) 893-5120
Fax	(714) 276-1621
Website	www.FlavorWest.com
Email	Flavor@FlavorWest.com

Emergency telephone number

Association / Organisation	Chemwatch
Emergency telephone numbers	see below
Other emergency telephone numbers	see below

CHEMWATCH EMERGENCY RESPONSE

Primary Number	Alternative Number 1	Alternative Number 2	
877 715 9305	+612 9186 1132	Not Available	

Once connected and if the message is not in your prefered language then please dial 01

Una vez conectado y si el mensaje no está en su idioma preferido, por favor marque 02

SECTION 2 HAZARDS IDENTIFICATION

Classification of the substance or mixture

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GHS Classification

Eye Irritation Category 2B

Label elements

GHS label elements

Not Applicable

SIGNAL WORD

WARNING

Hazard statement(s)

H320

Causes eye irritation

Precautionary statement(s) Prevention

P264

Wash all exposed external body areas thoroughly after handling.

Precautionary statement(s) Response

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.

Precautionary statement(s) Storage

Precautionary statement(s) Disposal

SECTION 3 COMPOSITION / INFORMATION ON INGREDIENTS

Substances

See section below for composition of Mixtures

Mixtures

CAS No	%[weight]	Name	
57-55-6	80-90	propylene glycol	
121-33-5	10-20	vanillin	

The specific chemical identity and/or exact percentage (concentration) of composition has been withheld as a trade secret.

SECTION 4 FIRST AID MEASURES

Description of first aid measures

Description of mist ar	u measures
Eye Contact	If this product comes in contact with the eyes: • Wash out immediately with fresh running water. • Ensure complete irrigation of the eye by keeping eyelids apart and away from eye and moving the eyelids by occasionally lifting the upper and lower lids. • Seek medical attention without delay; if pain persists or recurs seek medical attention. • Removal of contact lenses after an eye injury should only be undertaken by skilled personnel.
Skin Contact	If skin contact occurs: Immediately remove all contaminated clothing, including footwear. Flush skin and hair with running water (and soap if available). Seek medical attention in event of irritation.
Inhalation	 If fumes or combustion products are inhaled remove from contaminated area. Lay patient down. Keep warm and rested. Prostheses such as false teeth, which may block airway, should be removed, where possible, prior to initiating first aid procedures. Apply artificial respiration if not breathing, preferably with a demand valve resuscitator, bag-valve mask device, or pocket

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	 mask as trained. Perform CPR if necessary. Transport to hospital, or doctor.
Ingestion	 If swallowed do NOT induce vomiting. If vomiting occurs, lean patient forward or place on left side (head-down position, if possible) to maintain open airway and prevent aspiration. Observe the patient carefully. Never give liquid to a person showing signs of being sleepy or with reduced awareness; i.e. becoming unconscious. Give water to rinse out mouth, then provide liquid slowly and as much as casualty can comfortably drink. Seek medical advice.

Indication of any immediate medical attention and special treatment needed

- Polyethylene glycols are generally poorly absorbed orally and are mostly unchanged by the kidney.
- Dermal absorption can occur across damaged skin (e.g. through burns) leading to increased osmolality, anion gap metabolic acidosis, elevated calcium, low ionised calcium, CNS depression and renal failure.
- Treatment consists of supportive care.

[Ellenhorn and Barceloux: Medical Toxicology]

Propylene glycol is primarily a CNS depressant in large doses and may cause hypoglycaemia, lactic acidosis and seizures.

- The usual measures are supportive care and decontamination (Ipecac/ lavage/ activated charcoal/ cathartics), within 2 hours of exposure should suffice.
- Check the anion gap, arterial pH, renal function and glucose levels.

Ellenhorn and Barceloux: Medical Toxicology

SECTION 5 FIREFIGHTING MEASURES

Extinguishing media

- ▶ Alcohol stable foam.
- ▶ Dry chemical powder.
- ▶ BCF (where regulations permit).
- Carbon dioxide.

Special hazards arising from the substrate or mixture

Fire	Incompatibility
------	-----------------

Avoid contamination with oxidising agents i.e. nitrates, oxidising acids, chlorine bleaches, pool chlorine etc. as ignition may
result

Advice for firefighters

Fire Fighting

- Alert Fire Brigade and tell them location and nature of hazard.
- Wear full body protective clothing with breathing apparatus.
- Prevent, by any means available, spillage from entering drains or water course.
- Use water delivered as a fine spray to control fire and cool adjacent area.

Fire/Explosion Hazard

- ▶ Combustible.
- Slight fire hazard when exposed to heat or flame.
- ▶ Heating may cause expansion or decomposition leading to violent rupture of containers.
- ▶ On combustion, may emit toxic fumes of carbon monoxide (CO).

SECTION 6 ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Minor Spills

- ▶ Remove all ignition sources.
- Clean up all spills immediately.
- Avoid breathing vapours and contact with skin and eyes.
- ▶ Control personal contact with the substance, by using protective equipment.

Chemical Class: alcohols and glycols

For release onto land: recommended sorbents listed in order of priority.

Major Spills

SORBENT TYPE	RANK	APPLICATION	COLLECTION	LIMITATIONS
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LAND SPILL - SMALL

cross-linked polymer - particulate	1	shovel	shovel	R, W, SS
cross-linked polymer - pillow	1	throw	pitchfork	R, DGC, RT

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sorbent clay - particulate	2	shovel	shovel	R,I, P
wood fiber - pillow	3	throw	pitchfork	R, P, DGC, RT
treated wood fiber - pillow	3	throw	pitchfork	DGC, RT
foamed glass - pillow	4	throw	pichfork	R, P, DGC, RT

LAND SPILL - MEDIUM

cross-linked polymer - particulate	1	blower	skiploader	R,W, SS
polypropylene - particulate	2	blower	skiploader	W, SS, DGC
sorbent clay - particulate	2	blower	skiploader	R, I, W, P, DGC
polypropylene - mat	3	throw	skiploader	DGC, RT
expanded mineral - particulate	3	blower	skiploader	R, I, W, P, DGC
polyurethane - mat	4	throw	skiploader	DGC, RT

Legend

DGC: Not effective where ground cover is dense

R; Not reusable

I: Not incinerable

P: Effectiveness reduced when rainy

RT:Not effective where terrain is rugged

SS: Not for use within environmentally sensitive sites

W: Effectiveness reduced when windy

Reference: Sorbents for Liquid Hazardous Substance Cleanup and Control;

R.W Melvold et al: Pollution Technology Review No. 150: Noyes Data Corporation 1988

Moderate hazard.

- Clear area of personnel and move upwind.
- · Alert Fire Brigade and tell them location and nature of hazard.

Personal Protective Equipment advice is contained in Section 8 of the MSDS.

SECTION 7 HANDLING AND STORAGE

Precautions for safe handling

Safe handling

- ▶ DO NOT allow clothing wet with material to stay in contact with skin
- ▶ Avoid all personal contact, including inhalation.
- ► Wear protective clothing when risk of exposure occurs.
- Use in a well-ventilated area.
- Prevent concentration in hollows and sumps.
- Other information
- ▶ Material is hygroscopic, i.e. absorbs moisture from the air. Keep containers well sealed in storage.
- ▶ Store in original containers.
- ▶ Keep containers securely sealed.

Conditions for safe storage, including any incompatibilities

Suitable container

- ▶ Metal can or drum
- Packaging as recommended by manufacturer.
- Check all containers are clearly labelled and free from leaks.

Storage

• Glycols and their ethers undergo violent decomposition in contact with 70% perchloric acid. This seems likely to involve formation of the glycol perchlorate esters (after scission of ethers) which are explosive, those of ethylene glycol and 3-chloro-1,2-propanediol being more powerful than glyceryl nitrate, and the former so sensitive that it explodes on addition of water.

Alcohols

incompatibility

- $\textcolor{red}{\blacktriangleright} \text{ are incompatible with strong acids, acid chlorides, acid anhydrides, oxidising and reducing agents.}$
- reacts, possibly violently, with alkaline metals and alkaline earth metals to produce hydrogen
- react with strong acids, strong caustics, aliphatic amines, isocyanates, acetaldehyde, benzoyl peroxide, chromic acid, chromium oxide, dialkylzincs, dichlorine oxide, ethylene oxide, hypochlorous acid, isopropyl chlorocarbonate, lithium tetrahydroaluminate, nitrogen dioxide, pentafluoroguanidine, phosphorus halides, phosphorus pentasulfide, tangerine oil, triethylaluminium, triisobutylaluminium
- ▶ should not be heated above 49 deg.

PACKAGE MATERIAL INCOMPATIBILITIES

Not Available

SECTION 8 EXPOSURE CONTROLS / PERSONAL PROTECTION

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Control parameters

OCCUPATIONAL EXPOSURE LIMITS (OEL)

INGREDIENT DATA

Not Available

EMERGENCY LIMITS

Ingredient	Material name	TEEL-1	TEEL-2	TEEL-3
propylene glycol	Propylene glycol; (1,2-Propanediol)	30 mg/m3	1300 mg/m3	7900 mg/m3
vanillin	Vanilin	10 mg/m3	10 mg/m3	310 mg/m3

Ingredient Original IDLH		Revised IDLH	
propylene glycol	Not Available	Not Available	
vanillin	Not Available	Not Available	

MATERIAL DATA

for propylene glycol:

Saturated vapour concentration @ 20 deg C.= 65.8 ppm, 204.6 mg/m3; i.e higher concentrations can only occur as aerosols or at higher temperatures. Odour Threshold: Practically odourless.

A small number of individuals show skin irritation or sensitisation from repeated or prolonged exposure to propylene glycol. A workplace environmental exposure limit (WEEL) has been established by AIHA and is thought to be protective against systemic effects.

Exposure controls

Engineering controls are used to remove a hazard or place a barrier between the worker and the hazard. Well-designed engineering controls can be highly effective in protecting workers and will typically be independent of worker interactions to provide this high level of protection. **Appropriate** The basic types of engineering controls are: engineering controls Process controls which involve changing the way a job activity or process is done to reduce the risk. Enclosure and/or isolation of emission source which keeps a selected hazard "physically" away from the worker and ventilation that strategically "adds" and "removes" air in the work environment. Personal protection Safety glasses with side shields. Eye and face Chemical goggles. • Contact lenses may pose a special hazard; soft contact lenses may absorb and concentrate irritants. A written policy protection document, describing the wearing of lenses or restrictions on use, should be created for each workplace or task. Skin protection See Hand protection below Wear chemical protective gloves, e.g. PVC. • Wear safety footwear or safety gumboots, e.g. Rubber NOTE: Hands/feet protection ▶ The material may produce skin sensitisation in predisposed individuals. Care must be taken, when removing gloves and other protective equipment, to avoid all possible skin contact. ▶ Contaminated leather items, such as shoes, belts and watch-bands should be removed and destroyed. **Body protection** See Other protection below Overalls. ▶ P.V.C. apron. Other protection Barrier cream.

Recommended material(s)

Thermal hazards

GLOVE SELECTION INDEX

Glove selection is based on a modified presentation of the:

"Forsberg Clothing Performance Index".

The effect(s) of the following substance(s) are taken into account in the *computer-generated* selection:

Not Available

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Material	СРІ
PE/EVAL/PE	A

^{*} CPI - Chemwatch Performance Index

Respiratory protection

Type A-P Filter of sufficient capacity. (AS/NZS 1716 & 1715, EN 143:2000 & 149:2001, ANSI Z88 or national equivalent)

Where the concentration of gas/particulates in the breathing zone, approaches or exceeds the "Exposure Standard" (or ES), respiratory protection is required.

Degree of protection varies with both face-piece and Class of filter; the nature of protection varies with Type of filter.

Required	Half-Face	Full-Face	Powered Air
Minimum	Respirator	Respirator	Respirator
Minimum			

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A: Best Selection

B: Satisfactory; may degrade after 4 hours continuous immersion

C: Poor to Dangerous Choice for other than short term immersion

NOTE: As a series of factors will influence the actual performance of the glove, a final selection must be based on detailed observation. -

* Where the glove is to be used on a short term, casual or infrequent basis, factors such as "feel" or convenience (e.g. disposability), may dictate a choice of gloves which might otherwise be unsuitable following long-term or frequent use. A qualified practitioner should be consulted.

Protection Factor			
up to 10 x ES	A-AUS P2	-	A-PAPR-AUS / Class 1 P2
up to 50 x ES	-	A-AUS / Class 1 P2	-
up to 100 x ES	-	A-2 P2	A-PAPR-2 P2 ^

^ - Full-face

A(All classes) = Organic vapours, B AUS or B1 = Acid gasses, B2 = Acid gas or hydrogen cyanide(HCN), B3 = Acid gas or hydrogen cyanide(HCN), E = Sulfur dioxide(SO2), G = Agricultural chemicals, K = Ammonia(NH3), Hg = Mercury, NO = Oxides of nitrogen, MB = Methyl bromide, AX = Low boiling point organic compounds(below 65 degC)

SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Appearance	Clear colorless		
Physical state	Liquid	Relative density (Water = 1)	1.06
Odour	Characteristic	Partition coefficient n-octanol / water	Not Available
Odour threshold	Not Available	Auto-ignition temperature (°C)	Not Available
pH (as supplied)	Not Available	Decomposition temperature	Not Available
Melting point / freezing point (°C)	Not Available	Viscosity (cSt)	Not Available
Initial boiling point and boiling range (°C)	Not Available	Molecular weight (g/mol)	Not Available
Flash point (°C)	>93	Taste	Bavarian cream
Evaporation rate	Not Available	Explosive properties	Not Available
Flammability	Not Applicable	Oxidising properties	Not Available
Upper Explosive Limit (%)	Not Available	Surface Tension (dyn/cm or mN/m)	Not Available
Lower Explosive Limit (%)	Not Available	Volatile Component (%vol)	Not Available
Vapour pressure (kPa)	Not Available	Gas group	Not Available
Solubility in water (g/L)	Miscible	pH as a solution (1%)	Not Available
Vapour density (Air = 1)	Not Available	VOC g/L	Not Available

SECTION 10 STABILITY AND REACTIVITY

Reactivity	See section 7
Chemical stability	 Unstable in the presence of incompatible materials. Product is considered stable. Hazardous polymerisation will not occur.
Possibility of hazardous reactions	See section 7
Conditions to avoid	See section 7
Incompatible materials	See section 7
Hazardous decomposition products	See section 5

SECTION 11 TOXICOLOGICAL INFORMATION

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Information on toxicological effects

Inhaled

The material is not thought to produce respiratory irritation (as classified by EC Directives using animal models). Nevertheless inhalation of vapours, fumes or aerosols, especially for prolonged periods, may produce respiratory discomfort and occasionally, distress.

Inhalation of vapours may cause drowsiness and dizziness. This may be accompanied by narcosis, reduced alertness, loss of reflexes, lack of coordination and vertigo.

Ingestion

Accidental ingestion of the material may be damaging to the health of the individual.

Ingestion of propylene glycol produced reversible central nervous system depression in humans following ingestion of 60 ml. Symptoms included increased heart-rate (tachycardia), excessive sweating (diaphoresis) and grand mal seizures in a 15 month child who ingested large doses (7.5 ml/day for 8 days) as an ingredient of vitamin preparation.

Excessive repeated ingestions may cause hypoglycaemia (low levels of glucose in the blood stream) among susceptible individuals; this may result in muscular weakness, incoordination and mental confusion.

Skin Contact

Skin contact is not thought to have harmful health effects (as classified under EC Directives); the material may still produce health damage following entry through wounds, lesions or abrasions.

The material may produce moderate skin irritation; limited evidence or practical experience suggests, that the material either:

- ▶ produces moderate inflammation of the skin in a substantial number of individuals following direct contact and/or
- produces significant, but moderate, inflammation when applied to the healthy intact skin of animals (for up to four hours), such inflammation being present twenty-four hours or more after the end of the exposure period.

Skin irritation may also be present after prolonged or repeated exposure; this may result in a form of contact dermatitis (nonallergic). The dermatitis is often characterised by skin redness (erythema) and swelling (oedema) which may progress to blistering (vesiculation), scaling and thickening of the epidermis.

Eye

Limited evidence exists, or practical experience suggests, that the material may cause eye irritation in a substantial number of individuals and/or is expected to produce significant ocular lesions which are present twenty-four hours or more after instillation into the eye(s) of experimental animals. Repeated or prolonged eye contact may cause inflammation characterised by temporary redness (similar to windburn) of the conjunctiva (conjunctivitis); temporary impairment of vision and/or other transient eye damage/ulceration may occur.

Irritation of the eyes may produce a heavy secretion of tears (lachrymation).

Chronic

Limited evidence suggests that repeated or long-term occupational exposure may produce cumulative health effects involving organs or biochemical systems.

There exists limited evidence that shows that skin contact with the material is capable either of inducing a sensitisation reaction in a significant number of individuals, and/or of producing positive response in experimental animals.

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TOXICITY	IRRITATION
Not Available	Not Available

propylene glycol

TOXICITY	IRRITATION
Dermal (rabbit) LD50: >2000 mg/kg ^[1]	Eye (rabbit): 100 mg - mild
Oral (rat) LD50: 20000 mg/kgd ^[2]	Eye (rabbit): 500 mg/24h - mild
	Skin(human):104 mg/3d Intermit Mod
	Skin(human):500 mg/7days mild

vanillin

TOXICITY	IRRITATION
dermal (rat) LD50: >2000 mg/kg ^[1]	Not Available
Oral (rat) LD50: 1400 mg/kg ^[1]	

Legend:

1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2.* Value obtained from manufacturer's msds. Unless otherwise specified data extracted from RTECS - Register of Toxic Effect of chemical Substances

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The acute oral toxicity of propylene glycol is very low, and large quantities are required to cause perceptible health damage in humans. Serious toxicity generally occurs only at plasma concentrations over 1 g/L, which requires extremely high intake over a relatively short period of time. It would be nearly impossible to reach toxic levels by consuming foods or supplements, which contain at most 1 g/kg of PG. Cases of propylene glycol poisoning are usually related to either inappropriate intravenous administration or accidental ingestion of large quantities by children. The potential for long-term oral toxicity is also low.

PROPYLENE GLYCOL

The material may cause skin irritation after prolonged or repeated exposure and may produce a contact dermatitis (nonallergic). This form of dermatitis is often characterised by skin redness (erythema) and swelling the epidermis. Histologically there may be intercellular oedema of the spongy layer (spongiosis) and intracellular oedema of the epidermis.

The acute oral toxicity of propylene glycol is very low, and large quantities are required to cause perceptible health damage in humans.

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VANILLIN

For certain benzyl derivatives:

All members of this group (benzyl, benzoate and 2-hydroxybenzoate (salicylate) esters) contain a benzene ring bonded directly to an oxygenated functional group (aldehyde or ester) that is hydrolysed and/or oxidised to a benzoic acid derivative. As a stable animal metabolite, benzoic acid derivatives are efficiently excreted primarily in the urine. These reaction pathways have been reported in both aquatic and terrestrial species. The similarity of their toxicologic properties is a reflection their participation in these common metabolic pathways.

Miosis, somnolence, muscle weakness, coma, respiratory stimulation, maternal effects involving ovaries, fallopian tubes, uterus, cervix and vagina recorded.

Acute Toxicity	0	Carcinogenicity	0
Skin Irritation/Corrosion	0	Reproductivity	0
Serious Eye Damage/Irritation	~	STOT - Single Exposure	0
Respiratory or Skin sensitisation	0	STOT - Repeated Exposure	0
Mutagenicity	0	Aspiration Hazard	0

Legend:

✓ – Data required to make classification available

🗶 – Data available but does not fill the criteria for classification

Data Not Available to make classification

CMR STATUS

Not Applicable

SECTION 12 ECOLOGICAL INFORMATION

Toxicity

NOT AVAILABLE

Ingredient	Endpoint	Test Duration	Effect	Value	Species	BCF
propylene glycol	Not Available					
vanillin	Not Available					

Propylene glycol is known to exert high levels of biochemical oxygen demand (BOD) during degradation in surface waters. This process can adversely affect aquatic life by consuming oxygen needed by aquatic organisms for survival. Large quantities of dissolved oxygen (DO) in the water column are consumed when microbial populations decompose propylene glycol.

Sufficient dissolved oxygen levels in surface waters are critical for the survival of fish, macro-invertebrates, and other aquatic organisms.

Persistence and degradability

Ingredient	Persistence: Water/Soil	Persistence: Air	
propylene glycol	LOW	LOW	
vanillin	LOW	LOW	

Bioaccumulative potential

Ingredient	Bioaccumulation	
propylene glycol	LOW (BCF = 1)	
vanillin	LOW (LogKOW = 1.21)	

Mobility in soil

Ingredient	Mobility	
propylene glycol	HIGH (KOC = 1)	
vanillin	LOW (KOC = 38.45)	

SECTION 13 DISPOSAL CONSIDERATIONS

Waste treatment methods

Product / Packaging disposal

Legislation addressing waste disposal requirements may differ by country, state and/ or territory. Each user must refer to laws operating in their area. In some areas, certain wastes must be tracked.

A Hierarchy of Controls seems to be common - the user should investigate:

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- Reduction
- ▶ Reuse
- Recycling
- ▶ Disposal (if all else fails)

This material may be recycled if unused, or if it has not been contaminated so as to make it unsuitable for its intended use.

SECTION 14 TRANSPORT INFORMATION

Labels Required

Marine Pollutant

NO

Land transport (DOT): NOT REGULATED FOR TRANSPORT OF DANGEROUS GOODS

Air transport (ICAO-IATA / DGR): NOT REGULATED FOR TRANSPORT OF DANGEROUS GOODS

Sea transport (IMDG-Code / GGVSee): NOT REGULATED FOR TRANSPORT OF DANGEROUS GOODS

SECTION 15 REGULATORY INFORMATION

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

propylene glycol(57-55-6) is found on the following regulatory lists	"US ATSDR Minimal Risk Levels for Hazardous Substances (MRLs)", "US - Washington Toxic air pollutants and their ASIL, SQER and de minimis emission values", "US AIHA Workplace Environmental Exposure Levels (WEELs)", "US Spacecraft Maximum Allowable Concentrations (SMACs) for Airborne Contaminants", "US Toxic Substances Control Act (TSCA) - Chemical Substance Inventory"
vanillin(121-33-5) is	

vanillin(121-33-5) is found on the following regulatory lists

"US AIHA Workplace Environmental Exposure Levels (WEELs)", "US Toxic Substances Control Act (TSCA) - Chemical Substance Inventory"

National Inventory	Status	
Australia - AICS	Y	
Canada - DSL	Y	
China - IECSC	Υ	
Europe - EINEC / ELINCS / NLP	Υ	
Japan - ENCS	Υ	
Korea - KECI	Υ	
New Zealand - NZIoC	Y	
Philippines - PICCS	Υ	
USA - TSCA	Y	
Legend:	Y = All ingredients are on the inventory N = Not determined or one or more ingredients are not on the inventory and are not exempt from listing(see specific ingredients in brackets)	

SECTION 16 OTHER INFORMATION

Other information

Classification of the preparation and its individual components has drawn on official and authoritative sources as well as independent review by the Chemwatch Classification committee using available literature references.

A list of reference resources used to assist the committee may be found at:

www.chemwatch.net

The (M)SDS is a Hazard Communication tool and should be used to assist in the Risk Assessment. Many factors determine whether the reported Hazards are Risks in the workplace or other settings. Risks may be determined by reference to Exposures Scenarios. Scale of use, frequency of use and current or available engineering controls must be considered.

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TEL (+61 3) 9572 4700.