

Calcium Chloride Desiccant

Protection Experts Australia

Chemwatch: **5154-64** Version No: **6.1.1.1**

Safety Data Sheet according to WHS and ADG requirements

Chemwatch Hazard Alert Code: 2

Issue Date: **08/11/2019**Print Date: **08/11/2019**S.GHS.AUS.EN

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

Product Identifier

Product name	Calcium Chloride Desiccant
Chemical Name	calcium chloride
Synonyms	Absorpole; Absorbag; Absorbag Cardboard; Absortop
Other means of identification	Not Available

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

Relevant identified uses Drying agent.

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Details of the supplier of the safety data sheet

Registered company name	Protection Experts Australia	Absortech Asia Pacific Pte Ltd
Address	13 Phiney Place Ingleburn NSW 2565 Australia	12 Tannery Road #05-01 HB Center 1 Singapore 347722 Singapore
Telephone	+61406936575	+65 6423 9271
Fax	+61280070526	+65 6423 9372
Website	www.pro-ex.com.au	http://www.absortech.com/
Email	sales@pro-ex.com.au	asiapacific@absortech.com

Emergency telephone number

Association / Organisation	Not Available
Emergency telephone numbers	Not Available
Other emergency telephone numbers	Not Available

SECTION 2 HAZARDS IDENTIFICATION

Classification of the substance or mixture

HAZARDOUS CHEMICAL. NON-DANGEROUS GOODS. According to the WHS Regulations and the ADG Code.

Poisons Schedule No	Not Applicable
Classification [1] Ac	Acute Toxicity (Oral) Category 4, Eye Irritation Category 2A
Legend: 1.	1. Classified by Chemwatch; 2. Classification drawn from HCIS; 3. Classification drawn from Regulation (EU) No 1272/2008 - Annex VI

Hazard pictogram(s)



SIGNAL WORD	WARNING
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Hazard statement(s)

Label elements

H302	Harmful if swallowed.
H319	Causes serious eye irritation.
AUH066	Repeated exposure may cause skin dryness and cracking.

Precautionary statement(s) Prevention

P270 Do not eat, drink or smoke when using this product.	
20 not out, anim or office when doing the product	P270
P280 Wear protective gloves/protective clothing/eye protection/face protection.	P280

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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.
P301+P312	IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell.
P330	Rinse mouth.

Precautionary statement(s) Storage

Not Applicable

Precautionary statement(s) Disposal

P501

Dispose of contents/container to authorised hazardous or special waste collection point in accordance with any local regulation.

SECTION 3 COMPOSITION / INFORMATION ON INGREDIENTS

Substances

See section below for composition of Mixtures

Mixtures

CAS No	%[weight]	Name
10043-52-4	100	calcium chloride

SECTION 4 FIRST AID MEASURES

Description of first aid measures

Eye Contact	If this product comes in contact with the eyes: Nash 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 or hair contact occurs: ► Flush skin and hair with running water (and soap if available). ► Seek medical attention in event of irritation.
Inhalation	 If dust is inhaled, remove from contaminated area. Encourage patient to blow nose to ensure clear passage of breathing. If irritation or discomfort persists seek medical attention.
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

Treat symptomatically.

SECTION 5 FIREFIGHTING MEASURES

Extinguishing media

- ▶ There is no restriction on the type of extinguisher which may be used.
- ▶ Use extinguishing media suitable for surrounding area.

Special hazards arising from the substrate or mixture

<u> </u>		
Fire Incompatibility	None known.	
Advice for firefighters		
Fire Fighting	 Alert Fire Brigade and tell them location and nature of hazard. Wear breathing apparatus plus protective gloves in the event of a fire. Prevent, by any means available, spillage from entering drains or water courses. Use fire fighting procedures suitable for surrounding area. DO NOT approach containers suspected to be hot. Cool fire exposed containers with water spray from a protected location. If safe to do so, remove containers from path of fire. 	
Fire/Explosion Hazard	 Non combustible. Not considered a significant fire risk, however containers may burn. Decomposition may produce toxic fumes of: hydrogen chloride 	
HAZCHEM	Not Applicable	

SECTION 6 ACCIDENTAL RELEASE MEASURES

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See section 8

Environmental precautions

See section 12

Methods and material for containment and cleaning up

	► Clean up all spills immediately.
	Avoid contact with skin and eyes.
	Wear impervious gloves and safety glasses.
	Use dry clean up procedures and avoid generating dust.
Minor Spills	Vacuum up (consider explosion-proof machines designed to be grounded during storage and use).
winor Spills	▶ Do NOT use air hoses for cleaning
	▶ Place spilled material in clean, dry sealable, labelled container

Major Spills

- ▶ Clear area of personnel and move upwind. Alert Fire Brigade and tell them location and nature of hazard.
- $\begin{tabular}{ll} \hline \textbf{F} & \textbf{Control personal contact with the substance, by using protective equipment and dust respirator.} \\ \hline \end{tabular}$
- Prevent spillage from entering drains, sewers or water courses.
 Recover product wherever possible. Avoid generating dust.
- ► Sweep / shovel up.

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

SECTION 7 HANDLING AND STORAGE

Precautions for safe handling

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Safe handling	 Limit all unnecessary personal contact. Wear protective clothing when risk of exposure occurs. Use in a well-ventilated area. When handling DO NOT eat, drink or smoke. Always wash hands with soap and water after handling. Avoid physical damage to containers. Use good occupational work practice.
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. Store in a cool, dry, well-ventilated area. Store away from incompatible materials and foodstuff containers. Protect containers against physical damage and check regularly for leaks. Observe manufacturer's storage and handling recommendations contained within this SDS.

Conditions for safe storage, including any incompatibilities		
Suitable container	 Polyethylene or polypropylene container. Check all containers are clearly labelled and free from leaks. 	
Storage incompatibility	Calcium chloride (and its hydrates): • are incompatible with boric acid, calcium oxide, bromine trifluoride, 2-furan, percarboxylic acid • may produce explosive hydrogen gas on contact with zinc • catalyse exothermic polymerisation of methyl vinyl ether • produce heat on contact with water • attack metals Addition of a quantity of calcium chloride to boiling water has generated heat sufficient to cause a violent steam explosion on several occasions • In presence of moisture, the material is corrosive to aluminium, zinc and tin producing highly flammable hydrogen gas.	

SECTION 8 EXPOSURE CONTROLS / PERSONAL PROTECTION

Control parameters

OCCUPATIONAL EXPOSURE LIMITS (OEL)

INGREDIENT DATA

Not Available

EMERGENCY LIMITS

EMEROERO FEMILIO				
Ingredient	Material name	TEEL-1	TEEL-2	TEEL-3
calcium chloride	Calcium chloride dihydrate	16 mg/m3	170 mg/m3	1,100 mg/m3
calcium chloride	Calcium chloride	12 mg/m3	130 mg/m3	790 mg/m3
calcium chloride	Calcium chloride hydrate	13 mg/m3	140 mg/m3	850 mg/m3
calcium chloride	Calcium chloride hexahydrate	24 mg/m3	260 mg/m3	1,600 mg/m3

Ingredient	Original IDLH	Revised IDLH
calcium chloride	Not Available	Not Available

OCCUPATIONAL EXPOSURE BANDING

Ingredient Occupational Exposure Band Rating Occu	pational Exposure Band Limit
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calcium chloride	E	≤ 0.01 mg/m³
Notes:	Occupational exposure banding is a process of assigning chemicals into s adverse health outcomes associated with exposure. The output of this pro range of exposure concentrations that are expected to protect worker hea	ocess is an occupational exposure band (OEB), which corresponds to a

xposure controls	
Appropriate engineering controls	General exhaust is adequate under normal operating conditions.
Personal protection	
Eye and face protection	 Safety glasses with side shields. Chemical goggles. Contact lenses may pose a special hazard; soft contact lenses may absorb and concentrate irritants. A written policy document, describing the wearing of lenses or restrictions on use, should be created for each workplace or task. This should include a review of lens absorption and adsorption for the class of chemicals in use and an account of injury experience. Medical and first-aid personnel should be trained in their removal and suitable equipment should be readily available. In the event of chemical exposure, begin eye irrigation immediately and remove contact lens as soon as practicable.
Skin protection	See Hand protection below
Hands/feet protection	 Wear chemical protective gloves, e.g. PVC. Wear safety footwear or safety gumboots, e.g. Rubber
Body protection	See Other protection below
Other protection	Overalls. P.V.C. apron. Barrier cream. Skin cleansing cream. Eye wash unit.

Respiratory protection

Particulate. (AS/NZS 1716 & 1715, EN 143:2000 & 149:001, ANSI Z88 or national equivalent)

Required Minimum Protection Factor	Half-Face Respirator	Full-Face Respirator	Powered Air Respirator
up to 10 x ES	P1 Air-line*	-	PAPR-P1 -
up to 50 x ES	Air-line**	P2	PAPR-P2
up to 100 x ES	-	P3	-
		Air-line*	-
100+ x ES	-	Air-line**	PAPR-P3

^{* -} Negative pressure demand ** - Continuous flow

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)

- ▶ Respirators may be necessary when engineering and administrative controls do not adequately prevent exposures.
- The decision to use respiratory protection should be based on professional judgment that takes into account toxicity information, exposure measurement data, and frequency and likelihood of the worker's exposure - ensure users are not subject to high thermal loads which may result in heat stress or distress due to personal protective equipment (powered, positive flow, full face apparatus may be an option).
- Published occupational exposure limits, where they exist, will assist in determining the adequacy of the selected respiratory protection. These may be government mandated or vendor recommended.
- Certified respirators will be useful for protecting workers from inhalation of particulates when properly selected and fit tested as part of a complete respiratory protection program.
- ▶ Use approved positive flow mask if significant quantities of dust becomes airborne.
- ▶ Try to avoid creating dust conditions.

SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Appearance	White-grey odourless granules, soluble in water. Hygroscopic.			
Physical state	Divided Solid	Relative density (Water = 1)	750-800 kg/m3 bulk density	
Odour	Not Available	Partition coefficient n-octanol / water	Not Available	
Odour threshold	Not Available	Auto-ignition temperature (°C)	Not Applicable	
pH (as supplied)	Not Applicable	Applicable Decomposition temperature Not Available		
Melting point / freezing point (°C)	772	Viscosity (cSt)	Not Applicable	
Initial boiling point and boiling range (°C)	Not Available	Molecular weight (g/mol)	110.99	
Flash point (°C)	Not Applicable	Taste	Not Available	
Evaporation rate	Not Applicable	Explosive properties	Not Available	
Flammability	Not Applicable	Oxidising properties	Not Available	

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Upper Explosive Limit (%)	Not Applicable	Surface Tension (dyn/cm or mN/m)	Not Applicable
Lower Explosive Limit (%)	Not Applicable	Volatile Component (%vol)	Not Applicable
Vapour pressure (kPa)	Not Applicable	Gas group	Not Available
Solubility in water	Miscible	pH as a solution (1%)	5-6 (10% suspension)
Vapour density (Air = 1)	Not Applicable	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

Information on toxicological effects

Accidental ingestion of the material may be harmful; animal experiments indicate that ingestion of less than 150 gram may be fatal or may produce serious damage to the health of the individual. There is some evidence to suggest that this material can cause inflammation of the skin on contact in some persons. Open cuts, abraded or irritated skin should not be exposed to this material Solution of material in moisture on the skin, or perspiration, may increase irritant effects Entry into the blood-stream, through, for example, cuts, abrasions or lesions, may produce systemic injury with harmful effects. Examine the skin prior to the use of the material and ensure that any external damage is suitably protected. There is evidence that material may produce eye irritation in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Chronic Chronic There is evidence that material may produce eye irritation in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Ingestination in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Ingestination in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Ingestination in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Ingestination in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Ingestination in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Ingestination of the skin on contact may cause drying with cracking, irritation and possible dermatitis following. Ingestination of the skin on contact may cause drying with cracking, irritation and possible dermatitis following. Ingestination of the	Inhaled	The material is not thought to produce either adverse health effects or irritation of the respiratory tract following inhalation (as classified by EC Directives using animal models). Nevertheless, adverse systemic effects have been produced following exposure of animals by at least one other route and good hygiene practice requires that exposure be kept to a minimum and that suitable control measures be used in an occupational setting.		
Open cuts, abraded or irritated skin should not be exposed to this material Solution of material in moisture on the skin, or perspiration, may increase irritant effects Entry into the blood-stream, through, for example, cuts, abrasions or lesions, may produce systemic injury with harmful effects. Examine the skin prior to the use of the material and ensure that any external damage is suitably protected. Eye There is evidence that material may produce eye irritation in some persons and produce eye damage 24 hours or more after instillation. Severe inflammation may be expected with pain. Prolonged or repeated skin contact may cause drying with cracking, irritation and possible dermatitis following. Long term exposure to high dust concentrations may cause changes in lung function i.e. pneumoconiosis, caused by particles less than 0.5 micron penetrating and remaining in the lung. TOXICITY IRRITATION Not Available TOXICITY IRRITATION dermal (rat) LD50: =2630 mg/kg ^[2] Eye (unknown): severe* [ICI] Oral (rat) LD50: 1000 mg/kg ^[2] Skin (unknown): moderate* Legend: 1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2.* Value obtained from manufacturer's SDS. Unless otherwise	Ingestion	produce serious damage to the health of the individual.		
inflammation may be expected with pain. Prolonged or repeated skin contact may cause drying with cracking, irritation and possible dermatitis following. Long term exposure to high dust concentrations may cause changes in lung function i.e. pneumoconiosis, caused by particles less than 0.5 micron penetrating and remaining in the lung. TOXICITY IRRITATION	Skin Contact	Open cuts, abraded or irritated skin should not be exposed to this material Solution of material in moisture on the skin, or perspiration, may increase irritant effects Entry into the blood-stream, through, for example, cuts, abrasions or lesions, may produce systemic injury with harmful effects. Examine the skin		
Chronic Long term exposure to high dust concentrations may cause changes in lung function i.e. pneumoconiosis, caused by particles less than 0.5 micron penetrating and remaining in the lung. TOXICITY Not Available TOXICITY Not Available TOXICITY IRRITATION Not Available TOXICITY IRRITATION dermal (rat) LD50: =2630 mg/kg ^[2] Cral (rat) LD50: 1000 mg/kg ^[2] Eye (unknown): severe* [ICI] Oral (rat) LD50: 1000 mg/kg ^[2] Skin (unknown): moderate* Legend: 1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2.* Value obtained from manufacturer's SDS. Unless otherwise	Еуе			
Calcium Chloride Desiccant Not Available Not Available TOXICITY IRRITATION dermal (rat) LD50: =2630 mg/kg ^[2] Eye (unknown): severe* [ICI] Oral (rat) LD50: 1000 mg/kg ^[2] Skin (unknown): moderate* Legend: 1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2.* Value obtained from manufacturer's SDS. Unless otherwise	Chronic	Long term exposure to high dust concentrations may cause changes in lung function i.e. pneumoconiosis, caused by particles less than 0.5		
Not Available TOXICITY IRRITATION		TOXICITY	IRRITATION	
calcium chloride dermal (rat) LD50: =2630 mg/kg ^[2] Eye (unknown): severe* [ICI] Oral (rat) LD50: 1000 mg/kg ^[2] Skin (unknown): moderate* Legend: 1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2.* Value obtained from manufacturer's SDS. Unless otherwise	Calcium Chloride Desiccant	Not Available	Not Available	
Oral (rat) LD50: 1000 mg/kg ^[2] Skin (unknown): moderate* Legend: 1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2.* Value obtained from manufacturer's SDS. Unless otherwise		TOXICITY	IRRITATION	
Legend: 1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2.* Value obtained from manufacturer's SDS. Unless otherwise	calcium chloride	dermal (rat) LD50: =2630 mg/kg ^[2]	Eye (unknown): severe* [ICI]	
, , ,		Oral (rat) LD50: 1000 mg/kg ^[2]	Skin (unknown): moderate*	
	Legend:	, ,		

For calcium:

CALCIUM CHLORIDE

Toxicity from calcium is not common, because the gastrointestinal tract normally limits the amount of calcium absorbed. Therefore, short-term intake of large amounts of calcium does not generally produce any ill effects aside from constipation and an increased risk of kidney stones. However, more severe toxicity can occur when excess calcium is ingested over long periods, or when calcium is combined with increased amounts of vitamin D, which increases calcium absorption. Calcium toxicity is also found sometimes after excessive administration of calcium via a vein. Toxicity shows as abnormal deposition of calcium in tissues and by elevated blood calcium levels. However, high blood calcium is often due to other causes, such as abnormally high amounts of parathyroid hormone (PTH). Usually, under these circumstances, bone density is lost, and the resulting high blood calcium can cause kidney stones and abdominal pain.

The material may produce severe irritation to the eye causing pronounced inflammation. Repeated or prolonged exposure to irritants may produce conjunctivitis.

The material may cause skin irritation after prolonged or repeated exposure and may produce on contact skin redness, swelling, the production of vesicles, scaling and thickening of the skin.

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

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✓ – Data available to make classification

SECTION 12 ECOLOGICAL INFORMATION

Toxicity

Calcium Chloride Desiccant	ENDPOINT	TEST DURATION (HR)	SPECIES	VALUE	SOURCE
	Not Available	Not Available	Not Available	Not Available	Not Available
	ENDPOINT	TEST DURATION (HR)	SPECIES	VALUE	SOURCE
	LC50	96	Fish	=3mg/L	1
calcium chloride	EC50	48	Crustacea	1-62mg/L	2
	EC50	72	Algae or other aquatic plants	2-900mg/L	2
	BCFD	48	Crustacea	0.0832425mg/L	4
	EC20	72	Algae or other aquatic plants	1-mg/L	2
	NOEC	48	Crustacea	2-mg/L	2
Legend:	Extracted from 1. IUCLID Toxicity Data 2. Europe ECHA Registered Substances - Ecotoxicological Information - Aquatic Toxicity 3. EPIWIN Suite V3.12 (QSAR) - Aquatic Toxicity Data (Estimated) 4. US EPA, Ecotox database - Aquatic Toxicity Data 5. ECETOC Aquatic Hazard Assessment Data 6. NITE (Japan) - Bioconcentration Data 7. METI (Japan) - Bioconcentration Data 8. Vendor Data				

DO NOT discharge into sewer or waterways.

Persistence and degradability

Ingredient	Persistence: Water/Soil	Persistence: Air
	No Data available for all ingredients	No Data available for all ingredients

Bioaccumulative potential

Ingredient	Bioaccumulation	
	No Data available for all ingredients	

Mobility in soil

Ingredient	Mobility	
	No Data available for all ingredients	

SECTION 13 DISPOSAL CONSIDERATIONS

Waste treatment methods

Product / Packaging disposal

- ▶ Recycle wherever possible or consult manufacturer for recycling options.
- Consult State Land Waste Management Authority for disposal.
- ▶ Bury residue in an authorised landfill.
- Recycle containers if possible, or dispose of in an authorised landfill.

SECTION 14 TRANSPORT INFORMATION

Labels Required

Marine Pollutant	NO
HAZCHEM	Not Applicable

Land transport (ADG): 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

Transport in bulk according to Annex II of MARPOL and the IBC code

Not Applicable

SECTION 15 REGULATORY INFORMATION

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

CALCIUM CHLORIDE IS FOUND ON THE FOLLOWING REGULATORY LISTS

Australia Hazardous Chemical Information System (HCIS) - Hazardous Chemicals

Australia Inventory of Chemical Substances (AICS)

National Inventory Status

National Inventory	Status

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Australia - AICS	Yes
Canada - DSL	Yes
Canada - NDSL	No (calcium chloride)
China - IECSC	Yes
Europe - EINEC / ELINCS / NLP	Yes
Japan - ENCS	Yes
Korea - KECI	Yes
New Zealand - NZIoC	Yes
Philippines - PICCS	Yes
USA - TSCA	Yes
Taiwan - TCSI	Yes
Mexico - INSQ	Yes
Vietnam - NCI	Yes
Russia - ARIPS	Yes
Legend:	Yes = All CAS declared ingredients are on the inventory No = One or more of the CAS listed ingredients are not on the inventory and are not exempt from listing(see specific ingredients in brackets)

SECTION 16 OTHER INFORMATION

Revision Date	08/11/2019
Initial Date	27/10/2014

SDS Version Summary

Version	Issue Date	Sections Updated
5.1.1.1	01/11/2019	One-off system update. NOTE: This may or may not change the GHS classification
6.1.1.1	08/11/2019	Synonyms, Name

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.

The 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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