

Safety data sheet Safety data sheet

acc. to Regulation (EC) No. 1907/2006 (REACH)



PCB 190 ROTI®Star

article number: **1TPX**
Version: **1.0 en**

date of compilation: 2022-09-09

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1 Product identifier

Identification of the substance	PCB 190 ROTI®Star
Article number	1TPX
EC number	690-227-7
CAS number	41411-64-7
Alternative name(s)	Biphenyl, polychlorinated Hydrocarbon, chlorinated
Alternative number(s)	CAS number: 1336-36-3

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

Relevant identified uses:	Laboratory and analytical use Laboratory chemical
Uses advised against:	Do not use for products which come into contact with foodstuffs. Do not use for private purposes (household).

1.3 Details of the supplier of the safety data sheet

Carl Roth GmbH + Co KG
Schoemperlenstr. 3-5
D-76185 Karlsruhe
Germany

Telephone:+49 (0) 721 - 56 06 0

Telefax: +49 (0) 721 - 56 06 149

e-mail: sicherheit@carlroth.de

Website: www.carlroth.de

Competent person responsible for the safety data sheet: :Department Health, Safety and Environment

e-mail (competent person): **sicherheit@carlroth.de**

1.4 Emergency telephone number

Name	Street	Postal code/city	Telephone	Website
National Poisons Information Service City Hospital	Dudley Rd	B187QH Birmingham	844 892 0111	

SECTION 2: Hazards identification

2.1 Classification of the substance or mixture

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Classification acc. to GHS

Section	Hazard class	Cat-egory	Hazard class and category	Hazard statement
3.9	Specific target organ toxicity - repeated exposure	2	STOT RE 2	H373
4.1A	Hazardous to the aquatic environment - acute hazard	1	Aquatic Acute 1	H400
4.1C	Hazardous to the aquatic environment - chronic hazard	1	Aquatic Chronic 1	H410

For full text of abbreviations: see SECTION 16

The most important adverse physicochemical, human health and environmental effects

Delayed or immediate effects can be expected after short or long-term exposure. Spillage and fire water can cause pollution of watercourses.

2.2 Label elements

Labelling

Signal word

Warning

Pictograms

GHS08, GHS09



Hazard statements

H373

May cause damage to organs through prolonged or repeated exposure

H410

Very toxic to aquatic life with long lasting effects

Precautionary statements

Precautionary statements - prevention

P260

Do not breathe dust/fume/gas/mist/vapours/spray

P273

Avoid release to the environment

2.3 Other hazards

Results of PBT and vPvB assessment

According to the results of its assessment, this substance is not a PBT or a vPvB.

Endocrine disrupting properties

The substance has an endocrine disrupting potential.

SECTION 3: Composition/information on ingredients

3.1 Substances

Name of substance	PCB 190
Molecular formula	C ₁₂ H ₃ Cl ₇
Molar mass	395,3 g/mol
CAS No	41411-64-7
EC No	690-227-7

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Substance, Specific Conc. Limits, M-factors, ATE			
Specific Conc. Limits	M-Factors	ATE	Exposure route
STOT RE 2; H373: C ≥ 0,005 %	-	-	

SECTION 4: First aid measures

4.1 Description of first aid measures



General notes

Take off contaminated clothing.

Following inhalation

Provide fresh air. In all cases of doubt, or when symptoms persist, seek medical advice.

Following skin contact

Rinse skin with water/shower. In all cases of doubt, or when symptoms persist, seek medical advice.

Following eye contact

Rinse cautiously with water for several minutes. In all cases of doubt, or when symptoms persist, seek medical advice.

Following ingestion

Rinse mouth. Call a doctor if you feel unwell.

4.2 Most important symptoms and effects, both acute and delayed

Symptoms and effects are not known to date.

4.3 Indication of any immediate medical attention and special treatment needed

none

SECTION 5: Firefighting measures

5.1 Extinguishing media



Suitable extinguishing media

co-ordinate firefighting measures to the fire surroundings
water, foam, dry extinguishing powder, ABC-powder

Unsuitable extinguishing media

water jet

5.2 Special hazards arising from the substance or mixture

Combustible.

Hazardous combustion products

In case of fire may be liberated: Carbon monoxide (CO), Carbon dioxide (CO₂), Hydrogen chloride (HCl)

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5.3 Advice for firefighters

In case of fire and/or explosion do not breathe fumes. Do not allow firefighting water to enter drains or water courses. Fight fire with normal precautions from a reasonable distance. Wear self-contained breathing apparatus.

SECTION 6: Accidental release measures

6.1 Personal precautions, protective equipment and emergency procedures



For non-emergency personnel

Avoid contact with skin, eyes and clothes. Do not breathe dust.

6.2 Environmental precautions

Keep away from drains, surface and ground water. Retain contaminated washing water and dispose of it.

6.3 Methods and material for containment and cleaning up

Advice on how to contain a spill

Covering of drains. Take up mechanically.

Advice on how to clean up a spill

Take up mechanically. Control of dust.

Other information relating to spills and releases

Place in appropriate containers for disposal. Ventilate affected area.

6.4 Reference to other sections

Hazardous combustion products: see section 5. Personal protective equipment: see section 8. Incompatible materials: see section 10. Disposal considerations: see section 13.

SECTION 7: Handling and storage

7.1 Precautions for safe handling

Avoid dust formation.

Measures to protect the environment

Avoid release to the environment.

Advice on general occupational hygiene

Wash hands before breaks and after work. Keep away from food, drink and animal feedingstuffs.

7.2 Conditions for safe storage, including any incompatibilities

Store in a dry place. Keep in a cool place.

Incompatible substances or mixtures

Observe hints for combined storage.

Consideration of other advice:

Specific designs for storage rooms or vessels

Recommended storage temperature: 2 – 8 °C

7.3 Specific end use(s)

No information available.

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SECTION 8: Exposure controls/personal protection

8.1 Control parameters

National limit values

Occupational exposure limit values (Workplace Exposure Limits)

Country	Name of agent	CAS No	Identifier	TWA [mg/m ³]	STEL [mg/m ³]	Ceiling-C [mg/m ³]	Notation	Source
GB	polychlorinated biphenyls (PCB)	1336-36-3	WEL	0,1				EH40/2005

Notation

Ceiling-C	Ceiling value is a limit value above which exposure should not occur
STEL	Short-term exposure limit: a limit value above which exposure should not occur and which is related to a 15-minute period (unless otherwise specified)
TWA	Time-weighted average (long-term exposure limit): measured or calculated in relation to a reference period of 8 hours time-weighted average (unless otherwise specified)

8.2 Exposure controls

Individual protection measures (personal protective equipment)

Eye/face protection



Use safety goggle with side protection.

Skin protection



• hand protection

Wear suitable gloves. Chemical protection gloves are suitable, which are tested according to EN 374. For special purposes, it is recommended to check the resistance to chemicals of the protective gloves mentioned above together with the supplier of these gloves. The times are approximate values from measurements at 22 °C and permanent contact. Increased temperatures due to heated substances, body heat etc. and a reduction of the effective layer thickness by stretching can lead to a considerable reduction of the breakthrough time. If in doubt, contact manufacturer. At an approx. 1.5 times larger / smaller layer thickness, the respective breakthrough time is doubled / halved. The data apply only to the pure substance. When transferred to substance mixtures, they may only be considered as a guide.

• type of material

FKM (fluoro rubber)

• material thickness

0,4 mm

• breakthrough times of the glove material

>480 minutes (permeation: level 6)

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• other protection measures

Take recovery periods for skin regeneration. Preventive skin protection (barrier creams/ointments) is recommended.

Respiratory protection



Respiratory protection necessary at: Dust formation. Particulate filter device (EN 143). Type: A-P2 (combined filters against particles and organic gases and vapours, colour code: Brown/White).

Environmental exposure controls

Keep away from drains, surface and ground water.

SECTION 9: Physical and chemical properties

9.1 Information on basic physical and chemical properties

Physical state	solid
Colour	colourless
Odour	faintly perceptible
Melting point/freezing point	not determined
Boiling point or initial boiling point and boiling range	not determined
Flammability	this material is combustible, but will not ignite readily
Lower and upper explosion limit	not determined
Flash point	not applicable
Auto-ignition temperature	not determined
Decomposition temperature	not relevant
pH (value)	not applicable
Kinematic viscosity	not relevant
<u>Solubility(ies)</u>	
Water solubility	(practically insoluble)
<u>Partition coefficient</u>	
Partition coefficient n-octanol/water (log value):	this information is not available
Vapour pressure	not determined
<u>Density and/or relative density</u>	
Density	not determined
Relative vapour density	information on this property is not available

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Particle characteristics No data available.

Other safety parameters

Oxidising properties none

9.2 Other information

Information with regard to physical hazard classes: hazard classes acc. to GHS (physical hazards): not relevant

Other safety characteristics: There is no additional information.

SECTION 10: Stability and reactivity

10.1 Reactivity

The product in the delivered form is not dust explosion capable; the enrichment of fine dust however leads to the danger of dust explosion.

10.2 Chemical stability

The material is stable under normal ambient and anticipated storage and handling conditions of temperature and pressure.

10.3 Possibility of hazardous reactions

Violent reaction with: strong oxidiser

10.4 Conditions to avoid

There are no specific conditions known which have to be avoided.

10.5 Incompatible materials

There is no additional information.

10.6 Hazardous decomposition products

Hazardous combustion products: see section 5.

SECTION 11: Toxicological information

11.1 Information on toxicological effects

Classification acc. to GHS

Acute toxicity

Shall not be classified as acutely toxic.

Skin corrosion/irritation

Shall not be classified as corrosive/irritant to skin.

Serious eye damage/eye irritation

Shall not be classified as seriously damaging to the eye or eye irritant.

Respiratory or skin sensitisation

Shall not be classified as a respiratory or skin sensitiser.

Germ cell mutagenicity

Shall not be classified as germ cell mutagenic.

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Carcinogenicity

Shall not be classified as carcinogenic.

Reproductive toxicity

Shall not be classified as a reproductive toxicant.

Specific target organ toxicity - single exposure

Shall not be classified as a specific target organ toxicant (single exposure).

Specific target organ toxicity - repeated exposure

May cause damage to organs through prolonged or repeated exposure.

Aspiration hazard

Shall not be classified as presenting an aspiration hazard.

Symptoms related to the physical, chemical and toxicological characteristics

• If swallowed

Data are not available.

• If in eyes

Data are not available.

• If inhaled

Data are not available.

• If on skin

Data are not available.

• Other information

Irreversible damage to internal organs

11.2 Endocrine disrupting properties

This substance is known as an "endocrine disruptor".

11.3 Information on other hazards

There is no additional information.

SECTION 12: Ecological information

12.1 Toxicity

Very toxic to aquatic life with long lasting effects.

Biodegradation

Data are not available.

12.2 Process of degradability

Theoretical Oxygen Demand: 0,8904 mg/mg
Theoretical Carbon Dioxide: 1,336 mg/mg

12.3 Bioaccumulative potential

Data are not available.

12.4 Mobility in soil

Data are not available.

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12.5 Results of PBT and vPvB assessment

Data are not available.

12.6 Endocrine disrupting properties

This substance is known as an "endocrine disruptor".

12.7 Other adverse effects

Data are not available.

SECTION 13: Disposal considerations

13.1 Waste treatment methods



This material and its container must be disposed of as hazardous waste. Dispose of contents/container in accordance with local/regional/national/international regulations.

Sewage disposal-relevant information

Do not empty into drains. Avoid release to the environment. Refer to special instructions/safety data sheets.

Waste treatment of containers/packagings

It is a dangerous waste; only packagings which are approved (e.g. acc. to ADR) may be used.

13.2 Relevant provisions relating to waste

The allocation of waste identity numbers/waste descriptions must be carried out according to the EEC, specific to the industry and process. Waste catalogue ordinance (Germany).

13.3 Remarks

Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities. Please consider the relevant national or regional provisions.

SECTION 14: Transport information

14.1 UN number or ID number

ADRRID	UN 3432
IMDG-Code	UN 3432
ICAO-TI	UN 3432

14.2 UN proper shipping name

ADRRID	POLYCHLORINATED BIPHENYLS, SOLID
IMDG-Code	POLYCHLORINATED BIPHENYLS, SOLID
ICAO-TI	Polychlorinated biphenyls, solid

14.3 Transport hazard class(es)

ADRRID	9
IMDG-Code	9
ICAO-TI	9

14.4 Packing group

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ADRRID	II
IMDG-Code	II
ICAO-TI	II

14.5 Environmental hazards hazardous to the aquatic environment

14.6 Special precautions for user



Provisions for dangerous goods (ADR) should be complied within the premises.

14.7 Maritime transport in bulk according to IMO instruments

The cargo is not intended to be carried in bulk.

14.8 Information for each of the UN Model Regulations

Transport of dangerous goods by road, rail and inland waterway (ADR/RID/ADN) - Additional information

Proper shipping name	POLYCHLORINATED BIPHENYLS, SOLID
Particulars in the transport document	UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, II, (D/E), environmentally hazardous
Classification code	M2
Danger label(s)	9, "Fish and tree"
 	
Environmental hazards	YES (hazardous to the aquatic environment)
Special provisions (SP)	305, 802(ADN)
Excepted quantities (EQ)	E2
Limited quantities (LQ)	1 kg
Transport category (TC)	0
Tunnel restriction code (TRC)	D/E
Hazard identification No	90
Emergency Action Code	2X

Regulations concerning the International Carriage of Dangerous Goods by Rail (RID) Additional information

Classification code	M2
Danger label(s)	9 Fish and tree
 	
Environmental hazards	Yes Hazardous to water
Special provisions (SP)	305, 802(ADN)
Excepted quantities (EQ)	E2
Limited quantities (LQ)	1 kg



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Transport category (TC)	0
Hazard identification No	90
International Maritime Dangerous Goods Code (IMDG) - Additional information	
Proper shipping name	POLYCHLORINATED BIPHENYLS, SOLID
Particulars in the shipper's declaration	UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, II, MARINE POLLUTANT
Marine pollutant	yes (P) (hazardous to the aquatic environment)
Danger label(s)	9, "Fish and tree"
	
Special provisions (SP)	305, 958
Excepted quantities (EQ)	E2
Limited quantities (LQ)	1 kg
EmS	F-A, S-A
Stowage category	A
International Civil Aviation Organization (ICAO-IATA/DGR) - Additional information	
Proper shipping name	Polychlorinated biphenyls, solid
Particulars in the shipper's declaration	UN3432, Polychlorinated biphenyls, solid, 9, II
Environmental hazards	YES (hazardous to the aquatic environment)
Danger label(s)	9
	
Special provisions (SP)	A11
Excepted quantities (EQ)	E2

SECTION 15: Regulatory information

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

Relevant provisions of the European Union (EU)

Seveso Directive

2012/18/EU (Seveso III)			
No	Dangerous substance/hazard categories	Qualifying quantity (tonnes) for the application of lower and upper-tier requirements	Notes
E1	environmental hazards (hazardous to the aquatic environment, cat. 1)	100 200	56)

Notation

56) Hazardous to the Aquatic Environment in category Acute 1 or Chronic 1

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Deco-Paint Directive

VOC content	0 %
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Industrial Emissions Directive (IED)

VOC content	0 %
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Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)

not listed

Regulation concerning the establishment of a European Pollutant Release and Transfer Register (PRTR)

Pollutant release and transfer registers (PRTR)			
Name of substance	CAS No	Remarks	Threshold for releases to air (kg/year)
PCB 190	1336-36-3		0,1

Water Framework Directive (WFD)

List of pollutants (WFD)				
Name of substance	Name acc. to inventory	CAS No	Listed in	Remarks
PCB 190	Dioxins and dioxin-like compounds		b)	HAZ (9)
PCB 190	Dioxins and dioxin-like compounds		c)	
PCB 190	Organohalogen compounds and substances which may form such compounds in the aquatic environment		a)	
PCB 190	Substances and preparations, or the breakdown products of such, which have been proved to possess carcinogenic or mutagenic properties or properties which may affect steroidogenic, thyroid, reproduction or other endocrine-related functions in or via the aquatic environment		a)	
PCB 190	Persistent hydrocarbons and persistent and bioaccumulable organic toxic substances		a)	

Legend

(9)

This refers to the following compounds:

7 polychlorinated dibenzo-p-dioxins (PCDDs): 2,3,7,8-T4CDD (CAS 1746-01-6), 1,2,3,7,8-P5CDD (CAS 40321-76-4), 1,2,3,4,7,8-H6CDD (CAS 39227-28-6), 1,2,3,6,7,8-H6CDD (CAS 57653-85-7), 1,2,3,7,8,9-H6CDD (CAS 19408-74-3), 1,2,3,4,6,7,8-H7CDD (CAS 35822-46-9), 1,2,3,4,6,7,8,9-O8CDD (CAS 3268-87-9)

10 polychlorinated dibenzofurans (PCDFs): 2,3,7,8-T4CDF (CAS 51207-31-9), 1,2,3,7,8-P5CDF (CAS 57117-41-6), 2,3,4,7,8-P5CDF (CAS 57117-31-4), 1,2,3,4,7,8-H6CDF (CAS 70648-26-9), 1,2,3,6,7,8-H6CDF (CAS 57117-44-9), 1,2,3,7,8,9-H6CDF (CAS 72918-21-9), 2,3,4,6,7,8-H6CDF (CAS 60851-34-5), 1,2,3,4,6,7,8-H7CDF (CAS 67562-39-4), 1,2,3,4,7,8,9-H7CDF (CAS 55673-89-7), 1,2,3,4,6,7,8,9-O8CDF (CAS 39001-02-0)

12 dioxin-like polychlorinated biphenyls (PCB-DL): 3,3',4,4'-T4CB (PCB 77, CAS 32598-13-3), 3,3',4',5'-T4CB (PCB 81, CAS 70362-50-4), 2,3,3',4,4'-P5CB (PCB 105, CAS 32598-14-4), 2,3,4,4',5'-P5CB (PCB 114, CAS 74472-37-0), 2,3',4,4',5'-P5CB (PCB 118, CAS 31508-00-6), 2,3',4,4',5'-P5CB (PCB 123, CAS 65510-44-3), 3,3',4,4',5'-P5CB (PCB 126, CAS 57465-28-8), 2,3,3',4,4',5'-H6CB (PCB 156, CAS 38380-08-4), 2,3,3',4,4',5'-H6CB (PCB 157, CAS 69782-90-7), 2,3',4,4',5',5'-H6CB (PCB 167, CAS 52663-72-6), 3,3',4,4',5',5'-H6CB (PCB 169, CAS 32774-16-6), 2,3,3',4,4',5',5'-H7CB (PCB 189, CAS 39635-31-9).

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Legend

- A) Indicative list of the main pollutants
- B) List of priority substances in the field of water policy
- C) Environmental Quality Standards for Priority Substances and certain other pollutants
- HAZ Identified as priority hazardous substance

Regulation on the marketing and use of explosives precursors

not listed

Regulation on drug precursors

not listed

Regulation on substances that deplete the ozone layer (ODS)

not listed

Regulation concerning the export and import of hazardous chemicals (PIC)

chemicals subject to the international prior informed consent (PIC) procedure (the 'PIC procedure').

Name of substance	Name acc. to inventory	CAS No	Wt%	Category / subcategory	Use limitation
PCB 190	polychlorinated biphenyls (PCB)	1336-36-3	100	i	
PCB 190	polychlorinated biphenyls (PCB)	1336-36-3	100		

Legend

- i Category: i - industrial chemical

Regulation on persistent organic pollutants (POP)

Name of substance	CAS No	Wt%	Type of registration	Remarks	Exemptions	Concentration limit
PCB 190	1336-36-3	100	Annex I - A		A1-ex-08	
PCB 190	1336-36-3	100	Annex III - A			
PCB 190	1336-36-3	100	Annex IV			50 mg/kg

Legend

- A1-ex-08 Without prejudice to Directive 96/59/EC, articles already in use at the time of the entry into force of this Regulation are allowed to be used. Member States shall identify and remove from use equipment (e.g. transformers, capacitors or other receptacles containing liquid stocks) containing more than 0,005 % PCBs and volumes greater than 0,05 dm³, as soon as possible but no later than 31 December 2025.
- annex I - A Part A - Substances listed in the Convention and in the Protocol as well as substances listed only in the Convention
- annex III - A List of substances subject to release reduction provisions
- annex IV List of substances subject to waste management provisions set out in Article 7

National regulations(GB)

List of substances subject to authorisation (GB REACH, Annex 14) / SVHC - candidate list

not listed

Restrictions according to GB REACH, Annex 17

not listed

Other information

Directive 94/33/EC on the protection of young people at work. Observe employment restrictions under the Maternity Protection Directive (92/85/EEC) for expectant or nursing mothers.

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National inventories

Country	Inventory	Status
AU	AIIC	substance is listed
CA	DSL	substance is listed
CN	IECSC	substance is listed
EU	ECSI	substance is listed
KR	KECI	substance is listed
MX	INSQ	substance is listed
PH	PICCS	substance is listed
TW	TCSI	substance is listed
US	TSCA	substance is listed

Legend

AIIC	Australian Inventory of Industrial Chemicals
DSL	Domestic Substances List (DSL)
ECSI	EC Substance Inventory (EINECS, ELINCS, NLP)
IECSC	Inventory of Existing Chemical Substances Produced or Imported in China
INSQ	National Inventory of Chemical Substances
KECI	Korea Existing Chemicals Inventory
PICCS	Philippine Inventory of Chemicals and Chemical Substances (PICCS)
TCSI	Taiwan Chemical Substance Inventory
TSCA	Toxic Substance Control Act

15.2 Chemical Safety Assessment

No Chemical Safety Assessment has been carried out for this substance.

SECTION 16: Other information

Abbreviations and acronyms

Abbr.	Descriptions of used abbreviations
ADN	Accord européen relatif au transport international des marchandises dangereuses par voies de navigation intérieures (European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways)
ADR	Accord relatif au transport international des marchandises dangereuses par route (Agreement concerning the International Carriage of Dangerous Goods by Road)
ATE	Acute Toxicity Estimate
CAS	Chemical Abstracts Service (service that maintains the most comprehensive list of chemical substances)
Ceiling-C	Ceiling value
DGR	Dangerous Goods Regulations (see IATA/DGR)
EC No	The EC Inventory (EINECS, ELINCS and the NLP-list) is the source for the seven-digit EC number, an identifier of substances commercially available within the EU (European Union)
EH40/2005	EH40/2005 Workplace exposure limits (http://www.nationalarchives.gov.uk/doc/open-government-licence/)
EINECS	European Inventory of Existing Commercial Chemical Substances
ELINCS	European List of Notified Chemical Substances
EmS	Emergency Schedule
GB REACH	The REACH etc. (Amendment etc.) (EU Exit) Regulations 2019, SI 2019/758 (as amended)

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Abbr.	Descriptions of used abbreviations
GHS	"Globally Harmonized System of Classification and Labelling of Chemicals" developed by the United Nations
IATA	International Air Transport Association
IATA/DGR	Dangerous Goods Regulations (DGR) for the air transport (IATA)
ICAO	International Civil Aviation Organization
ICAO-TI	Technical instructions for the safe transport of dangerous goods by air
IMDG	International Maritime Dangerous Goods Code
IMDG-Code	International Maritime Dangerous Goods Code
NLP	No-Longer Polymer
PBT	Persistent, Bioaccumulative and Toxic
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RID	Règlement concernant le transport International ferroviaire des marchandises Dangereuses (Regulations concerning the International carriage of Dangerous goods by Rail)
STEL	Short-term exposure limit
TWA	Time-weighted average
VOC	Volatile Organic Compounds
vPvB	Very Persistent and very Bioaccumulative
WEL	Workplace exposure limit

Key literature references and sources for data

Agreement concerning the International Carriage of Dangerous Goods by Road (ADR). Regulations concerning the International Carriage of Dangerous Goods by Rail (RID). International Maritime Dangerous Goods Code (IMDG). Dangerous Goods Regulations (DGR) for the air transport (IATA).

List of relevant phrases (code and full text as stated in section 2 and 3)

Code	Text
H373	May cause damage to organs through prolonged or repeated exposure.
H400	Very toxic to aquatic life.
H410	Very toxic to aquatic life with long lasting effects.

Disclaimer

This information is based upon the present state of our knowledge. This SDS has been compiled and is solely intended for this product.