



SAFETY DATA SHEET

1. Identification

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|---|---|
| Product identifier | On & Off Gel Hull & Bottom Cleaner |
| Other means of identification | |
| Product Code | No. MK35128 (Item# 1007598) |
| Recommended use | Cleaner for fiberglass hulls |
| Recommended restrictions | None known. |
| Manufacturer/Importer/Supplier/Distributor information | |
| Manufactured or sold by: | |
| Company name | CRC Industries, Inc. |
| Address | 885 Louis Dr. Warminster, PA 18974 US |
| Telephone | |
| General Information | 215-674-4300 |
| Technical Assistance | 800-521-3168 |
| Customer Service | 800-272-4620 |
| 24-Hour Emergency (CHEMTREC) | 800-424-9300 (US) |
| Website | www.crcindustries.com |

2. Hazard(s) identification

| | | |
|------------------------------|--|---|
| Physical hazards | Corrosive to metals | Category 1 |
| Health hazards | Acute toxicity, oral | Category 4 |
| | Skin corrosion/irritation | Category 1B |
| | Serious eye damage/eye irritation | Category 1 |
| | Specific target organ toxicity, single exposure | Category 3 respiratory tract irritation |
| Environmental hazards | Hazardous to the aquatic environment, acute hazard | Category 2 |
| | Hazardous to the aquatic environment, long-term hazard | Category 3 |
| OSHA defined hazards | Not classified. | |

Label elements



| | |
|--------------------------------|--|
| Signal word | Danger |
| Hazard statement | May be corrosive to metals. Harmful if swallowed. Causes severe skin burns and eye damage. Causes serious eye damage. May cause respiratory irritation. Toxic to aquatic life. Harmful to aquatic life with long lasting effects. |
| Precautionary statement | |
| Prevention | Keep only in original container. Do not breathe mist or vapor. Use with adequate ventilation. Open doors and windows or use other means to ensure a fresh air supply during use and while product is drying. If you experience any symptoms listed on this label, increase ventilation or leave the area. Wash thoroughly after handling. Do not eat, drink or smoke when using this product. Wear protective gloves/protective clothing/eye protection/face protection. Avoid release to the environment. |

| | |
|--|---|
| Response | If swallowed: Rinse mouth. Do NOT induce vomiting. Call a poison center/doctor if you feel unwell. If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. Wash contaminated clothing before reuse. If inhaled: Remove person to fresh air and keep comfortable for breathing. Immediately call a poison center/doctor. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a poison center/doctor. Absorb spillage to prevent material damage. |
| Storage | Store in a well-ventilated place. Keep container tightly closed. Store locked up. Store in corrosive resistant container with a resistant inner liner. |
| Disposal | Dispose of contents/container in accordance with local/regional/national regulations. |
| Hazard(s) not otherwise classified (HNOC) | None known. |
| Supplemental information | When exposed to extreme heat or hot surfaces, vapors may decompose to harmful or fatal corrosive gases such as hydrogen chloride and possibly phosgene. |

3. Composition/information on ingredients

Mixtures

| Chemical name | Common name and synonyms | CAS number | % |
|----------------------------------|--------------------------|------------|---------|
| water | | 7732-18-5 | 80 - 90 |
| hydrochloric acid | | 7647-01-0 | 10 - 20 |
| phosphoric acid | | 7664-38-2 | 3 - 5 |
| oxalic acid | | 144-62-7 | 1 - 3 |
| tallow alkyl amines, ethoxylated | | 61791-26-2 | 1 - 3 |

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

4. First-aid measures

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| Inhalation | If breathing is difficult, remove to fresh air and keep at rest in a position comfortable for breathing. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. If respiratory irritation, dizziness, or unconsciousness occurs, seek immediate medical assistance. |
| Skin contact | Take off immediately all contaminated clothing. Rinse skin with water/shower. Call a physician or poison control center immediately. Chemical burns must be treated by a physician. 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. Call a physician or poison control center immediately. |
| Ingestion | Call a physician or poison control center immediately. Rinse mouth. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Never give anything by mouth to a victim who is unconscious or is having convulsions. Do not induce vomiting without advice from poison control center. If vomiting occurs, keep head low so that stomach content doesn't get into the lungs. Probable mucosal damage may contraindicate the use of gastric lavage. |
| Most important symptoms/effects, acute and delayed | Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. |
| Indication of immediate medical attention and special treatment needed | Provide general supportive measures and treat symptomatically. Chemical burns: Flush with water immediately. While flushing, remove clothes which do not adhere to affected area. Call an ambulance. Continue flushing during transport to hospital. Keep victim under observation. Symptoms may be delayed. |
| General information | Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. |

5. Fire-fighting measures

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| Suitable extinguishing media | Water fog. Foam. Dry chemical powder. Carbon dioxide (CO ₂). |
| Unsuitable extinguishing media | Do not use water jet as an extinguisher, as this will spread the fire. |
| Specific hazards arising from the chemical | During fire, gases hazardous to health may be formed. When exposed to extreme heat or hot surfaces, vapors may decompose to harmful or fatal corrosive gases such as hydrogen chloride and possibly phosgene. |
| Special protective equipment and precautions for firefighters | Self-contained breathing apparatus and full protective clothing must be worn in case of fire. |

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 breathe mist or vapor. 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

This product is miscible in water. Should not be released into the environment. Prevent entry into waterways, sewer, basements or confined areas.

Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination.

Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.

Environmental precautions

Avoid release to the environment. Inform appropriate managerial or supervisory personnel of all environmental releases. Prevent further leakage or spillage if safe to do so. Do not contaminate water. Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling

Do not get in eyes, on skin, or on clothing. Do not taste or swallow. Avoid prolonged exposure. When using, do not eat, drink or smoke. Provide adequate ventilation. Wear appropriate personal protective equipment. Wash hands thoroughly after handling. Avoid release to the environment. Observe good industrial hygiene practices. For product usage instructions, see the product label.

Conditions for safe storage, including any incompatibilities

Store in a cool, dry place out of direct sunlight. Store in corrosive resistant container with a resistant inner liner. Store in tightly closed container. Keep only in the original container. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

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

| Components | Type | Value |
|-----------------------------------|---------|---------------------|
| hydrochloric acid (CAS 7647-01-0) | Ceiling | 7 mg/m ³ |
| | | 5 ppm |
| oxalic acid (CAS 144-62-7) | PEL | 1 mg/m ³ |
| phosphoric acid (CAS 7664-38-2) | PEL | 1 mg/m ³ |

US. ACGIH Threshold Limit Values

| Components | Type | Value |
|-----------------------------------|---------|---------------------|
| hydrochloric acid (CAS 7647-01-0) | Ceiling | 2 ppm |
| oxalic acid (CAS 144-62-7) | STEL | 2 mg/m ³ |
| | TWA | 1 mg/m ³ |
| phosphoric acid (CAS 7664-38-2) | STEL | 3 mg/m ³ |
| | TWA | 1 mg/m ³ |

US. NIOSH: Pocket Guide to Chemical Hazards

| Components | Type | Value |
|-----------------------------------|---------|---------------------|
| hydrochloric acid (CAS 7647-01-0) | Ceiling | 7 mg/m ³ |
| | | 5 ppm |
| oxalic acid (CAS 144-62-7) | STEL | 2 mg/m ³ |
| | TWA | 1 mg/m ³ |
| phosphoric acid (CAS 7664-38-2) | STEL | 3 mg/m ³ |
| | TWA | 1 mg/m ³ |

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| Biological limit values | No biological exposure limits noted for the ingredient(s). |
| Appropriate engineering controls | Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Eye wash facilities and emergency shower should be available when handling this product. |
| Individual protection measures, such as personal protective equipment | |
| Eye/face protection | Wear safety glasses with side shields (or goggles) and a face shield. |
| Skin protection | |
| Hand protection | Wear protective gloves such as: Latex. Neoprene. |
| Other | Wear appropriate chemical resistant clothing. |
| Respiratory protection | If engineering controls are not feasible or if exposure exceeds the applicable exposure limits, use a NIOSH-approved cartridge respirator with an acid gas cartridge. Use a self-contained breathing apparatus in confined spaces and for emergencies. Air monitoring is needed to determine actual employee exposure levels. |
| Thermal hazards | Wear appropriate thermal protective clothing, when necessary. |
| General hygiene considerations | 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. |

9. Physical and chemical properties

Appearance

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|---|-----------------------|
| Physical state | Liquid. |
| Form | Liquid. |
| Color | Blue green. |
| Odor | Cherry. Acid. |
| Odor threshold | Not available. |
| pH | < 1 |
| Melting point/freezing point | < 0 °F (< -17.8 °C) |
| Initial boiling point and boiling range | 195 °F (90.6 °C) |
| Flash point | None. |
| Evaporation rate | Similar to water. |
| Flammability (solid, gas) | Not available. |
| Upper/lower flammability or explosive limits | |
| Flammability limit - lower (%) | Not available. |
| Flammability limit - upper (%) | Not available. |
| Vapor pressure | 0.00001 hPa estimated |
| Vapor density | Not available. |
| Relative density | 1.08 |
| Solubility(ies) | |
| Solubility (water) | 100 % Soluble. |
| Partition coefficient (n-octanol/water) | Not available. |
| Auto-ignition temperature | Not available. |
| Decomposition temperature | Not available. |
| Viscosity | Not available. |
| Percent volatile | 84 % estimated |

10. Stability and reactivity

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|---------------------------|--|
| Reactivity | Reacts violently with strong alkaline substances. This product may react with reducing agents. May be corrosive to metals. |
| Chemical stability | Material is stable under normal conditions. |

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| Possibility of hazardous reactions | No dangerous reaction known under conditions of normal use. |
| Conditions to avoid | Temperatures above 50 °C or below 10 °C. When exposed to extreme heat or hot surfaces, vapors may decompose to harmful or fatal corrosive gases such as Hydrogen chloride and Phosgene. Do not mix with other chemicals. Contact with incompatible materials. |
| Incompatible materials | Bases. Strong oxidizing agents. Reducing agents. Metals. Bleach. |
| Hazardous decomposition products | Hydrogen chloride. Phosgene. |

11. Toxicological information

Information on likely routes of exposure

| | |
|---------------------|--|
| Inhalation | May cause irritation to the respiratory system. Prolonged inhalation may be harmful. |
| Skin contact | Causes severe skin burns. |
| Eye contact | Causes serious eye damage. |
| Ingestion | Causes digestive tract burns. Harmful if swallowed. |

Symptoms related to the physical, chemical and toxicological characteristics Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. May cause respiratory irritation.

Information on toxicological effects

Acute toxicity In high concentrations, vapors are anesthetic and may cause headache, fatigue, dizziness and central nervous system effects. Harmful if swallowed. May cause respiratory irritation.

| Product | Species | Test Results |
|---|----------------|---------------------|
| On & Off Gel Hull & Bottom Cleaner | | |
| <u>Acute</u> | | |
| Inhalation | | |
| LC50 | Rat | > 20 mg/l, 4 hours |
| Components | Species | Test Results |
| hydrochloric acid (CAS 7647-01-0) | | |
| <u>Acute</u> | | |
| Dermal | | |
| LD50 | Mouse | 1449 mg/kg |
| phosphoric acid (CAS 7664-38-2) | | |
| <u>Acute</u> | | |
| Dermal | | |
| LD50 | Rabbit | 2740 mg/kg |
| tallow alkyl amines, ethoxylated (CAS 61791-26-2) | | |
| <u>Acute</u> | | |
| Dermal | | |
| LD50 | Rabbit | > 10000 mg/kg |

* Estimates for product may be based on additional component data not shown.

| | |
|--|--|
| Skin corrosion/irritation | Causes severe skin burns and eye damage. |
| Serious eye damage/eye irritation | Causes serious eye damage. |
| Respiratory or skin sensitization | |
| Respiratory sensitization | Not a respiratory sensitizer. |
| Skin sensitization | This product is not expected to cause skin sensitization. |
| Germ cell mutagenicity | No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic. |
| Carcinogenicity | This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA. |

IARC Monographs. Overall Evaluation of Carcinogenicity

hydrochloric acid (CAS 7647-01-0) 3 Not classifiable as to carcinogenicity to humans.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1052)

Not regulated.

US. National Toxicology Program (NTP) Report on Carcinogens

Not listed.

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| Reproductive toxicity | This product is not expected to cause reproductive or developmental effects. |
| Specific target organ toxicity - single exposure | May cause respiratory irritation. |
| Specific target organ toxicity - repeated exposure | Not classified. |
| Aspiration hazard | Not an aspiration hazard. |
| Chronic effects | Prolonged inhalation may be harmful. |

12. Ecological information

Ecotoxicity Toxic to aquatic life. Harmful to aquatic life with long lasting effects. Because of the low pH of this product, it would be expected to produce significant ecotoxicity upon exposure to aquatic organisms and aquatic systems.

| Product | Species | Test Results |
|---|---------|--|
| On & Off Gel Hull & Bottom Cleaner | | |
| Aquatic | | |
| Fish | LC50 | Fish 145.6517 mg/l, 96 hours estimated |
| <i>Acute</i> | | |
| Algae | IC50 | Algae 5.0001 mg/l, 72 hours estimated |
| Crustacea | EC50 | Daphnia 8.5 mg/l, 48 hours estimated |
| Components | Species | Test Results |
| hydrochloric acid (CAS 7647-01-0) | | |
| Aquatic | | |
| Fish | LC50 | Western mosquitofish (<i>Gambusia affinis</i>) 282 mg/l, 96 hours |
| oxalic acid (CAS 144-62-7) | | |
| Aquatic | | |
| Crustacea | EC50 | Water flea (<i>Daphnia magna</i>) 125 - 150 mg/l, 48 hours |
| tallow alkyl amines, ethoxylated (CAS 61791-26-2) | | |
| Aquatic | | |
| Fish | LC50 | Fathead minnow (<i>Pimephales promelas</i>) 1 mg/l, 96 hours |
| <i>Acute</i> | | |
| Algae | IC50 | Algae 0.1 - 1 mg/l, 72 hours |
| Crustacea | EC50 | Water flea (<i>Daphnia magna</i>) 0.17 mg/l, 48 hours |
| Fish | LC50 | Rainbow trout,donaldson trout (<i>Oncorhynchus mykiss</i>) 0.13 mg/l, 96 hours |

| | |
|--------------------------------------|---|
| Persistence and degradability | No data is available on the degradability of any ingredients in the mixture. |
| Bioaccumulative potential | No data available. |
| Mobility in soil | No data available. |
| Other adverse effects | No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component. |

13. Disposal considerations

| | |
|-------------------------------|---|
| Disposal instructions | This material and its container must be disposed of as hazardous waste. Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Do not allow this material to drain into sewers/water supplies. Dispose in accordance with all applicable regulations. |
| Hazardous waste code | D002: Waste Corrosive material [pH <=2 or =>12.5, or corrosive to steel] |
| Contaminated packaging | Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal. |

14. Transport information

| | |
|------------------|--------|
| DOT | |
| UN number | UN3264 |

UN proper shipping name Corrosive liquid, acidic, inorganic, n.o.s. (hydrochloric acid RQ = 44643 LBS, phosphoric acid RQ = 135135 LBS)

Transport hazard class(es)

Class 8

Subsidiary risk -

Label(s) 8

Packing group II

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

Special provisions B2, IB2, T11, TP2, TP27

Packaging exceptions 154

Packaging non bulk 202

Packaging bulk 242

IATA

Not permitted for shipment by air.

IMDG

UN number UN3264

UN proper shipping name CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (hydrochloric acid, phosphoric acid)

Transport hazard class(es)

Class 8

Subsidiary risk -

Packing group II

Environmental hazards

Marine pollutant No

EmS F-A, S-B

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

DOT



IMDG



15. Regulatory information

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

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

oxalic acid (CAS 144-62-7) 1.0 % One-Time Export Notification only.

SARA 304 Emergency release notification

hydrochloric acid (CAS 7647-01-0) 5000 LBS

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1052)

Not regulated.

US EPCRA (SARA Title III) Section 313 - Toxic Chemical: Listed substance

HYDROCHLORIC ACID (ACID AEROSOLS INCLUDING MISTS, VAPORS, GAS, FOG, AND OTHER AIRBORNE FORMS OF ANY PARTICLE SIZE) (CAS 7647-01-0)

CERCLA Hazardous Substance List (40 CFR 302.4)

hydrochloric acid (CAS 7647-01-0) Listed.
phosphoric acid (CAS 7664-38-2) Listed.

CERCLA Hazardous Substances: Reportable quantity

hydrochloric acid (CAS 7647-01-0) 5000 LBS
phosphoric acid (CAS 7664-38-2) 5000 LBS

Spills or releases resulting in the loss of any ingredient at or above its RQ require immediate notification to the National Response Center (800-424-8802) and to your Local Emergency Planning Committee.

Other federal regulations

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

hydrochloric acid (CAS 7647-01-0)

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

hydrochloric acid (CAS 7647-01-0)

Safe Drinking Water Act (SDWA) Not regulated.

Drug Enforcement Administration (DEA). List 2, Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2) and Chemical Code Number

hydrochloric acid (CAS 7647-01-0) 6545

Drug Enforcement Administration (DEA). List 1 & 2 Exempt Chemical Mixtures (21 CFR 1310.12(c))

hydrochloric acid (CAS 7647-01-0) 20 %WV

DEA Exempt Chemical Mixtures Code Number

hydrochloric acid (CAS 7647-01-0) 6545

FEMA Priority Substances Respiratory Health and Safety in the Flavor Manufacturing Workplace

phosphoric acid (CAS 7664-38-2) High priority

Food and Drug Administration (FDA) Not regulated.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Classified hazard categories Corrosive to metal
Acute toxicity (any route of exposure)
Skin corrosion or irritation
Serious eye damage or eye irritation
Specific target organ toxicity (single or repeated exposure)

SARA 302 Extremely hazardous substance

| Chemical name | CAS number | Reportable quantity (pounds) | Threshold planning quantity (pounds) | Threshold planning quantity, lower value (pounds) | Threshold planning quantity, upper value (pounds) |
|-------------------|------------|------------------------------|--------------------------------------|---|---|
| hydrochloric acid | 7647-01-0 | 5000 | 500 | | |

SARA 313 (TRI reporting)

| Chemical name | CAS number | % by wt. |
|-------------------|------------|----------|
| hydrochloric acid | 7647-01-0 | 10 - 20 |

US state regulations

US. New Jersey Worker and Community Right-to-Know Act

hydrochloric acid (CAS 7647-01-0)
oxalic acid (CAS 144-62-7)
phosphoric acid (CAS 7664-38-2)

US. Massachusetts RTK - Substance List

hydrochloric acid (CAS 7647-01-0)
oxalic acid (CAS 144-62-7)
phosphoric acid (CAS 7664-38-2)

US. Pennsylvania Worker and Community Right-to-Know Law

hydrochloric acid (CAS 7647-01-0)
oxalic acid (CAS 144-62-7)
phosphoric acid (CAS 7664-38-2)

US. Rhode Island RTK

hydrochloric acid (CAS 7647-01-0)
oxalic acid (CAS 144-62-7)
phosphoric acid (CAS 7664-38-2)

California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 2016 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins. For more information go to www.P65Warnings.ca.gov.

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

hydrochloric acid (CAS 7647-01-0)
phosphoric acid (CAS 7664-38-2)

Volatile organic compounds (VOC) regulations

EPA

VOC content (40 CFR 51.100(s)) < 0.5 %

Consumer products (40 CFR 59, Subpt. C) Not regulated

State

Consumer products Not regulated

VOC content (CA) < 0.5 %

VOC content (OTC) < 0.5 %

International Inventories

| Country(s) or region | Inventory name | On inventory (yes/no)* |
|-----------------------------|--|------------------------|
| Australia | Australian Inventory of Chemical Substances (AICS) | Yes |
| Canada | Domestic Substances List (DSL) | Yes |
| Canada | Non-Domestic Substances List (NDSL) | No |
| China | Inventory of Existing Chemical Substances in China (IECSC) | Yes |
| Europe | European Inventory of Existing Commercial Chemical Substances (EINECS) | No |
| Europe | European List of Notified Chemical Substances (ELINCS) | No |
| Japan | Inventory of Existing and New Chemical Substances (ENCS) | Yes |
| Korea | Existing Chemicals List (ECL) | Yes |
| New Zealand | New Zealand Inventory | Yes |
| Philippines | Philippine Inventory of Chemicals and Chemical Substances (PICCS) | Yes |
| Taiwan | Taiwan Chemical Substance Inventory (TCSI) | Yes |
| United States & Puerto Rico | Toxic Substances Control Act (TSCA) Inventory | Yes |

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

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

Issue date 06-11-2015
Revision date 11-07-2018
Prepared by Allison Yoon
Version # 02

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Revision information This document has undergone significant changes and should be reviewed in its entirety.