

Trade name: glimtrex Hardener 101073

Version: 20 / DE

Revision: 29.03.2021

Replaces Version: 19 / DE

Print date: 21.06.21

1. Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

glimtrex Hardener 101073

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

Use of the substance/preparation

Surface treatment of wood and other materials

Identified Uses

	REACHSET 2003
SU22	Professional uses: Public domain (administration, education, entertainment, services, craftsmen)
ERC8a	Wide dispersive indoor use of processing aids in open systems
ERC8c	Wide dispersive indoor use resulting in inclusion into or onto a matrix
PROC10	Roller application or brushing

1.3. Details of the supplier of the safety data sheet

Manufacturer

glimtrex GmbH
Orkotten 68
48291 Telgte
Telephone no. +49 (0) 2504 88887-111
Fax no. +49 (0) 2504 88887-112
E-mail address info@glimtrex.de

1.4. Emergency telephone number

Germany: +49 (0) 30 30686700

2. Hazards identification

2.1. Classification of the substance or mixture

Classification (Regulation (EC) No. 1272/2008)

Classification (Regulation (EC) No. 1272/2008)

Acute Tox. 4	H332
Skin Sens. 1	H317
STOT SE 3	H335

The product is classified and labelled in accordance with Regulation (EC) No 1272/2008
For explanation of abbreviations see section 16.

2.2. Label elements

Labelling according to regulation (EC) No 1272/2008

Hazard pictograms



Signal word

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Warning

Hazard statements

H332 Harmful if inhaled.
 H317 May cause an allergic skin reaction.
 H335 May cause respiratory irritation.

Precautionary statements

P261 Avoid breathing dust/fume/gas/mist/vapours/spray.
 P271 Use only outdoors or in a well-ventilated area.
 P280 Wear protective gloves/protective clothing/eye protection/face protection.
 P304+P340 IF INHALED: Remove person to fresh air and keep comfortable for breathing.
 P308+P313 IF exposed or concerned: Get medical advice/ attention.
 P333+P313 If skin irritation or rash occurs: Get medical advice/attention.

Supplemental information

EUH204 Contains isocyanates. May produce an allergic reaction.

2.3. Other hazards

This mixture contains no substance considered to be persistent, bioaccumulating nor toxic (PBT). This mixture contains no substance considered to be very persistent nor very bioaccumulating (vPvB) (if not listed in Section 3).

3. Composition/information on ingredients**Hazardous ingredients****hexamethylene diisocyanate, oligomers**

CAS No.	28182-81-2		
Registration no.	01-2119485796-17		
Concentration	>= 50		%
Classification (Regulation (EC) No. 1272/2008)			
	Acute Tox. 4	H332	Route of exposure: Inhalation exposure
	Skin Sens. 1	H317	
	STOT SE 3	H335	Respiratory tract

Hexamethylene-di-isocyanate

CAS No.	822-06-0		
EINECS no.	212-485-8		
Registration no.	01-2119457571-37		
Concentration	>= 0,1	< 0,3	%
Classification (Regulation (EC) No. 1272/2008)			
	Acute Tox. 4	H302	Route of exposure: Oral exposure
	Acute Tox. 1	H330	Route of exposure: Inhalation exposure
	Eye Irrit. 2	H319	
	STOT SE 3	H335	
	Skin Irrit. 2	H315	
	Resp. Sens. 1	H334	
	Skin Sens. 1	H317	

Concentration limits (Regulation (EC) No. 1272/2008)

Resp. Sens. 1	H334	>= 0,5 %
Skin Sens. 1	H317	>= 0,5 %

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Note

For explanation of abbreviations see section 16.

This product does not contain substances of very high concern (Regulation (EC) No 1907/2006 (REACH), Article 57) (if not listed in Section 3).

4. First aid measures

4.1. Description of first aid measures

General information

In all cases of doubt, or when symptoms persist, seek medical attention. If unconscious place in recovery position and seek medical advice. First aider: Pay attention to self-protection! Remove affected person from danger area, lay him down.

After inhalation

In case of accident by inhalation: remove casualty to fresh air and keep at rest. Keep warm, calm and covered up. In all cases of doubt, or when symptoms persist, seek medical attention.

After skin contact

Wash off immediately with soap and water. Do NOT use solvents or thinners. Consult a doctor if skin irritation persists.

After eye contact

Remove contact lenses, irrigate copiously with clean, fresh water, holding the eyelids apart for at least 10 minutes and seek immediate medical advice. Take medical treatment.

After ingestion

Do not induce vomiting. Take medical treatment.

4.2. Most important symptoms and effects, both acute and delayed

Symptoms and signs include headache, dizziness, fatigue, muscular weakness, drowsiness and in extreme cases, loss of consciousness. Based on the properties of the isocyanate components and considering toxicological data on similar mixtures, this mixture may cause acute irritation and/or sensitisation of the respiratory system leading to an asthmatic condition, wheeziness and a tightness of the chest.

4.3. Indication of any immediate medical attention and special treatment needed

Hints for the physician / treatment

Treat symptomatically.

5. Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media

Recommended: alcohol resistant foam, CO₂, powders, water spray/mist

Non suitable extinguishing media

Do not use a solid water stream as it may scatter and spread fire.

5.2. Special hazards arising from the substance or mixture

Vapours can form an explosive mixture with air.

5.3. Advice for firefighters

Other information

Standard procedure for chemical fires.

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6. Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

Eliminate all ignition sources if safe to do so. Ensure adequate ventilation. Do not inhale vapours. Do not inhale gases. Do not inhale mist.

6.2. Environmental precautions

Do not allow to enter drains or waterways. Do not allow to enter soil, waterways or waste water canal. In case of gas escape or of entry into waterways, soil or drains, inform the responsible authorities.

6.3. Methods and material for containment and cleaning up

Contain and collect spillage with non-combustible absorbent materials, e.g. sand, earth, vermiculite, diatomaceous earth and place in container for disposal according to local regulations (see section 13). Clean contaminated floors and objects thoroughly with water and detergents, observing environmental regulations. Do NOT use solvents or thinners. Send in suitable containers for recovery or disposal.

6.4. Reference to other sections

Refer to protective measures listed in Sections 7 and 8.

7. Handling and storage

7.1. Precautions for safe handling

Advice on safe handling

Prevent the creation of flammable or explosive concentrations of vapour in air and avoid vapour concentration higher than the occupational exposure limits. Keep container tightly closed and dry in a cool, well-ventilated place. Use only with adequate ventilation/personal protection. Ensure adequate ventilation. Provide for sufficient ventilation. This can be achieved by local exhaust or general exhaust air collection. Wear a suitable respirator if the ventilation is not sufficient to keep the solvent vapour concentration below the occupational limit values. Persons with a history of asthma, allergies, chronic or recurrent respiratory disease should not be exposed to any process in which this mixture is used. Avoid contact with skin and eyes. Avoid inhalation of vapour and spray mist. Do not eat, drink or smoke when using this product. Use personal protective clothing. For personal protection see Section 8.

Advice on protection against fire and explosion

Vapours can form an explosive mixture with air. Vapours are heavier than air and may spread along floors. In addition, the product should only be used in areas from which all naked lights and other sources of ignition have been excluded. Mixture may charge electrostatically: always use earthing leads when transferring from one container to another. Take measures to prevent the build up of electrostatic charge. Wear shoes with conductive soles. No sparking tools should be used. Fight fire with normal precautions from a reasonable distance.

7.2. Conditions for safe storage, including any incompatibilities

Requirements for storage rooms and vessels

Provide solvent-resistant and impermeable floor. Keep only in the original container in a cool, well-ventilated place. Containers which are opened must be carefully resealed and kept upright to prevent leakage.

Hints on storage assembly

Keep away from oxidising agents, strongly alkaline and strongly acid materials, amines, alcohols and water.

Storage classes

Storage class according to TRGS 510 10 Flammable liquids

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Further information on storage conditions

Protect from frost. Protect from heat and direct sunlight. Keep away from sources of ignition - No smoking. Store in accordance with the particular national regulations.

7.3. Specific end use(s)

See exposure scenario, if available.

8. Exposure controls/personal protection

8.1. Control parameters

Other information

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8.2. Exposure controls

Exposure controls

Users are advised to consider national Occupational Exposure Limits or other equivalent values. Provide for sufficient ventilation. This can be achieved by local exhaust or general exhaust air collection. Wear a suitable respirator if the ventilation is not sufficient to keep the solvent vapour concentration below the occupational limit values.

Respiratory protection

Avoid inhalation of vapour and spray mist. Use breathing apparatus if exposed to vapours/dust/aerosol. Recommended Filter type: Respiratory protection mask with combination filter A/P2

Hand protection

Protective gloves complying with EN 374.

Glove material

Multilayer gloves made from

Appropriate Material Fluorinated rubber / butyl-rubber

Material thickness \geq 0,7 mm

Breakthrough time \geq 30 min

This recommendation is valid only for the product named in this safety data sheet supplied by us, and only for the indicated intended use purposes.

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 instructions and information provided by the glove manufacturer on use, storage, maintenance and replacement must be followed.

The breakthrough time must be greater than the end use time of the product.

Gloves should be replaced regularly and if there is any sign of damage to the glove material.

The performance or effectiveness of the glove may be reduced by physical/ chemical damage and poor maintenance.

Eye protection

Wear eye glasses with side protection according to EN 166.

Body protection

Wear suitable protective clothing. Remove contaminated clothing and wash it before reuse. Wash hands before breaks and after work.

9. Physical and chemical properties

9.1. Information on basic physical and chemical properties

Form	liquid
Colour	colourless

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Odour	odourless		
Odour threshold	not determined		
Remarks	not determined		
Melting point	not determined		
Remarks	not determined		
Freezing point	not determined		
Remarks	not determined		
Initial boiling point and boiling range	Not applicable		
Remarks	Not applicable		
Flash point			
Value	>	60	°C
Evaporation rate	not determined		
Remarks	not determined		
Flammability (solid, gas)	not determined		
Remarks	not determined		
Upper/lower flammability or explosive limits	not determined		
Remarks	not determined		
Vapour pressure	not determined		
Remarks	not determined		
Vapour density	not determined		
Remarks	not determined		
Density			
Value	appr.	1,13	kg/l
Temperature		20	°C
Solubility in water	not determined		
Remarks	not determined		
Solubility(ies)	not determined		
Remarks	not determined		
Partition coefficient: n-octanol/water	not determined		
Remarks	not determined		
Ignition temperature	not determined		
Remarks	not determined		
Decomposition temperature	not determined		
Remarks	not determined		
Viscosity	not determined		
Remarks	not determined		
Efflux time			
Value	32	to	40
Temperature	20	°C	s
Method	DIN 53211 - 6 mm		
Explosive properties	not determined		
evaluation	not determined		

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Oxidising properties

Remarks not determined

9.2. Other information**Non-volatile content**

Value	100	%
Method	calculated value	

Other information

This information is not available.

10. Stability and reactivity**10.1. Reactivity**

Stable under recommended storage and handling conditions (see section 7).

10.2. Chemical stability

Stable under normal conditions.

10.3. Possibility of hazardous reactions

To avoid thermal decomposition, do not overheat.

10.4. Conditions to avoid

Isolate from sources of heat, sparks and open flame.

10.5. Incompatible materials

Keep away from oxidising agents, strongly alkaline and strongly acid materials in order to avoid exothermic reactions. Uncontrolled exothermic reactions occur with amines and alcohols. The product reacts slowly with water resulting in evolution of carbon dioxide. Gaseous decomposition products cause pressure to build up in tightly sealed vessels. Precautions should be taken to minimise exposure to atmospheric humidity or water: CO₂ will be formed which in closed containers can result in pressurisation.

10.6. Hazardous decomposition products

Carbon monoxide and carbon dioxide, nitrous oxides (NO_x), dense black smoke, hydrocyanic acid,
Stable under recommended storage and handling conditions (see section 7).

11. Toxicological information**11.1. Information on toxicological effects****Acute oral toxicity**

Method	Calculation method (Regulation (EC) No. 1272/2008)
Remarks	Based on available data, the classification criteria are not met.

Acute oral toxicity (Components)**Hexamethylene-di-isocyanate**

Species	rat	
LD50	746	mg/kg
Method	OECD 401	

Acute dermal toxicity

Method	Calculation method (Regulation (EC) No. 1272/2008)
Remarks	Based on available data, the classification criteria are not met.

Acute inhalational toxicity

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Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks The classification criteria are met.

Acute inhalative toxicity (Components)**Hexamethylene-di-isocyanate**

Species rat
 LC50 0,015 mg/l
 Duration of exposure 4 h
 Administration/Form Dust/Mist

hexamethylene diisocyanate, oligomers

Species rat
 LC50 2,18 mg/l
 Duration of exposure 4 h
 Administration/Form Dust/Mist
 Remarks Mist

Skin corrosion/irritation

Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks Based on available data, the classification criteria are not met.

Skin corrosion/irritation (Components)**Hexamethylene-di-isocyanate**

Species rabbit
 evaluation Severe skin irritation

Serious eye damage/irritation

Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks Based on available data, the classification criteria are not met.

Serious eye damage/irritation (Components)**Hexamethylene-di-isocyanate**

Species rabbit
 evaluation Severe eye irritation

Sensitization

evaluation May cause sensitization by skin contact.
 Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks The classification criteria are met.

Sensitization (Components)**Hexamethylene-di-isocyanate**

Species guinea pig
 evaluation May cause sensitization by skin contact.
 Method OECD Test Guideline 406

Hexamethylene-di-isocyanate

Route of exposure inhalative
 Species guinea pig
 evaluation May cause sensitization by inhalation.

hexamethylene diisocyanate, oligomers

evaluation May cause sensitization by skin contact.

Mutagenicity

Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks Based on available data, the classification criteria are not met.

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Reproductive toxicity

Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks Based on available data, the classification criteria are not met.

Carcinogenicity

Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks Based on available data, the classification criteria are not met.

Specific Target Organ Toxicity (STOT)**Single exposure**

Method Calculation method (Regulation (EC) No. 1272/2008)
 Remarks The classification criteria are met.
 evaluation May cause respiratory irritation.

Repeated exposure

Remarks Based on available data, the classification criteria are not met.

Specific Target Organ Toxicity (STOT) (Components)**Hexamethylene-di-isocyanate****Specific target organ toxicity - single exposure**

evaluation May cause respiratory irritation.
 Organs: Respiratory tract

hexamethylene diisocyanate, oligomers

Remarks May cause respiratory irritation.

Aspiration hazard

Based on available data, the classification criteria are not met.

Other information

No toxicological data are available.

12. Ecological information**12.1. Toxicity****General information**

For this subsection there is no ecotoxicological data available on the product as such.

Daphnia toxicity (Components)**hexamethylene diisocyanate, oligomers**

Species	Daphnia magna (Water flea)	
EC50	127	mg/l
Duration of exposure	48	h

12.2. Persistence and degradability**General information**

For this subsection there is no ecotoxicological data available on the product as such.

12.3. Bioaccumulative potential**General information**

For this subsection there is no ecotoxicological data available on the product as such.

Partition coefficient: n-octanol/water

Remarks not determined

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12.4. Mobility in soil

General information

For this subsection there is no ecotoxicological data available on the product as such.

Mobility in soil

no data available

12.5. Results of PBT and vPvB assessment

General information

For this subsection there is no ecotoxicological data available on the product as such.

12.6. Other adverse effects

General information

For this subsection there is no ecotoxicological data available on the product as such.

General information / ecology

For this subsection there is no ecotoxicological data available on the product as such.

13. Disposal considerations

13.1. Waste treatment methods

Disposal recommendations for the product

EWC waste code	080111 - waste paint and varnish containing organic solvents or other dangerous substances
EWC waste code	200127 - paint, inks, adhesives and resins containing dangerous substances

Where possible recycling is preferred to disposal or incineration.
Do not allow to enter drains or waterways.

modified product

EWC waste code	080115 - aqueous sludges containing paint or varnish containing organic solvents or other dangerous substances
EWC waste code	080113 - sludges from paint or varnish containing organic solvents or other dangerous substances

Dried residues

EWC waste code	080112 - waste lacquers and waste paint except those falling under 080111
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Disposal recommendations for packaging

EWC waste code	150110 - packaging containing residues of or contaminated by dangerous substances
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Germany: KBS system for sheet covering
Completely emptied packagings can be given for recycling.

14. Transport information

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	Land transport ADR/RID	Marine transport IMDG/GGVSee
14.1. UN number	Not classified as dangerous in the meaning of transport regulations.	Not classified as dangerous in the meaning of sea and air transport regulations.
14.5. Environmental hazards		no

15. Regulatory information

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

Water Hazard Class (Germany)

Water Hazard Class (Germany) WGK 1

Remarks Derivation of WGK according to Annex 1 No. 5.2 AwSV

VOC

VOC (EU) 0 % 0 g/l

15.2. Chemical safety assessment

For this substance / mixture a chemical safety assessment was not carried out.

16. Other information

Hazard statements listed in Chapter 3

H302 Harmful if swallowed.
 H315 Causes skin irritation.
 H317 May cause an allergic skin reaction.
 H319 Causes serious eye irritation.
 H330 Fatal if inhaled.
 H332 Harmful if inhaled.
 H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled.
 H335 May cause respiratory irritation.

CLP categories listed in Chapter 3

Acute Tox. 1 Acute toxicity, Category 1
 Acute Tox. 4 Acute toxicity, Category 4
 Eye Irrit. 2 Eye irritation, Category 2
 Resp. Sens. 1 Respiratory sensitization, Category 1
 Skin Irrit. 2 Skin irritation, Category 2
 Skin Sens. 1 Skin sensitization, Category 1
 STOT SE 3 Specific target organ toxicity - single exposure, Category 3

Abbreviations

ADR - Accord européen sur le transport des marchandises dangereuses par Route (European Agreement concerning the International Carriage of Dangerous Goods by Road)
 RID - Règlement international concernant le transport des marchandises dangereuses par chemin de fer (Regulations Concerning the International Transport of Dangerous Goods by Rail)
 IMDG - International Maritime Code for Dangerous Goods
 IATA - International Air Transport Association

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IATA-DGR - Dangerous Goods Regulations by the "International Air Transport Association" (IATA)
 ICAO-TI - Technical Instructions by the "International Civil Aviation Organization" (ICAO)
 GHS - Globally Harmonized System of Classification and Labelling of Chemicals
 EINECS - European Inventory of Existing Commercial Chemical Substances
 CAS - Chemical Abstracts Service (division of the American Chemical Society)
 GefStoffV - Gefahrstoffverordnung (Ordinance on Hazardous Substances, Germany)
 LOAEL - Lowest Observed Adverse Effect Level
 LOEL - Lowest Observed Effect Level
 NOAEL - No Observed Adverse Effect Level
 NOEC - No Observed Effect Concentration
 NOEL - No Observed Effect Level
 OECD - Organisation for Economic Cooperation and Development
 VOC - Volatile Organic Compounds

Changes since the last version are highlighted in the margin (***) . This version replaces all previous versions.

This safety datasheet only contains information relating to safety and does not replace any product information or product specification.

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification.

The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

The information contained herein is based on the present state of our knowledge and does therefore not guarantee certain properties.

Annex to the extended Safety Data Sheet (eSDS)

Short title of the exposure scenario

ES004 - Professional uses: roller application or brushing, dipping and pouring and other processing without aerosol formation (inside)

Use of the substance/preparation

Surface treatment of wood and other materials

Use

SU22	Professional uses: Public domain (administration, education, entertainment, services, craftsmen)
ERC8a	Wide dispersive indoor use of processing aids in open systems
ERC8c	Wide dispersive indoor use resulting in inclusion into or onto a matrix
PROC10	Roller application or brushing
PROC13	Treatment of articles by dipping and pouring
PROCh01	Other processing without aerosol formation

Contributing exposure scenario controlling environmental exposure

Use

ERC8a	Wide dispersive indoor use of processing aids in open systems
ERC8c	Wide dispersive indoor use resulting in inclusion into or onto a matrix

Physical form

liquid

Maximum amount used per time or activity

Emission days per site: <= 250

Other relevant operational conditions

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Use: Room temperature
 Drying and through-curing takes place at ambient temperature or at higher temperatures.
 Volatile organic substances will volatilise into the atmospheric air inside.
 Where possible recycling is preferred to disposal or incineration.
 Do not allow to enter soil, waterways or waste water canal.
 Dispose of rinse water in accordance with local and national regulations.

Waste water

Do not discharge into the drains/surface waters/groundwater.

Exhaust air

Keep container closed. Avoid release to the environment.

Soil

Floors should be impervious, resistant to liquids and easy to clean.

Disposal recommendations for the product

EWC waste code	080111 - waste paint and varnish containing organic solvents or other dangerous substances
	200127 - paint, inks, adhesives and resins containing dangerous substances

Where possible recycling is preferred to disposal or incineration.
 Do not allow to enter drains or waterways.

modified product

EWC waste code	080115 - aqueous sludges containing paint or varnish containing organic solvents or other dangerous substances
	080113 - sludges from paint or varnish containing organic solvents or other dangerous substances

Dried residues

EWC waste code	080112 - waste lacquers and waste paint except those falling under 080111
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Disposal recommendations for packaging

EWC waste code	150110 - packaging containing residues of or contaminated by dangerous substances
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Germany: KBS system for sheet covering
 Completely emptied packagings can be given for recycling.

Contributing exposure scenario controlling worker exposure (professional)

Short title of the exposure scenario

Substance number:CES008

Use

SU22	Professional uses: Public domain (administration, education, entertainment, services, craftsmen)
PROC10	Roller application or brushing
PROC13	Treatment of articles by dipping and pouring
PROCh01	Other processing without aerosol formation

Physical form liquid

Maximum amount used per time or activity

Duration of exposure	<=	8	h/d
Frequency of exposure	<=	220	d/a

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Other relevant operational conditions

Use: Room temperature

Drying and through-curing takes place at ambient temperature or at higher temperatures.

Volatile organic substances will volatilise into the atmospheric air inside.

Read attached instructions before use.

Product substance and product safety related measures

Apply technical measures to comply with the occupational exposure limits. Where reasonably practicable this should be achieved by the use of local exhaust ventilation and good general extraction. Provide for sufficient ventilation. This can be achieved by local exhaust or general exhaust air collection. Wear a suitable respirator if the ventilation is not sufficient to keep the solvent vapour concentration below the occupational limit values.

Respiratory protection

Avoid inhalation of vapour and spray mist. Use breathing apparatus if exposed to vapours/dust/aerosol.

Recommended Filter type: Respiratory protection mask with combination filter A/P2

Hand protection

Protective gloves complying with EN 374.

Glove material

Multilayer gloves made from

Appropriate Material Fluorinated rubber / butyl-rubber

Material thickness \geq 0,7

Breakthrough time \geq 30

This recommendation is valid only for the product named in this safety data sheet supplied by us, and only for the indicated intended use purposes.

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 instructions and information provided by the glove manufacturer on use, storage, maintenance and replacement must be followed.

The breakthrough time must be greater than the end use time of the product.

Gloves should be replaced regularly and if there is any sign of damage to the glove material.

The performance or effectiveness of the glove may be reduced by physical/ chemical damage and poor maintenance.

Eye protection

Wear eye glasses with side protection according to EN 166.

Body protection

Wear suitable protective clothing. Remove contaminated clothing and wash it before reuse. Wash hands before breaks and after work.

Information on estimated exposure and downstream-user guidance

Guidance for Downstream Users

The downstream user can evaluate whether he operates within the conditions set in the exposure scenario on the basis of the information supplied. This evaluation can be conducted by an expert or using the risk assessment tools recommended by ECHA.