SAFETY DATA SHEET

Brasso Metal Polish



1. Product and company identification	
Product name	: Brasso Metal Polish
Distributed by	: Reckitt Benckiser LLC. Morris Corporate Center IV 399 Interpace Parkway (P.O. Box 225) Parsippany, New Jersey 07054-0225 +1 973 404 2600
	Reckitt Benckiser (Canada) Inc. 1680 Tech Avenue, Unit #2 Mississauga, Ontario L4W 5S9 CANADA Telephone: +1 905 283 7000
Emergency telephone number (Medical)	: 1-800-338-6167
Emergency telephone number (Transport) Website:	 1-800-424-9300 (U.S. & Canada) CHEMTREC Outside U.S. and Canada (North America), call Chemtrec:703-527-3887 http://www.rbnainfo.com

Product use : Metal cleaning.

This SDS is designed for workplace employees, emergency personnel and for other conditions and situations where there is greater potential for large-scale or prolonged exposure, in accordance with the requirements of USDOL Occupational Safety and Health Administration.

This SDS is not applicable for consumer use of our products. For consumer use, all precautionary and first aid language is provided on the product label in accordance with the applicable government regulations, and shown in Section 15 of this SDS.

SDS #	: D8049596 v4.0
Formulation #:	: #8043677 v1.0
UPC Code / Sizes	: 26600-89331-00 (Brasso Metal Polish 8oz), 56200-81382-01 (Brasso Metal Polish 142ml),
	56200-00049-4 (Brasso Metal Polish 142ml)

2. Hazards identification

Classification of the substance or mixture	: FLAMMABLE LIQUIDS - Category 3 ACUTE TOXICITY (oral) - Category 4 SERIOUS EYE DAMAGE/ EYE IRRITATION - Category 2B
GHS label elements	
Hazard pictograms	
Signal word	: Warning
Hazard statements	: Flammable liquid and vapor. Harmful if swallowed. Causes eye irritation.
Precautionary statements	
General	 Read label before use. Keep out of reach of children. If medical advice is needed, have product container or label at hand.
Prevention	: Wear protective gloves. Wear eye or face protection. Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. Use explosion-proof electrical, ventilating, lighting and all material-handling equipment. Use only non-sparking tools. Take precautionary measures against static discharge. Keep container tightly closed. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling.
Response	: IF SWALLOWED: Call a POISON CENTER or physician if you feel unwell. Rinse mouth. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical attention.
Storage	: Store in a well-ventilated place. Keep cool.
Disposal	 Dispose of contents and container in accordance with all local, regional, national and international regulations.
Supplemental label elements	: None known.
Hazards not otherwise classified	: None known.

3. Composition/information on ingredients

Substance/mixture : Mixture		
Ingredient name	%	CAS number
Ammonia solution Ethanedioic acid, hydrate (1:2) Isopropyl alcohol	5 - 10 1 - 2.5 1 - 2.5	1336-21-6 6153-56-6 67-63-0

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

4. First aid measures

Description of necessary first aid measures

Eye contact	: Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. If irritation persists, get medical attention.
Inhalation	: Remove victim to fresh air and keep at rest in a position comfortable for breathing. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention if adverse health effects persist or are severe. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband. In case of inhalation of decomposition products in a fire, symptoms may be delayed. The exposed person may need to be kept under medical surveillance for 48 hours.
Skin contact	: Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Get medical attention if symptoms occur. Wash clothing before reuse. Clean shoes thoroughly before reuse.
Ingestion	: Wash out mouth with water. Remove dentures if any. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Get medical attention. If necessary, call a poison center or physician. Never give anything by mouth to an unconscious person. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

Most important symptoms/effects, acute and delayed

Potential acute health effects	
Eye contact	: Causes eye irritation.
Inhalation	: Exposure to decomposition products may cause a health hazard. Serious effects may be delayed following exposure.
Skin contact	: No known significant effects or critical hazards.
Ingestion	: Harmful if swallowed. May be irritating to mouth, throat and stomach.
Over-exposure signs/sympto	oms
Eye contact	: Adverse symptoms may include the following: irritation watering redness
Inhalation	: No specific data.
Skin contact	: No specific data.
Ingestion	: No specific data.
Indication of immediate medic	cal attention and special treatment needed, if necessary
Notes to physician	: In case of inhalation of decomposition products in a fire, symptoms may be delayed. The exposed person may need to be kept under medical surveillance for 48 hours.
Specific treatments	: No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation.

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4. First aid measures

See toxicological information (Section 11)

5. Fire-fighting measures

•••	
Extinguishing media	
Suitable extinguishing media	: Use dry chemical, CO ₂ , water spray (fog) or foam.
Unsuitable extinguishing media	: Do not use water jet.
Specific hazards arising from the chemical	: Flammable liquid and vapor. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. Runoff to sewer may create fire or explosion hazard.
Hazardous thermal decomposition products	: Decomposition products may include the following materials: carbon dioxide carbon monoxide nitrogen oxides metal oxide/oxides
Special protective actions for fire-fighters	: Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.
Special protective equipment for fire-fighters	: Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

6. Accidental release measures

Personal precautions, protect	tiv	e equipment and emergency procedures
For non-emergency personnel	•	No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Avoid breathing vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.
For emergency responders	:	If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".
Environmental precautions	:	Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill	: Stop leak if without risk. Move containers from spill area. Use spark-proof tools and
-	explosion-proof equipment. Dilute with water and mop up if water-soluble. Alternatively,
	or if water-insoluble, absorb with an inert dry material and place in an appropriate waste
	disposal container. Dispose of via a licensed waste disposal contractor.

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6. Accidental release measures

Large spill

: Stop leak if without risk. Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

7. Handling and storage

Precautions for safe handling

Protective measures	: Put on appropriate personal protective equipment (see Section 8). Do not ingest. Avoid contact with eyes, skin and clothing. Avoid breathing vapor or mist. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use only non-sparking tools. Take precautionary measures against electrostatic discharges. Empty containers retain product residue and can be hazardous. Do not reuse container.

Conditions for safe storage, including any incompatibilities incompatible materials (see Section 10) and food and drink. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

8. Exposure controls/personal protection

<u>Control</u>

Occupational exposure limits

Ingredient name	Exposure limits
Isopropyl alcohol	ACGIH TLV (United States, 6/2013).
	TWA: 200 ppm 8 hours.
	STEL: 400 ppm 15 minutes.
	OSHA PEL 1989 (United States, 3/1989).
	TWA: 400 ppm 8 hours.
	TWA: 980 mg/m ³ 8 hours.
	STEL: 500 ppm 15 minutes.
	STEL: 1225 mg/m ³ 15 minutes.
	NIOSH REL (United States, 10/2013).
	TWA: 400 ppm 10 hours.
	TWA: 980 mg/m ³ 10 hours.
	STEL: 500 ppm 15 minutes.
	STEL: 1225 mg/m ³ 15 minutes.
	OSHA PEL (United States, 2/2013).
	TWA: 400 ppm 8 hours.
	TWA: 980 mg/m ³ 8 hours.

8. Exposure controls/personal protection

Appropriate engineering controls	: Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.
Environmental exposure controls	: Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.
Individual protection meas	<u>ires</u>
Hygiene measures	: Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
Eye/face protection	: Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles.
Skin protection	
Hand protection	: Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.
Body protection	: Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. When there is a risk of ignition from static electricity, wear anti-static protective clothing. For the greatest protection from static discharges, clothing should include anti-static overalls, boots and gloves.
Other skin protection	: Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
Respiratory protection	: Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

9. Physical and chemical properties

<u>Appearance</u>			
Physical state	: Liquid. [Viscous liquid.]		
Color	: Opaque. Light tan.		
Odor	: Ammoniacal.		
Odor threshold	: Not available.		
рН	: 9.6 to 10.2		
Melting point	: Not available.		
Boiling point	: Not available.		
Flash point	: Closed cup: 40.56 to 43.33°C (105 to 110°F)		
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9. Physical and chemical properties

Evaporation rate	1	Not available.
Flammability (solid, gas)	:	Not available.
Lower and upper explosive (flammable) limits	:	Not available.
Vapor pressure	1	Not available.
Vapor density	:	Not available.
Relative density	:	1.104 to 1.14
Solubility	:	Not available.
Partition coefficient: n- octanol/water	:	Not available.
Auto-ignition temperature	:	Not available.
Decomposition temperature	:	Not available.
Viscosity	1	Dynamic (room temperature): 8000 to 11000 mPa·s (8000 to 11000 cP)

10. Stability and reactivity

Reactivity	: No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	: The product is stable.
Possibility of hazardous reactions	: Under normal conditions of storage and use, hazardous reactions will not occur.
Conditions to avoid	: Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.
Incompatible materials	 Reactive or incompatible with the following materials: oxidizing materials
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.

11. Toxicological information

Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Ammonia solution	LD50 Oral	Rat	350 mg/kg	-
Ethanedioic acid, hydrate (1: 2)	LD50 Oral	Rat	33 mg/kg	-
Isopropyl alcohol	LD50 Dermal LD50 Oral	Rabbit Rat	12800 mg/kg 5000 mg/kg	-

Irritation/Corrosion

-
-
-
-
-
-

11. Toxicological information

minigrams

Sensitization

Not available.

Mutagenicity

Not available.

Carcinogenicity

Not available.

Classification

Product/ingredient name	OSHA	IARC	NTP
Isopropyl alcohol	-	3	-

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Specific target organ toxicity (single exposure)

Name		Route of exposure	Target organs
Isopropyl alcohol	Category 3	Not applicable.	Narcotic effects

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure	: No	ot available.
Potential acute health effect		
Eye contact	: Ca	auses eye irritation.
Inhalation		posure to decomposition products may cause a health hazard. Serious effects may delayed following exposure.
Skin contact	: No	hnown significant effects or critical hazards.
Ingestion	: Ha	rmful if swallowed. May be irritating to mouth, throat and stomach.
Symptoms related to the ph	sical,	chemical and toxicological characteristics
Eye contact	irri wa	lverse symptoms may include the following: tation itering dness
Inhalation	: No	o specific data.
Skin contact	: No	o specific data.

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11. Toxicological information

Delayed and immediate effects and also chronic effects from short and long term exposure

<u>Short term exposure</u>				
Potential immediate effects	: Not available.			
Potential delayed effects	: Not available.			
<u>Long term exposure</u>				
Potential immediate effects	: Not available.			
Potential delayed effects	: Not available.			
Potential chronic health effects				
Not available.				
General	: No known significant effects or critical hazards.			
Carcinogenicity	: No known significant effects or critical hazards.			
Mutagenicity	: No known significant effects or critical hazards.			
Teratogenicity	: No known significant effects or critical hazards.			
Developmental effects	: No known significant effects or critical hazards.			
Fertility effects	: No known significant effects or critical hazards.			

Numerical measures of toxicity

<u>Acute toxicity estimates</u>	
Route	ATE value
Oral	929.5 mg/kg

12. Ecological information

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Product/ingredient name	Result	Species	Exposure
Isopropyl alcohol	Acute LC50 1400000 µg/l Marine water	Crustaceans - Crangon crangon	96 hours 48 hours 96 hours

Persistence and degradability

Not available.

Bioaccumulative potential

Product/ingredient name	LogPow	BCF	Potential
Isopropyl alcohol	0.05	-	low

Mobility in soil

Soil/water partition coefficient (Koc)

: Not available.

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12. Ecological information

Other adverse effects

: No known significant effects or critical hazards.

13. Disposal considerations

Disposal methods
 The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Vapor from product residues may create a highly flammable or explosive atmosphere inside the container. Do not cut, weld or grind used containers unless they have been cleaned thoroughly internally. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

14. Transport information

Regulatory information	UN number	Proper shipping name	Classes	PG*	Label	Additional information
DOT Classification	UN1987	Alcohols, n.o.s. RQ (ammonia)	3	111	\diamond	Limited quantity
TDG Classification	UN1987	ALCOHOLS, N.O.S. (Isopropyl alcohol)	3	111		Limited quantity
Mexico Classification	UN1987	ALCOHOLES, N.E.P. (Isopropyl alcohol)	3	111	\diamond	Limited quantity
IMDG Class	UN1987	ALCOHOLS, N.O.S. (Isopropyl alcohol)	3	111		Limited quantity
IATA-DGR Class	UN1987	Alcohols, n.o.s. (Isopropyl alcohol)	3	111		See DG List

PG* : Packing group

5. Regulatory infor	mation
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U.S. Federal regulations	:	United S	()	tory (TSC	A 8b): All cor	n: Not determin mponents are	ned listed or exemp	oted.
Clean Air Act Section 112 (b) Hazardous Air Pollutants (HAPs)	:	Not liste	d					
Clean Air Act Section 602 Class I Substances	:	Not liste	d					
Clean Air Act Section 602 Class II Substances	1	Not liste	d					
DEA List I Chemicals (Precursor Chemicals)	:	Not liste	d					
DEA List II Chemicals (Essential Chemicals)	1	Not liste	d					
SARA 302/304								
Composition/information	on	<u>ingredie</u>	<u>nts</u>					
No products were found.								
SARA 304 RQ	:	Not app	icable.					
<u>SARA 311/312</u>								
Classification	1	Fire haz Immedia	ard ate (acute) he	alth haza	rd			
Composition/information	on	<u>ingredie</u>	<u>nts</u>					
Name			%	Fire hazard	Sudden release of	Reactive	Immediate (acute)	Delayed (chronic)

Name	70		release of pressure	Reactive	(acute) health hazard	chronic) health hazard
Ammonia solution	5 - 10	No.	No.	No.	Yes.	No.
Ethanedioic acid, hydrate (1:2)	1 - 2.5	No.	No.	No.	Yes.	No.
Isopropyl alcohol	1 - 2.5	Yes.	No.	No.	Yes.	No.

SARA 313

	Product name	CAS number	%
Form R - Reporting requirements		1336-21-6 67-63-0	6.4159 2.178
Supplier notification		1336-21-6 67-63-0	6.4159 2.178

SARA 313 notifications must not be detached from the SDS and any copying and redistribution of the SDS shall include copying and redistribution of the notice attached to copies of the SDS subsequently redistributed.

State regulations

Massachusetts	 The following components are listed: CALCIUM CARBONATE; ISOPROPYL ALCOHOL; AMMONIUM HYDROXIDE
New York	: The following components are listed: Ammonium hydroxide
New Jersey	 The following components are listed: CALCIUM CARBONATE; LIMESTONE; ISOPROPYL ALCOHOL; 2-PROPANOL; AMMONIUM HYDROXIDE

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15. Regulatory inf	15. Regulatory information					
Pennsylvania	: The following components are listed: LIMESTONE; ETHANEDIOIC ACID, DIHYDRATE; 2-PROPANOL; AMMONIUM HYDROXIDE ((NH4)(OH))					
<u>Canada</u>						
WHMIS (Canada)	: Class B-3: Combustible liquid with a flash point between 37.8°C (100°F) and 93.3°C (200°E)					
	(200°F). Class D-2A: Material causing other toxic effects (Very toxic). Class E: Corrosive material					
Canadian lists						
Canadian NPRI	: The following components are listed: Isopropyl alcohol; Ammonia (total)					
CEPA Toxic substances	: None of the components are listed.					
Canada inventory	: At least one component is not listed in DSL but all such components are listed in NDSL.					
Label elements						
Signal word	: CAUTION					
Hazard statements	: CAUSES EYE IRRITATION.					
Precautionary measures	: Contains Ammonia. May cause skin irritation. Avoid contact with skin and eyes. In case of contact with eyes, rinse immediately with plenty of water. If irritation persists, get medical attention. After contact with skin, wash immediately with plenty of water.					

16. Other information



Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks Although HMIS® ratings are not required on MSDSs under 29 CFR 1910. 1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

National Fire Protection Association (U.S.A.)



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16. Other information

Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Key to abbreviations	: ATE = Acute Toxicity Estimate BCF = Bioconcentration Factor GHS = Globally Harmonized System of Classification and Labelling of Chemicals IATA = International Air Transport Association IBC = International Air Transport Association IMDG = International Maritime Dangerous Goods LogPow = logarithm of the octanol/water partition coefficient MARPOL 73/78 = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution) UN = United Nations
Date of issue	: 09/06/2016.
Date of previous issue	: 13/08/2014.
Version	: 4
Prepared by	: Reckitt Benckiser LLC. Product Safety Department 1 Philips Parkway Montvale, New Jersey 07646-1810 USA. FAX: 201-476-7770

Revision comments : Update as per OSHA GHS for US/CAN.

V Indicates information that has changed from previously issued version.

Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.



RB is a member of the CSPA Product Care Product Stewardship Program.