

City of Santa Barbara
Integrated Pest Management Advisory Committee
MATERIAL EXEMPTION REQUEST FOR PESTICIDE APPLICATION

Name Monique O'Conner Department Parks and Recreation Phone 805-560-7576
Pesticide Applicator (employee or company) Either City licensed applicator, or contractor licensed applicator Phone N/A
Application Site Douglas Family Preserve Specific Location throughout upland portion of open space
Date(s) of Application sometime between Nov. 2022 and Feb. 2023 Date of Request 11/01/2022
Product Name Roundup Custom Active Ingredient glyphosate
Type: ☒ One-time ☐ Programmatic ☐ Emergency
Number of Applications: ☐ One ☒ Other one time, with possible follow up re-treatment required
Product type: ☒ Herbicide ☐ Insecticide ☐ Fungicide ☐ Other _____
Application: ☐ Ornamental ☐ Sports Field ☐ Golf Course ☐ Vector Control ☐ Park Tree ☐ Street Tree
☐ Airport Runways ☐ Right of Way ☐ City Facility ☒ Other invasive woody plants
Is the pesticide on the *Approved Materials List*? ☐ No ☒ Yes If yes, provide the color Red
If the pesticide is not on the *Approved Materials List*, provide the following information. Please use the Material Selection Criteria and work with a Certified Pesticide Applicator to determine the estimated color.
EPA Reg # _____ Signal _____ Estimated Color _____
Restricted ☐ No ☐ Yes/Describe _____
P Waste _____ PBT _____ WA PBT _____ Persistent _____ Mobil _____
Cancer _____ Repro _____ Neuro _____ Endocrine _____
Bird _____ Fish _____ Bees _____ Wildlife _____
Please attach product label and MSDS to this form.

Describe the pest problem. Invasive plant species are (1) directly competing with desirable natives, primarily oaks, (2) expanding their footprint throughout the preserve. The primary problematic invasives in Douglas Family Preserve are golden wattle (*Acacia pycnantha*), Eucalyptus (*Eucalyptus* sp.) and Brazilian pepper tree (*Schinus terebinthifolius*); other invasive species are present, but not as prolific. Golden wattle grows in dense clusters that are directly outcompeting young oak saplings. Eucalyptus spreads rapidly, and is allelopathic, meaning it produces compounds that inhibit the growth of nearby competing plants to more successfully compete for resources. Brazilian pepper is appearing as an escaped ornamental, and showing an increased presence of young recruits throughout the open space.

These invasive species are extremely difficult to remove mechanically. When cut, they will re-sprout, even if stump grinding is performed. Given the spread of these species on site, full root system removal would be highly disruptive and is not feasible; it would greatly disturb the soil causing an erosional risk, and do more harm than good to the competing natives.

Describe the overall management goals and objectives for this site. The goal is to eliminate invasive woody species from the site.

What is the damage or action threshold for this pest at this site? (The action threshold is the number of pests or level of damage beyond which management action should be taken.) Any new locational presence or spreading of invasives on site will trigger removal action.

Describe the monitoring of the pest and potential predators that was conducted and the control methods previously used at the site. Mechanized removal of Acacia has been used on site in years past. The site will continue to be actively monitored by the Parks and Recreation Open Space Planner.

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Describe how the product would be applied including frequency, concentration, and method of application.

Invasive trees/shrubs would be cut 2-4 inches above ground level, and herbicide would be immediately applied to the cut. The area would be rechecked within 4-6 weeks for any regrowth, and retreated if necessary.

What non-target impacts are anticipated? Because the application is so localized, pesticide drift will be minimized to the maximum extent possible. Colored dye will reduce the risk of excess application. There is the potential for the non-target impact of physical damage to adjacent vegetation due to trampling, stockpiling, etc.; this will be limited to the extent feasible.

How does the use of this product help achieve the site management goals? Note if this is curative or preventative. Localized herbicide treatment on invasive species will help achieve the active management goals for Douglas Family Preserve, including but not limited to vegetative fuels management goals and habitat management goals. This is a part of a comprehensive and sustainable approach of open space management, to both serve the community that utilizes the space and support the existing natural ecosystem. This is both a curative (treating existing invasives on site) and a preventative (treating young invasives early on so that an existing native vegetation community is not outcompeted/transitioned to a non-native vegetation community) action. This treatment is a step towards making Douglas Family Preserve a more resilient open space.

How will the effectiveness of this product be monitored? Include expected results and indicators of success.

Short-term success will be determined via visual observations determining if the target invasive species were successfully removed in treated locations. The treatment would be considered a long-term success if native vegetation is able to successfully infill and outcompete invasives in the treated locations.

Describe what precautions would be used for application. For example consider restricting access, distance from a creek or body of water, degree of runoff, weather conditions, etc.

The target treatment areas are all upland vegetation communities; no treatment would occur within 50 feet of aquatic environments. Treatment will be scheduled around peak use times at Douglas Family Preserve (for example, mid-morning on a weekday). Weather forecasts will be checked, and treatment will not occur within 24 hours of predicted rain. Signage will be posted at all site entrances, and City staff will be present for the duration of active treatment to answer any public questions, and direct them away from treated areas. Given the localized application method, the product should be fully absorbed (i.e. dry at the applied location) within approximately 15 minutes.

List alternatives considered, alternatives implemented and why they were eliminated. Mechanized removal was considered, but eliminated for the following reasons: negative impacts to surrounding vegetation, contribution to soil disturbance and associated erosion, difficulty to ensure effectiveness.

Justification: describe why is applying this pesticide is the best solution and why a less-hazardous chemical, non-chemical option or taking no action is not feasible. Taking no action is infeasible, as woody invasives are actively spreading and outcompeting natives on site. Waiting would only further reduce the acreage of healthy, native vegetation communities on site, and require additional herbicide using the future to successfully treat these target invasives. Less hazardous chemicals have not been deemed effective on the target woody invasives, and mechanized removal was eliminated for the reasons stated above.

Was outside expertise utilized? ☐ No ☒ Yes / **Describe:** Resources including the *Cal-IPC-IPCW Plant Report*, discussion with Santa Barbara County Weed Management Area staff, and internal discussion with City departments on successful and unsuccessful treatment methods for target invasives were utilized.

Describe future plans to prevent using the chemical again. As active management of Douglas Family Preserve continues, the hope is that native vegetation will begin to successfully outcompete invasives. Consistent site monitoring by City staff will aim to catch new invasives and re-sprouts early on, where hand removal or other non-chemical approach would be a feasible treatment option.

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Signatures _____
Department IPM Coordinator City IPM Coordinator

Completed by the City of Santa Barbara IPM Staff

Vote Tally _____ Disposition: ☐ Approved ☐ Denied/Reason _____

If approved, follow the attached best management practices.

Comments:

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

Product identifier

Trade name	ROUNDUP CUSTOM® FOR AQUATIC & TERRESTRIAL USE
Product code (UVP)	86738473
SDS Number	102000037603
EPA Registration No.	524-343

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

Use	Herbicide
Restrictions on use	See product label for restrictions.
Information on supplier	
Supplier	Bayer Environmental Science A division of Bayer CropScience LP 5000 Centregreen Way, Suite 400 Cary, NC 27513 USA
Responsible Department	Email: SDSINFO.BCS-NA@bayer.com
Emergency telephone no.	
Emergency Telephone Number (24hr/ 7 days)	1-800-334-7577
Product Information Telephone Number	1-800-331-2867

SECTION 2: HAZARDS IDENTIFICATION

Classification in accordance with regulation HCS 29CFR §1910.1200

This material is not hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29CFR 1910.1200.

Hazards Not Otherwise Classified (HNOC)

No physical hazards not otherwise classified.
No health hazards not otherwise classified.

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

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Hazardous Component Name
Isopropylamine salt of glyphosate

CAS-No.
38641-94-0

Concentration % by weight
53.8

SECTION 4: FIRST AID MEASURES

Description of first aid measures

General advice	When possible, have the product container or label with you when calling a poison control center or doctor or going for treatment.
Inhalation	Move to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a physician or poison control center immediately.
Skin contact	Wash off immediately with plenty of water for at least 15 minutes. Take off contaminated clothing and shoes immediately. Call a physician or poison control center immediately.
Eye contact	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a physician or poison control center immediately.
Ingestion	Call a physician or poison control center immediately. Rinse out mouth and give water in small sips to drink. DO NOT induce vomiting unless directed to do so by a physician or poison control center. Never give anything by mouth to an unconscious person. Do not leave victim unattended.

Most important symptoms and effects, both acute and delayed

Symptoms To date no symptoms are known.

Indication of any immediate medical attention and special treatment needed

Risks This product is not a cholinesterase inhibitor.

Treatment Treatment with atropine and oximes is not indicated. Appropriate supportive and symptomatic treatment as indicated by the patient's condition is recommended.

SECTION 5: FIREFIGHTING MEASURES

Extinguishing media

Suitable Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.

Unsuitable High volume water jet

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Special hazards arising from the substance or mixture	In the event of fire the following may be released: Carbon monoxide (CO), Carbon dioxide (CO ₂), Nitrogen oxides (NO _x), Oxides of phosphorus
Advice for firefighters	
Special protective equipment for firefighters	In the event of fire and/or explosion do not breathe fumes. Firefighters should wear NIOSH approved self-contained breathing apparatus and full protective clothing. Equipment should be thoroughly decontaminated after use.
Further information	Keep out of smoke. Fight fire from upwind position. Cool closed containers exposed to fire with water spray. Do not allow run-off from fire fighting to enter drains or water courses.
Flash point	does not flash
Auto-ignition temperature	No data available
Lower explosion limit	Not applicable
Upper explosion limit	Not applicable
Explosivity	Not explosive

SECTION 6: ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Precautions Use personal protective equipment. Keep unauthorized people away. Avoid contact with spilled product or contaminated surfaces.

Methods and materials for containment and cleaning up

Methods for cleaning up Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Collect and transfer the product into a properly labelled and tightly closed container. Keep in suitable, closed containers for disposal. Clean contaminated floors and objects thoroughly, observing environmental regulations.

Additional advice Use personal protective equipment. If the product is accidentally spilled, do not allow to enter soil, waterways or waste water canal. Do not allow product to contact non-target plants.

Reference to other sections Information regarding safe handling, see section 7.
Information regarding personal protective equipment, see section 8.
Information regarding waste disposal, see section 13.

SECTION 7: HANDLING AND STORAGE

Precautions for safe handling

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Advice on safe handling	Avoid contact with skin, eyes and clothing. Ensure adequate ventilation.
Hygiene measures	<p>Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, using the toilet or applying cosmetics.</p> <p>Remove Personal Protective Equipment (PPE) immediately after handling this product. Remove soiled clothing immediately and clean thoroughly before using again. Wash thoroughly and put on clean clothing. Keep working clothes separately. Garments that cannot be cleaned must be destroyed (burnt).</p>
Conditions for safe storage, including any incompatibilities	
Requirements for storage areas and containers	<p>Store in original container. Store in a cool, dry place and in such a manner as to prevent cross contamination with other crop protection products, fertilizers, food, and feed. Store in a place accessible by authorized persons only. Reacts with galvanised steel or unlined mild steel to produce hydrogen, a highly flammable gas that could explode. Protect from freezing. Partial crystallization may occur on prolonged storage below the minimum storage temperature. Freezing will affect the physical condition but will not damage the material. Thaw and mix before using.</p>
Advice on common storage	Keep away from food, drink and animal feedingstuffs.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

No known occupational limit values.

Exposure controls

Personal protective equipment

In normal use and handling conditions please refer to the label and/or leaflet. In all other cases the following recommendations would apply.

Respiratory protection	When respirators are required, select NIOSH approved equipment based on actual or potential airborne concentrations and in accordance with the appropriate regulatory standards and/or industry recommendations.
Hand protection	<p>Please observe the instructions regarding permeability and breakthrough time which are provided by the supplier of the gloves. Also take into consideration the specific local conditions under which the product is used, such as the danger of cuts, abrasion, and the contact time.</p> <p>Chemical-resistant gloves (barrier laminate, butyl rubber, nitrile rubber or Viton)</p> <p>Wash gloves when contaminated. Dispose of when contaminated inside, when perforated or when contamination on the outside cannot be removed. Wash hands frequently and always before eating,</p>

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	drinking, smoking or using the toilet.
Eye protection	Use tightly sealed goggles and face protection.
Skin and body protection	Wear long-sleeved shirt and long pants and shoes plus socks.
General protective measures	Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and warm/tepid water. Keep and wash PPE separately from other laundry.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Form	Liquid, clear
Colour	colorless to light yellow or brown
Odour	odourless
Odour Threshold	No data available
pH	4.4 - 4.8 (6.3 %)
Melting point/range	No data available
Boiling Point	No data available
Flash point	does not flash
Flammability	No data available
Auto-ignition temperature	No data available
Minimum ignition energy	Not applicable
Self-accelarating decomposition temperature (SADT)	No data available
Upper explosion limit	Not applicable
Lower explosion limit	Not applicable
Vapour pressure	Not applicable
Evaporation rate	No data available
Relative vapour density	No significant volatility.
Relative density	1.206 (20 °C)
Density	1.21 g/cm ³ (20 °C)
Water solubility	completely soluble
Partition coefficient: n-	Glyphosate: log Pow: -3.2

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octanol/water

Viscosity, dynamic	No data available
Viscosity, kinematic	No data available
Oxidizing properties	No data available
Explosivity	Not explosive
Other information	Further safety related physical-chemical data are not known.

SECTION 10: STABILITY AND REACTIVITY

Reactivity

Thermal decomposition	Stable under normal conditions.
Chemical stability	Stable under recommended storage conditions.
Possibility of hazardous reactions	Reacts with galvanised steel or unlined mild steel to produce hydrogen, a highly flammable gas that could explode.
Conditions to avoid	Extremes of temperature and direct sunlight.
Incompatible materials	Galvanised steel, Unlined mild steel
Hazardous decomposition products	No decomposition products expected under normal conditions of use.

SECTION 11: TOXICOLOGICAL INFORMATION

Exposure routes	Skin contact, Eye contact, Inhalation
Immediate Effects	
Eye	Not expected to produce significant adverse effects when recommended use instructions are followed.
Skin	Not expected to produce significant adverse effects when recommended use instructions are followed.
Ingestion	Not expected to produce significant adverse effects when recommended use instructions are followed.
Inhalation	Not expected to produce significant adverse effects when recommended use instructions are followed.
Information on toxicological effects	
Acute oral toxicity	LD50 (Rat) > 5,000 mg/kg Test conducted with a similar formulation. No deaths

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Acute inhalation toxicity	LC50 (Rat) > 4.24 mg/l Exposure time: 4 h Determined in the form of liquid aerosol. Highest attainable concentration. No deaths Test conducted with a similar formulation.
Acute dermal toxicity	LD50 (Rabbit) > 5,000 mg/kg Test conducted with a similar formulation. No deaths
Skin corrosion/irritation	No skin irritation (Rabbit) Test conducted with a similar formulation.
Serious eye damage/eye irritation	No eye irritation (Rabbit) Test conducted with a similar formulation.
Respiratory or skin sensitisation	Skin: Non-sensitizing. (Guinea pig) OECD Test Guideline 406, Buehler test Test conducted with a similar formulation.

Assessment STOT Specific target organ toxicity – single exposure

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

Assessment STOT Specific target organ toxicity – repeated exposure

Glyphosate did not cause specific target organ toxicity in experimental animal studies.

Assessment mutagenicity

Glyphosate was not mutagenic or genotoxic in a battery of in vitro and in vivo tests.

Assessment carcinogenicity

Glyphosate was not carcinogenic in lifetime feeding studies in rats and mice.

Important comment to IARC Listing: Our expert opinion is that classification as a carcinogen is not warranted.

ACGIH

None.

NTP

None.

IARC

Isopropylamine salt of glyphosate

38641-94-0

Overall evaluation: 2A

OSHA

None.

Assessment toxicity to reproduction

Glyphosate did not cause reproductive toxicity in a two-generation study in rats.

Assessment developmental toxicity

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Glyphosate did not cause developmental toxicity in rats and rabbits.

Aspiration hazard

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

SECTION 12: ECOLOGICAL INFORMATION

Toxicity to fish	LC50 (Oncorhynchus mykiss (rainbow trout)) > 1,000 mg/l static test; Exposure time: 96 h Test conducted with a similar formulation. LC50 (Lepomis macrochirus (Bluegill sunfish)) > 1,000 mg/l static test; Exposure time: 96 h Test conducted with a similar formulation.
Chronic toxicity to fish	Oncorhynchus mykiss (rainbow trout) flow-through test NOEC: >= 9.63 mg/l The value mentioned relates to the active ingredient glyphosate.
Toxicity to aquatic invertebrates	EC50 (Daphnia magna (Water flea)) 930 mg/l static test; Exposure time: 48 h Test conducted with a similar formulation.
Chronic toxicity to aquatic invertebrates	EC50 (Daphnia magna (Water flea)): 12.5 mg/l Exposure time: 21 d The value mentioned relates to the active ingredient glyphosate.
Toxicity to aquatic plants	EbC50 (Raphidocelis subcapitata (freshwater green alga)) 72.9 mg/l static test; Exposure time: 72 h The value mentioned relates to the active ingredient glyphosate. NOEC (Raphidocelis subcapitata (freshwater green alga)) 26.4 mg/l static test; Exposure time: 72 h The value mentioned relates to the active ingredient glyphosate.
Biodegradability	Glyphosate: Not rapidly biodegradable
Koc	Glyphosate: Koc: 6920
Bioaccumulation	Glyphosate: Does not bioaccumulate.
Mobility in soil	Glyphosate: Immobile in soil
Results of PBT and vPvB assessment	
PBT and vPvB assessment	Glyphosate: This substance is not considered to be persistent, bioaccumulative and toxic (PBT). This substance is not considered to be very persistent and very bioaccumulative (vPvB).
Additional ecological	No further ecological information is available.

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information

Environmental precautions Apply this product as specified on the label.
Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark.
Do not contaminate surface or ground water by cleaning equipment or disposal of wastes, including equipment wash water.
Retain and dispose of contaminated wash water.

SECTION 13: DISPOSAL CONSIDERATIONS

Waste treatment methods

Product It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow container label instructions and applicable local guidelines.
Do not contaminate water, food, or feed by disposal.
Follow all local/regional/national/international regulations.

Contaminated packaging Follow advice on product label and/or leaflet.
Do not re-use empty containers.
Triple rinse containers.
Puncture container to avoid re-use.
Completely empty container into application equipment, then dispose of empty container in a sanitary landfill, by incineration or by other procedures approved by state/provincial and local authorities.
If burned, stay out of smoke.

RCRA Information Characterization and proper disposal of this material as a special or hazardous waste is dependent upon Federal, State and local laws and are the user's responsibility. RCRA classification may apply.

SECTION 14: TRANSPORT INFORMATION

According to national and international transport regulations this material is not classified as dangerous goods / hazardous material.

SECTION 15: REGULATORY INFORMATION

EPA Registration No.	524-343
US Federal Regulations	
TSCA list	
Water	7732-18-5

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US. Toxic Substances Control Act (TSCA) Section 12(b) Export Notification (40 CFR 707, Subpt D)

No export notification needs to be made.

SARA Title III - Section 302 - Notification and Information

Not applicable.

SARA Title III - Section 313 - Toxic Chemical Release Reporting

None.

US States Regulatory Reporting

CA Prop65

This product does not contain any substances known to the State of California to cause cancer.

This product does not contain any substances known to the State of California to cause reproductive harm.

US State Right-To-Know Ingredients

None.

Environmental

CERCLA

None.

Clean Water Section 307(a)(1)

None.

Safe Drinking Water Act Maximum Contaminant Levels

None.

EPA/FIFRA Information:

This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and for workplace labels of non-pesticide chemicals. Following is the hazard information required on the pesticide label:

Signal word: Caution!

SECTION 16: OTHER INFORMATION

Abbreviations and acronyms

49CFR	Code of Federal Regulations, Title 49
ACGIH	US. ACGIH Threshold Limit Values
ATE	Acute toxicity estimate
CAS-Nr.	Chemical Abstracts Service number
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EINECS	European inventory of existing commercial substances
ELINCS	European list of notified chemical substances
IARC	International Agency for Research on Cancer
IATA	International Air Transport Association
IMDG	International Maritime Dangerous Goods

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N.O.S.	Not otherwise specified
NTP	US. National Toxicology Program (NTP) Report on Carcinogens
OECD	Organization for Economic Co-operation and Development
TDG	Transportation of Dangerous Goods
TWA	Time weighted average
UN	United Nations
WHO	World health organisation

NFPA 704 (National Fire Protection Association):

Health - 0 Flammability - 1 Instability - 1 Others - none

HMIS (Hazardous Materials Identification System, based on the Third Edition Ratings Guide)

Health - 0 Flammability - 1 Physical Hazard - 1 PPE -

0 = minimal hazard, 1 = slight hazard, 2 = moderate hazard, 3 = severe hazard, 4 = extreme hazard

Reason for Revision: New Safety Data Sheet.

Revision Date: 09/25/2020

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