

**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 Parma Park Specific Location throughout open space, priority areas are adjacent to trails  
Date(s) of Application periodic dates between Jan. 2023 and Nov. 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 (2) expanding their footprint throughout the open space. The primary problematic woody invasives in Parma Park are Eucalyptus (*Eucalyptus* sp.), olive (*Olea europaea*), tree tobacco (*Nicotiana glauca*), castor bean (*Ricinus communis*), and Peruvian pepper tree (*Schinus molle*), and Brazilian pepper tree (*Schinus terebinthifolius*). Some of these species are present as escaped ornamentals, and have been able to spread throughout the park. All of these species are 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 Parks and Recreation Department aims to prevent invasive species from further encroaching into native communities, with the long-term goal of transitioning areas dominated by invasive plants back to native vegetation communities.

**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 young 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, hand removal, and use of glyphosate associated with an IPM exemption request have 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.**

The primary invasive treatment event would be timed with the disturbance window of the Sustainable Trails Plan for the following reasons (1) work within the same disturbance event (as opposed to a separate event requiring bushwhacking, mechanized tools, etc.) (2) assist native plants/trees potentially stressed by the trail disturbance in competing with adjacent invasives for resources. Invasive trees/shrubs would be cut 2-4 inches above ground level, and herbicide would be immediately applied to the cut. If it is not feasible to fall the target invasive tree, or if its physical removal would do more harm to the adjacent habitat, then the "drill and fill" method may be applied; this method would involve drilling a series of downward angled holes into the sapwood, and injecting herbicide via a syringe. 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 tree falling/trampling 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 Parma Park, 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 Parma Park 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.** While a vast majority of the target treatment areas are upland vegetation communities, Roundup Custom is approved for use in aquatic environments. As much as possible, treatment will be scheduled to correspond with trail closures associated with the Sustainable Trails Plan. Weather forecasts will be checked, and treatment will not occur within 24 hours of predicted rain. Signage will be posted at all site entrances. 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.

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**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 Parma Park 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.

**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	CAS-No.	Concentration % by weight
Isopropylamine salt of glyphosate	38641-94-0	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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<b>Special hazards arising from the substance or mixture</b>	In the event of fire the following may be released:, Carbon monoxide (CO), Carbon dioxide (CO <sub>2</sub> ), Nitrogen oxides (NO <sub>x</sub> ), Oxides of phosphorus
<b>Advice for firefighters</b>	
<b>Special protective equipment for firefighters</b>	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.
<b>Further information</b>	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.
<b>Flash point</b>	does not flash
<b>Auto-ignition temperature</b>	No data available
<b>Lower explosion limit</b>	Not applicable
<b>Upper explosion limit</b>	Not applicable
<b>Explosivity</b>	Not explosive

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### 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.

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### 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** Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, using the toilet or applying cosmetics.

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).

### Conditions for safe storage, including any incompatibilities

**Requirements for storage areas and containers** 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.

**Advice on common storage** Keep away from food, drink and animal feedingstuffs.

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## 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

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.

Chemical-resistant gloves (barrier laminate, butyl rubber, nitrile rubber or Viton)

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,

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	drinking, smoking or using the toilet.
<b>Eye protection</b>	Use tightly sealed goggles and face protection.
<b>Skin and body protection</b>	Wear long-sleeved shirt and long pants and shoes plus socks.
<b>General protective measures</b>	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.

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### SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

#### Information on basic physical and chemical properties

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



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### octanol/water

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

## SECTION 10: STABILITY AND REACTIVITY

### Reactivity

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

## SECTION 11: TOXICOLOGICAL INFORMATION

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

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<b>Acute inhalation toxicity</b>	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.
<b>Acute dermal toxicity</b>	LD50 (Rabbit) > 5,000 mg/kg Test conducted with a similar formulation. No deaths
<b>Skin corrosion/irritation</b>	No skin irritation (Rabbit) Test conducted with a similar formulation.
<b>Serious eye damage/eye irritation</b>	No eye irritation (Rabbit) Test conducted with a similar formulation.
<b>Respiratory or skin sensitisation</b>	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

<b>Toxicity to fish</b>	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.
<b>Chronic toxicity to fish</b>	Oncorhynchus mykiss (rainbow trout) flow-through test NOEC: >= 9.63 mg/l The value mentioned relates to the active ingredient glyphosate.
<b>Toxicity to aquatic invertebrates</b>	EC50 (Daphnia magna (Water flea)) 930 mg/l static test; Exposure time: 48 h Test conducted with a similar formulation.
<b>Chronic toxicity to aquatic invertebrates</b>	EC50 (Daphnia magna (Water flea)): 12.5 mg/l Exposure time: 21 d The value mentioned relates to the active ingredient glyphosate.
<b>Toxicity to aquatic plants</b>	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.
<b>Biodegradability</b>	Glyphosate: Not rapidly biodegradable
<b>Koc</b>	Glyphosate: Koc: 6920
<b>Bioaccumulation</b>	Glyphosate: Does not bioaccumulate.
<b>Mobility in soil</b>	Glyphosate: Immobile in soil
<b>Results of PBT and vPvB assessment</b>	
<b>PBT and vPvB assessment</b>	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).
<b>Additional ecological</b>	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.

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### 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.

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### SECTION 14: TRANSPORT INFORMATION

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

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### 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!

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## 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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