

SAFETY DATA SHEET

(according to Regulation (EC) No. 1907/2006 (REACH), amended by Regulation (EU) 2020/878)

Date of issue: Jun 1998

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Revision date: 30 Jan 2024. Replaces version of Mar 2021

Product name: **HS-LACQUER VIKTOR 41**

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Product identifier: **HS-LACQUER VIKTOR 41**
UFI: 1H30-J0TM-Q00D-X8AE
Other names, synonyms: Not given
Registration number REACH: Not applied to mixtures

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

Identified uses: Heat-weldable lacquer.
Intended for professional/industrial use.
Unadvisable uses: None known.

1.3. Details of the supplier of the safety data sheet

Name or trade name: **VIKTOR Lacquers, s.r.o.**
Registered office/place of business: U Jatek 1551, 592 31 Nové Město na Moravě, CZ
Identification no.: 09344781
Telephone: +420 566 618 550
Fax: +420 566 618 053
www: www.viktorlac.com
E-mail of the **competent person** responsible for the Safety Data Sheet elaboration: info@viktorlac.com

1.4. Emergency telephone number

112 (24 hour service) – applicable to EU countries only

Czech Republic: +420 – 224 91 92 93; 224 91 54 02 (24-hour service)

Klinika pracovního lékařství – Toxikologické informační středisko, Na Bojišti 1, 128 08 Praha 2, CZ

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification according to EC 1272/2008

Flam. Liq. 2; H225 Eye Irrit. 2; H319 STOT SE 3; H336

The mixture is classified as hazardous within the meaning of Regulation (EC) no. 1272/2008.


The most important adverse physicochemical, human health and environmental effects

Highly flammable liquid and vapour. Causes serious eye irritation. May cause drowsiness or dizziness. Repeated exposure may cause skin dryness or cracking.

The full texts of all classifications and hazard statements are given in Section 16.

2.2. Label elements

Labelling according to EC 1272/2008

Product identifier:	HS-LACQUER VIKTOR 41
Chemical names of dangerous substances:	Acetone, ethyl acetate
Hazard pictogram:	
Signal word:	Danger
Hazard statements:	H225 Highly flammable liquid and vapour. H319 Causes serious eye irritation. H336 May cause drowsiness or dizziness.
Precautionary statements:	P210 Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.

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	P260 Do not breathe vapours/spray. P280 Wear protective gloves/eye protection. P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. P337 + P313 If eye irritation persists: Get medical advice/attention. P403 + P235 Store in a well-ventilated place. Keep cool.
Supplemental information on the label:	EUH066 Repeated exposure may cause skin dryness or cracking.

2.3. Other hazards

Flammable liquid, hazard class I acc. to ČSN 65 0201.

The mixture does not meet the criteria for the PBT or vPvB classification.

To the date of the SDS elaboration, the substances contained are not included on the Candidate List (SVHC inventory) for inclusion in Annex XIV to REACH Regulation.

No substance was included in the list established in accordance with Article 59(1) for having endocrine disrupting properties. No substance is a substance identified as having endocrine disrupting properties in accordance with the criteria set out in Commission Delegated Regulation (EU) 2017/2100(3) or Commission Regulation (EU) 2018/605 (at a concentration equal to or greater than 0,1 % by weight).

SECTION 3: Composition/information on ingredients

3.1. Substances

The product is a mixture of more substances.

3.2. Mixtures

Product identifier:	Concentration/ concentration ranges	Index No. CAS No. EC No.	Classification according to EC 1272/2008	SCL ATE M-Factor
Acetone (REACH no. 01-2119471330-49-XXXX)	30 – 40 %	606-001-00-8 67-64-1 200-662-2	Flam. Liq. 2; H225 Eye Irrit. 2; H319 STOT SE 3; H336 EUH066	-
Ethyl acetate (REACH no. 01-2119475103-46-XXXX)	30 – 40 %	607-022-00-5 141-78-6 205-500-4	Flam. Liq. 2; H225 Eye Irrit. 2; H319 STOT SE 3; H336 EUH066	-
<i>n</i> -butyl acetate	0 – 5 %	607-025-00-1 123-86-4 204-658-1	Flam. Liq. 3; H226 STOT SE 3; H336 EUH066	-

This classification corresponds to 100% concentration of the substance.

The full texts of all classifications and hazard statements are given in Section 16.

SECTION 4: First aid measures

4.1. Description of first aid measures

Immediately remove garments contaminated with the product. If health problems occur or if in doubt, seek medical help. In life-threatening conditions the following must be performed:

Pulmonary arrest – immediately start with artificial respiration, not directly mouth-to-mouth.

Cardiac arrest – immediately start with indirect heart massage.

Unconsciousness – place the affected person into an emergency position.

<i>Inhalation:</i>	Move the affected person to fresh air. Remove their clothing if contaminated with the product. Protect them against chilling and prevent from walking! Provide sufficient amounts of fresh air. In case of health problems seek medical help.
<i>Skin contact:</i>	Remove contaminated clothing. Rinse affected skin immediately with large quantities of lukewarm water. If there are no skin wounds, use soap, soap solution or another mild cleaning agent suitable for skin. If irritation persists, seek medical help.
<i>Eye contact:</i>	Immediately start rinsing wide open eyes with running lukewarm water and continue for at least 15 minutes. Remove contact lenses. Seek medical help.

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<i>Ingestion:</i>	In any case do not induce vomiting. Immediately rinse their mouth with potable water. Call medical help immediately or ensure transport to hospital.

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

Inhalation: Vapours have intoxicating and narcotic effects, headaches, drowsiness, dizziness, nausea, and even unconsciousness. Irritating to mucous membranes.

Skin contact: Mildly irritating in contact with skin. Repeated or long-term contact may cause skin irritation, dryness or cracking.

Eye contact: Irritating to eyes.

Ingestion: Causes nausea and depression. Affects the central nervous system. Depending on the quantity of the product ingested, symptoms begin with painful feeling in the throat, leading to gastroenteritis with bigger concentrations.

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

Treat symptomatically.

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media: foam, powder, carbon dioxide (CO₂), water mist. If possible, remove the product from the place of fire. Cool vessels containing the product with water spray or mist.

Unsuitable extinguishing media: strong water jet. If a direct jet is squirted into hot liquids, violent generation of steam or explosion may occur.

5.2. Special hazards arising from the substance or mixture

Vapours are heavier than air; they may travel over a long distance and accumulate in low-lying areas, posing the risk of ignition and combustion. Vapours may form explosive mixtures with air. Vessels may rupture due to the generation of gases inside them in fire. Attention! Product entering the sewerage or waste waters poses the risk of explosion!

Thermal decomposition may lead to the formation of toxic emissions – oxides of carbon (CO, CO₂). Avoid inhaling products of combustion.

5.3. Advice for firefighters

Wear complete protective chemical clothing and self-contained breathing apparatus (EN 137). If possible, remove the product from the place of fire. Enclose the hazard area and prevent unauthorised access. Extinguish the fire from a protected place or a safe distance. Cool vessels containing the product with water spray or mist. Prevent used extinguishing media from entering the sewerage and water sources.

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

Direct contact with the product must be prevented. Use personal protective equipment. Avoid contact with skin and eyes. Ventilate enclosed spaces. Remove flammable materials (wood, paper, oil, etc.) from the released product. Remove all possible sources of ignition. No smoking and handling open flames. Use non-explosive lights and working equipment and non-sparking tools. Mark (e.g. with a tape, hazard symbols) and isolate the place of release. Inform local emergency centre (police, fire brigade) about the accident.

6.2. Environmental precautions

Prevent the product from entering the environment, water sources, sewerage, and soil. Create retaining points such as lagoons or ponds to retain the released product. Cover the product with plastic canvas in order to minimise further release. If the product enters water sources, sewerage or soil, inform competent authorities dealing with environmental protection.

6.3. Methods and material for containment and cleaning up

When released into water sources, the product remains on the water surface; risk of water contamination. Containment booms must be used to prevent further water contamination.

Large releases:

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Pump off the product. If possible, remove the released product with a suitable pump for hazard class I flammable liquids.

Small releases:

Contain the released product with a suitable non-flammable material (vapex, dirt, universal sorbent) and place the contaminated material into waste collection containers. For disposal see Section 13.

6.4. Reference to other sections

Observe also provisions given in Sections 8 and 13 of this Safety Data Sheet.

SECTION 7: Handling and storage

7.1. Precautions for safe handling

Observe all fire prevention measures (no smoking, no handling open flame, removing all possible sources of ignition). Before transferring or using the product, connect electrically and ground all vessels and equipment. Storehouses must comply with the requirements on fire safety of structures and electrical equipment must comply with valid regulations. Take precautionary measures against static discharges.

No eating, drinking or smoking at work. Observe personal hygiene rules. Use personal protective equipment (see Section 10). Provide sufficient ventilation of the workplace. Avoid inhaling vapours and aerosols. Avoid contact with skin and eyes. Contaminate working clothing may be used only after having been thoroughly cleaned. After finishing work wash hands and face thoroughly with soap and water.

Preventing environmental release: depending on the quantity of the product stored, keep vessels in retaining tubs, on sorption mats, or take other measures for collecting drippings from the vessels. Equip storage spaces with retaining no-drain sumps. Collect damaged packaging mechanically and remove it, if it may be done safely. Prevent from entering the sewerage, surface and ground waters, and soil. If a release occurs, proceed acc. to Section 6.

7.2. Conditions for safe storage, including any incompatibilities

Store in tightly closed vessels, in a clean, dry, and well-ventilated space. Store separately from sources of ignition (open flames, sparks, hot surfaces), direct sunlight, strong oxidising agents, and explosive substances. Storehouses must be equipped with emergency sumps.

7.3. Specific end use(s)

Specific use is given in the instructions for use on the product packaging label or in the product documentation.

SECTION 8: Exposure controls/personal protection

8.1. Control parameters

Exposure limit values according to Directive 2000/39/EC, 2006/15/EC, 2009/161/EU, 2017/164/EU and 2019/1831/EU, as amended – are specified.

CAS	Substance name	8 hours		Short time		Note
		mg/m ³	ppm	mg/m ³	ppm	
67-64-1	Acetone	1 210	500	-	-	-
141-78-6	Ethyl acetate	734	200	1 468	400	-
123-86-4	<i>n</i> -butyl acetate	241	50	723	150	-

Limit values of biological exposure tests are not specified in Directive no. 98/24/EC, as amended.

DNEL and PNEC values: not yet available for the mixture.

Acetone

DNEL values:

Workers: 1,210 mg/m³ – human exposure, inhalation, long-term exposure, systemic effects

Workers: 2,420 mg/m³ – human exposure, inhalation, short-term exposure, local effects

Workers: 186 mg/kg bw/day – human exposure, dermal, long-term exposure, systemic effects

Consumers: 200 mg/m³ – human exposure, inhalation, long-term exposure, systemic effects

Consumers: 62 mg/kg bw/day – human exposure, dermal, long-term exposure, systemic effects

Consumers: 62 mg/kg bw/day – human exposure, oral, long-term exposure, systemic effects

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PNEC values:

Freshwater: 10.6 mg/l

Marine water: 1.06 mg/l

Microorganisms in STP: 100 mg/l

Freshwater sediments: 30.4 mg/kg sediment dw

Marine water sediments: 3.04 mg/kg sediment dw

Soil: 29.5 mg/kg soil dw

Ethyl acetate

DNEL values:

Workers: 734 mg/m³ – human exposure, inhalation, long-term exposure, systemic effects

Workers: 1,468 mg/m³ – human exposure, inhalation, short-term exposure, systemic effects

Workers: 734 mg/m³ – human exposure, inhalation, short-term exposure, local effects

Workers: 63 mg/kg bw/day – human exposure, dermal, long-term exposure, systemic effects

Consumers: 367 mg/m³ – human exposure, inhalation, long-term exposure, systemic effects

Consumers: 734 mg/m³ – human exposure, inhalation, short-term exposure, systemic effects

Consumers: 367 mg/m³ – human exposure, inhalation, short-term exposure, local effects

Consumers: 37 mg/kg bw/day – human exposure, dermal, long-term exposure, systemic effects

Consumers: 4.5 mg/kg bw/day – human exposure, oral, long-term exposure, systemic effects

PNEC values:

Freshwater: 0.24 mg/l

Marine water: 0.024 mg/l

Microorganisms in STP: 650 mg/l

Freshwater sediments: 1.15 mg/kg sediment dw

Marine water sediments: 0.115 mg/kg sediment dw

Soil: 0.148 mg/kg soil dw

8.2. Exposure controls

8.2.1. Appropriate engineering controls

Ensure sufficient ventilation if the overall mechanical ventilation is insufficient; local extraction recommended. Make sure only workers wearing personal protective equipment handle the product. Equip the workplace with an eye fountain.

8.2.2. Individual protection measures, such as personal protective equipment

Directive EU 89/656/EEC and Regulation (EU) 2016/425 introduces all personal protective equipment used.

Eye/face protection:	Protective goggles (EN 166).
Skin protection:	Hand protection: Protective gloves (EN 374-1) – rubber. Read the instructions for use specified by the manufacturer. Other: Antistatic work clothing (EN ISO 13688), antistatic footwear (EN ISO 20347).
Respiratory protection:	If ventilation is insufficient or limit concentrations are exceeded, use appropriate respiratory protection. The mask must be selected upon the known or expected level of exposure concentration, product hazard, and permissible exposure limits. Recommended: Protective mask with organic vapour filter.
Thermal hazards:	None.

8.2.3. Environmental exposure controls

See Directives 2000/60/EEC, on waters, and Directive 2008/50/EC, on air.

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

Physical state:	Liquid
Colour:	Colorless, clear or slightly opalescent
Odour:	Solvent-like

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Melting point/freezing point:	< - 40 °C
Boiling point or initial boiling point and boiling range:	Ca 80 °C
Flammability:	Flammable, hazard category 2
Lower and upper explosion limit:	Data not available
Flash point:	- 6 °C
Auto-ignition temperature:	Data not available
Decomposition temperature:	Data not available
pH:	Data not available
Kinematic viscosity:	Data not available
Solubility:	Readily soluble in common solvents
Partition coefficient n-octanol/water (log value):	Data not available
Vapour pressure:	Data not available
Density and/or relative density:	0.94 g/cm ³
Relative vapour density:	Data not available
Particle characteristics:	Does not apply for liquids

9.2. Other information

Dry matter:	25 – 30 %
VOC:	686 g/l Min. 60 %

Information with regard to physical hazard classes

Not explosive, but vapours may form explosive mixtures with air.

Other safety characteristics

Data not available.

SECTION 10: Stability and reactivity

10.1. Reactivity

No risks of reactions with other substances are known under normal conditions.

10.2. Chemical stability

Stable in storage and handling at normal ambient conditions.

10.3. Possibility of hazardous reactions

The product is volatile and evaporates even at normal temperature and pressure conditions. Vapours may form explosive mixtures with air. Vapours are heavier than air and travel along the floor.

10.4. Conditions to avoid

High temperature, sparks, open flames, direct sunlight, other sources of ignition.

10.5. Incompatible materials

Strong oxidising agents, flammable substances.

10.6. Hazardous decomposition products

Oxides of carbon (CO, CO₂).

SECTION 11: Toxicological information

11.1. Information on hazard classes as defined in Regulation (EC) No 1272/2008

Toxicological data have not been determined experimentally for the mixture.

Data on the possible effect of the mixture are based on known effects of individual ingredients.

Acute toxicity

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

- LD ₅₀ , oral, rat (mg.kg ⁻¹):	5,800 (acetone) 5,620 (ethyl acetate)
- LD ₅₀ , dermal, rabbit (mg.kg ⁻¹):	> 20,000 (ethyl acetate)
- LC ₅₀ , inhalation, rat (mg.l ⁻¹):	76 / 4 hrs., gases, vapors (acetone) 45 / 2 hrs. (ethyl acetate)

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Skin corrosion/irritation

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

Serious eye damage/irritation

Causes severe eye irritation.

Respiratory or skin sensitisation

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

Germ cell mutagenicity

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

Carcinogenicity

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

Reproductive toxicity

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

STOT-single exposure

May cause drowsiness or dizziness.

STOT-repeated exposure

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

Aspiration hazard

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

Other information

Repeated exposure may cause skin dryness or cracking.

11.2. Information on other hazards

Data not available. The endocrine disrupting properties are unknown.

SECTION 12: Ecological information

Toxicological data have not been determined experimentally for the mixture.

Data on the possible effect of the mixture are based on known effects of individual ingredients.

12.1. Toxicity

- LC ₅₀ , 96 hrs., fish (mg.l ⁻¹):	5,540, 96 hrs., <i>Salmo gairneri</i> (acetone) 8,300, 96 hrs., <i>Lepomis macrochirus</i> (acetone) 8,120, 96 hrs., <i>Pimephales promelas</i> (acetone) 7,032, 14 days, <i>Poecilia reticulanta</i> (acetone) 270 – 330, 48 hrs. (ethyl acetate) 220 – 250, 96 hrs., <i>Pimephales promelas</i> (ethyl acetate)
- EC ₅₀ , 48 hrs., crustacea (mg.l ⁻¹):	10 – 24, 48 hrs., <i>Daphnia magna</i> (acetone) 12,600 – 12,700, <i>Daphnia magna</i> (acetone) > 3,090, 24 hrs., <i>Daphnia sp.</i> (ethyl acetate)
- IC ₅₀ , 72 hrs., algae (mg.l ⁻¹):	> 15, 168 hrs. (ethyl acetate)

12.2. Persistence and degradability

Data not given.

12.3. Bioaccumulative potential

Data not given.

12.4. Mobility in soil

Data not given.

12.5. Results of PBT and vPvB assessment

The mixture is not classified as PBT or vPvB.

12.6. Endocrine disrupting properties

Data not available. The endocrine disrupting properties are unknown.

12.7. Other adverse effects

Prevent from entering soil, sewerage, surface and ground waters.

The product is volatile and evaporates even at normal temperature and pressure conditions.

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SECTION 13: Disposal considerations

13.1. Waste treatment methods

Catalogue numbers of waste types are to be assigned by the user upon the product application used and other facts. Must not be disposed of together with municipal waste. No to be discharged to the sewerage.

European Waste Catalogue (EWC):

Recommended packaging code: 08 01 11

Packaging: 15 01 10

Cleaning waste: 15 02 02

Recommended disposal method for legal persons and physical persons authorised to enterprise:




Place unused preparation and contaminated packaging into labelled waste collection containers, hand over labelled waste for disposal to a specialised company authorised to carry out such activities.

Recommended disposal method: recycle the product if possible or incinerate in an approved facility. Contaminated packaging must be cleaned before recycling. Incineration should be considered only if recycling is not possible.

Legal regulations relating to waste

Directive 2008/98/EC on waste. Commission Decision 2014/955/EU on the list of waste. Directive 94/62/EC on packaging and packaging waste. Disposal must be made according to official regulations.

SECTION 14: Transport information

14.1. UN number or ID number	UN1993										
14.2. UN proper shipping name	ADR/RID: FLAMMABLE LIQUID, N.O.S. (acetone, ethyl-acetate) IMDG, ICAO/IATA: FLAMMABLE LIQUID, N.O.S.										
14.3. Transport hazard class(es)	3										
14.4. Packing group	II										
14.5. Environmental hazards	No										
14.6. Special precautions for user	Not known										
14.7. Maritime transport in bulk according to IMO instruments	Not known										
Additional information	<table border="0"><tr><td><table border="1"><tr><td>33</td></tr><tr><td>1993</td></tr></table></td><td></td></tr><tr><td>Maritime transport – IMDG</td><td></td></tr><tr><td>EMS (emergency plan)</td><td>F-E, S-E</td></tr><tr><td>Maritime contamination</td><td>yes</td></tr></table>	<table border="1"><tr><td>33</td></tr><tr><td>1993</td></tr></table>	33	1993		Maritime transport – IMDG		EMS (emergency plan)	F-E, S-E	Maritime contamination	yes
<table border="1"><tr><td>33</td></tr><tr><td>1993</td></tr></table>	33	1993									
33											
1993											
Maritime transport – IMDG											
EMS (emergency plan)	F-E, S-E										
Maritime contamination	yes										

SECTION 15: Regulatory information

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

Restrictions on the substances or mixtures according to Annex XVII of the REACH: Section 3.

Candidate list (SVHC list of substances) – REACH article 59: none.

Substances subject to authorization (Annex XIV of the REACH Regulation): none.

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Regulation (EC) of the European Parliament and of the Council no. 1907/2006 on Registration, evaluation, authorisation and restriction of chemicals (REACH)

Regulation (EC) of the European Parliament and of the Council no. 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP)

The recipient of the substance or mixture must take measures following the legal status of the substance or mixture (including substances contained in the mixture) in compliance with domestic legislation of the particular member state, and to list those legal regulations here.

15.2. Chemical safety assessment

Chemical safety assessment has not been performed for the mixture.

SECTION 16: Other information

Changes to the SDS

Revision history:

Version	Date	Changes
0	26 Nov 2015	First issue according to Regulation (EC) of the European Parliament and of the Council no. 1907/2006 and to Regulation (EC) of the European Parliament and of the Council no. 1272/2008
1.0	15 Mar 2021	Revision of format of safety data sheet according to Commission regulation (EU) 2020/878. Addition of control parameters in section 8. Legislative update in section 8 and 13.

Legend to abbreviations and acronyms

ATE	Acute toxicity estimate
M-factor	Multiplying factor
SCL	Specific concentration limit
CAS	Chemical Abstract Service
EC	European Community number of a chemical for EINECS, ELINCS and NLP inventories
PBT	Persistent, Bioaccumulative and Toxic substances
vPvB	very Persistent and very Bioaccumulative substances
LD ₅₀	Lethal dose, 50 %
LC ₅₀	Lethal concentration, 50 %
EC ₅₀	Half maximal effective concentration
IC ₅₀	Half maximal inhibitory concentration
SVHC	Substances of very high concern
DNEL	Derived no-effect level
Flam. Liq. 2, 3	Flammable liquid, category 2, 3
Eye Irrit. 2	Eye irritation, category 2
STOT SE 3	Toxicity for specific target organs – single exposure, category 3

Key literature references and sources for data

The information contained herein is based on our best knowledge and the present legislation. Further, the Safety Data Sheet has been elaborated on the basis of the original Safety Data Sheet provided by the manufacturer.

Methods used to classify a mixture

The mixture has been evaluated and classified acc. to Regulation (ES) no. 1272/2008 with the use of the additive or non-additive methods (human health hazard), summing method (environmental hazard) and upon test results (physical hazard).

List of relevant hazard statements and precautionary statements used in the SDS

H225 Highly flammable liquid and vapour.

H226 Flammable liquid and vapour.

H319 Causes serious eye irritation.

H336 May cause drowsiness or dizziness.

EUH066 Repeated exposure may cause skin dryness or cracking.

P210 Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.

P260 Do not breathe vapours/spray.

P280 Wear protective gloves/eye protection.

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P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P337 + P313 If eye irritation persists: Get medical advice/attention.

P403 + P235 Store in a well-ventilated place. Keep cool.

Training advice

See Directive 91/383/EEC.

Other information

For further information see Section 1.3.

This Safety Data Sheet represents an expert competent material complying with valid legal regulations. No modifications may be performed without the approval of the competent person.

The product shall not be used for any other purpose than the intended one (see Section 1.2). Since specific conditions of the preparation usage are beyond the supplier's control, it is the user's responsibility to adapt specified notices for local laws and regulations. Safety information describes the product in terms of safety, and therefore may not be considered to be technical information about the product.