Western Sugar Cooperative Scotsbluff 44141 NE0111686

Anderson, Reuel

From:

Anderson, Reuel

Sent:

Wednesday, June 27, 2018 12:11 PM

To: Cc: Josh Livingston; Ducey, Patrick; Flint, John; Aanerud, Alan; O'Connor, Tom; Schneider, Shelley Jeff Kaya; Matthew Maybee; Tracy Bentley; Chuck E. Gibbs; Hope Dibble (Hope@awws.org);

Sean Dibble (Sean@awws.org)

Subject:

RE: Western Sugar Cooperative, Scottsbluff, NE facility ID 44141

Josh,

The NPDES Permits and Compliance Section does not object to the use of the products as described. Please review the NPDES Pesticides General Permit available on our website:

http://deq.ne.gov/publica.nsf/PubsForm.xsp?documentId=10FD05B45D9F22ED86257D1E006C30D2&action=openDocument

Be sure to document the application of the algaecide accordingly. The odor control product does not fall under the same restrictions but I recommend documenting the use. Please do not hesitate to contact me with any questions you may have.

Sincerely,

Reuel S. Anderson, Section Supervisor NPDES Permits and Compliance Department of Environmental Quality 402-471-1367 reuel.anderson@nebraska.gov

From: Josh Livingston <i livingston@westernsugar.com>

Sent: Wednesday, June 27, 2018 8:02 AM

To: Anderson, Reuel < reuel.anderson@nebraska.gov>; Ducey, Patrick < patrick.ducey@nebraska.gov>; Flint, John < john.flint@nebraska.gov>; Aanerud, Alan < alan.aanerud@nebraska.gov>

Cc: Jeff Kava <jkava@westernsugar.com>; Matthew Maybee <mmaybee@westernsugar.com>; Tracy Bentley <tbentley@westernsugar.com>; Chuck E. Gibbs <cegibbs@westernsugar.com>; Hope Dibble (Hope@awws.org) <Hope@awws.org>; Sean Dibble (Sean@awws.org) <Sean@awws.org>; Josh Livingston <jlivingston@westernsugar.com>

Subject: RE: Western Sugar Cooperative, Scottsbluff, NE facility ID 44141

HI Reuel,

Following up from our conversation last night Yes, as stated in Section 15 of the attached SDS this product is registered with EPA as a pesticide, the EPA Reg. No. # 68660-9-895.



Western Sugar Cooperative Scotsbluff 44141 NE0111686

WSC will be able to fully control the application and confinement of the Phycomycin within the Condenser pond per the recommended retention and consumption times prior to any discharge through WSC UV station and final outfall discharge at the Platte River.

Please let us know if you need anything else?

Josh

Josh Livingston

Western Sugar Cooperative 7555 East Hampden Ave. Suite 520 Denver, CO 80231 O (303) 813-3576 C (303) 253-2287

www.westernsugar.com

From: Anderson, Reuel [mailto:reuel.anderson@nebraska.gov]

Sent: Tuesday, June 26, 2018 12:34 PM

To: Josh Livingston storng: Ducey, Patrick patrick.ducey@nebraska.gov; Flint, John silvingston@westernsugar.com; Ducey, Patrick patrick.ducey@nebraska.gov; Flint, John silvingston@westernsugar.com; Flint, John <a href="mailto:silvingston@

Cc: Jeff Kava <<u>jkava@westernsugar.com</u>>; Matthew Maybee <<u>mmaybee@westernsugar.com</u>>; Tracy Bentley <<u>tbentley@westernsugar.com</u>>; Chuck E. Gibbs <<u>cegibbs@westernsugar.com</u>>; Hope Dibble (<u>Hope@awws.org</u>) <Hope@awws.org>; Sean Dibble (Sean@awws.org) <Sean@awws.org>

Subject: RE: Western Sugar Cooperative, Scottsbluff, NE facility ID 44141

Josh,

Is the algaecide a registered pesticide?

Sincerely,

Reuel S. Anderson, Section Supervisor NPDES Permits and Compliance Department of Environmental Quality 402-471-1367 reuel.anderson@nebraska.gov

From: Josh Livingston < ilivingston@westernsugar.com >

Sent: Monday, June 25, 2018 6:20 PM

To: Anderson, Reuel < reuel.anderson@nebraska.gov >; Ducey, Patrick < patrick.ducey@nebraska.gov >; Flint, John < john.flint@nebraska.gov >

Cc: Jeff Kava <<u>ikava@westernsugar.com</u>>; Matthew Maybee <<u>mmaybee@westernsugar.com</u>>; Josh Livingston <<u>ilivingston@westernsugar.com</u>>; Tracy Bentley <<u>tbentley@westernsugar.com</u>>; Chuck E. Gibbs

<cegibbs@westernsugar.com>; Hope Dibble (Hope@awws.org) <Hope@awws.org>; Sean Dibble (Sean@awws.org)

<Sean@awws.org>

Western Sugar Cooperative Scotsbluff 44141 NE0111686

Subject: Western Sugar Cooperative, Scottsbluff, NE facility ID 44141

Importance: High

Hi Reuel,

As a follow-up from Western Sugar Cooperative's (WSC) conference call with John Flint this past Thursday, it was discussed that WSC should add additional information concerning WSC request to trial Interox® Food Grade 34% Hydrogen Peroxide and Phycomycin for algae and odor control at the Scottsbluff, NE facility.

Please note the original signed request has been sent to Reuel's attention.

Western Sugar Cooperative looks forward to reviewing this with the NDEQ and appreciates the NDEQ's expedited response.

Please let us know if you are available this week to discuss additional if needed?

Thank you

Josh

Josh Livingston

Western Sugar Cooperative 7555 East Hampden Ave. Suite 520 Denver, CO 80231 O (303) 813-3576 C (303) 253-2287

www.westernsugar.com





Phycomycin® SCP Algaecide and Oxidizer Non-copper algaecide



Phycomycin® SCP Algaecide and Oxidizer controls cyanobacteria (blue-green algae). Also proven effective on green algae and diatoms.



Advantages

- Controls the cyanobacteria that causes taste and odor in drinking water
- Rapid acting non-copper algaecide
- Granules provide targeted delivery to benthic cyanobacteria
- Low toxicity to fish, aquatic invertebrates and other non-target organisms
- Certified to ANSI-NSF 60 for drinking water

Application

 Apply by broadcasting or mechanical spreader. Product rapidly dissociates to sodium carbonate and hydrogen peroxide molecules within minutes.



Water Use Restrictions

Waters treated with this product may be used for swimming, fishing, further potable water treatment, livestock watering or irrigating turf, ornamental plants or crops after treatment. When applying this product to water bodies, avoid solid particles from falling on nearby ground where birds and feed may be present. Undissolved particles of sodium carbonate peroxyhydrate may be corrosive to beaks of birds.

Specifications

Active Ingredient(s)	85% Sodium Carbonate Peroxyhydrate		
Appearance	Fine White Granules		
Dosing	3 - 100 lb./acre-ft		

Packaging

SKU	Unit	Case	Case	Pallet	Pallet	
Number	Size	Count	Weight (lb.)	Count	Weight (lb.)	
395550A	50 lbs	1	52	40	2127	

Lonza Water Treatment is a leader in specialty chemicals. For over 45 years, Applied Biochemists® products have improved the recreational and functional value of water in many use sites.



The Maximum Usage Level (MUL) of this product is 33 mg/L for drinking water use.



For use in: lakes, ponds and drinking water reservoirs; irrigation, drainage and conveyance ditches, canals, laterals; estuaries, bayous, lagoons; water gardens and water features; impounded water and waste water; and aquaculture.



Accurately targets cyanobacteria, which can cause the water to have an unpleasant odor and taste, while minimizing the impact on non-problematic species.

Lonza Water Treatment 1200 Bluegrass Lakes Pkwy Alpharetta, GA 30004 Tel (800) 558-5106

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AB-395550A-SS

www.lonza.com www.appliedbiochemists.com

FOR ANY EMERGENCY, 24 HOURS / 7 DAYS, CALL:

FOR ALL TRANSPORTATION ACCIDENTS, CALL CHEMTREC®:

FOR ALL SDS QUESTIONS & REQUESTS, CALL:

1-800-654-6911 (OUTSIDE

USA: 1-423-780-2970) 1-800-424-9300 (OUTSIDE

USA: 1-703-527-3887) 1-800-511-MSDS (OUTSIDE

USA: 1-423-780-2347)

PRODUCT NAME: AB PHYCOMYCIN SCP

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Supplier

Applied Biochemists (WI) 1400 Bluegrass Lakes Pkwy , Alpharetta, GA, 30004

USA

Telephone: +18005585106

Telefax: +12626741786

Web: www.appliedbiochemists.com

REVISION DATE:

SUPERCEDES: 02/18/2016

MSDS Number: SYNONYMS:

CHEMICAL FAMILY:

DESCRIPTION / USE FORMULA:

07/06/2016

000000024551

None

None established None established

Manufacturer

Advantis Technologies 1200 Bluegrass Lakes Parkway Alpharetta, GA 30004 United States of America (USA)

SECTION 2. HAZARDS IDENTIFICATION

GHS Classification

Oxidizing solids

Category 3

Corrosive to metals

Category 1

Acute toxicity (Oral)

Category 4

Skin irritation

Category 2

Eye irritation

Category 2A

GHS label elements

AB PHYCOMYCIN SCP

REVISION DATE: 07/06/2016

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Hazard pictograms







Signal word

Warning

Hazard statements

H272 May intensify fire; oxidizer. H290 May be corrosive to metals. H302 Harmful if swallowed. H315 Causes skin irritation. H319 Causes serious eye irritation.

Precautionary statements

Prevention:

P210 Keep away from heat.

P220 Keep/Store away from clothing/ combustible materials. P221 Take any precaution to avoid mixing with combustibles.

P234 Keep only in original container. P264 Wash skin thoroughly after handling.

P270 Do not eat, drink or smoke when using this product. P280 Wear protective gloves/ eye protection/ face protection.

Response:

P301 + P312 + P330 IF SWALLOWED: Call a POISON

CENTER/doctor if you feel unwell. Rinse mouth.

P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P332 + P313 If skin irritation occurs: Get medical advice/ attention.

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

attention.

P362 Take off contaminated clothing and wash before reuse. P370 + P378 In case of fire: Use dry sand, dry chemical or

alcohol-resistant foam to extinguish.

P390 Absorb spillage to prevent material damage.

Storage:

P406 Store in corrosive resistant stainless steel container with a

resistant inner liner.

Disposal:

P501 Dispose of contents/ container to an approved waste

disposal plant.

Other hazards

None known.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

CAS OR CHEMICAL NAME

Sodium Percarbonate

CAS#

15630-89-4

% RANGE

80 - 90

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Sodium carbonate 497-19-8 10 - 16

sodium silicate 1344-09-8 1 - 3

SECTION 4. FIRST AID MEASURES

General Advice: Call a poison control center or doctor for treatment advice. For 24-hour

emergency medical assistance, call Arch Chemical Emergency Action Network at 1-800-654-6911. Have the product container or label with you when calling a

poison control center or doctor, or going for treatment.

Inhalation: IF INHALED: Move person 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 poison control center or doctor for further treatment advice.

Skin Contact: IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin

immediately with plenty of water for 15-20 minutes. Call a poison control center or

doctor for treatment advice.

Eye Contact: IF IN EYES: 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 poison control center or doctor for treatment advice.

Ingestion: IF SWALLOWED: Call a poison control center or doctor immediately for treatment

advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give

anything by mouth to an unconscious person.

SECTION 5. FIREFIGHTING MEASURES

Flammability Summary (OSHA): Product is not known to be flammable, combustible, pyrophoric or

explosive.

Flammable Properties

Flash Point: no data available
Autoignition Temperature: no data available

Fire / Explosion Hazards: May intensify fire; oxidizer.

Extinguishing Media: Water spray

Fire Fighting Instructions: Use water spray to cool unopened containers. In case of fire, use

normal fire-fighting equipment and the personal protective

equipment recommended in Section 8 to include a NIOSH approved

self-contained breathing apparatus.

Upper Flammable / Explosive Limit,

% in air:

no data available

Lower Flammable / Explosive Limit,

no data available

% in air:

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SECTION 6. ACCIDENTAL RELEASE MEASURES

Situations: and a NIOSH approved self-contained breathing apparatus.

Spill Mitigation Procedures

Air Release: Keep people away from and upwind of spill/leak.

Water Release: If the product contaminates rivers and lakes or drains inform

respective authorities.

Land Release: Sweep up and shovel into suitable containers for disposal. Avoid

creating dust.

Additional Spill Information: Prevent further leakage or spillage if safe to do so. Use personal

protective equipment as required. Evacuate personnel to safe areas.

SECTION 7. HANDLING AND STORAGE

Handling: Do not take internally. Avoid contact with skin, eyes and clothing. If in

eyes or on skin, rinse well with water. Avoid breathing dust. The Maximum Usage Level (MUL) of this product is 33 mg/L for drinking

water use.

Storage: Store in a cool dry ventilated location, away from sources of ignition

or other incompatible conditions and chemicals. Keep container(s)

closed.

Incompatible Materials for Storage: Refer to Section 10, "Incompatible Materials."

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Ventilation: Local exhaust ventilation is recommended if vapors, mists or aerosols are

generated. Otherwise, use general exhaust ventilation. No exposure limits

exist for the constituents of this product.

Protective Equipment for Routine Use of Product

Respiratory Protection: Respiratory protection not normally needed., If vapors, mists or aerosols are

generated, wear a NIOSH approved respirator.

Skin Protection : Avoid contact with skin. Impervious gloves

Eye Protection: Chemical resistant goggles must be worn.

Protective Clothing Type: Impervious clothing

General Protective Ensure that evewash stations and safety showers are close to the

Measures: workstation location.

Components with workplace control parameters

no data available

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SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Physical State:

solid

Form

granular

Color:

no data available

Odor:

no data available None established

Molecular Weight: pH:

10.4 - 10.6

() 10 g/l (as aqueous solution)

Boiling Point:

Not applicable

no data available

Melting point/freezing

point **Bulk Density:**

()

Vapor Pressure:

no data available Not applicable

Vapor Density:

Not applicable Not applicable

Viscosity: Solubility in Water:

140 g/l

75 °F (24 °C)

Partition coefficient n-

octanol/water:

no data available

Evaporation Rate:

Not applicable

Oxidizing:

None established

Volatiles, % by vol.: **VOC Content**

no data available

This product does not contain any chemicals listed under the U.S. Clean Air Act Section 111 SOCMI Intermediate or Final VOC's (40 CFR 60.489). This product does not contain any VOC exemptions

listed under the U.S. Clean Air Act Section 450.

HAP Content

no data available

SECTION 10. STABILITY AND REACTIVITY

Stability and Reactivity Summary:

Stable under normal conditions.

Conditions to Avoid:

Heat, Exposure to moist air or water

Chemical Incompatibility:

Water, Acids, Bases, Reducing agents, Organic materials,

Flammable materials, metal salts

Hazardous Decomposition Products:

Oxygen, Steam and heat

Decomposition Temperature:

No data

SECTION 11. TOXICOLOGICAL INFORMATION

Component Animal Toxicology

Oral LD50 value:

Sodium Percarbonate

= 2,400 mg/kgRat

LD50 = 1,034 mg/kgRat

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LD50

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Sodium carbonate

LD50 = 4,090 mg/kg Rat

sodium silicate

LD50 = 1,960 mg/kg Rat

Component Animal Toxicology

Dermal LD50 value:

Sodium Percarbonate LD5

LD50 > 2,000 mg/kg Rabbit

Sodium carbonate

LD50 Believed to be > 2,000 mg/kg Rabbit

sodium silicate

LD50 > 4,640 mg/kg Rabbit

Component Animal Toxicology

Inhalation LC50 value:

Sodium Percarbonate

no data available

Sodium carbonate

LC50 1h =

4.6 mg/l Rat

sodium silicate

no data available

Product Animal Toxicity

Oral LD50 value:

Believed to be approximately 1,158 mg/kg

Dermal LD50 value: Inhalation LC50

No data. No data.

value:

Skin Irritation:

Moderate skin irritation

Eye Irritation:

Severe eye irritation

Skin Sensitization:

Not believed to be sensitising to skin.

Sodium Percarbonate

This material tested negative for skin sensitization in

animals.

Subchronic / Chronic

There are no known or reported effects from chronic exposure.

Toxicity:

Sodium carbonate Male rats were exposed to an aerosol of 2% aqueous

solution of this chemical, 4 hr.day, 5 days/week for 3-1/2 months. No effect was observed at a concentration of 10 or 20 mg/cubic meter. At 70 mg/cubic meter weight gain was decreased and the lungs showed thickening of the intra-alveolar walls, hyperemia, and lymphoid infiltration. Repeated or prolonged skin contact with this

product may cause dermatitis and blistering.

Reproductive and Developmental Toxicity:

Not known or reported to cause reproductive or developmental toxicity.

Sodium carbonate

This chemical has been tested in laboratory animals

and no evidence of teratogenicity was seen.

Mutagenicity:

Not known or reported to be mutagenic.

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Sodium carbonate

This product was determined to be non-mutagenic in the Ames assay. It was also shown to be nonclastogenic in the chromosomal aberration test.

Carcinogenicity:

This product is not known or reported to be carcinogenic by any reference

source including IARC, OSHA, NTP or EPA.

SECTION 12. ECOLOGICAL INFORMATION

Overview:

This material is not expected to be harmful to aquatic life., Based on the physical

properties of this product, significant environmental persistence and

bioaccumulation would not be expected.

Ecological Toxicity Values for: Sodium carbonate

Pimephales promelas (fathead - (nominal, static). 96 h LC50 < 850 mg/l

minnow)

Bluegill - (nominal, static). 96 h LC50 = 320 mg/l

Mosquito fish - (nominal, static). 96 h LC50 = 740 mg/l

Daphnia magna, - (nominal, static). 48 h LC50= 265 mg/l Ceriodaphnia dubia - (nominal) 48 h EC50= 199.82 mg/l

Navicula seminulum (diatom) - (nominal, static). 96 h EC50 = 242 mg/l

Ecological Toxicity Values for: sodium silicate

Gambusia affinis (Mosquito fish) - static test 96 h LC50 = 1,800 - 2,320 mg/l

Lepomis macrochirus (Bluegill - 96 h LC50 = 301 - 478 mg/l

sunfish)

Fish, fresh water - semi-static test 96 h LC50 = 3,185 mg/l

(brachydaniorerio)

Daphnia magna (Water flea) - static test 48 h LC50= 494 mg/l

Ceriodaphnia dubia - 48 h EC50= 33.53 mg/l

SECTION 13. DISPOSAL CONSIDERATIONS

CARE MUST BE TAKEN TO PREVENT ENVIRONMENTAL CONTAMINATION FROM THE USE OF THE MATERIAL. THE USER OF THE MATERIAL HAS THE RESPONSIBILITY TO DISPOSE OF UNUSED MATERIAL, RESIDUES AND CONTAINERS IN COMPLIANCE WITH ALL RELEVANT LOCAL, STATE AND FEDERAL LAWS AND REGULATIONS REGARDING TREATMENT, STORAGE AND DISPOSAL FOR HAZARDOUS AND NONHAZARDOUS WASTES.

Waste Disposal Summary:

If this product becomes a waste, it meets the criteria of a hazardous

AB PHYCOMYCIN SCP

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waste as defined under 40 CFR 261 and would have the following

EPA hazardous waste number: D001.

Disposal Methods: As a nonhazardous liquid waste, it should be disposed of in

accordance with local, state and federal regulations.

SECTION 14. TRANSPORT INFORMATION

DOT

UN number : 3378

Description of the goods : Sodium carbonate peroxyhydrate

Class : 5.1
Packing group : III
Labels : 5.1
Emergency Response : 140

Guidebook Number

IATA

UN number : 3378

Description of the goods : Sodium carbonate peroxyhydrate

Class : 5.1
Packing group : III
Labels : 5.1
Packing instruction (cargo : 563

aircraft)

Packing instruction : 559

(passenger aircraft)

Packing instruction : Y546

(passenger aircraft)

IMDG-CODE

UN number : 3378

Description of the goods : SODIUM CARBONATE PEROXYHYDRATE

Class : 5.1
Packing group : III
Labels : 5.1
EmS Number 1 : F-A
EmS Number 2 : S-Q

SECTION 15. REGULATORY INFORMATION

This chemical is a pesticide product registered by the United States 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 (SDS), and for workplace labels of non-pesticide chemicals.

Signal word : DANGER!

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Hazard statements

: Harmful if swallowed.

Harmful if inhaled.

Corrosive. Causes skin burns.

Corrosive. Causes irreversible eye damage.

Prolonged or frequently repeated skin contact may cause allergic

reactions in some individuals.

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

This material does not contain any components with a CERCLA RQ.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 302

No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313

This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

Clean Air Act

This product does not contain any hazardous air pollutants (HAP), as defined by the U.S. Clean Air Act Section 112 (40 CFR 61).

This product does not contain any chemicals listed under the U.S. Clean Air Act Section 112(r) for Accidental Release Prevention (40 CFR 68.130, Subpart F).

This product does not contain any chemicals listed under the U.S. Clean Air Act Section 111 SOCMI Intermediate or Final VOC's (40 CFR 60.489).

Clean Water Act

This product does not contain any Hazardous Substances listed under the U.S. CleanWater Act, Section 311, Table 116.4A.

This product does not contain any Hazardous Chemicals listed under the U.S. CleanWater Act, Section 311, Table 117.3.

This product does not contain any toxic pollutants listed under the U.S. Clean Water Act Section 307

US State Regulations

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Massachusetts Right To Know

No components are subject to the Massachusetts Right to

Know Act.

Pennsylvania Right To Know

Sodium carbonate

497-19-8

New Jersey Right To Know

Sodium carbonate

497-19-8

Silicic acid, sodium salt

1344-09-8

California Prop 65

This product does not contain any chemicals known to State of

California to cause cancer, birth defects, or any other

reproductive harm.

The components of this product are reported in the following inventories:

TSCA

The components of this product are listed on the TSCA

Inventory of Existing Chemical Substances.

Inventories

AICS (Australia), DSL (Canada), IECSC (China), REACH (European Union), ENCS (Japan), ISHL (Japan), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TCSI (Taiwan), TSCA (USA)

SECTION 16. OTHER INFORMATION

SECTIONS REVISED:

3

Major References:

Available upon request.

THIS MATERIAL SAFETY DATA SHEET (MSDS) HAS BEEN PREPARED IN COMPLIANCE WITH THE FEDERAL OSHA HAZARD COMMUNICATION STANDARD, 29 CFR 1910.1200. THE INFORMATION IN THIS MSDS SHOULD BE PROVIDED TO ALL WHO WILL USE, HANDLE, STORE, TRANSPORT, OR OTHERWISE BE EXPOSED TO THIS PRODUCT. THIS INFORMATION HAS BEEN PREPARED FOR THE GUIDANCE OF PLANT ENGINEERING, OPERATIONS AND MANAGEMENT AND FOR PERSONS WORKING WITH OR HANDLING THIS PRODUCT. ARCH CHEMICALS BELIEVES THIS INFORMATION TO BE RELIABLE AND UP TO DATE AS OF THE DATE OF PUBLICATION BUT, MAKES NO WARRANTY THAT IT IS. ADDITIONALLY, IF THIS MSDS IS MORE THAN THREE YEARS OLD, YOU SHOULD CONTACT ARCH CHEMICALS MSDS CONTROL AT THE PHONE NUMBER ON THE FRONT PAGE TO MAKE CERTAIN THAT THIS DOCUMENT IS CURRENT.

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