

# Safety Data Sheet

## PENDULUM 2G GRANULE HERBICIDE

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### 1. Identification

#### Product identifier used on the label

## PENDULUM 2G GRANULE HERBICIDE

#### Recommended use of the chemical and restriction on use

Recommended use\*: herbicide

\* The "Recommended use" identified for this product is provided solely to comply with a Federal requirement and is not part of the seller's published specification. The terms of this Safety Data Sheet (SDS) do not create or infer any warranty, express or implied, including by incorporation into or reference in the seller's sales agreement.

#### Details of the supplier of the safety data sheet

##### Company:

BASF CORPORATION  
100 Park Avenue  
Florham Park, NJ 07932, USA

Telephone: +1 973 245-6000

#### Emergency telephone number

CHEMTREC: 1-800-424-9300  
BASF HOTLINE: 1-800-832-HELP (4357)

#### Other means of identification

Substance number: 63445  
EPA Registration number: 241-375  
Molecular formula: C13 H19 N3 O4  
Chemical family: aniline derivative  
Synonyms: pendimethalin

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### 2. Hazards Identification

According to Regulation 2012 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

#### Classification of the product

Aquatic Acute	1	Hazardous to the aquatic environment - acute
Aquatic Chronic	2	Hazardous to the aquatic environment - chronic

#### Label elements

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The product does not require a hazard warning label in accordance with GHS criteria.

### Hazards not otherwise classified

#### Labeling of special preparations (GHS):

The following percentage of the mixture consists of components(s) with unknown hazards regarding the acute toxicity: 0 - 1 % oral

The following percentage of the mixture consists of components(s) with unknown hazards regarding the acute toxicity: 0 - 1 % Inhalation - dust

This product is not combustible in the form in which it is shipped by the manufacturer, but may form a combustible dust through downstream activities (e.g. grinding, pulverizing) that reduce its particle size.

#### According to Regulation 1994 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

### Emergency overview

CAUTION:  
HARMFUL IF ABSORBED THROUGH SKIN.  
Moderately irritating to the eyes.  
Avoid contact with the skin, eyes and clothing.

## 3. Composition / Information on Ingredients

#### According to Regulation 2012 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

<u>CAS Number</u>	<u>Weight %</u>	<u>Chemical name</u>
40487-42-1	<= 2.0%	pendimethalin
872-50-4	<= 2.0%	2-Pyrrolidinone, 1-methyl-
14808-60-7	<= 10.0%	crystalline silica

#### According to Regulation 1994 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

<u>CAS Number</u>	<u>Weight %</u>	<u>Chemical name</u>
40487-42-1	<= 2.0%	pendimethalin
872-50-4	<= 2.0%	2-Pyrrolidinone, 1-methyl-
14808-60-7	<= 10.0%	crystalline silica
	<= 96.0%	Proprietary ingredients

## 4. First-Aid Measures

### Description of first aid measures

#### **General advice:**

First aid personnel should pay attention to their own safety. If the patient is likely to become unconscious, place and transport in stable sideways position (recovery position). Immediately remove contaminated clothing.

#### **If inhaled:**

Keep patient calm, remove to fresh air, seek medical attention.

#### **If on skin:**

Immediately wash thoroughly with soap and water, seek medical attention.

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### **If in eyes:**

Wash affected eyes for at least 15 minutes under running water with eyelids held open.

### **If swallowed:**

Immediately rinse mouth and then drink 200-300 ml of water, seek medical attention.

### **Most important symptoms and effects, both acute and delayed**

Symptoms: The most important known symptoms and effects are described in the labelling (see section 2) and/or in section 11., Further important symptoms and effects are so far not known.

### **Indication of any immediate medical attention and special treatment needed**

#### Note to physician

Treatment: Treat according to symptoms (decontamination, vital functions), no known specific antidote.

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## **5. Fire-Fighting Measures**

### **Extinguishing media**

Suitable extinguishing media:  
foam, dry powder, carbon dioxide, water spray

### **Special hazards arising from the substance or mixture**

Hazards during fire-fighting:  
carbon monoxide, carbon dioxide, nitrogen oxide, nitrogen dioxide, Hydrocarbons,  
If product is heated above decomposition temperature, toxic vapours will be released. The substances/groups of substances mentioned can be released if the product is involved in a fire.

### **Advice for fire-fighters**

Protective equipment for fire-fighting:  
Firefighters should be equipped with self-contained breathing apparatus and turn-out gear.

### **Further information:**

Evacuate area of all unnecessary personnel. Contain contaminated water/firefighting water. Do not allow to enter drains or waterways. Dusty conditions may ignite explosively in the presence of an ignition source causing flash fire.

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## **6. Accidental release measures**

### Further accidental release measures:

Avoid dispersal of dust in the air (i.e., clearing dust surfaces with compressed air). Avoid the formation and build-up of dust - danger of dust explosion. Dust in sufficient concentration can result in an explosive mixture in air. Handle to minimize dusting and eliminate open flame and other sources of ignition.

### **Personal precautions, protective equipment and emergency procedures**

Take appropriate protective measures. Clear area. Shut off source of leak only under safe conditions. Extinguish sources of ignition nearby and downwind. Ensure adequate ventilation. Wear suitable personal protective clothing and equipment.

### **Environmental precautions**

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Do not discharge into the subsoil/soil. Do not discharge into drains/surface waters/groundwater. Contain contaminated water/firefighting water.

### Methods and material for containment and cleaning up

Dike spillage. Pick up with suitable absorbent material. Place into suitable containers for reuse or disposal in a licensed facility. Spilled substance/product should be recovered and applied according to label rates whenever possible. If application of spilled substance/product is not possible, then spills should be contained, solidified, and placed in suitable containers for disposal. After decontamination, spill area can be washed with water. Collect wash water for approved disposal.

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## 7. Handling and Storage

### Precautions for safe handling

RECOMMENDATIONS ARE FOR MANUFACTURING, COMMERCIAL BLENDING, AND PACKAGING WORKERS. PESTICIDE APPLICATORS & WORKERS must refer to the Product Label and Directions for Use attached to the product for Agricultural Use Requirements in accordance with the EPA Worker Protection Standard 40 CFR part 170. Ensure adequate ventilation. Provide good ventilation of working area (local exhaust ventilation if necessary). Keep away from sources of ignition - No smoking. Keep container tightly sealed. Protect contents from the effects of light. Protect against heat. Protect from air. Handle and open container with care. Do not open until ready to use. Once container is opened, content should be used as soon as possible. Avoid aerosol formation. Avoid dust formation. Provide means for controlling leaks and spills. Do not return residues to the storage containers. Follow label warnings even after container is emptied. The substance/ product may be handled only by appropriately trained personnel. Avoid all direct contact with the substance/product. Avoid contact with the skin, eyes and clothing. Avoid inhalation of dusts/mists/vapours. Wear suitable personal protective clothing and equipment.

### Protection against fire and explosion:

The relevant fire protection measures should be noted. Fire extinguishers should be kept handy. Avoid all sources of ignition: heat, sparks, open flame. Sources of ignition should be kept well clear. Avoid extreme heat. Keep away from oxidizable substances. Electrical equipment should conform to national electric code. Ground all transfer equipment properly to prevent electrostatic discharge. Electrostatic discharge may cause ignition. Avoid dust formation. Dust in sufficient concentration can result in an explosive mixture in air. Handle to minimize dusting and eliminate open flame and other sources of ignition. Routine housekeeping should be instituted to ensure that dusts do not accumulate on surfaces. Dry powders can build static electricity charges when subjected to the friction of transfer and mixing operations. Provide adequate precautions, such as electrical grounding and bonding, or inert atmospheres. Refer to NFPA 654, Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids (2013 Edition) for safe handling.

### Conditions for safe storage, including any incompatibilities

Segregate from incompatible substances. Segregate from foods and animal feeds. Segregate from textiles and similar materials.

Further information on storage conditions: Keep only in the original container in a cool, dry, well-ventilated place away from ignition sources, heat or flame. Protect containers from physical damage. Protect against contamination. The authority permits and storage regulations must be observed.

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## 8. Exposure Controls/Personal Protection

**Users of a pesticidal product should refer to the product label for personal protective equipment requirements.**

### Components with occupational exposure limits

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crystalline silica	OSHA PEL	TWA value 2.4 millions of particles per cubic foot of air Respirable ; The exposure limit is calculated from the equation, $250/(\%SiO_2+5)$ , using a value of 100% SiO <sub>2</sub> . Lower percentages of SiO <sub>2</sub> will yield higher exposure limits. TWA value 0.1 mg/m <sup>3</sup> Respirable ; The exposure limit is calculated from the equation, $10/(\%SiO_2+2)$ , using a value of 100% SiO <sub>2</sub> . Lower percentages of SiO <sub>2</sub> will yield higher exposure limits. TWA value 0.3 mg/m <sup>3</sup> Total dust ; The exposure limit is calculated from the equation, $30/(\%SiO_2+2)$ , using a value of 100% SiO <sub>2</sub> . Lower percentages of SiO <sub>2</sub> will yield higher exposure limits.
	ACGIH TLV	TWA value 0.025 mg/m <sup>3</sup> Respirable fraction ;

### Advice on system design:

Whenever possible, engineering controls should be used to minimize the need for personal protective equipment. It is recommended that all dust control equipment such as local exhaust ventilation and material transport systems involved in handling of this product contain explosion relief vents or an explosion suppression system or an oxygen deficient environment. Ensure that dust-handling systems (such as exhaust ducts, dust collectors, vessels, and processing equipment) are designed in a manner to prevent the escape of dust into the work area (i.e., there is no leakage from the equipment). Use only appropriately classified electrical equipment and powered industrial trucks.

### Personal protective equipment

#### RECOMMENDATIONS FOR MANUFACTURING, COMMERCIAL BLENDING, AND PACKAGING WORKERS:

##### Respiratory protection:

Wear respiratory protection if ventilation is inadequate. Wear a NIOSH-certified (or equivalent) TC23C Chemical/Mechanical type filter system to remove a combination of particles, gas and vapours. For situations where the airborne concentrations may exceed the level for which an air purifying respirator is effective, or where the levels are unknown or Immediately Dangerous to Life or Health (IDLH), use NIOSH-certified full facepiece pressure demand self-contained breathing apparatus (SCBA) or a full facepiece pressure demand supplied-air respirator (SAR) with escape provisions.

##### Hand protection:

Chemical resistant protective gloves, Protective glove selection must be based on the user's assessment of the workplace hazards.

##### Eye protection:

Safety glasses with side-shields. Tightly fitting safety goggles (chemical goggles). Wear face shield if splashing hazard exists.

##### Body protection:

Body protection must be chosen depending on activity and possible exposure, e.g. head protection, apron, protective boots, chemical-protection suit.

##### General safety and hygiene measures:

Wear long sleeved work shirt and long work pants in addition to other stated personal protective equipment. Work place should be equipped with a shower and an eye wash. Handle in accordance

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with good industrial hygiene and safety practice. Personal protective equipment should be decontaminated prior to reuse. Gloves must be inspected regularly and prior to each use. Replace if necessary (e.g. pinhole leaks). Take off immediately all contaminated clothing. Store work clothing separately. Hands and/or face should be washed before breaks and at the end of the shift. No eating, drinking, smoking or tobacco use at the place of work. Keep away from food, drink and animal feeding stuffs.

### 9. Physical and Chemical Properties

Form:	solid
Odour:	odourless
Odour threshold:	not applicable, odour not perceivable
Colour:	yellow to brown
pH value:	approx. 5 - 7 ( 1 %(m), 37 °C)
Flash point:	not applicable
Flammability:	not flammable
Lower explosion limit:	As a result of our experience with this product and our knowledge of its composition we do not expect any hazard as long as the product is used appropriately and in accordance with the intended use.
Upper explosion limit:	As a result of our experience with this product and our knowledge of its composition we do not expect any hazard as long as the product is used appropriately and in accordance with the intended use.
Bulk density:	620 - 650 kg/m <sup>3</sup>
Vapour density:	not applicable
Partitioning coefficient n-octanol/water (log Pow):	not applicable
Self-ignition temperature:	not self-igniting
Thermal decomposition:	carbon monoxide, carbon dioxide, nitrogen oxide, nitrogen dioxide, Hydrocarbons Stable at ambient temperature. If product is heated above decomposition temperature toxic vapours may be released.
Viscosity, dynamic:	not applicable, the product is a solid
Solubility in water:	dispersible
Evaporation rate:	not applicable
Other Information:	If necessary, information on other physical and chemical parameters is indicated in this section.

### 10. Stability and Reactivity

#### Reactivity

No hazardous reactions if stored and handled as prescribed/indicated.

Corrosion to metals:  
Corrosive effects to metal are not anticipated.

Oxidizing properties:  
not fire-propagating

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### Chemical stability

The product is stable if stored and handled as prescribed/indicated.

### Possibility of hazardous reactions

The product is chemically stable.

Hazardous polymerization will not occur. No hazardous reactions if stored and handled as prescribed/indicated.

No hazardous reactions if stored and handled as prescribed/indicated.

### Conditions to avoid

Avoid all sources of ignition: heat, sparks, open flame. Avoid extreme temperatures. Avoid prolonged exposure to extreme heat. Avoid contamination. Avoid electro-static discharge. Avoid prolonged storage. This product may form an explosive mixture if: 1. the dust is suspended in the atmosphere as a dust cloud AND 2. the concentration of the dust is above the lower explosion limit (LEL) AND 3. the limiting oxygen concentration (LOC) is exceeded.

### Incompatible materials

strong bases, strong acids, strong oxidizing agents

### Hazardous decomposition products

Decomposition products:

Hazardous decomposition products: No hazardous decomposition products if stored and handled as prescribed/indicated.

Thermal decomposition:

Possible thermal decomposition products:

carbon monoxide, carbon dioxide, nitrogen oxide, nitrogen dioxide, Hydrocarbons

Stable at ambient temperature. If product is heated above decomposition temperature toxic vapours may be released.

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## 11. Toxicological information

### Primary routes of exposure

Routes of entry for solids and liquids are ingestion and inhalation, but may include eye or skin contact. Routes of entry for gases include inhalation and eye contact. Skin contact may be a route of entry for liquefied gases.

### Acute Toxicity/Effects

#### Acute toxicity

Assessment of acute toxicity: Relatively nontoxic after single ingestion. Slightly toxic after short-term skin contact.

#### Oral

Type of value: LD50

Species: rat

Value: > 5,000 mg/kg

#### Inhalation

Type of value: LC50

Species: rat

Value: > 2.7 mg/l

Exposure time: 4 h

Tested as dust aerosol.

No mortality was observed.

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### Dermal

Type of value: LD50  
Species: rat  
Value: > 2,000 mg/kg

### Irritation / corrosion

Assessment of irritating effects: May cause moderate but temporary irritation to the eyes. May cause moderate irritation to the skin.

### Skin

Species: rabbit  
Result: non-irritant

### Eye

Species: rabbit  
Result: non-irritant

### Sensitization

Assessment of sensitization: There is no evidence of a skin-sensitizing potential.

modified Buehler test

Species: guinea pig  
Result: Skin sensitizing effects were not observed in animal studies.

## **Chronic Toxicity/Effects**

### Repeated dose toxicity

Assessment of repeated dose toxicity: The product has not been tested. The statement has been derived from the properties of the individual components. The respiratory fraction is < 0.1 %, therefore the classification regarding inhalation toxicity does not apply.

### *Information on: Quartz (SiO<sub>2</sub>)*

*Assessment of repeated dose toxicity: The substance may cause increase in lung mass and lung tissue changes after repeated inhalation.*

*This product may contain greater than 0.1% crystalline silica. Repeated exposure to high concentrations results in silicosis, a lung disease characterized by coughing, difficult breathing, wheezing, scarring of the lungs, and repeated, non-specific chest illnesses.*

### *Information on: pendimethalin*

*Assessment of repeated dose toxicity: No substance-specific organotoxicity was observed after repeated administration to animals. Adaptive effects were observed after repeated exposure in animal studies.*

### *Information on: N-Methylpyrrolidone*

*Assessment of repeated dose toxicity: After repeated exposure the prominent effect is local irritation. The substance may cause damage to the testes after repeated inhalation of high doses.*

### Genetic toxicity

Assessment of mutagenicity: The product has not been tested. The statement has been derived from the properties of the individual components. Mutagenicity tests revealed no genotoxic potential.

### Carcinogenicity

Assessment of carcinogenicity: The product has not been tested. The statement has been derived from the properties of the individual components.



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*Information on: pendimethalin*

*Assessment of carcinogenicity: In long-term studies in rats the substance induced thyroid tumors. The effect is caused by an animal specific mechanism that has no human counter part. In long-term studies in mice in which the substance was given by feed, a carcinogenic effect was not observed.*

*Information on: Quartz (SiO<sub>2</sub>)*

*Assessment of carcinogenicity: In long-term studies in rats and mice in which the substance was given by feed, a carcinogenic effect was not observed. In long-term animal studies in which the substance was given by inhalation in high doses, a carcinogenic effect was observed. The substance and its compounds in the form of respirable dusts/aerosols classified by the German MAK commission as a category 1 carcinogen (substances that cause cancer to humans). A carcinogenic effect cannot safely be ruled out. The inhalation uptake of the alveolar fraction of the fine dust may cause damage to the lungs. The International Agency for Research on Cancer (IARC) has classified this substance as a Group 1 (known) human carcinogen.*

*NTP listed carcinogen*  
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Reproductive toxicity

Assessment of reproduction toxicity: The product has not been tested. The statement has been derived from the properties of the individual components.

*Information on: N-Methylpyrrolidone*

*Assessment of reproduction toxicity: As shown in animal studies, the product may cause damage to the testes after repeated high exposures that cause other toxic effects.*  
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Teratogenicity

Assessment of teratogenicity: The product has not been tested. The statement has been derived from the properties of the individual components.

*Information on: N-Methylpyrrolidone*

*Assessment of teratogenicity: The substance caused malformations/developmental toxicity in laboratory animals.*

*Information on: pendimethalin*

*Assessment of teratogenicity: No indications of a developmental toxic / teratogenic effect were seen in animal studies.*  
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Other Information

Misuse can be harmful to health.

### Symptoms of Exposure

The most important known symptoms and effects are described in the labelling (see section 2) and/or in section 11., Further important symptoms and effects are so far not known.

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## 12. Ecological Information

### Toxicity

Aquatic toxicity

Assessment of aquatic toxicity:

Very toxic (acute effect) to fish. Very toxic (acute effect) to aquatic invertebrates. Very toxic (acute effect) to aquatic plants.

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### Toxicity to fish

*Information on: pendimethalin*  
*LC50 (96 h) 0.89 mg/l, Oncorhynchus mykiss (static)*  
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### Aquatic invertebrates

*Information on: pendimethalin*  
*EC50 (48 h) 0.4 mg/l, Daphnia magna (static)*  
*EC50 (48 h) 7.73 mg/l, Daphnia magna (OECD Guideline 202, part 1, static)*  
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### Aquatic plants

*Information on: pendimethalin*  
*EC50 (5 d) 0.005 mg/l, Skeletonema costatum (static)*  
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### Assessment of terrestrial toxicity

Acutely harmful to terrestrial organisms. Acutely harmful to honeybees.

### Other terrestrial non-mammals

*Information on: pendimethalin*  
*LD50 1,421 mg/kg, Anas platyrhynchos*  
*Acutely harmful to terrestrial organisms.*  
*LD50 49.8 ug/bee, Apis mellifera*  
*Acutely harmful to terrestrial organisms.*  
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## **Bioaccumulative potential**

### Bioaccumulation potential

*Information on: pendimethalin*

*Bioconcentration factor: 5,100*  
*Based on a weight of evidence, the compound will not bioaccumulate.*  
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## **Mobility in soil**

### Assessment transport between environmental compartments

The product has not been tested. The statement has been derived from the properties of the individual components.

*Information on: pendimethalin*

*The substance will slowly evaporate into the atmosphere from the water surface.*  
*Following exposure to soil, adsorption to solid soil particles is probable, therefore contamination of groundwater is not expected.*  
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## **Additional information**

Other ecotoxicological advice:

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The ecological data given are those of the active ingredient.

Do not discharge product into the environment without control.

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### 13. Disposal considerations

#### Waste disposal of substance:

Pesticide wastes are regulated. Improper disposal of excess pesticide, spray mix or rinsate is a violation of federal law. If pesticide wastes cannot be disposed of according to label instructions, contact the State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

#### Container disposal:

Rinse thoroughly at least three times (triple rinse) in accordance with EPA recommendations. Consult state or local disposal authorities for approved alternative procedures such as container recycling. Recommend crushing, puncturing or other means to prevent unauthorized use of used containers.

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### 14. Transport Information

#### Land transport

USDOT

Not classified as a dangerous good under transport regulations

#### Sea transport

IMDG

Hazard class: 9  
Packing group: III  
ID number: UN 3077  
Hazard label: 9, EHSM  
Marine pollutant: YES  
Proper shipping name: ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S.  
(contains PENDIMETHALIN)

#### Air transport

IATA/ICAO

Hazard class: 9  
Packing group: III  
ID number: UN 3077  
Hazard label: 9, EHSM  
Proper shipping name: ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S.  
(contains PENDIMETHALIN)

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### 15. Regulatory Information

#### Federal Regulations

##### Registration status:

Chemical TSCA, US blocked / not listed

Crop Protection TSCA, US released / exempt

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**EPCRA 311/312 (Hazard categories):** Acute; Chronic

**EPCRA 313:**

<u>CAS Number</u>	<u>Chemical name</u>
872-50-4	N-Methylpyrrolidone
40487-42-1	pendimethalin

**State regulations**

<u>State RTK</u>	<u>CAS Number</u>	<u>Chemical name</u>
MA	14808-60-7	crystalline silica

**Labeling requirements under FIFRA**

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 workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label.

CAUTION:  
HARMFUL IF ABSORBED THROUGH SKIN.  
May cause moderate but temporary irritation to the eyes.  
Avoid contact with the skin, eyes and clothing.

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## 16. Other Information

**SDS Prepared by:**  
BASF NA Product Regulations  
SDS Prepared on: 2015/12/04

We support worldwide Responsible Care® initiatives. We value the health and safety of our employees, customers, suppliers and neighbors, and the protection of the environment. Our commitment to Responsible Care is integral to conducting our business and operating our facilities in a safe and environmentally responsible fashion, supporting our customers and suppliers in ensuring the safe and environmentally sound handling of our products, and minimizing the impact of our operations on society and the environment during production, storage, transport, use and disposal of our products.

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IMPORTANT: WHILE THE DESCRIPTIONS, DESIGNS, DATA AND INFORMATION CONTAINED HEREIN ARE PRESENTED IN GOOD FAITH AND BELIEVED TO BE ACCURATE, IT IS PROVIDED FOR YOUR GUIDANCE ONLY. BECAUSE MANY FACTORS MAY AFFECT PROCESSING OR APPLICATION/USE, WE RECOMMEND THAT YOU MAKE TESTS TO DETERMINE THE SUITABILITY OF A PRODUCT FOR YOUR PARTICULAR PURPOSE PRIOR TO USE. NO WARRANTIES OF ANY KIND, EITHER EXPRESSED OR IMPLIED, INCLUDING WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, ARE MADE REGARDING PRODUCTS DESCRIBED OR DESIGNS, DATA OR INFORMATION SET FORTH, OR THAT THE PRODUCTS, DESIGNS, DATA OR INFORMATION MAY BE USED WITHOUT INFRINGING THE INTELLECTUAL PROPERTY RIGHTS OF OTHERS. IN NO CASE SHALL THE DESCRIPTIONS, INFORMATION, DATA OR DESIGNS PROVIDED BE CONSIDERED A PART OF OUR TERMS AND CONDITIONS OF SALE. FURTHER, YOU EXPRESSLY UNDERSTAND AND AGREE THAT THE DESCRIPTIONS, DESIGNS, DATA, AND INFORMATION FURNISHED BY OUR COMPANY HEREUNDER ARE GIVEN GRATIS AND WE ASSUME NO

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