

US: ENGLISH

### SAFETY DATA SHEET

# **Section 1. Identification**

**Product identifier** : PFHF316R8

Product name : AMANO EN75 GRAY
Other means of : 2065002399093

identification

**Date of issue** : 11/11/2022 **Version** : 2.22

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

**Identified uses** : Powder coating for industrial use.

**Uses advised against** : Not for sale to or use by consumers.

Supplier's details : Axalta Coating Systems, LLC

50 Applied Bank Blvd.

Suite 300

Glen Mills, PA 19342

USA

**Product information** 855-6AXALTA

Emergency telephone

number

: (CHEMTREC) - 800-424-9300

## Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard

(29 CFR 1910.1200).

Classification of the substance or mixture

: COMBUSTIBLE DUSTS

SERIOUS EYE DAMAGE - Category 1 SKIN SENSITIZATION - Category 1 GERM CELL MUTAGENICITY - Category 1

CARCINOGENICITY - Category 2

SPECIFIC TARGET ORGAN TOXICITY (REPEATED EXPOSURE) - Category 2

#### **GHS label elements**

Hazard pictograms :







Signal word : Danger

**Hazard statements** : H317 - May cause an allergic skin reaction.

H318 - Causes serious eye damage. H340 - May cause genetic defects. H351 - Suspected of causing cancer.

H373 - May cause damage to organs through prolonged or repeated exposure.

May form combustible dust concentrations in air.

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### Section 2. Hazards identification

#### **Precautionary statements**

**Prevention**: P201 - Obtain special instructions before use.

P280 - Wear protective gloves, protective clothing and eye or face protection.

P260 - Do not breathe dust or mist.

**Response**: P308 + P313 - IF exposed or concerned: Get medical advice or attention.

P363 - Wash contaminated clothing before reuse. P302 + P352 - IF ON SKIN: Wash with plenty of water.

P333 + P313 - If skin irritation or rash occurs: Get medical advice or attention. P305 + P351 + P338, P310 - IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

Immediately call a POISON CENTER or doctor.

**Storage** : Not applicable.

**Disposal** : P501 - Dispose of contents and container in accordance with all local, regional, national

and international regulations.

Supplemental label

elements

: Keep container tightly closed. Keep away from heat, hot surfaces, sparks, open flames

and other ignition sources. No smoking. Prevent dust accumulation.

Hazards not otherwise

classified

: None known.

## Section 3. Composition/information on ingredients

Substance/mixture : Mixture

| Ingredient name  | CAS number | Concentration |
|--|------------|---------------|
| Manium dioxide   | 13463-67-7 | ≥10 - ≤25     |
| 1,3,5-tris(oxiranylmethyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione | 2451-62-9  | ≤5            |

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

### Section 4. First aid measures

#### **Description of necessary first aid measures**

Eye contact

: Get medical attention immediately. Call a poison center or physician. Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Chemical burns must be treated promptly by a physician.

Inhalation

: Get medical attention immediately. Call a poison center or physician. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband. In case of inhalation of decomposition products in a fire, symptoms may be delayed. The exposed person may need to be kept under medical surveillance for 48 hours.

### Section 4. First aid measures

Skin contact : Get medical at

: Get medical attention immediately. Call a poison center or physician. Wash with plenty of soap and water. Remove contaminated clothing and shoes. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. Continue to rinse for at least 10 minutes. Chemical burns must be treated promptly by a physician. In the event of any complaints or symptoms, avoid further exposure. Wash clothing before reuse. Clean shoes thoroughly before reuse.

Ingestion

: Get medical attention immediately. Call a poison center or physician. Wash out mouth with water. Remove dentures if any. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Chemical burns must be treated promptly by a physician. Never give anything by mouth to an unconscious person. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

### Most important symptoms/effects, acute and delayed

#### Potential acute health effects

**Eye contact** : Causes serious eye damage.

**Inhalation**: Exposure to airborne concentrations above statutory or recommended exposure limits

may cause irritation of the nose, throat and lungs.

**Skin contact**: May cause an allergic skin reaction.

**Ingestion**: No known significant effects or critical hazards.

Over-exposure signs/symptoms

**Eye contact** : Adverse symptoms may include the following:

watering redness

**Inhalation** : Adverse symptoms may include the following:

respiratory tract irritation

coughing

**Skin contact**: Adverse symptoms may include the following:

pain or irritation

redness

blistering may occur

**Ingestion**: Adverse symptoms may include the following:

stomach pains

#### Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : In case of inhalation of decomposition products in a fire, symptoms may be delayed.

The exposed person may need to be kept under medical surveillance for 48 hours.

**Specific treatments**: No specific treatment.

**Protection of first-aiders**: No action shall be taken involving any personal risk or without suitable training. If it is

suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water

before removing it, or wear gloves.

#### See toxicological information (Section 11)

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## Section 5. Fire-fighting measures

#### **Extinguishing media**

Suitable extinguishing media

: Use dry chemical powder.

Unsuitable extinguishing media

: Avoid high pressure media which could cause the formation of a potentially explosible dust-air mixture.

Specific hazards arising from the chemical

: May form explosible dust-air mixture if dispersed.

Hazardous thermal decomposition products : Decomposition products may include the following materials: carbon dioxide

carbon monoxide nitrogen oxides sulfur oxides metal oxide/oxides

Special protective actions for fire-fighters

: Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.

**Special protective** equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

### Section 6. Accidental release measures

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

For non-emergency personnel

: No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Do not breathe dust. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders: If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For nonemergency personnel".

**Environmental precautions** 

: Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

#### Methods and materials for containment and cleaning up

Small spill

: Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Avoid dust generation. Do not dry sweep. Vacuum dust with equipment fitted with a HEPA filter and place in a closed, labeled waste container. Place spilled material in a designated, labeled waste container. Dispose of via a licensed waste disposal contractor.

Large spill

: Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Avoid dust generation. Do not dry sweep. Vacuum dust with equipment fitted with a HEPA filter and place in a closed, labeled waste container. Avoid creating dusty conditions and prevent wind dispersal. Dispose of via a licensed waste disposal contractor. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

## Section 7. Handling and storage

#### Precautions for safe handling

#### **Protective measures**

: Put on appropriate personal protective equipment (see Section 8). Persons with a history of skin sensitization problems should not be employed in any process in which this product is used. Avoid exposure - obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not get in eyes or on skin or clothing. Do not breathe dust. Do not ingest. Avoid the creation of dust when handling and avoid all possible sources of ignition (spark or flame). Prevent dust accumulation. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Electrical equipment and lighting should be protected to appropriate standards to prevent dust coming into contact with hot surfaces, sparks or other ignition sources. Take precautionary measures against electrostatic discharges. To avoid fire or explosion, dissipate static electricity during transfer by grounding and bonding containers and equipment before transferring material. Empty containers retain product residue and can be hazardous. Do not reuse container.

### Advice on general occupational hygiene

: Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

# including any incompatibilities

**Conditions for safe storage**, : Store in accordance with local regulations. Store in a segregated and approved area. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Store locked up. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. See Section 10 for incompatible materials before handling or use.

# Section 8. Exposure controls/personal protection

### **Control parameters**

#### Occupational exposure limits

| Ingredient name  | Exposure limits   |  |
|--|---|--|
| iranium dioxide  | OSHA PEL 1989 (United States, 3/1989).  TWA: 10 mg/m³ 8 hours. Form: Total dust OSHA PEL (United States, 5/2018).  TWA: 15 mg/m³ 8 hours. Form: Total dust ACGIH TLV (United States, 1/2022).  TWA: 2.5 mg/m³ 8 hours. Form: respirable fraction, |  |
| 1,3,5-tris(oxiranylmethyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione | finescale particles  ACGIH TLV (United States, 1/2022). [1,3,5-Triglycidyl-s-triazinetrione]  TWA: 0.05 mg/m³ 8 hours.  |  |

### Appropriate engineering controls

: Use only with adequate ventilation. If user operations generate dust, fumes, gas, vapor or mist, use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

## Section 8. Exposure controls/personal protection

Environmental exposure controls

: Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

#### **Individual protection measures**

Hygiene measures

: Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Contaminated work clothing should not be allowed out of the workplace. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection

Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles and/ or face shield. If inhalation hazards exist, a full-face respirator may be required instead.

#### **Skin protection**

**Hand protection** 

: Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

**Body protection** 

: Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection

: Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection

Based on the hazard and potential for exposure, select a respirator that meets the appropriate standard or certification. Respirators must be used according to a respiratory protection program to ensure proper fitting, training, and other important aspects of use.

## Section 9. Physical and chemical properties

**Appearance** 

Physical state : Solid.

Color : Grey

Odor : Not available.
Odor threshold : Not available.
pH : Not applicable.
Melting point : Not applicable.

**Boiling point** : 3000 to 3000°C (5432 to 5432°F)

Flash point : Closed cup: Not applicable. [Product does not sustain combustion.]

Evaporation rate : Not available.
Flammability (solid, gas) : Not available.
Lower and upper explosive : Lower: 20 g/m³

(flammable) limits

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## Section 9. Physical and chemical properties

: 0 kPa (0 mm Hg) Vapor pressure Vapor density : Not applicable. : 1.558 g/cm<sup>3</sup> **Density** 

Solubility(ies)

| Media     | Result                |
|-----------|-----------------------|
| old water | Very slightly soluble |
|           |                       |

Partition coefficient: n-

octanol/water

: Not applicable.

**Decomposition temperature**: Not applicable. **Viscosity** : Not applicable. Flow time (ISO 2431) : Not available.

## Section 10. Stability and reactivity

: No specific test data related to reactivity available for this product or its ingredients. Reactivity

**Chemical stability** : The product is stable.

Possibility of hazardous

reactions

: Under normal conditions of storage and use, hazardous reactions will not occur.

Conditions to avoid

: Avoid the creation of dust when handling and avoid all possible sources of ignition (spark or flame). Take precautionary measures against electrostatic discharges. To avoid fire or explosion, dissipate static electricity during transfer by grounding and bonding containers and equipment before transferring material. Prevent dust accumulation.

Incompatible materials

: Reactive or incompatible with the following materials: oxidizing materials

**Hazardous decomposition** 

products

: Under normal conditions of storage and use, hazardous decomposition products should not be produced.

# **Section 11. Toxicological information**

#### Information on toxicological effects

### **Acute toxicity**

| Product/ingredient name  | Result                          | Species | Dose      | Exposure |
|--|---------------------------------|---------|-----------|----------|
| <ul><li> √,3,5-tris(oxiranylmethyl) -1,3,5-triazine-2,4,6(1H,3H, 5H)-trione </li></ul> | LC50 Inhalation Dusts and mists | Rat     | 650 mg/m³ | 4 hours  |
|  | LD50 Oral                       | Rat     | 138 mg/kg | -        |

#### Irritation/Corrosion

| Product/ingredient name   | Result                 | Species | Score | Exposure | Observation |
|---|------------------------|---------|-------|----------|-------------|
| 7,3,5-tris(oxiranylmethyl) -1,3,5-triazine-2,4,6(1H,3H,5H)-trione | Eyes - Severe irritant | Rabbit  | -     | 100 mg   | -           |

### **Sensitization**

Not available.

### **Mutagenicity**

# **Section 11. Toxicological information**

| Product/ingredient name  | Test | Experiment  | Result   |
|--|------|---|----------|
| √,3,5-tris(oxiranylmethyl)<br>-1,3,5-triazine-2,4,6(1H,3H,<br>5H)-trione | -    | Experiment: In vitro<br>Subject: Mammalian-Animal<br>Cell: Germ | Positive |

#### **Carcinogenicity**

Not available.

### **Classification**

| Product/ingredient name | OSHA | IARC | NTP |
|-------------------------|------|------|-----|
| iranium dioxide         | -    | 2B   | -   |

#### Reproductive toxicity

Not available.

### **Teratogenicity**

Not available.

### Specific target organ toxicity (single exposure)

Not available.

### Specific target organ toxicity (repeated exposure)

| Name   | Category   | Route of exposure | Target organs |
|--|------------|-------------------|---------------|
| 1,3,5-tris(oxiranylmethyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione | Category 2 | -                 | -             |

### **Aspiration hazard**

Not available.

Information on the likely

routes of exposure

: Not available.

#### Potential acute health effects

**Eye contact** : Causes serious eye damage.

**Inhalation** : Exposure to airborne concentrations above statutory or recommended exposure limits

may cause irritation of the nose, throat and lungs.

**Skin contact**: May cause an allergic skin reaction.

**Ingestion**: No known significant effects or critical hazards.

### Symptoms related to the physical, chemical and toxicological characteristics

**Eye contact**: Adverse symptoms may include the following:

pain watering redness

**Inhalation** : Adverse symptoms may include the following:

respiratory tract irritation

coughing

**Skin contact**: Adverse symptoms may include the following:

pain or irritation

redness

blistering may occur

## Section 11. Toxicological information

**Ingestion** : Adverse symptoms may include the following:

stomach pains

#### Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

**Potential immediate** 

: Not available.

effects

Potential delayed effects : Not available.

Long term exposure

Potential immediate

: Not available.

effects

Potential delayed effects : Not available.

#### Potential chronic health effects

Not available.

**General**: May cause damage to organs through prolonged or repeated exposure. Repeated or

prolonged inhalation of dust may lead to chronic respiratory irritation. Once sensitized, a severe allergic reaction may occur when subsequently exposed to very low levels.

**Carcinogenicity**: Suspected of causing cancer. Risk of cancer depends on duration and level of

exposure.

**Mutagenicity**: May cause genetic defects.

Teratogenicity : No known significant effects or critical hazards.

Developmental effects : No known significant effects or critical hazards.

Fertility effects : No known significant effects or critical hazards.

### **Numerical measures of toxicity**

#### **Acute toxicity estimates**

| Route | ATE value                   |
|-------|-----------------------------|
|       | 2920.93 mg/kg<br>13.76 mg/l |

# **Section 12. Ecological information**

There are no data available on the product itself. The product should not be allowed to enter drains or watercourses waterways.

## Section 13. Disposal considerations

#### Disposal methods

: The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains

# Section 13. Disposal considerations

and sewers.

## **Section 14. Transport information**

|                            | DOT<br>Classification | TDG<br>Classification | Mexico<br>Classification | IMDG           | IATA           |
|----------------------------|-----------------------|-----------------------|--------------------------|----------------|----------------|
| UN number                  | Not regulated.        | Not regulated.        | Not regulated.           | Not regulated. | Not regulated. |
| UN proper shipping name    | -                     | -                     | -                        | -              | -              |
| Transport hazard class(es) | -                     | -                     | -                        | -              | -              |
| Packing group              | -                     | -                     | -                        | -              | -              |
| Environmental hazards      | No.                   | No.                   | No.                      | No.            | No.            |

Special precautions for user : Transport within user's premises: always transport in closed containers that are

upright and secure. Ensure that persons transporting the product know what to do in the

event of an accident or spillage.

Transport in bulk according : Not available.

to IMO instruments

The actual shipping description for this product may vary based several factors including, but not limited to, the volume of material, size of the container, mode of transport and use of exemptions or exceptions found in the applicable regulations. The information provided in Section 14 is one possible shipping description for this product. Consult your shipping specialist or supplier for appropriate assignment information.

# Section 15. Regulatory information

Clean Air Act Section 112 : Listed

(b) Hazardous Air Pollutants (HAPs)

**SARA 304 RQ** 

**SARA 304 RQ** : 23515579.1 lbs / 10676072.9 kg

**SARA 311/312** 

Classification : COMBUSTIBLE DUSTS

SERIOUS EYE DAMAGE - Category 1 SKIN SENSITIZATION - Category 1 GERM CELL MUTAGENICITY - Category 1

**CARCINOGENICITY - Category 2** 

SPECIFIC TARGET ORGAN TOXICITY (REPEATED EXPOSURE) - Category 2

**Inventory list** 

Canada : All components are listed or exempted.
United States : All components are listed or exempted.

### **Section 16. Other information**

#### **Hazardous Material Information System (U.S.A.)**



Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings and the associated label are not required on SDSs or products leaving a facility under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered trademark and service mark of the American Coatings Association, Inc.

The customer is responsible for determining the PPE code for this material. For more information on HMIS® Personal Protective Equipment (PPE) codes, consult the HMIS® Implementation Manual.

#### National Fire Protection Association (U.S.A.)



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Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

#### <u>History</u>

**Date of issue** : 11/11/2022

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Product stewardship and regulatory compliance.

**Key to abbreviations** : ATE = Acute Toxicity Estimate

GHS = Globally Harmonized System of Classification and Labelling of Chemicals

IATA = International Air Transport Association

IBC = Intermediate Bulk Container

IMDG = International Maritime Dangerous Goods

LogPow = logarithm of the octanol/water partition coefficient

MARPOL = International Convention for the Prevention of Pollution From Ships, 1973

as modified by the Protocol of 1978. ("Marpol" = marine pollution)

UN = United Nations

✓ Indicates information that has changed from previously issued version.

#### Notice to reader

This product is intended for industrial use only.

Safety Data Sheet (SDS) content is believed to be accurate as of its issue date, but is subject to change as new information is received by Axalta Coatings Systems, LLC or any of its subsidiaries or affiliates (Axalta). This SDS may incorporate information that has been provided to Axalta by its suppliers. Users should ensure that they are referring to the most current version of the SDS. Users are responsible for following the precautions identified in this SDS. It is the users' responsibility to comply with all laws and regulations applicable to the safe handling, use, and disposal of the product.

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# Section 16. Other information

information on this SDS relates only to the specific product identified in Section 1, Identification, and does not relate to its possible use in combination with any other material or in any specific process. If this product is to be used in combination with other products, Axalta encourages you to read and understand the SDS for all products prior to use.

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