

According to article 31 and Annex II of the EU REACH Regulation

Revision: 20.12.2016

Version 1.0

Update date: -

### **GRAFEN PROFESSIONAL AIR CONDITIONING CLEANER** SPRAY

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#### SECTION 1: Identification of the substance/mixture and of the company/undertaking **1.1 Product identifier**

**Grafen Professional Air Conditioning Cleaner Spray** 

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

Relevant identified uses: Cleans and protects the vehicle A/C systems. It destroys the germs, bacteria and fungi. Effectively stops odor.

Uses advised against: No further relevant information available.

1.3 Details of the supplier of the safety data sheet:

Supplier: Madejski Sp. J. Street address: ul. Makuszyńskiego 28 Country/Postcode: Poland, 31-752 Kraków **Telephone number:** +48 (12) 643 67 67 info@madejski.com.pl

E-mail:

112

### 1.4 Emergency telephone number:

# **SECTION 2: Hazards identification**

#### 2.1 Classification of the substance or mixture Mixture:

Classification according to Regulation (EC) No 1272/2008 (CLP)

Classification of the mixture	Regulation (EC) No 1272/2008 (CLP)
Hazard	
Physical and chemical properties	Flam. Aerosol 1 H222, H229
Human	Skin Irrit.2 H315 Skin Sens.1 H317 Eye Irrit.2 H319 Acute Tox.4 H332 STOT RE.2 H373
Environment	Aquatic Acute 1 H400 Aquatic Chronic 1 H410

#### 2.2 Label elements

Contains Isopropyl alcohol, Xylenes, mixed isomers with ethylbenzene, Ethylebenzene, d-limonene, Propane, Isobutane, n-Butane.

### Supplemental information on the label:

Not applicable



Hazard pictograms:



Signal word: DANGER

#### Hazard statements:

H222 Extremely flammable aerosol.

H229 Pressurised container: May burst if heated.

H315 Causes skin irritation.

H317 May cause an allergic skin reaction.

H319 Causes serious eye irritation.

H332 Harmful if inhaled.

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

H400 Very toxic to aquatic life.

H410 Very toxic to aquatic life with long lasting effects.

#### **Precautionary statements:**

P101 If medical advice is needed, have product container or label at hand.

P102 Keep out of reach of children

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

P251 Do not pierce or burn, even after use.

P261 Avoid breathing dust/fume/gas/mist/vapours/spray.

P264 Wash hands thoroughly after handling.

P270 Do not eat, drink or smoke when using this product.

P271 Use only outdoors or in a well-ventilated area.

P280 Wear protective gloves/protective clothing/eye protection/face protection.

P302 + P352 IF ON SKIN: Wash with plenty of water with soap.

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

P331 Do NOT induce vomiting.

P362 +364 Take off contaminated clothing and wash it before reuse.

P410+P412 Protect from sunlight. Do not expose to temperatures exceeding 50 °C/122 °F.

P501 Dispose of contents/container to in accordance with local/ regional/national/international regulation.

#### 2.3 Other hazards

This mixture does not contain any substances that are assessed to be a PBT or a vPvB.

#### **SECTION 3: Composition/information on ingredients**

#### 3.1 Substances: not applicable

3.2 Mixtures: Contains carbon dioxide.

Name	Identifiers	[% weight]	Classification according to Regulation (EC) No 1278/2008 (CLP).
Isopropyl alcohol	Index No: 603-117-00-0 EC No: 200-661-7	5-10	Flam. Liq. 2 H225 Eye Irrit. 2 H319



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	CAS No: 67-63-0		STOT SE 3 H336
	REACH Registration No.: 01-2119457558-25-xxxx		
Xylenes, mixed isomers with ethylbenzene	Index No: 601-022-00-9 EC No: 215-535-7 CAS No: 1330-20-7 REACH Registration No.: 01-2119488216-32-0007	30-35	Flam. Liq.3 H226 Acute Tox.4 H312 Skin Irrit.2 H315 Acute Tox.4 H332
Ethylbenzene	Index No: 601-023-00-4 EC No: 202-849-4 CAS No: 100-41-4 REACH Registration No.:-	30-35	Flam. Liq.2 H225 Asp. Tox.1 H304 Acute. Tox.4 H332 STOT RE.2 H373
d-limonene	Index No: 601-029-00-7 EC No: 227-813-5 CAS No: 5989-27-5 REACH Registration No.:	30-35	Flam. Liq. 3 H226 Skin Irrit. 2 H315 Skin Sens. 1 H317 Aquatic Acute 1 H400 Aquatic Chronic 1 H410
Propane	Index No: 601-003-00-5 EC No: 200-827-9 CAS No: 74-98-6 REACH Registration No.:-	25-30	Flam. Gas 1 H220 Press. Gas
Isobutane	Index No: - EC No: 200-857-2 CAS No: 75-28-5 REACH Registration No.:-	25-30	Flam. Gas 1 H220 Press. Gas
n-Butane	Index No: 601-004-00-0 EC No: 203-448-7 CAS No: 106-97-8 REACH Registration No.:-	25-30	Flam. Gas 1 H220 Press. Gas

The Full Text for all H-Phrases and Hazard Statements are Displayed in Section 16.

#### **SECTION 4: First aid measures**

#### 4.1 Description of first aid measures

**Following eye contact:** Make sure to remove any contact lenses from the eyes before rinsing. Promptly wash eyes with plenty of water while lifting the eye lids. Continue to rinse for at least 15 minutes and get medical attention.

**Following inhalation:** Move the exposed person to fresh air at once. Provide fresh air, warmth and rest, preferably in a comfortable upright sitting position. Get medical attention if any discomfort continues.

**Following skin contact:** Immediately remove contaminated clothing. Wash the skin with soap and water. Contaminated clothing should be washed before re-use. Get medical attention promptly if symptoms occur after washing.

**Following ingestion:** Do not induce vomiting. Immediately rinse mouth. Give victim two glasses of water. Never give anything by mouth to an unconscious person. Seek medical advice. Provide ventilation.



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

Respiratory system:

Breathing of high vapour concentrations may cause central nervous system (CNS) depression resulting in dizziness, light-headedness, headache, nausea and loss of coordination. Continued inhalation may result in unconsciousness and death.

Respiratory irritation signs and symptoms may include a temporary burning sensation of the nose and throat, coughing, and/or difficulty breathing.

<u>Skin:</u>

Skin irritation signs and symptoms may include a burning sensation, redness, swelling, and/or blisters. Eye:

Eye irritation signs and symptoms may include a burning sensation, redness, swelling, and/or blurred vision.

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

If any symptoms persist seek medical advice and show the msds or label. **Notes for the doctor:** Treat symptomatically.

### **SECTION 5: Firefighting measures**

5.1 Extinguishing media

Suitable extinguishing media: foam, carbon dioxide, dry powder, water spray Unsuitable extinguishing media: do not use water in a jet

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

Thermal decomposition or combustion may liberate carbon oxides.

#### 5.3 Advice for firefighters

**Special Fire Fighting Procedures:** Wear full protective clothing and self-contained breathing apparatus. **Protective equipment for fire-fighters:** Keep containers cool by spraying with water. If possible remove containers from the danger zone. Prevent from spreading or entering drains, ditches or rivers. Dispose of released and contained material in accordance with local regulations.

#### **SECTION 6: Accidental release measures**

# 6.1 Personal precautions, protective equipment and emergency procedures For non-emergency personnel:

Removed from the danger area all persons not involved in the emergency. If necessary, order the evacuation. Avoid contact with skin, eyes. Avoid inhalation of vapours / aerosols. Provide ventilation. **For emergency responders:** 

Wear protective clothing as described in Section 8.

#### **6.2 Environmental precautions**

Do not discharge into drains, water courses or into the ground. Local authorities should be advised if any exposure to the environment occurs.

#### 6.3 Methods and material for containment and cleaning up

Absorb with liquid-binding material (eg. sawdust, sand). Collect in a waste container. Dispose of waste according to the applicable local and national regulation.

#### 6.4 Reference to other sections

See Section 8 for information on personal protective equipment.



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See Section 13 for disposal information.

### **SECTION 7: Handling and storage**

### 7.1 Precautions for safe handling

### Protective measures:

Use only in a well-ventilated area. Avoid breathing vapor or aerosol. Avoid contact with eyes, skin. When handling, use appropriate personal protective equipment (see Section 8). Keep away from heat, sparks, flame and all other sources of ignition. Do not smoke! When using do not eat or drink.

#### Advice on general occupational hygiene:

Ensure good ventilation / exhaustion at the workplace. When using do not eat, drink or smoke. Wash hand before and after work with product. Contaminated clothing should be washed before re-use. Avoid spillage.

### 7.2 Conditions for safe storage, including any incompatibilities

Store in tightly closed original container in a dry, cool and well-ventilated place (in temperature below 50°C) Keep away from heat, sparks, sunlight, open flame and smoking. Do not store together with oxidizing agents. Keep away from acids and bases. Store away from combustible materials.

### 7.3 Specific end use(s)

No further relevant information available.

### **SECTION 8: Exposure controls/personal protection**

#### 8.1 Control parameters

International Limits Values:

Substance	CAS No:	Basis / Country	Short Time Value [mg/m <sup>3</sup> ]	Short Time Value [ppm- Calculated]	Time Weighted Average Exposure Limit [mg/m <sup>3</sup> -8 h]	Time Weighted Average Exposure Limit [ppm- Calculated]
Isopropyl	67-63-0	Germany	500	200	1000	400
alcohol		European Union	-	-	-	-
Xylene	1330-20-7	Germany	200	880	100	440
		European Union	100	442	50	221
Ethylbenzene	100-41-4	Germany	40	176	20	88
		European Union	200	884	100	442
D-Limonene	5989-27-5	Germany	110	20	28	5
		European Union	-	-	-	-
Propane	74-98-6	Germany	7200	4000	1800	1000
		European Union	-	-		
Isobutane	75-28-5	Germany	9600	4000	2400	1000
		European Union	-	-		
Butane	106-97-8	Germany	9600	4000	2400	1000
		European Union	-	-		

Derived No Effect Level (DNEL) according to Regulation (EC) No. 1907/2006:



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Isopropyl alcohol				
	WORKERS		CONSUMERS	
Route of	Acute effect local	Acute effects systemic	Acute effect local	Acute effects systemic
exposure				
Oral	No data available	No data available	No data available	26 mg/kg bw/day
Inhalation	No data available	500 mg/m³	No data available	89 mg/m³
Dermal	No data available	888 mg/kg bw/day	No data available	319 mg/kg bw/day

#### Xylene

	WORKERS		CONSUMERS	
Route of exposure	Acute effect local	Acute effects systemic	Acute effect local	Acute effects systemic
Oral	No data available	No data available	No data available	1.6 mg/kg bw/day
Inhalation	289 mg/m³	289 mg/m³	174 mg/m³	174 mg/m³
Dermal	No data available	No data available	No data available	108 mg/kg bw/day

#### Ethylbenzene

	WORKERS		CONSUMERS	
Route of	Acute effect local	Acute effects systemic	Acute effect local	Acute effects systemic
exposure				
Oral	No data available	No data available	No hazard identified	1.6 mg/kg bw/day
Inhalation	293 mg/m³	77 mg/m³	No hazard identified	15 mg/m³
Dermal	No hazard identified	180 mg/kg bw/day	No hazard identified	No hazard identified

#### **D-Limonene**

	WORKERS		CONSUMERS	
Route of	Acute effect local Acute effects systemic		Acute effect local	Acute effects systemic
exposure				
Oral	No data available	No data available	No hazard identified	4.8 mg/kg bw/day
Inhalation	No hazard identified	66.7 mg/m³	No hazard identified	16.6 mg/m <sup>3</sup>
Dermal	No hazard identified	9.5 mg/kg bw/day	No hazard identified	4.8 mg/kg bw/day

#### Propane

No data available

#### Isobutane

No data available

### n- Butane

No data available

Predicted No Effect Concentration (PNEC) according to Regulation (EC) No. 1907/2006:

Xylene		
Environmental protection target	PNEC	
Freshwater	0.327 mg/L	
Freshwater sediments	12.46 mg/kg sediment dw	
Marine water	0.327 mg/L	
Marine sediments	12.46 mg/kg sediment dw	
Food chain	No data available	
Microorganisms in sewage treatment	No data available	
Soil (agricultural)	2.31 mg/kg soil dw	



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Air	No data available			
Ethylbenzene				
Environmental protection target	PNEC			
Freshwater	0.1 mg/L			
Freshwater sediments	13.7 mg/kg sediment dw			
Marine water	0.01 mg/L			
Marine sediments	1.37 mg/kg sediment dw			
Food chain	0.02 g/kg food			
Microorganisms in sewage treatment	No data available			
Soil (agricultural)	2.68 mg/kg soil dw			
Air	No data available			

D-Limonene	
Environmental protection target	PNEC
Freshwater	14 µg/L
Freshwater sediments	3.85 mg/kg sediment dw
Marine water	1.4 µg/L
Marine sediments	0.385 mg/kg sediment dw
Food chain	No data available
Microorganisms in sewage treatment	No data available
Soil (agricultural)	0.763 mg/kg soil dw
Air	No data available

Isopropyl alcohol Environmental protection target	PNEC	
Freshwater	140.9 mg/L	
Freshwater sediments	552 mg/kg sediment dw	
Marine water	140.9 mg/L	
Marine sediments	552 mg/kg sediment dw	
Food chain	No data available	
Microorganisms in sewage treatment	No data available	
Soil (agricultural)	28 mg/kg soil dw	
Air	No data available	

#### Propane

No data available

**Isobutane** No data available

NU Uala avaliabi

**n- Butane** No data available

#### 8.2 Exposure controls

#### Appropriate engineering controls

Wash hands at the end of each work shift and before eating, smoking and using the toilet. Promptly remove any clothing that becomes contaminated. When using do not eat, drink or smoke.



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# Individual protection measures, such as personal protective equipment Eye/face protection

Avoid contact with eyes. Wear approved chemical safety goggles where eye exposure is reasonably probable.

#### Skin protection:

<u>Hand protection</u>: Wear protective gloves. The most suitable glove must be chosen in consultation with the gloves supplier, who can inform about the breakthrough time of the glove material.

Other: Wear protective clothing. Contaminated clothing should be washed before re-use.

**Respiratory protection:** Respiratory protection must be used if air contamination exceeds acceptable level. It is recommended to use respiratory equipment with filter.

#### **Environmental exposure controls**

Local guidelines on emission limits for volatile substances must be observed for the discharge of exhaust air containing vapour. Do not discharge into drains, water courses or into the ground. Local authorities should be advised if any exposure to the environment occurs.

### SECTION 9: Physical and chemical properties

### 9.1 Information on basic physical and chemical properties

Appearance	Aerosol
Odour	No data available
Odour threshold	No data available
рН	No data available
Melting point / freezing point	No data available
Initial boiling point and boiling range	No data available
Flash point	No data available
Evaporation rate	No data available
Flammability (solid, gas)	No data available
Upper/lower flammability or explosive limits	No data available
Vapour pressure	No data available
Vapour density	No data available
Vapour density Relative density	No data available No data available
Relative density	No data available
Relative density Solubility(ies)	No data available No data available
Relative density Solubility(ies) Partition coefficient: n-octanol / water	No data available No data available No data available
Relative density Solubility(ies) Partition coefficient: n-octanol / water Auto-ignition temperature	No data available No data available No data available No data available
Relative density Solubility(ies) Partition coefficient: n-octanol / water Auto-ignition temperature Decomposition temperature	No data available No data available No data available No data available No data available
Relative density Solubility(ies) Partition coefficient: n-octanol / water Auto-ignition temperature Decomposition temperature Viscosity	No data available No data available No data available No data available No data available No data available
Relative density Solubility(ies) Partition coefficient: n-octanol / water Auto-ignition temperature Decomposition temperature Viscosity Explosive properties	No data available No data available No data available No data available No data available No data available No data available



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#### 10.1 Reactivity

Not reactive under normal conditions of storage and use. May explode if heated or overheated

#### 10.2 Chemical stability

Stable under recommended storage conditions.

#### 10.3 Possibility of hazardous reactions

Reacts with acids, bases and oxidizing agents.

#### 10.4 Conditions to avoid

Avoid release to the environment. Avoid heat, flames and other sources of ignition.

#### 10.5 Incompatible materials

No further relevant information available.

#### **10.6 Hazardous decomposition products**

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

### **SECTION 11: Toxicological information**

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11.1. Information on toxicological effects					
Acute toxicity					
No data available for the mixture					
d-limonene					
LD50 (rat, oral)	>2000 mg/kg bw				
LC50 (inhalation)	No data available				
LD50 ( rabbit, dermal)	> 5 000 mg/kg bw				
Xylenes, mixed isomers with ethy	lbenzene				
LD50 (rat, oral)	4300 mg/kg bw				
LC50 (rat, inhalation)	6700 ppm				
LD50 (rabbit, dermal)	>5000 mg/kg bw				
Isopropyl alcohol					
LD50 (rat, oral)	5,84 g/kg				
LC50 (rat, inhalation)	≥10000 ppm				
LD50 (rabbit, dermal)	16,4 mg/kg				
Ethylbenzene					
LD50 (rat, oral)	3500 mL/kg bw				
LC50 (rat, inhalation)	4000 ppm				
LD50 (rabbit, dermal)	17.8 mL/kg bw				
Propane, Isobutane					
LD50 (oral)	No data available				
LC50 (rat, inhalation)	1237 mg/L				
LD50 (dermal)	No data available				
Mixture classified for acute toxicity:					
Harmful if inhaled.					

Skin corrosion/irritation
The mixture was classified as an irritant to the skin.
Serious eye damage/irritation
The mixture was classified as an irritant to the eyes.
Respiratory or skin sensitisation
The mixture was classified as an may cause an allergic skin reaction.
Germ cell mutagenicity



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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 Based on available data, the classification criteria are not met. STOT-repeated exposure The mixture was classified as an may cause damage to organs through prolonged or repeated exposure. Aspiration hazard Based on available data, the classification criteria are not met. **Additional information** No data available. **SECTION 12: Ecological information** 12.1 Toxicity

LC50

No data available for the mixture d-limonen Ryby(Pimephales promelas) Bezkręgowce wodne (Daphnia magna) Algi i bakterie (Pseudokirchneriella subcapitata)

#### Xylenes, mixed isomers with ethylbenzene

······································
Fish (Bryconamericus iheringii)
Aquatic invertebrates (Daphnia magna)
Algae and bacteria (Pseudokirchneriella subcapitata)
Isopropyl alcohol
Fish (Pimephales promelas)
Aquatic invertebrates (Daphnia magna)
Algae and bacteria (Scenedesmus quadricauda)
Ethylbenzene
Fish (Lepomis macrochirus)
Aquatic invertebrates (Daphnia magna)
Algae and bacteria (Skeletonema costatum)
Propane, Isobutane
Fish
Aquatic invertebrates
Algae and bacteria (Green algea)

#### 12.2 Persistence and degradability

No further relevant information available.

#### 12.3 Bioaccumulative potential

No further relevant information available.

#### 12.4 Mobility in soil

No further relevant information available.

#### 12.5 Results of PBT and vPvB assessment

This mixture does not contain any substances that are assessed to be a PBT or a vPvB.

#### 12.6 Other adverse effects

EC50 EC50	0,307 mg/L exposition time: 48h 0,32 mg/L exposition time 72h
LL50 IC50 EC50	6.9 mg/L exposition time: 96h 1 mg/L exposition time:24h 4.36 mg/L exposition time: 72h
LC50 EC50 TGK	10000 mg/l exposition time: 96h >10000 mg/l exposition time: 24h 1800 mg/l exposition time: 8d
LC50 EC50 EC50	150 mg/L exposition time: 96h 1.8 – 2.4 mg/L exposition time: 48h > 438 mg/L exposition time: 96h
LC50 EC50 EC50	27.98 mg/L exposition time: 96h 14.22 mg/L exposition time: 48h 7.71 mg/L exposition time: 96h

720µg/L exposition time: 96h



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Mixture classified as very toxic to aquatic life with long lasting effects.

### **SECTION 13: Disposal considerations**

#### 13.1 Waste treatment methods

Waste is classified as hazardous waste. Disposal to licensed waste disposal site in accordance with the local Waste Disposal Authority.

#### Proposed waste code

07 01 04 other organic solvents, washing liquids and mother liquors

16 05 04 gases in pressure containers (including halons) containing dangerous substances

#### **SECTION 14: Transport Information**

	ADR/RID	IMDG	ΙΑΤΑ
14.1. UN number	UN1950	UN1950	UN1950
14.2. UN proper shipping name	Aerosol, flame	Aerosol, flame	Aerosol, flame
14.3. Transport hazard class(es)	2.1	2.1	2.1
14.4. Packing group	Not applicable	Not applicable	Not applicable
14.5. Environmental hazards	YES	YES	YES
14.6. Special precautions for user	Not applicable	Not applicable	Not applicable
14.7. Transport in bulk according to Annex II of Marpol and the IBC Code	Not applicable	Not applicable	Not applicable

#### **SECTION 15: Regulatory information**

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

Commission Directive 2000/39/EC of 8 June 2000 establishing a first list of indicative occupational exposure limit values in implementation of Council Directive 98/24/EC on the protection of the health and safety of workers from the risks related to chemical agents at work.

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH),

Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 with amendments.

2014/955/EU: Commission Decision of 18 December 2014 amending Decision 2000/532/EC on the list of waste pursuant to Directive 2008/98/EC of the European Parliament and of the Council Text with EEA relevance

#### **15.2 Chemical Safety Assessment**

No Chemical Safety Assessment has been carried out for this mixture by the supplier.

#### **SECTION 16: Other information**

Classification according to Regulation (EC) No. 1272/2008 Classification procedure: calculation method

Flam. Aerosol 1 H222, H229 Skin Irrit.2 H315 Skin Sens. 1 H317 Eye Irrit. 2 H319



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Acute Tox.4 H332 STOT RE.2 H373 Aquatic Acute 1 H400 Aquatic Chronic 1 H410

### Relevant H-statements (number and full text)

H220 Extremely flammable gas.

H225 Highly flammable liquid and vapour.

H226 Flammable liquid and vapour.

H304 May be fatal if swallowed and enters airways.

H312 Harmful in contact with skin.

H315 Causes skin irritation

H317 May cause an allergic skin reaction.

H319 Causes serious eye irritation.

H332 Harmful if inhaled.

H336 May cause drowsiness or dizziness.

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

H400 Very toxic to aquatic life.

H410 Very toxic to aquatic life with long lasting effects.

### **Additional Information**

The information provided in this Safety Data Sheet is correct to the best of our knowledge, Information and belief at the date of its publication. The information given is designed only as guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

It is the responsibility of persons in receipt of this Product Safety Data Sheet to ensure that the information contained herein is properly read and understood by all people who may use, handle, dispose or in any way come in contact with the product. If the recipient subsequently produces a formulation containing the product, it is the recipient's sole responsibility to ensure the transfer of all relevant information from the Product Safety Data Sheet to their own Product Safety Data Sheet.

All information and instructions provided in this Safety Data Sheet (SDS) are based on the current state of scientific and technical knowledge at the date indicated on the present SDS. As stated above, this Safety Data Sheet has been prepared in compliance with applicable European law. If you purchase this material outside Europe, where compliance laws may differ, you should receive from your local supplier a SDS applicable to the country in which the product is sold and intended to be used. Please note that the appearance and content of the SDS may vary –even for the same product between different countries, reflecting the different compliance requirements.