

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 1/13  
(30406695/SDS\_CPA\_US/EN)

### 1. Identification

#### Product identifier used on the label

## Tower Herbicide

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

Recommended use\*: crop protection product, herbicide  
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: 472794  
EPA Registration number: 7969-239  
Molecular formula: C12 H18 Cl N O2 S  
Chemical family: carboxylic acid amide, halogenated  
Synonyms: dimethenamid-P

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### 2. Hazards Identification

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

#### Classification of the product

Asp. Tox.	1	Aspiration hazard
Acute Tox.	4 (oral)	Acute toxicity
Skin Corr./Irrit.	2	Skin corrosion/irritation

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11

Page: 2/13

Version: 5.0

(30406695/SDS\_CPA\_US/EN)

Eye Dam./Irrit.	2A	Serious eye damage/eye irritation
Skin Sens.	1	Skin sensitization
Carc.	2	Carcinogenicity

### Label elements

Pictogram:



Signal Word:

Danger

Hazard Statement:

H319	Causes serious eye irritation.
H315	Causes skin irritation.
H302	Harmful if swallowed.
H317	May cause an allergic skin reaction.
H304	May be fatal if swallowed and enters airways.
H351	Suspected of causing cancer.

Precautionary Statements (Prevention):

P280	Wear protective gloves and eye/face protection.
P201	Obtain special instructions before use.
P261	Avoid breathing vapours.

Precautionary Statements (Response):

P301 + P310	IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician.
P331	Do NOT induce vomiting.
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.
P308 + P313	IF exposed or concerned: Get medical advice/attention.
P333 + P313	If skin irritation or rash occurs: Get medical advice/attention.
P361	Take off immediately all contaminated clothing.
P391	Collect spillage.
P330	Rinse mouth.

Precautionary Statements (Storage):

P405	Store locked up.
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Precautionary Statements (Disposal):

P501	Dispose of contents/container to hazardous or special waste collection point.
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### Hazards not otherwise classified

Labeling of special preparations (GHS):

The following percentage of the mixture consists of component(s) with unknown hazards regarding the acute toxicity: 10 % dermal

The following percentage of the mixture consists of component(s) with unknown hazards regarding the acute toxicity: 10 % oral

The following percentage of the mixture consists of component(s) with unknown hazards regarding the acute toxicity: 10 % Inhalation - vapour

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 3/13  
(30406695/SDS\_CPA\_US/EN)

The following percentage of the mixture consists of component(s) with unknown hazards regarding the acute toxicity: 10 % Inhalation - mist

### 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>
163515-14-8	<= 64.0%	dimethenamid-P (ISO); (S)-2-chloro-N-(2,4-dimethyl-3-thienyl)-N-(2-methoxy-1-methylethyl)acetamide
91-20-3	<= 3.0%	naphthalene
64742-94-5	<= 20.0%	solvent naphtha

### 4. First-Aid Measures

#### Description of first aid measures

##### General advice:

First aid providers should wear personal protective equipment to prevent exposure. Remove contaminated clothing. Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. In case of intoxication, call a poison control center or physician for treatment advice, taking the packaging or the label of the product.

##### If inhaled:

Remove the affected individual into fresh air and keep the person calm. Assist in breathing if necessary.

##### If on skin:

Rinse skin immediately with plenty of water for 15 - 20 minutes.

##### If in eyes:

Hold eyes open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing.

##### If swallowed:

Do not induce vomiting unless told to by a poison control center or doctor. Never induce vomiting or give anything by mouth if the victim is unconscious or having convulsions.

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

Symptoms: aspiration pneumonia

Hazards: Contains petroleum distillates.

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

##### Note to physician

Treatment: Vomiting may cause aspiration pneumonia due to the ingredients.

### 5. Fire-Fighting Measures

#### Extinguishing media

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 4/13  
(30406695/SDS\_CPA\_US/EN)

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, Hydrogen chloride, halogenated hydrocarbons, To be archived:  
Hydrocarbons, nitrogen oxides, sulfur oxides

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.

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## 6. Accidental release measures

### 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

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.

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11

Version: 5.0

Page: 5/13

(30406695/SDS\_CPA\_US/EN)

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.

### 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.

## 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

naphthalene	OSHA PEL	PEL 10 ppm 50 mg/m <sup>3</sup> ; TWA value 10 ppm 50 mg/m <sup>3</sup> ; STEL value 15 ppm 75 mg/m <sup>3</sup> ;
	ACGIH TLV	Skin Designation ; The substance can be absorbed through the skin. TWA value 10 ppm ;
solvent naphtha	ACGIH TLV	TWA value 200 mg/m <sup>3</sup> Non-aerosol (total hydrocarbon vapor); Application restricted to conditions in which there are negligible aerosol exposures. Skin Designation Non-aerosol (total hydrocarbon vapor); The substance can be absorbed through the skin.
Naphthalene, 1-methyl-	ACGIH TLV	Skin Designation ; The substance can be absorbed through the skin. TWA value 0.5 ppm ;
Naphthalene, 2-methyl-	ACGIH TLV	TWA value 0.5 ppm ; Skin Designation ; The substance can be absorbed through the skin.

### **Advice on system design:**

Whenever possible, engineering controls should be used to minimize the need for personal protective equipment.

### Personal protective equipment

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

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11

Version: 5.0

Page: 6/13

(30406695/SDS\_CPA\_US/EN)

### 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 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.

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## 9. Physical and Chemical Properties

Form:	liquid	
Odour:	strong, aromatic	
Odour threshold:	Not determined due to potential health hazard by inhalation.	
Colour:	dark brown	
pH value:	approx. 3.1 ( 1 %(m), 25 °C)	
cloud point:	approx. -1.2 °C	
Boiling point:	approx. 204 °C ( 1,013 hPa)	
Flash point:	Information applies to the solvent. approx. 105 °C	(Directive 92/69/EEC, A.9)
Flammability:	not highly flammable	(Directive 92/69/EEC, A.12)
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.	

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 7/13  
(30406695/SDS\_CPA\_US/EN)

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.	
Autoignition:	approx. 425 °C	(Directive 92/69/EEC, A.15)
Vapour pressure:	< 1 mmHg ( 25 °C)	
Density:	approx. 1.13 g/cm <sup>3</sup> (approx. 20 °C) approx. 9.4303 Lb/USg ( 68 °F)	(OECD Guideline 109)
Relative density:	approx. 1.130 (approx. 20 °C)	(OECD Guideline 109)
Vapour density:	not applicable	
Thermal decomposition:	carbon monoxide, carbon dioxide, nitrogen dioxide, nitrogen oxide, Sulphur dioxide, Hydrogen chloride, halogenated hydrocarbons, To be archived: Hydrocarbons Stable at ambient temperature. If product is heated above decomposition temperature toxic vapours may be released.	
Viscosity, dynamic:	approx. 16.3 mPa.s (approx. 40 °C)	
Viscosity, kinematic:	approx. 14.7 mm <sup>2</sup> /s ( 40 °C)	
Solubility in water:	emulsifiable	
Molar mass:	275.8 g/mol	
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:

Based on its structural properties the product is not classified as oxidizing. (Directive 2004/73/EC, A.21)

### 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.

### Conditions to avoid

Avoid all sources of ignition: heat, sparks, open flame. Avoid prolonged storage. Avoid electro-static discharge. Avoid contamination. Avoid prolonged exposure to extreme heat. Avoid extreme temperatures.

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11

Version: 5.0

Page: 8/13

(30406695/SDS\_CPA\_US/EN)

### Incompatible materials

Nitric acid (HONO<sub>2</sub>), Sulfuric acid, strong oxidizing agents

### Hazardous decomposition products

Decomposition products:

Hazardous decomposition products: nitrogen oxides, sulfur oxides, aldehydes

Thermal decomposition:

Possible thermal decomposition products:

carbon monoxide, carbon dioxide, nitrogen dioxide, nitrogen oxide, Sulphur dioxide, Hydrogen chloride, halogenated hydrocarbons, To be archived: 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: Slightly toxic after single ingestion. Slightly toxic after short-term skin contact. Relatively nontoxic after short-term inhalation.

#### Oral

Type of value: LD50

Species: rat

Value: 695 mg/kg

#### Inhalation

Type of value: LC50

Species: rat

Value: > 5.6 mg/l

Exposure time: 4 h

#### Dermal

Type of value: LD50

Species: rat (male/female)

Value: > 5,000 mg/kg (OECD Guideline 402)

#### Irritation / corrosion

Assessment of irritating effects: Causes substantial but temporary eye injury. May cause slight irritation to the skin.

#### Skin

Species: rabbit

Result: Slightly irritating.

#### Eye

Species: rabbit

Result: moderately irritating



# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 9/13  
(30406695/SDS\_CPA\_US/EN)

### Sensitization

Assessment of sensitization: Caused skin sensitization in animal studies.

Skin sensitization test

Species: guinea pig

Result: Caused skin sensitization 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. No substance-specific organotoxicity was observed after repeated administration to animals.

#### 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.

#### *Information on: Dimethenamid-P*

*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.*

#### *Information on: naphthalene*

*Assessment of carcinogenicity: In long-term studies in rats and mice in which the substance was given by inhalation, a carcinogenic effect was observed. EU-classification The substance was classified as a group 3 carcinogen by the German MAK-Commission (substances for which a suspicion of a carcinogenic potential exists). IARC (International Agency for Research on Cancer) has classified this substance as group 2B (The agent is possibly carcinogenic to humans). IARC (International Agency for Research on Cancer) has classified this substance as group 2B (The agent is possibly carcinogenic to humans).*

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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. The results of animal studies gave no indication of a fertility impairing effect.

#### Teratogenicity

Assessment of teratogenicity: The product has not been tested. The statement has been derived from the properties of the individual components. Animal studies gave no indication of a developmental toxic effect at doses that were not toxic to the parental animals.

### **Symptoms of Exposure**

aspiration pneumonia

#### Medical conditions aggravated by overexposure

Individuals with pre-existing diseases of the respiratory system, skin or eyes may have increased susceptibility to excessive exposures.

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 10/13  
(30406695/SDS\_CPA\_US/EN)

## 12. Ecological Information

### Toxicity

#### Aquatic toxicity

##### Assessment of aquatic toxicity:

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

#### Toxicity to fish

LC50 (96 h) 7.94 mg/l, *Oncorhynchus mykiss*

#### Aquatic invertebrates

EC50 (48 h) 17.1 mg/l, *Daphnia magna*

#### Aquatic plants

EC50 (72 h) 0.1327 mg/l, *Scenedesmus subspicatus*

#### Assessment of terrestrial toxicity

With high probability not acutely harmful to honeybees. With high probability not acutely harmful to terrestrial organisms.

#### Other terrestrial non-mammals

##### *Information on: Dimethenamid-P*

*LD50 1,068 mg/kg, Colinus virginianus*

*LC50 > 5,620 mg/kg, Colinus virginianus*

*LC50 > 5,620 mg/kg, Anas platyrhynchos*

*LD50 (24 d) > 1000 ug/bee, Apis mellifera*

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### Bioaccumulative potential

#### Bioaccumulation potential

*Information on: dimethenamid-P (ISO); (S)-2-chloro-N-(2,4-dimethyl-3-thienyl)-N-(2-methoxy-1-methylethyl)acetamide*

*No significant accumulation in organisms is expected as a result of the distribution coefficient of n-octanol/water (log Pow).*

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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: dimethenamid-P (ISO); (S)-2-chloro-N-(2,4-dimethyl-3-thienyl)-N-(2-methoxy-1-methylethyl)acetamide*

*Following exposure to soil, the product trickles away and can - dependant on degradation - be transported to deeper soil areas with larger water loads.*

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# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 11/13  
(30406695/SDS\_CPA\_US/EN)

### Additional information

Other ecotoxicological advice:

The ecological data given are those of the active ingredient. Do not release untreated into natural waters.

## 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.

### RCRA:

This product is not regulated by RCRA.

## 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 3082
Hazard label:	9, EHSM
Marine pollutant:	YES
Proper shipping name:	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (contains DIMETHENAMID-P)

### Air transport

IATA/ICAO

Hazard class:	9
Packing group:	III
ID number:	UN 3082
Hazard label:	9, EHSM
Proper shipping name:	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (contains DIMETHENAMID-P)

### Further information

DOT: This product is regulated if the amount in a single receptacle exceeds the Reportable Quantity (RQ). Please refer to Section 15 of this MSDS for the RQ for this product.

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11  
Version: 5.0

Page: 12/13  
(30406695/SDS\_CPA\_US/EN)

### 15. Regulatory Information

#### Federal Regulations

##### Registration status:

Crop Protection TSCA, US released / exempt

Chemical TSCA, US blocked / not listed

**EPCRA 311/312 (Hazard categories):** Refer to SDS section 2 for GHS hazard classes applicable for this product.

##### EPCRA 313:

<u>CAS Number</u>	<u>Chemical name</u>
91-20-3	naphthalene

#### **Safe Drinking Water & Toxic Enforcement Act, CA Prop. 65:**

#### **BASF Risk Assessment, CA Prop. 65:**

Based on an evaluation of the product's composition and the use(s), this product does not require a California Proposition 65 Warning.

#### **NFPA Hazard codes:**

Health: 2      Fire: 1      Reactivity: 1      Special:

#### **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.

##### WARNING:

Causes substantial but temporary eye injury.

HARMFUL IF INHALED.

HARMFUL IF SWALLOWED.

HARMFUL IF ABSORBED THROUGH SKIN.

Prolonged or repeated skin contact may cause sensitization or allergic reactions.

Do not get in eyes, on skin, or on clothing.

Avoid inhalation of mists/vapours.

### 16. Other Information

#### **SDS Prepared by:**

BASF NA Product Regulations

SDS Prepared on: 2019/06/11

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

# Safety Data Sheet

## Tower Herbicide

Revision date : 2019/06/11

Version: 5.0

Page: 13/13

(30406695/SDS\_CPA\_US/EN)

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.

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 OBLIGATION OR LIABILITY FOR THE DESCRIPTION, DESIGNS, DATA AND INFORMATION GIVEN OR RESULTS OBTAINED, ALL SUCH BEING GIVEN AND ACCEPTED AT YOUR RISK.  
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