DREXEL IMITATOR® + 2,4-D

Section 1: Material Identification

Product Name: Drexel Imitator® + 2,4-D

EPA Reg No.: 19713-635

CAS NO: 5742-17-6 (IPA Salt of 2,4-D)
38641-94-0 (IPA Salt of Glyphosate)

Formula: $C_{11}H_{15}Cl_2NO_3$
$C_6H_7N_2O_5P$

Company: Drexel Chemical Company
1700 Channel Avenue
Memphis, TN 38106

Synonyms: Isopropylamine salt 2,4-Dichlorophenoxyacetic acid
Isopropylamine salt of N-(phosphonomethyl) glycine

Identifiers:
EINECS: 202-422-2 (2,4-D)
213-997-4 (Glyphosate)
RTECS No.: AG6825000 (2,4-D)
MC1075000 (Glyphosate)

DOT information: See Section 14 for Transportation Information

Emergency Telephone Number:
CHEMTREC Drexel Chemical Co.
Tel: 1-800-424-9300 901-774-4370

This product is an EPA FIFRA registered pesticide. Some of the classifications on this SDS are not the same as the FIFRA label. Certain sections of this SDS are superseded by federal law governed by EPA for a registered pesticide. Please see Section 15. REGULATORY INFORMATION for explanation.

Section 2: Hazard Identification
(As defined by the OSHA Hazard Communication Standard, 29)

GHS Classification:
Health Hazards:
- Skin corrosion/irritation Category 2
- Eye damage/irritation Category 2A
- Specific organ toxicity – single exposure Category 3
- Specific organ toxicity – repeated exposure Category 2
- Aquatic acute toxicity Category 1
- Aquatic toxicity long term Category 2
GHS Label Elements:

Signal word: Warning

Hazard statements:
Causes skin irritation.
Causes serious eye irritation.
May cause respiratory irritation.
May cause damage to organs (liver, kidneys) through prolonged or repeated exposure.
Very toxic to aquatic life.
Toxic to aquatic life with long lasting effects.

Precautionary statement:
Prevention:
Wash thoroughly after handling.
Wear protective gloves.
Wear eye protection/face protection.
Avoid release to environment.

Response:
If on skin: Wash with plenty of water while removing contaminated clothing and shoes. If skin irritation occurs: Get medical advice/attention. Take off contaminated clothing and wash it before reuse.
If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.
Collect spillage.

Storage:
Store in a well ventilated place.
Keep container closed.
Store locked up.

Disposal:
If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local regulations.

Section 3: Composition Information

<table>
<thead>
<tr>
<th>Components</th>
<th>CAS No.</th>
<th>% By Wt.</th>
<th>OSHA PEL:</th>
<th>ACGIHTLV:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Ingredients:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Isopropylamine salt of 2, 4-dichlorophenoxyacetic acid:</td>
<td>5742-17-6</td>
<td>20.6%</td>
<td>N/Av</td>
<td>N/Av</td>
</tr>
<tr>
<td>Isopropylamine salt of N-(phosphonomethyl) glycine:</td>
<td>38641-94-0</td>
<td>12.9%</td>
<td>N/Av</td>
<td>N/Av</td>
</tr>
<tr>
<td>Inert Ingredients:</td>
<td>N/A</td>
<td>66.5%</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Section 4: First-Aid Measures

If Swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Skin Contact: Immediately flush skin with water while removing contaminated clothing and shoes. Get medical attention if symptoms occur. Wash clothing before reuse. Destroy contaminated leather items such as shoes, belts, and watchbands.

Eye Contact: Immediately flush eyes with water; remove contact lenses, if present, after the first 5 minutes, then continue flushing eyes for at least 15 minutes. Obtain medical attention without delay, preferably from an ophthalmologist.

If Inhaled: Move person to fresh air; if effects occur, consult a physician.

Notes to Physician: No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

Section 5: Fire Fighting Measures

Fire Hazards: Closed containers may rupture if exposed to excess heat or flame due to a build-up of internal pressure. Thermal decomposition during a fire can produce fumes and irritating gases.

Flash point: >200°F
Lower flammable limit (% by volume): N/Av
Upper flammable limit (% by volume): N/Av

Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Evacuate the area and fight the fire from upwind at a safe distance to avoid hazardous vapors or decomposition products. Dike and collect fire-extinguishing water to prevent environmental damage and excessive waste runoff.

Firefighting media: Use foam, dry chemical, carbon dioxide, or water fog when fighting fires involving this product. Do not use water jet, as this may spread burning material. Minimize the use of water to avoid environmental contamination. Contain all runoff.

Special Protective Equipment for Firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective firefighting clothing (includes firefighting helmet, coat, trousers, boots, and gloves). Use full face shield and operate in positive pressure mode. Avoid contact with this material during firefighting operations. If contact is likely, change to full chemical resistant firefighting clothing with self-contained breathing apparatus. If this is not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.

Hazardous Combustion Products: Carbon oxides, phosphorus oxides, nitrogen oxides, and irritating fumes and smoke.

NFPA: Health: Flammability: Reactivity:

2 1 0

(Rating: 4-Extreme, 3-High, 2-Moderate, 1-Slight, 0-Insignificant)
Section 6: Accidental Release Measures

Steps to be taken if Material is Released or Spilled:
- Contain spilled material if possible. Small spills: Apply suitable absorbent and sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Drexel Chemical Co. for clean-up assistance. See Section 13, Disposal Considerations, for additional information.

Personal Precautions:
- Isolate area. Keep unnecessary and unprotected personnel from entering the area. Refer to Section 7, Handling, for additional precautionary measures. Keep upwind of spill. Spilled material may cause a slipping hazard. Ventilate area of leak or spill. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls/Personal Protection.

Environmental Precautions:
- Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

Section 7: Handling and Storage


Storage: Store in a cool, dry areas designated specifically for pesticides and away from heat sources. Keep in original containers and keep containers closed when not in use. Do not store below 45°F (7°C). If frozen or crystallized, slowly warm to 80 to 90°F and re-dissolve by rolling or shaking container before use. Do not store near children, food, foodstuffs, drugs or potable water supplies.

Section 8: Exposure Controls / Personal Protection

Personal Protection:
- Eye/Face Protection: Wear/Use protective eyeglasses or chemical safety goggles.
- Skin Protection: Use protective clothing chemically resistant to this material. Selection of specific items such as face shield, boots, apron, or full body suit will depend on the task. Safety shower should be located in immediate work area. Remove contaminated clothing immediately, wash skin area with soap and water, and launder clothing before reuse or dispose of properly. Items which cannot be decontaminated, such as shoes, belts and watchbands, should be removed and disposed of properly.
- Hand protection: Use gloves chemically resistant to this material. Examples of preferred glove barrier materials include: Neoprene, Nitrile/butadiene rubber (“nitrile” or “NBR”) or Polyvinyl chloride (“PVC” or “vinyl”). NOTICE: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all relevant workplace factors such as, but not limited to: Other chemicals which may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), potential body reactions to glove materials, as well as the instructions/specifications provided by the glove supplier.
- Respiratory Protection: Respiratory protection should be worn when there is a potential to exceed the exposure
limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, use an approved respirator such as an OSHA/NIOSH-approved respirator. Selection of air-purifying or positive-pressure supplied-air will depend on the specific operation and the potential airborne concentration of the material. For emergency conditions, use an approved positive-pressure self-contained breathing apparatus. The following should be effective types of air-purifying respirators: Organic vapor cartridge with a particulate pre-filter.

**Ingestion:** Avoid ingestion of even very small amounts; do not consume or store food or tobacco in the work area; wash hands and face before smoking or eating.

**Engineering Controls:**

**Ventilation:** Use engineering controls to maintain airborne level below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, use only with adequate ventilation. Local exhaust ventilation may be necessary for some operations and is preferred.

### Section 9: Physical and Chemical Properties

<table>
<thead>
<tr>
<th>Physical State:</th>
<th>Liquid</th>
</tr>
</thead>
<tbody>
<tr>
<td>Color:</td>
<td>Yellow to amber</td>
</tr>
<tr>
<td>Odor:</td>
<td>Mild</td>
</tr>
<tr>
<td>Flash Point:</td>
<td>N/A</td>
</tr>
<tr>
<td>Vapor Pressure (mmHg):</td>
<td>N/Av</td>
</tr>
<tr>
<td>Boiling Point:</td>
<td>&gt;212°F</td>
</tr>
<tr>
<td>Vapor Density (air = 1):</td>
<td>N/Av</td>
</tr>
<tr>
<td>Bulk Density (H₂O = 1):</td>
<td>1.12 g/ml @ 21°C</td>
</tr>
<tr>
<td>Freezing Point:</td>
<td>&lt;10°F</td>
</tr>
<tr>
<td>Solubility in water (wt. %):</td>
<td>Soluble</td>
</tr>
<tr>
<td>pH:</td>
<td>5.0 – 7.0 (5% solution)</td>
</tr>
<tr>
<td>Viscosity:</td>
<td>N/Av</td>
</tr>
</tbody>
</table>

### Section 10: Stability and Reactivity

**Stability/Instability:** Thermally stable at typical use temperatures and in closed containers.

**Conditions to Avoid:** Extreme heat and freezing conditions.

**Incompatible Materials:** Avoid contact with: Strong acids. Strong bases. Strong oxidizers.

**Hazardous Polymerization:** Will not occur

**Thermal Decomposition:** Decomposition products depend upon temperature, air supply and the presence of other materials. Decomposition products can include and are not limited to: Carbon monoxide, Carbon dioxide, Chlorine-containing compounds.
Section 11: Toxicological Information

Acute Toxicity:

Ingestion:
- Oral LD50, (rat): >2000 mg/kg

Dermal (rat):
- Dermal LD50, (rat): >5,000 mg/kg

Inhalation:
- LC50,(24h), Aerosol, Rat: >5.0 mg/l

Eye Irritation: (rabbit):
- Moderate to severe

Skin Irritation (rabbit):
- Slight

Sensitization Skin:
- Non-sensitizer (guinea pig)

Data presented for 2,4-D and 2,4-D salts:

Repeated Dose Toxicity:
- In animals, effects have been reported on the following organs: Liver, Kidney, Gastrointestinal tract, Muscles. Observations in animals include: Gastrointestinal irritation, Vomiting.

Chronic Toxicity and Carcinogenicity:
- Various animal cancer tests have shown no reliably positive association between 2,4-D exposure and cancer. Epidemiology studies on herbicide use have been both positive and negative with the majority being negative.

Carcinogenicity Classifications:
- ACGIH - Not classifiable as a human carcinogen
- NTP - Not classifiable as a human carcinogen
- IARC - Listed as possible carcinogen Class 2B

Developmental Toxicity: Has been toxic to the fetus in laboratory animals at doses toxic to the mother. Did not cause birth defects in laboratory animals. Studies in laboratory animals with 2,4-D have shown decreased fetal body weights and delayed development in the offspring at doses toxic to mother animals.

Reproductive Toxicity: In laboratory animals, excessive doses toxic to the parent animals caused decreased weight and survival of offspring.

Genetic Toxicology: In vitro genetic toxicity studies were predominantly negative.

Section 12: Ecological Information

Ecotoxicological data: Data presented for 2,4-D and 2,4-D salts:

ENVIRONMENTAL FATE:
- This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the
mean high water mark. Do not contaminate water when disposing of equipment wash waters.

**Persistence and Degradability: 2,4-D has low soil persistence**
- Under aerobic soil conditions the half-life is 4-7 days.

**Stability in Water (1/2-life):**
- 2,4-D; pH 2.49 (1% aqueous suspension)
- In aquatic environments, microorganisms readily degrade 2,4-D. Rates of breakdown increase with increased nutrients, sediment load, and dissolved organic carbon. Under oxygenated conditions the half-life is 1-2 weeks.

**ECOTOXICITY:** Material is moderately toxic to aquatic organisms on an acute basis (LC50/EC50 is >100 mg/L in the most sensitive species tested). Material is moderately toxic to birds on an acute basis (LD50 between 51 and 500 mg/kg). Material is practically non-toxic to birds on a dietary basis (LC50 >5000 ppm).

**Fish Acute & Prolonged Toxicity:**
- LC50, rainbow trout (Oncorhynchus mykiss), static, 96 h: 250 mg/l
- LC50, fathead minnow (Pimephales promelas), static, 96 h: 344 mg/l
- EC50, bluegill (Lepomis macrochirus), static, 96 h: 525 mg/l

**Aquatic Invertebrate Acute Toxicity:**
- LC50, water flea (Daphnia magna), 185 mg/l
- EC50, eastern oyster (Crassostrea virginica), flow-through, 96 h, shell growth inhibition: 136 mg/l
- LC50, pink shrimp (Penaeus duorarum) sp., 182 mg/l
- LC50, tidewater silverside (Menidia beryllina), 470 mg/l

**Aquatic Plant Toxicity:**
- EC50, blue-green algae (Anabaena flosaquae): 153 mg/L
- EC50, green algae (Selenastrum capricornutum) 5 d: 66.5 mg/l
- EC50, diatom Navicula sp., static, biomass growth inhibition, 5 d: 5.28 mg/l
- EC50, duckweed Lemna sp., static, Number of fronds, 14 d: .58 mg/L

**Toxicity to Non-mammalian Terrestrial Species: Moderately toxic**
- Dietary LC50, bobwhite (Colinus virginianus): >5,620 ppm
- Dietary LC50, mallard (Anas platyrhynchos): >5,620 ppm
- Acute oral LD50 (Bobwhite quail), <500 mg/kg; Mallard duck >5,000 ppm

### Section 13: Disposal Considerations

If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities. This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations. If the material as supplied becomes a waste, follow all applicable regional, national and local laws.

### Section 14: Transport Information

**DOT:**
- <52 Gal.: Not regulated – See 49 CFR 173.132(b) (3) & 172.101 Appendix A.
- ≥52 Gal.: UN-3082, Environmentally hazardous substances, liquid, N.O.S., (amine salt of 2,4-D), 9, PG-III, RQ 100 lbs.
IMDG: UN 3082, Environmentally hazardous substances, liquid, n.o.s. (2,4-D amine/glyphosate amine), 9, PG-III, RQ 100 lbs., Marine Pollutant

IATA: UN 3082, Environmentally hazardous substances, liquid, n.o.s. (2,4-D amine/glyphosate amine), 9, PG-III, RQ 100 lbs., Marine Pollutant

Freight description: Agricultural herbicide, liquid, n.o.s.

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This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

Section 15: Regulatory Information

OSHA:
• This product is hazardous according to the OSHA Hazard Communication Standard 29 CFR 1910.1200.

EPA FIFRA INFORMATION:
This chemical is a pesticide product registered by the United States Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets (SDS), and for workplace labels of non-pesticide chemical. The hazard information required on the pesticide label is listed out below. The pesticide label also includes other important information, including directions for use.
• EPA/CERCLA Reportable Quantity: 2,4-D component RQ 100 lbs.

SARA/TITLE III:
• Sec. 302. Extremely Hazardous Substance Notification: 2,4-D component – De Minimis 0.1%.
• Sec. 311/312. Hazard Categories: Immediate
  Chronic
• Sec. 313. Toxic Chemical(s): 2,4-D component – De Minimis 0.1%.
• RCRA Waste Code: (2,4-D component - U240)

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986):
• Not listed

Toxic Substances Control Act (TSCA):
• All components of this product are on the TSCA Inventory or are exempt from TSCA Inventory requirements under 40 CFR 720.30

Section 16: Other Information

Drexel Chemical Company recommends that each customer or recipient of this SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown below. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ between various locations. It is the buyer’s/user’s responsibility to ensure that his activities comply with all federal, state, provincial or local
laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of sources for information such as manufacturer-specific SDSs, we are not and cannot be responsible for SDSs obtained from any source other than ourselves. If you have obtained an SDS from another source or if you are not sure that the SDS you have is current, please contact us for the most current version.

Date Revised: August 3, 2016

Supersedes: November 20, 2015