

# SAFETY DATA SHEET

<b>SECTION 1</b>	<b>PRODUCT AND COMPANY IDENTIFICATION</b>
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## PRODUCT

**Product Name:** MOBILGARD M50  
**Product Description:** Base Oil and Additives  
**Product Code:** 201540109010  
**Intended Use:** Diesel engine oil

## COMPANY IDENTIFICATION

**Supplier:** VAD Ltd. (Antigua)  
Fort Road PO Box 359  
St. John's Antigua/Barbuda

**24 Hour Health Emergency Supplier General Contact** +1 703-741-5970 (CHEMTREC)  
1-268-462-0805

<b>SECTION 2</b>	<b>HAZARDS IDENTIFICATION</b>
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This material is not hazardous according to regulatory guidelines (see (M)SDS Section 15).

### Other hazard information:

**HAZARD NOT OTHERWISE CLASSIFIED (HNOC):** None as defined under 29 CFR 1910.1200.

### PHYSICAL / CHEMICAL HAZARDS

No significant hazards.

### HEALTH HAZARDS

High-pressure injection under skin may cause serious damage. Mildly irritating to skin. May be irritating to the eyes, nose, throat, and lungs.

### ENVIRONMENTAL HAZARDS

No significant hazards.

<b>NFPA Hazard ID:</b>	Health: 1	Flammability: 1	Reactivity: 0
<b>HMIS Hazard ID:</b>	Health: 1	Flammability: 1	Reactivity: 0

**NOTE:** This material should not be used for any other purpose than the intended use in Section 1 without expert advice. Health studies have shown that chemical exposure may cause potential human health risks which may vary from person to person.

<b>SECTION 3</b>	<b>COMPOSITION / INFORMATION ON INGREDIENTS</b>
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Product Name: MOBILGARD M50

Revision Date: 30 Jul 2021

Page 2 of 11

This material is defined as a mixture.

**Hazardous Substance(s) or Complex Substance(s) required for disclosure**

Name	CAS#	Concentration*	GHS Hazard Codes
BENZOIC ACID, HYDROXY-, MONO-C20-24-BRANCHED ALKYL DERIVS., CALCIUM SALTS (2:1)	900185-18-4	1 - < 5%	H316, H317
CALCIUM SALICYLATE/PHENATE COMPLEX	220795-13-1	1 - < 5%	H316, H317, H413
CARBONIC ACID, CALCIUM SALT (1:1)	471-34-1	1 - < 5%	None
PHENOL, C20-24-ALKYL DERIVS., CALCIUM SALTS	851232-34-3	1 - < 5%	H315, H413
PHENOL, C20-24-BRANCHED ALKYL DERIVS.	1854959-67-3	1 - < 5%	H315, H413
PHENOL, C20-24-BRANCHED ALKYL DERIVS., REACTION PRODUCTS WITH CARBON DIOXIDE, DISTN. RESIDUES FROM MANUF. OF PHENOL (TETRAPROPENYL) DERIVS. AND PHENOL (TETRAPROPENYL) DERIVS., CALCIUM SALTS	2101458-08-4	1 - < 5%	H315, H317, H402, H412
TETRAPROPENYL PHENOL (74499-35-7 & 132752-19-3)		0.1 - < 0.25%	H314(1C), H360(1B)(F), H400(M factor 10), H410(M factor 10)
ZINC BIS(O,O-DIISOCTYL) BIS(DITHIOPHOSPHATE)	28629-66-5	0.1 - < 1%	H315, H318, H401, H411

\* All concentrations are percent by weight unless material is a gas. Gas concentrations are in percent by volume.

As per paragraph (i) of 29 CFR 1910.1200, formulation is considered a trade secret and specific chemical identity and exact percentage (concentration) of composition may have been withheld. Specific chemical identity and exact percentage composition will be provided to health professionals, employees, or designated representatives in accordance with applicable provisions of paragraph (i).

**SECTION 4 FIRST AID MEASURES**

**INHALATION**

Remove from further exposure. For those providing assistance, avoid exposure to yourself or others. Use adequate respiratory protection. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or use mouth-to-mouth resuscitation.

**SKIN CONTACT**

Wash contact areas with soap and water. Remove contaminated clothing. Launder contaminated clothing before reuse. If product is injected into or under the skin, or into any part of the body, regardless of the appearance of the wound or its size, the individual should be evaluated immediately by a physician as a surgical emergency. Even though initial symptoms from high pressure injection may be minimal or absent, early surgical treatment within the first few hours may significantly reduce the ultimate extent of injury.

**EYE CONTACT**

Flush thoroughly with water. If irritation occurs, get medical assistance.

**INGESTION**

First aid is normally not required. Seek medical attention if discomfort occurs.

**SECTION 5 FIRE FIGHTING MEASURES**

## EXTINGUISHING MEDIA

**Appropriate Extinguishing Media:** Use water fog, foam, dry chemical or carbon dioxide (CO<sub>2</sub>) to extinguish flames.

**Inappropriate Extinguishing Media:** Straight Streams of Water

## FIRE FIGHTING

**Fire Fighting Instructions:** Evacuate area. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply. Firefighters should use standard protective equipment and in enclosed spaces, self-contained breathing apparatus (SCBA). Use water spray to cool fire exposed surfaces and to protect personnel.

**Hazardous Combustion Products:** Aldehydes, Incomplete combustion products, Oxides of carbon, Smoke, Fume, Sulfur oxides

## FLAMMABILITY PROPERTIES

**Flash Point [Method]:** >230°C (446°F) [ASTM D-92]

**Flammable Limits (Approximate volume % in air):** LEL: 0.9 UEL: 7.0

**Autoignition Temperature:** N/D

## SECTION 6

## ACCIDENTAL RELEASE MEASURES

### NOTIFICATION PROCEDURES

In the event of a spill or accidental release, notify relevant authorities in accordance with all applicable regulations. US regulations require reporting releases of this material to the environment which exceed the applicable reportable quantity or oil spills which could reach any waterway including intermittent dry creeks. The National Response Center can be reached at (800)424-8802.

### PROTECTIVE MEASURES

Avoid contact with spilled material. Warn or evacuate occupants in surrounding and downwind areas if required due to toxicity or flammability of the material. See Section 5 for fire fighting information. See the Hazard Identification Section for Significant Hazards. See Section 4 for First Aid Advice. See Section 8 for advice on the minimum requirements for personal protective equipment. Additional protective measures may be necessary, depending on the specific circumstances and/or the expert judgment of the emergency responders.

For emergency responders: Respiratory protection: respiratory protection will be necessary only in special cases, e.g., formation of mists. Half-face or full-face respirator with filter(s) for dust/organic vapor or Self Contained Breathing Apparatus (SCBA) can be used depending on the size of spill and potential level of exposure. If the exposure cannot be completely characterized or an oxygen deficient atmosphere is possible or anticipated, SCBA is recommended. Work gloves that are resistant to hydrocarbons are recommended. Gloves made of polyvinyl acetate (PVA) are not water-resistant and are not suitable for emergency use. Chemical goggles are recommended if splashes or contact with eyes is possible. Small spills: normal antistatic work clothes are usually adequate. Large spills: full body suit of chemical resistant, antistatic material is recommended.

### SPILL MANAGEMENT

**Land Spill:** Stop leak if you can do it without risk. Recover by pumping or with suitable absorbent.

**Water Spill:** Stop leak if you can do it without risk. Confine the spill immediately with booms. Warn other shipping. Remove from the surface by skimming or with suitable absorbents. Seek the advice of a specialist

before using dispersants.

Water spill and land spill recommendations are based on the most likely spill scenario for this material; however, geographic conditions, wind, temperature, (and in the case of a water spill) wave and current direction and speed may greatly influence the appropriate action to be taken. For this reason, local experts should be consulted. Note: Local regulations may prescribe or limit action to be taken.

### ENVIRONMENTAL PRECAUTIONS

Large Spills: Dike far ahead of liquid spill for later recovery and disposal. Prevent entry into waterways, sewers, basements or confined areas.

<b>SECTION 7</b>	<b>HANDLING AND STORAGE</b>
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#### HANDLING

Avoid contact with skin. Prevent small spills and leakage to avoid slip hazard. Material can accumulate static charges which may cause an electrical spark (ignition source). When the material is handled in bulk, an electrical spark could ignite any flammable vapors from liquids or residues that may be present (e.g., during switch-loading operations). Use proper bonding and/or ground procedures. However, bonding and grounds may not eliminate the hazard from static accumulation. Consult local applicable standards for guidance. Additional references include American Petroleum Institute 2003 (Protection Against Ignitions Arising out of Static, Lightning and Stray Currents) or National Fire Protection Agency 77 (Recommended Practice on Static Electricity) or CENELEC CLC/TR 50404 (Electrostatics - Code of practice for the avoidance of hazards due to static electricity).

**Static Accumulator:** This material is a static accumulator.

#### STORAGE

The type of container used to store the material may affect static accumulation and dissipation. Do not store in open or unlabelled containers. Keep away from incompatible materials.

<b>SECTION 8</b>	<b>EXPOSURE CONTROLS / PERSONAL PROTECTION</b>
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#### EXPOSURE LIMIT VALUES

**Exposure limits/standards (Note: Exposure limits are not additive)**

Substance Name	Form	Limit / Standard			NOTE	Source
CARBONIC ACID, CALCIUM SALT (1:1)	Respirable fraction.	TWA	5 mg/m <sup>3</sup>		N/A	OSHA Z1
CARBONIC ACID, CALCIUM SALT (1:1)	Total dust.	TWA	15 mg/m <sup>3</sup>		N/A	OSHA Z1

**Exposure limits/standards for materials that can be formed when handling this product:** When mists/aerosols can occur the following are recommended: 5 mg/m<sup>3</sup> - ACGIH TLV (inhalable fraction), 5 mg/m<sup>3</sup> - OSHA PEL.

NOTE: Limits/standards shown for guidance only. Follow applicable regulations.

No biological limits allocated.

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## ENGINEERING CONTROLS

The level of protection and types of controls necessary will vary depending upon potential exposure conditions.

Control measures to consider:

No special requirements under ordinary conditions of use and with adequate ventilation.

## PERSONAL PROTECTION

Personal protective equipment selections vary based on potential exposure conditions such as applications, handling practices, concentration and ventilation. Information on the selection of protective equipment for use with this material, as provided below, is based upon intended, normal usage.

**Respiratory Protection:** If engineering controls do not maintain airborne contaminant concentrations at a level which is adequate to protect worker health, an approved respirator may be appropriate. Respirator selection, use, and maintenance must be in accordance with regulatory requirements, if applicable. Types of respirators to be considered for this material include:

No special requirements under ordinary conditions of use and with adequate ventilation.

For high airborne concentrations, use an approved supplied-air respirator, operated in positive pressure mode. Supplied air respirators with an escape bottle may be appropriate when oxygen levels are inadequate, gas/vapor warning properties are poor, or if air purifying filter capacity/rating may be exceeded.

**Hand Protection:** Any specific glove information provided is based on published literature and glove manufacturer data. Glove suitability and breakthrough time will differ depending on the specific use conditions. Contact the glove manufacturer for specific advice on glove selection and breakthrough times for your use conditions. Inspect and replace worn or damaged gloves. The types of gloves to be considered for this material include:

Chemical resistant gloves are recommended.

**Eye Protection:** If contact is likely, safety glasses with side shields are recommended.

**Skin and Body Protection:** Any specific clothing information provided is based on published literature or manufacturer data. The types of clothing to be considered for this material include:

Chemical/oil resistant clothing is recommended.

**Specific Hygiene Measures:** Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Discard contaminated clothing and footwear that cannot be cleaned. Practice good housekeeping.

## ENVIRONMENTAL CONTROLS

Comply with applicable environmental regulations limiting discharge to air, water and soil. Protect the environment by applying appropriate control measures to prevent or limit emissions.

<b>SECTION 9</b>	<b>PHYSICAL AND CHEMICAL PROPERTIES</b>
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**Note:** Physical and chemical properties are provided for safety, health and environmental considerations only and may not fully represent product specifications. Contact the Supplier for additional information.

## GENERAL INFORMATION

Product Name: MOBILGARD M50  
 Revision Date: 30 Jul 2021  
 Page 6 of 11

**Physical State:** Liquid  
**Color:** Brown  
**Odor:** Characteristic  
**Odor Threshold:** N/D

**IMPORTANT HEALTH, SAFETY, AND ENVIRONMENTAL INFORMATION**

**Relative Density (at 15 °C):** 0.917 [ASTM D4052]  
**Flammability (Solid, Gas):** N/A  
**Flash Point [Method]:** >230°C (446°F) [ASTM D-92]  
**Flammable Limits (Approximate volume % in air):** LEL: 0.9 UEL: 7.0  
**Autoignition Temperature:** N/D  
**Boiling Point / Range:** > 316°C (600°F)  
**Decomposition Temperature:** N/D  
**Vapor Density (Air = 1):** > 2 at 101 kPa  
**Vapor Pressure:** < 0.013 kPa (0.1 mm Hg) at 20 °C  
**Evaporation Rate (n-butyl acetate = 1):** N/D  
**pH:** N/A  
**Log Pow (n-Octanol/Water Partition Coefficient):** > 3.5  
**Solubility in Water:** Negligible  
**Viscosity:** 113 cSt (113 mm<sup>2</sup>/sec) at 40 °C | 13.8 cSt (13.8 mm<sup>2</sup>/sec) at 100°C [ASTM D 445]  
**Oxidizing Properties:** See Hazards Identification Section.

**OTHER INFORMATION**

**Freezing Point:** N/D  
**Melting Point:** N/A  
**Pour Point:** -6°C (21°F) [ASTM D97]  
**DMSO Extract (mineral oil only), IP-346:** < 3 %wt

<b>SECTION 10</b>	<b>STABILITY AND REACTIVITY</b>
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**REACTIVITY:** See sub-sections below.

**STABILITY:** Material is stable under normal conditions.

**CONDITIONS TO AVOID:** Excessive heat. High energy sources of ignition.

**MATERIALS TO AVOID:** Strong oxidizers

**HAZARDOUS DECOMPOSITION PRODUCTS:** Material does not decompose at ambient temperatures.

**POSSIBILITY OF HAZARDOUS REACTIONS:** Hazardous polymerization will not occur.

<b>SECTION 11</b>	<b>TOXICOLOGICAL INFORMATION</b>
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**INFORMATION ON TOXICOLOGICAL EFFECTS**

<u>Hazard Class</u>	<u>Conclusion / Remarks</u>
<b>Inhalation</b>	
Acute Toxicity: No end point data for material.	Minimally Toxic. Based on assessment of the components.
Irritation: No end point data for material.	Negligible hazard at ambient/normal handling temperatures.

Product Name: MOBILGARD M50

Revision Date: 30 Jul 2021

Page 7 of 11

<b>Ingestion</b>	
Acute Toxicity: No end point data for material.	Minimally Toxic. Based on assessment of the components.
<b>Skin</b>	
Acute Toxicity: No end point data for material.	Minimally Toxic. Based on assessment of the components.
Skin Corrosion/Irritation: No end point data for material.	Mildly irritating to skin with prolonged exposure. Based on assessment of the components.
<b>Eye</b>	
Serious Eye Damage/Irritation: No end point data for material.	May cause mild, short-lasting discomfort to eyes. Based on assessment of the components.
<b>Sensitization</b>	
Respiratory Sensitization: No end point data for material.	Not expected to be a respiratory sensitizer.
Skin Sensitization: No end point data for material.	Not expected to be a skin sensitizer. Based on assessment of the components.
<b>Aspiration:</b> Data available.	Not expected to be an aspiration hazard. Based on physico-chemical properties of the material.
<b>Germ Cell Mutagenicity:</b> No end point data for material.	Not expected to be a germ cell mutagen. Based on assessment of the components.
<b>Carcinogenicity:</b> No end point data for material.	Not expected to cause cancer. Based on assessment of the components.
<b>Reproductive Toxicity:</b> No end point data for material.	Not expected to be a reproductive toxicant. Based on assessment of the components.
<b>Lactation:</b> No end point data for material.	Not expected to cause harm to breast-fed children.
<b>Specific Target Organ Toxicity (STOT)</b>	
Single Exposure: No end point data for material.	Not expected to cause organ damage from a single exposure.
Repeated Exposure: No end point data for material.	Not expected to cause organ damage from prolonged or repeated exposure. Based on assessment of the components.

## OTHER INFORMATION

### For the product itself:

Component concentrations in this formulation would not be expected to cause skin sensitization, based on tests of the components, this formulation, or similar formulations.

Diesel engine oils: Not carcinogenic in animals tests. Used and unused diesel engine oils did not produce any carcinogenic effects in chronic mouse skin painting studies.

### Contains:

Base oil severely refined: Not carcinogenic in animal studies. Representative material passes IP-346, Modified Ames test, and/or other screening tests. Dermal and inhalation studies showed minimal effects; lung non-specific infiltration of immune cells, oil deposition and minimal granuloma formation. Not sensitizing in test animals.

Tetrapropenyl phenol (TPP). TPP was tested in a rat oral gavage one-generation reproductive toxicity study and a rat dietary two-generation reproductive toxicity study. Results from the one-generation study included reduced ovary weights and changes in male reproductive accessory organs. Results from the two-generation study included prolonged estrous cyclicity, reduced ovary weights, accelerated sexual maturation, decreased mean live litter size, decreased fertility rates, hypospermia, and reduced weights of male reproductive accessory organs. A classification threshold for reproductive effects of 1.5 wt% TPP was derived by the supplier based on the NOEL (15 mg/kg/day) from the rat dietary two-generation study and was confirmed in supporting studies with other substances containing TPP as an impurity.

The following ingredients are cited on the lists below: None.

--REGULATORY LISTS SEARCHED--

1 = NTP CARC  
2 = NTP SUS

3 = IARC 1  
4 = IARC 2A

5 = IARC 2B  
6 = OSHA CARC

<b>SECTION 12</b>	<b>ECOLOGICAL INFORMATION</b>
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The information given is based on data for the material, components of the material, or for similar materials, through the application of bridging principals.

**ECOTOXICITY**

Material -- Not expected to be harmful to aquatic organisms.

**MOBILITY**

Base oil component -- Low solubility and floats and is expected to migrate from water to the land.  
Expected to partition to sediment and wastewater solids.

**PERSISTENCE AND DEGRADABILITY**

**Biodegradation:**

Base oil component -- Expected to be inherently biodegradable

**BIOACCUMULATION POTENTIAL**

Base oil component -- Has the potential to bioaccumulate, however metabolism or physical properties may reduce the bioconcentration or limit bioavailability.

NOTE: One or more additive components of this material contains a branched alkylphenol impurity that is highly toxic to aquatic organisms. The components containing the impurity have been tested by the additive supplier and found to be no more than minimally toxic to aquatic organisms.

<b>SECTION 13</b>	<b>DISPOSAL CONSIDERATIONS</b>
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Disposal recommendations based on material as supplied. Disposal must be in accordance with current applicable laws and regulations, and material characteristics at time of disposal.

**DISPOSAL RECOMMENDATIONS**

Product is suitable for burning in an enclosed controlled burner for fuel value or disposal by supervised incineration at very high temperatures to prevent formation of undesirable combustion products. Protect the environment. Dispose of used oil at designated sites. Minimize skin contact. Do not mix used oils with solvents, brake fluids or coolants.

**REGULATORY DISPOSAL INFORMATION**

RCRA Information: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D), nor is it formulated to contain materials which are listed as hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.



Product Name: MOBILGARD M50  
Revision Date: 30 Jul 2021  
Page 9 of 11

**Empty Container Warning** Empty Container Warning (where applicable): Empty containers may contain residue and can be dangerous. Do not attempt to refill or clean containers without proper instructions. Empty drums should be completely drained and safely stored until appropriately reconditioned or disposed. Empty containers should be taken for recycling, recovery, or disposal through suitably qualified or licensed contractor and in accordance with governmental regulations. DO NOT PRESSURISE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND, OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION. THEY MAY EXPLODE AND CAUSE INJURY OR DEATH.

<b>SECTION 14</b>	<b>TRANSPORT INFORMATION</b>
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**LAND (DOT):** Not Regulated for Land Transport

**LAND (TDG):** Not Regulated for Land Transport

**SEA (IMDG):** Not Regulated for Sea Transport according to IMDG-Code

**Marine Pollutant:** No

**AIR (IATA):** Not Regulated for Air Transport

<b>SECTION 15</b>	<b>REGULATORY INFORMATION</b>
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**OSHA HAZARD COMMUNICATION STANDARD:** This material is not considered hazardous in accordance with OSHA HazCom 2012, 29 CFR 1910.1200.

**Listed or exempt from listing/notification on the following chemical inventories:** AIIIC, DSL, ENCS, ISHL, PICCS, TSCA

**Special Cases:**

Inventory	Status
IECSC	Restrictions Apply
KECI	Restrictions Apply
TCSI	Restrictions Apply

**SARA 302:** No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302

**SARA (311/312) REPORTABLE GHS HAZARD CLASSES:** None.

**SARA (313) TOXIC RELEASE INVENTORY:** This material contains no chemicals subject to the supplier notification requirements of the SARA 313 Toxic Release Program.

**The following ingredients are cited on the lists below:**

Chemical Name	CAS Number	List Citations
CARBONIC ACID, CALCIUM	471-34-1	4, 16, 17, 18

Product Name: MOBILGARD M50

Revision Date: 30 Jul 2021

Page 10 of 11

SALT (1:1)		
SEVERELY HYDROTREATED HEAVY PARAFFINIC DISTILLATE	64742-54-7	17, 18, 19
ZINC BIS(O,O-DIISOCTYL) BIS(DITHIOPHOSPHATE)	28629-66-5	15

--REGULATORY LISTS SEARCHED--

1 = ACGIH ALL	6 = TSCA 5a2	11 = CA P65 REPRO	16 = MN RTK
2 = ACGIH A1	7 = TSCA 5e	12 = CA RTK	17 = NJ RTK
3 = ACGIH A2	8 = TSCA 6	13 = IL RTK	18 = PA RTK
4 = OSHA Z	9 = TSCA 12b	14 = LA RTK	19 = RI RTK
5 = TSCA 4	10 = CA P65 CARC	15 = MI 293	

Code key: CARC=Carcinogen; REPRO=Reproductive

<b>SECTION 16</b>	<b>OTHER INFORMATION</b>
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N/D = Not determined, N/A = Not applicable

**KEY TO THE H-CODES CONTAINED IN SECTION 3 OF THIS DOCUMENT (for information only):**

- H314(1): Causes severe skin burns and eye damage; Skin Corr/Irritation, Cat 1
- H314(1C): Causes severe skin burns and eye damage; Skin Corr/Irritation, Cat 1C
- H315: Causes skin irritation; Skin Corr/Irritation, Cat 2
- H316: Causes mild skin irritation; Skin Corr/Irritation, Cat 3
- H317: May cause allergic skin reaction; Skin Sensitization, Cat 1
- H318: Causes serious eye damage; Serious Eye Damage/Irr, Cat 1
- H319(2A): Causes serious eye irritation; Serious Eye Damage/Irr, Cat 2A
- H360(1B)(F): May damage fertility; Repro Tox, Cat 1B (Fertility)
- H400: Very toxic to aquatic life; Acute Env Tox, Cat 1
- H401: Toxic to aquatic life; Acute Env Tox, Cat 2
- H402: Harmful to aquatic life; Acute Env Tox, Cat 3
- H410: Very toxic to aquatic life with long lasting effects; Chronic Env Tox, Cat 1
- H411: Toxic to aquatic life with long lasting effects; Chronic Env Tox, Cat 2
- H412: Harmful to aquatic life with long lasting effects; Chronic Env Tox, Cat 3
- H413: May cause long lasting harmful effects to aquatic life; Chronic Env Tox, Cat 4

**THIS SAFETY DATA SHEET CONTAINS THE FOLLOWING REVISIONS:**

- Composition: Component Table information was modified.
- Section 13: Disposal Considerations - Disposal Recommendations information was modified.
- Section 15: National Chemical Inventory Listing information was modified.
- Section 15: Special Cases Table information was modified.
- Section 16: HCode Key information was modified.

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Product Name: MOBILGARD M50

Revision Date: 30 Jul 2021

Page 11 of 11

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included with and/or on the container. Appropriate warnings and safe-handling procedures should be provided to handlers and users. Alteration of this document is strictly prohibited. Except to the extent required by law, re-publication or retransmission of this document, in whole or in part, is not permitted. The term, "ExxonMobil" is used for convenience, and may include any one or more of ExxonMobil Chemical Company, Exxon Mobil Corporation, or any affiliates in which they directly or indirectly hold any interest.

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