

SAFETY DATA SHEET

DOW AGROSCIENCES LLC

Product name: ELEMENT™ 3A Herbicide

Issue Date: 04/04/2016

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DOW AGROSCIENCES LLC encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. IDENTIFICATION

Product name: ELEMENT™ 3A Herbicide

Recommended use of the chemical and restrictions on use

Identified uses: End use herbicide product

COMPANY IDENTIFICATION

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD
INDIANAPOLIS IN 46268-1053
UNITED STATES

Customer Information Number:

800-992-5994
info@dow.com

EMERGENCY TELEPHONE NUMBER

24-Hour Emergency Contact: 800-992-5994

Local Emergency Contact: 352-323-3500

2. HAZARDS IDENTIFICATION

Hazard classification

This material is hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29CFR 1910.1200.

Flammable liquids - Category 3

Eye irritation - Category 2A

Specific target organ toxicity - repeated exposure - Category 2

Label elements

Hazard pictograms



Signal word: **WARNING!**

Hazards

Flammable liquid and vapour.

Causes serious eye irritation.

May cause damage to organs (Kidney) through prolonged or repeated exposure.

Precautionary statements**Prevention**

Keep away from heat/sparks/open flames/hot surfaces. No smoking.

Keep container tightly closed.

Ground/bond container and receiving equipment.

Use explosion-proof electrical/ ventilating/ lighting/ equipment.

Use only non-sparking tools.

Take precautionary measures against static discharge.

Do not breathe dust/ fume/ gas/ mist/ vapours/ spray.

Wash skin thoroughly after handling.

Wear protective gloves/ eye protection/ face protection.

Response

IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.

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

Get medical advice/ attention if you feel unwell.

If eye irritation persists: Get medical advice/ attention.

In case of fire: Use dry sand, dry chemical or alcohol-resistant foam to extinguish.

Storage

Store in a well-ventilated place. Keep cool.

Disposal

Dispose of contents/ container to an approved waste disposal plant.

Other hazards

No data available

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical nature: Mixture

This product is a mixture.

Component	CASRN	Concentration
Triclopyr Triethylamine Salt	57213-69-1	44.4%
Ethanol	64-17-5	2.1%
Alkylphenol alkoxyate	69029-39-6	1.0%
Balance	Not available	52.5%

4. FIRST AID MEASURES

Description of first aid measures

General advice: First Aid responders should pay attention to self-protection and use the recommended protective clothing (chemical resistant gloves, splash protection). If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Inhalation: Move person to fresh air. If person is not breathing, call an emergency responder or ambulance, then give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask etc). Call a poison control center or doctor for treatment advice.

Skin contact: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Eye contact: Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice. Suitable emergency eye wash facility should be immediately available.

Ingestion: 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. Never give anything by mouth to an unconscious person.

Most important symptoms and effects, both acute and delayed: Aside from the information found under Description of first aid measures (above) and Indication of immediate medical attention and special treatment needed (below), any additional important symptoms and effects are described in Section 11: Toxicology Information.

Indication of any immediate medical attention and special treatment needed

Notes to physician: No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. Have the Safety Data Sheet, and if available, the product container or label with you when calling a poison control center or doctor, or going for treatment.

5. FIREFIGHTING MEASURES

Suitable extinguishing media: To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. General purpose synthetic foams (including AFFF type) or protein foams are preferred if available. Alcohol resistant foams (ATC type) may function.

Unsuitable extinguishing media: No data available

Special hazards arising from the substance or mixture

Hazardous combustion products: Under fire conditions some components of this product may decompose. The smoke may contain unidentified toxic and/or irritating compounds. Combustion products may include and are not limited to: Nitrogen oxides. Hydrogen chloride. Carbon monoxide. Carbon dioxide.

Unusual Fire and Explosion Hazards: This material will not burn until the water has evaporated. Residue can burn. May produce flash fire. Vapors are heavier than air and may travel a long distance and accumulate in low lying areas. Ignition and/or flash back may occur. If exposed to fire from another source and water is evaporated, exposure to high temperatures may cause toxic fumes.

Advice for firefighters

Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Stay upwind. Keep out of low areas where gases (fumes) can accumulate. Eliminate ignition sources. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage. Review the "Accidental Release Measures" and the "Ecological Information" sections of this (M)SDS.

Special protective equipment for firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting 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.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures: Evacuate area. Keep unnecessary and unprotected personnel from entering the area. Keep personnel out of low areas. Keep upwind of spill. Ventilate area of leak or spill. No smoking in area. Eliminate all sources of ignition in vicinity of spill or released vapor to avoid fire or explosion. Vapor explosion hazard. Keep out of sewers. Refer to section 7, Handling, for additional precautionary measures. Eliminate all sources of ignition in vicinity of spill or released vapor to avoid fire or explosion. Ground and bond all containers and handling equipment. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection.

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

Methods and materials for containment and cleaning up: Contain spilled material if possible. Pump with explosion-proof equipment. If available, use foam to smother or suppress. Small spills: Absorb with materials such as: Clay. Dirt. Sand. Sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Dow AgroSciences for clean-up assistance. See Section 13, Disposal Considerations, for additional information.

7. HANDLING AND STORAGE

Precautions for safe handling: Keep away from heat, sparks and flame. Keep out of reach of children. No smoking, open flames or sources of ignition in handling and storage area. Containers, even those that have been emptied, can contain vapors. Do not cut, drill, grind, weld, or perform similar operations on or near empty containers. Do not get in eyes. Avoid contact with skin and clothing. Avoid breathing vapor or mist. Do not swallow. Wash thoroughly after handling. Keep container closed. Use with adequate ventilation. Electrically ground and bond all equipment. Vapors are heavier than air and may travel a long distance and accumulate in low lying areas. Ignition and/or flash back may occur. Use of non-sparking or explosion-proof equipment may be necessary,

depending upon the type of operation. See Section 8, EXPOSURE CONTROLS AND PERSONAL PROTECTION.

Conditions for safe storage: Store in a dry place. Store in original container. Keep container tightly closed when not in use. Do not store near food, foodstuffs, drugs or potable water supplies. Minimize sources of ignition, such as static build-up, heat, spark or flame.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Exposure limits are listed below, if they exist.

Component	Regulation	Type of listing	Value/Notation
Triclopyr Triethylamine Salt	Dow IHG	TWA	2 mg/m ³
	Dow IHG	TWA	SKIN, DSEN, BEI
Ethanol	ACGIH	TWA	1,000 ppm
	ACGIH	STEL	1,000 ppm
	OSHA Z-1	TWA	1,900 mg/m ³ 1,000 ppm
	CAL PEL	PEL	1,900 mg/m ³ 1,000 ppm
Alkylphenol alkoxyolate	Dow IHG	TWA	2 mg/m ³

RECOMMENDATIONS IN THIS SECTION ARE FOR MANUFACTURING, COMMERCIAL BLENDING AND PACKAGING WORKERS. APPLICATORS AND HANDLERS SHOULD SEE THE PRODUCT LABEL FOR PROPER PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING.

Exposure controls

Engineering controls: Use local exhaust ventilation, or other engineering controls to maintain airborne levels below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, general ventilation should be sufficient for most operations. Local exhaust ventilation may be necessary for some operations.

Individual protection measures

Eye/face protection: Use chemical goggles.

Skin protection

Hand protection: Use gloves chemically resistant to this material when prolonged or frequently repeated contact could occur. Examples of preferred glove barrier materials include: Butyl rubber. Natural rubber ("latex"). Neoprene. Nitrile/butadiene rubber ("nitrile" or "NBR"). Polyethylene. Ethyl vinyl alcohol laminate ("EVAL"). 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.

Other protection: Wear clean, body-covering clothing.

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, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. For most conditions no respiratory protection should be needed; however, if discomfort is experienced, use an approved air-purifying respirator.

The following should be effective types of air-purifying respirators: Organic vapor cartridge with a particulate pre-filter.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance

Physical state	Liquid.
Color	Pink
Odor	Ammoniacal
Odor Threshold	No test data available
pH	9.5 10% <i>pH Electrode</i>
Melting point/range	Not applicable
Freezing point	No test data available
Boiling point (760 mmHg)	No test data available
Flash point	closed cup 43 °C (109 °F) <i>Setaflash Closed Cup ASTM D3828</i>
Evaporation Rate (Butyl Acetate = 1)	No test data available
Flammability (solid, gas)	No data available
Lower explosion limit	No test data available
Upper explosion limit	No test data available
Vapor Pressure	Not applicable
Relative Vapor Density (air = 1)	Not applicable
Relative Density (water = 1)	1.1385 at 20 °C (68 °F) <i>Digital Density Meter (Oscillating Coil)</i>
Water solubility	Soluble
Partition coefficient: n-octanol/water	No data available
Auto-ignition temperature	No test data available
Decomposition temperature	No test data available
Dynamic Viscosity	12.5 mPa.s at 25 °C (77 °F)
Kinematic Viscosity	No test data available
Explosive properties	No <i>Thermal</i>
Oxidizing properties	No
Liquid Density	1.1385 g/cm ³ at 20 °C (68 °F) <i>Digital density meter</i>
Molecular weight	No data available
Surface tension	38.5 mN/m at 20 °C (68 °F) <i>EC Method A5</i>

NOTE: The physical data presented above are typical values and should not be construed as a specification.

10. STABILITY AND REACTIVITY

Reactivity: No dangerous reaction known under conditions of normal use.

Chemical stability: Thermally stable at recommended temperatures and pressures.

Possibility of hazardous reactions: Polymerization will not occur.

Conditions to avoid: Active ingredient decomposes at elevated temperatures.

Incompatible materials: Avoid contact with: Oxidizers.

Hazardous decomposition products: Decomposition products depend upon temperature, air supply and the presence of other materials. Decomposition products can include and are not limited to: Hydrogen chloride. Nitrogen oxides.

11. TOXICOLOGICAL INFORMATION

Toxicological information appears in this section when such data is available.

Acute toxicity

Acute oral toxicity

Low toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury.

As product:

LD50, Rat, female, 4,100 mg/kg

Acute dermal toxicity

Prolonged skin contact is unlikely to result in absorption of harmful amounts.

As product:

LD50, Rabbit, male and female, > 5,000 mg/kg

Acute inhalation toxicity

No adverse effects are anticipated from single exposure to mist. Excessive exposure may cause irritation to upper respiratory tract (nose and throat).

As product:

LC50, Rat, male and female, 4 Hour, Mist, > 5.4 mg/l

Maximum attainable concentration.

No deaths occurred at this concentration.

Skin corrosion/irritation

Brief contact is essentially nonirritating to skin.

Serious eye damage/eye irritation

May cause moderate eye irritation.

May cause moderate corneal injury.

Sensitization

Did not demonstrate the potential for contact allergy in mice.

For respiratory sensitization:

No relevant data found.

Specific Target Organ Systemic Toxicity (Single Exposure)

Evaluation of available data suggests that this material is not an STOT-SE toxicant.

Specific Target Organ Systemic Toxicity (Repeated Exposure)

For the active ingredient(s):

In animals, effects have been reported on the following organs:

Kidney.

For the minor component(s):

In animals, effects have been reported on the following organs:

Kidney.

Liver.

Carcinogenicity

For similar active ingredient(s). Triclopyr. Did not cause cancer in laboratory animals.

Teratogenicity

For the active ingredient(s): Has been toxic to the fetus in laboratory animals at doses toxic to the mother. Did not cause birth defects in laboratory animals.

For the minor component(s): Has caused birth defects in lab animals at high doses.

Reproductive toxicity

For similar active ingredient(s). Triclopyr. In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals.

Mutagenicity

In vitro genetic toxicity studies were negative. Animal genetic toxicity studies were negative.

Aspiration Hazard

Based on physical properties, not likely to be an aspiration hazard.

12. ECOLOGICAL INFORMATION

Ecotoxicological information appears in this section when such data is available.

Toxicity

Acute toxicity to fish

Based on information for a similar material:

Material is highly toxic to aquatic organisms on an acute basis (LC50/EC50 between 0.1 and 1 mg/L in the most sensitive species tested).

LC50, *Oncorhynchus mykiss* (rainbow trout), 96 Hour, 400 mg/l, OECD Test Guideline 203 or Equivalent

LC50, *Lepomis macrochirus* (Bluegill sunfish), semi-static test, 96 Hour, > 100 mg/l

Acute toxicity to aquatic invertebrates

EC50, eastern oyster (*Crassostrea virginica*), static test, 48 Hour, 56 - 87 mg/l, Method Not Specified.

LC50, Daphnia magna (Water flea), static test, 48 Hour, > 1,000 mg/l, OECD Test Guideline 202 or Equivalent

Acute toxicity to algae/aquatic plants

ErC50, Pseudokirchneriella subcapitata (green algae), 72 Hour, Growth rate inhibition, 107 mg/l, OECD Test Guideline 201 or Equivalent

ErC50, blue-green alga Anabaena flos-aquae, 72 Hour, Growth inhibition, > 100 mg/l

EC50, Lemna gibba, 7 d, Growth inhibition, > 100 mg/l

Based on information for a similar material:

ErC50, Myriophyllum spicatum, 14 d, 0.241 mg/l

Based on information for a similar material:

NOEC, Myriophyllum spicatum, 14 d, 0.0191 mg/l

Persistence and degradability

Triclopyr Triethylamine Salt

Biodegradability: For similar active ingredient(s). Triclopyr. Biodegradation under aerobic static laboratory conditions is high (BOD20 or BOD28/ThOD > 40%).

For similar active ingredient(s). Triclopyr. Based on stringent OECD test guidelines, this material cannot be considered as readily biodegradable; however, these results do not necessarily mean that the material is not biodegradable under environmental conditions.

Ethanol

Biodegradability: Material is readily biodegradable. Passes OECD test(s) for ready biodegradability.

10-day Window: Pass

Biodegradation: > 70 %

Exposure time: 5 d

Method: OECD Test Guideline 301D or Equivalent

Theoretical Oxygen Demand: 2.08 mg/mg

Photodegradation

Test Type: Half-life (indirect photolysis)

Sensitizer: OH radicals

Atmospheric half-life: 2.99 d

Method: Estimated.

Alkylphenol alkoxyate

Biodegradability: Biodegradation under aerobic laboratory conditions is below detectable limits (BOD20 or BOD28/ThOD < 2.5%).

Theoretical Oxygen Demand: 2.35 mg/mg

Chemical Oxygen Demand: 1.78 mg/mg

Balance

Biodegradability: No relevant data found.

Bioaccumulative potential

Triclopyr Triethylamine Salt

Bioaccumulation: For similar active ingredient(s). Bioconcentration potential is low (BCF < 100 or Log Pow < 3).

Ethanol

Bioaccumulation: Bioaccumulation is unlikely. Bioconcentration potential is low (BCF < 100 or Log Pow < 3).

Partition coefficient: n-octanol/water(log Pow): -0.31 Measured

Alkylphenol alkoxyate

Bioaccumulation: No bioconcentration is expected because of the relatively high water solubility. May foam in water.

Balance

Bioaccumulation: No relevant data found.

Mobility in soil

Triclopyr Triethylamine Salt

For similar active ingredient(s).
Potential for mobility in soil is very high (Koc between 0 and 50).

Ethanol

Potential for mobility in soil is very high (Koc between 0 and 50).

Partition coefficient(Koc): 1.0 Estimated.

Alkylphenol alkoxyate

No data available.

Balance

No relevant data found.

13. DISPOSAL CONSIDERATIONS

Disposal methods: 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.

14. TRANSPORT INFORMATION

DOT

Proper shipping name	Combustible liquid, n.o.s.(Triclopyr Triethylamine Salt, Ethanol)
UN number	NA 1993
Class	CBL
Packing group	III

Classification for SEA transport (IMO-IMDG):

Proper shipping name	FLAMMABLE LIQUID, N.O.S.(Triclopyr Triethylamine Salt, Ethanol)
UN number	UN 1993
Class	3
Packing group	III
Marine pollutant	Triclopyr Triethylamine Salt
Transport in bulk according to Annex I or II of MARPOL 73/78 and the IBC or IGC Code	Consult IMO regulations before transporting ocean bulk

Classification for AIR transport (IATA/ICAO):

Proper shipping name	Flammable liquid, n.o.s.(Triclopyr Triethylamine Salt, Ethanol)
UN number	UN 1993
Class	3
Packing group	III

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Transportation classifications may vary by container volume and may be influenced by regional or country variations in regulations. 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.

15. REGULATORY INFORMATION

OSHA Hazard Communication Standard

This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312

Fire Hazard
Acute Health Hazard

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313

Components
Triclopyr Triethylamine Salt

CASRN
57213-69-1

Pennsylvania Worker and Community Right-To-Know Act:

The following chemicals are listed because of the additional requirements of Pennsylvania law:

Components	CASRN
Ethanol	64-17-5

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)

This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

United States TSCA Inventory (TSCA)

This product contains chemical substance(s) exempt from U.S. EPA TSCA Inventory requirements. It is regulated as a pesticide subject to Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requirements.

Federal Insecticide, Fungicide and Rodenticide Act

EPA Registration Number: 62719-037

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 for workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label:

DANGER

Corrosive

Causes irreversible eye damage

Harmful if swallowed or absorbed through skin

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

16. OTHER INFORMATION

Hazard Rating System**NFPA**

Health	Fire	Reactivity
3	2	0

Revision

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DAS Code: XRM-3724

Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

ACGIH	USA. ACGIH Threshold Limit Values (TLV)
CAL PEL	California permissible exposure limits for chemical contaminants (Title 8, Article 107)
Dow IHG	Dow Industrial Hygiene Guideline

OSHA Z-1	USA. Occupational Exposure Limits (OSHA) - Table Z-1 Limits for Air Contaminants
PEL	Permissible exposure limit
SKIN, DSEN, BEI	Absorbed via Skin, Skin Sensitizer, Biological Exposure Indice
STEL	Short-term exposure limit
TWA	8-hour, time-weighted average

Information Source and References

This SDS is prepared by Product Regulatory Services and Hazard Communications Groups from information supplied by internal references within our company.

DOW AGROSCIENCES LLC urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)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 above. 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 (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.