# SAFETY DATA SHEET



#### 1. Identification

**Product identifier** InstaDry Ink (black & red)

Other means of identification None.

Printing Inks. Recommended use None known. **Recommended restrictions** 

Manufacturer/Importer/Supplier/Distributor information

Company name Diagraph MSP

5307 Meadowland Parkway Marion IL 62959 **Address** 

**Telephone** 1-800-521-3047

E-mail msds@diagraphmsp.com

**Contact person Customer Service** 

**Emergency phone number** Emergency telephone 800-535-5053 (US only)

+1-352-323-3500 international

## 2. Hazard(s) identification

**Physical hazards** Flammable liquids Category 2 **Health hazards** Acute toxicity, dermal Category 4 Acute toxicity, inhalation Category 4 Skin corrosion/irritation Category 2 Serious eye damage/eye irritation Category 2

Carcinogenicity

Specific target organ toxicity, single exposure Category 3 respiratory tract irritation

Specific target organ toxicity, repeated

Category 2 (Central Nervous System, Kidney,

Liver)

Category 2

Aspiration hazard Category 1 Category 2

**Environmental hazards** Hazardous to the aquatic environment, acute

exposure

hazard

**OSHA** defined hazards Not classified.

Label elements



Signal word

**Hazard statement** Highly flammable liquid and vapor. May be fatal if swallowed and enters airways. Harmful in

contact with skin. Causes skin irritation. Causes serious eye irritation. Harmful if inhaled. May cause respiratory irritation. Suspected of causing cancer. May cause damage to organs (Central Nervous System, Kidney, Liver) through prolonged or repeated exposure. Toxic to aquatic life.

**Precautionary statement** 

Obtain special instructions before use. Do not handle until all safety precautions have been read Prevention

and understood. 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 mist or vapor. Wash thoroughly after handling. Use only outdoors or in a well-ventilated area. Wear protective gloves/protective clothing/eye

protection/face protection. Avoid release to the environment.

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#### Response

If exposed or concerned: Get medical advice/attention. If swallowed: Immediately call a poison center/doctor. Do NOT induce vomiting. If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. If skin irritation occurs: Get medical advice/attention. If inhaled: Remove person to fresh air and keep comfortable for breathing. Call a poison center/doctor if you feel unwell. 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. Take off contaminated clothing and wash before reuse. In case of fire: Use appropriate media to extinguish.

Storage

Store in a well-ventilated place. Keep cool. Keep container tightly closed. Store locked up.

Disposal

Dispose of contents/container in accordance with local/regional/national/international regulations.

Hazard(s) not otherwise classified (HNOC)

None known.

## 3. Composition/information on ingredients

#### **Mixtures**

Chemical name	CAS number	%
Xylene	1330-20-7	50-85
Ethylbenzene	100-41-4	10-15
Stearic acid	57-11-4	<5
Cumene	98-82-8	<1
Aniline	62-53-3	<0.1
Benzene	71-43-2	<0.1
Toluene	108-88-3	<0.1
Other components below reportable levels		17.36

**Composition comments** 

All concentrations are in percent by weight unless ingredient is a gas. Gas concentrations are in percent by volume.

#### 4. First-aid measures

Inhalation

Remove victim to fresh air and keep at rest in a position comfortable for breathing. Oxygen or artificial respiration if needed. Call a POISON CENTER or doctor/physician if you feel unwell.

Skin contact

Take off immediately all contaminated clothing. Rinse skin with water/shower. Get medical advice/attention if you feel unwell. If skin irritation occurs: Get medical advice/attention. Wash contaminated clothing before reuse.

Eye contact

Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention if irritation develops and persists.

Ingestion

Call a physician or poison control center immediately. Rinse mouth. Do not induce vomiting. If vomiting occurs, keep head low so that stomach content doesn't get into the lungs.

Most important symptoms/effects, acute and delayed

Aspiration may cause pulmonary edema and pneumonitis. Narcosis. Dizziness. Nausea, vomiting. Abdominal pain. Behavioral changes. Decrease in motor functions. Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. May cause respiratory irritation. Skin irritation. May cause redness and pain. Edema. Jaundice. Prolonged exposure may cause chronic effects.

Indication of immediate medical attention and special treatment needed

Provide general supportive measures and treat symptomatically. Thermal burns: Flush with water immediately. While flushing, remove clothes which do not adhere to affected area. Call an ambulance. Continue flushing during transport to hospital. Keep victim warm. Keep victim under observation. Symptoms may be delayed.

**General information** 

Take off all contaminated clothing immediately. IF exposed or concerned: Get medical advice/attention. If you feel unwell, seek medical advice (show the label where possible). Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Show this safety data sheet to the doctor in attendance. Wash contaminated clothing before reuse.

## 5. Fire-fighting measures

Suitable extinguishing media Unsuitable extinguishing media Water fog. Alcohol resistant foam. Dry chemical powder. Carbon dioxide (CO2).

Do not use water jet as an extinguisher, as this will spread the fire.

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Specific hazards arising from the chemical

Special protective equipment and precautions for firefighters

Vapors may form explosive mixtures with air. Vapors may travel considerable distance to a source of ignition and flash back. During fire, gases hazardous to health may be formed.

Self-contained breathing apparatus and full protective clothing must be worn in case of fire.

Fire fighting equipment/instructions

In case of fire and/or explosion do not breathe fumes. Move containers from fire area if you can do so without risk.

Specific methods
General fire hazards

Use standard firefighting procedures and consider the hazards of other involved materials.

Highly flammable liquid and vapor.

#### 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Eliminate all ignition sources (no smoking, flares, sparks, or flames in immediate area). Wear appropriate protective equipment and clothing during clean-up. Do not breathe mist or vapor. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ventilate closed spaces before entering them. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.

Methods and materials for containment and cleaning up

Eliminate all ignition sources (no smoking, flares, sparks, or flames in immediate area). Take precautionary measures against static discharge. Use only non-sparking tools. Keep combustibles (wood, paper, oil, etc.) away from spilled material. This product is miscible in water.

Large Spills: Stop the flow of material, if this is without risk. Use water spray to reduce vapors or divert vapor cloud drift. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Use a non-combustible material like vermiculite, sand or earth to soak up the product and place into a container for later disposal. Prevent product from entering drains. Following product recovery, flush area with water.

Small Spills: Absorb with earth, sand or other non-combustible material and transfer to containers for later disposal. Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination.

Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.

**Environmental precautions** 

Avoid release to the environment. Prevent further leakage or spillage if safe to do so. Avoid discharge into drains, water courses or onto the ground. Inform appropriate managerial or supervisory personnel of all environmental releases.

### 7. Handling and storage

Precautions for safe handling

Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not handle, store or open near an open flame, sources of heat or sources of ignition. Protect material from direct sunlight. Explosion-proof general and local exhaust ventilation. Take precautionary measures against static discharges. All equipment used when handling the product must be grounded. Use non-sparking tools and explosion-proof equipment. Do not breathe mist or vapor. Avoid contact with eyes, skin, and clothing. Avoid prolonged exposure. When using, do not eat, drink or smoke. Should be handled in closed systems, if possible. Use only outdoors or in a well-ventilated area. Wear appropriate personal protective equipment. Wash hands thoroughly after handling. Avoid release to the environment. Wash contaminated clothing before reuse. Observe good industrial hygiene practices.

Conditions for safe storage, including any incompatibilities

Store locked up. Keep away from heat, sparks and open flame. Prevent electrostatic charge build-up by using common bonding and grounding techniques. Store in a cool, dry place out of direct sunlight. Store in original tightly closed container. Store in a well-ventilated place. Keep in an area equipped with sprinklers. Maintain storage temperatures between 35°F to 120°F (2°C to 49°C). Store away from incompatible materials (see Section 10 of the SDS).

## 8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Туре	Value	
PEL	245 mg/m3	
PEL	30 ррт 435 mg/m3	
	100 ppm	
PEL	435 mg/m3	
	PEL PEL	PEL 245 mg/m3 50 ppm PEL 435 mg/m3 100 ppm

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#### **US. ACGIH Threshold Limit Values**

Components	Туре	Value	
Cumene (CAS 98-82-8)	TWA	50 ppm	
Ethylbenzene (CAS 100-41-4)	TWA	20 ppm	
Stearic acid (CAS 57-11-4)	TWA	10 mg/m3	
Xylene (CAS 1330-20-7)	STEL TWA	150 ppm 100 ppm	

#### **US. NIOSH: Pocket Guide to Chemical Hazards**

Components	Туре	Value	
Cumene (CAS 98-82-8)	TWA	245 mg/m3	
		50 ppm	
Ethylbenzene (CAS 100-41-4)	STEL	545 mg/m3	
		125 ppm	
	TWA	435 mg/m3	
		100 ppm	
Xylene (CAS 1330-20-7)	STEL	655 mg/m3	
		150 ppm	
	TWA	435 mg/m3	
		100 ppm	

### **Biological limit values**

### **ACGIH Biological Exposure Indices**

Components	Value	Determinant	Specimen	Sampling Time
Ethylbenzene (CAS 100-41-4)	0.15 g/g	Sum of mandelic acid and phenylglyoxylic acid	Creatinine in urine	*
Xylene (CAS 1330-20-7)	1.5 g/g	Methylhippuric acids	Creatinine in urine	*

<sup>\* -</sup> For sampling details, please see the source document.

#### **Exposure guidelines**

US - California OELs: Skin designation

Cumene (CAS 98-82-8) Can be absorbed through the skin.

US - Minnesota Haz Subs: Skin designation applies

Cumene (CAS 98-82-8) Skin designation applies.

**US - Tennessee OELs: Skin designation** 

Cumene (CAS 98-82-8) Can be absorbed through the skin.

**US. NIOSH: Pocket Guide to Chemical Hazards** 

Cumene (CAS 98-82-8) Can be absorbed through the skin.

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Cumene (CAS 98-82-8) Can be absorbed through the skin.

Appropriate engineering

controls

Explosion-proof general and local exhaust ventilation. Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Eye wash facilities and emergency shower must be available when handling this product.

## Individual protection measures, such as personal protective equipment

Chemical respirator with organic vapor cartridge and full facepiece. Eye/face protection

Skin protection

Hand protection Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove

supplier.

Other Wear appropriate chemical resistant clothing. Use of an impervious apron is recommended.

Respiratory protection Chemical respirator with organic vapor cartridge and full facepiece. Thermal hazards Wear appropriate thermal protective clothing, when necessary.

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General hygiene considerations

When using do not smoke. 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.

## 9. Physical and chemical properties

**Appearance** 

Physical state Liquid.
Form Liquid.

**Color** According to product specification.

Odor Characteristic.

Odor threshold Not available.

PH Not available.

Melting point/freezing point Not available.

Initial boiling point and boiling 276.8 °F (136 °C)

range

Flash point 69.8 °F (21.0 °C)
Evaporation rate Not available.
Flammability (solid, gas) Not applicable.

Upper/lower flammability or explosive limits

Explosive limit - lower (%) 1 % V/VExplosive limit - upper (%) 7.8 % V/V

Vapor pressure9.5 hPa (7 mm Hg)Vapor densityNot available.Relative densityNot available.

Solubility(ies)

Solubility (water) Fully miscible.

Partition coefficient Not available.

(n-octanol/water)

Auto-ignition temperatureNot available.Decomposition temperatureNot available.ViscosityNot available.

Other information

**Density** 0.87 g/cm3 (7.26 lbs/gal)

**Explosive properties** Not explosive. **Oxidizing properties** Not oxidizing.

10. Stability and reactivity

**Reactivity**The product is stable and non-reactive under normal conditions of use, storage and transport.

**Chemical stability** Material is stable under normal conditions.

Possibility of hazardous

reactions

No dangerous reaction known under conditions of normal use.

**Conditions to avoid** Avoid heat, sparks, open flames and other ignition sources. Avoid temperatures exceeding the

flash point. Contact with incompatible materials.

**Incompatible materials** Strong acids. Strong oxidizing agents. Halogens.

**Hazardous decomposition** 

products

Thermal decomposition or combustion may liberate carbon oxides and other toxic gases or vapors.

### 11. Toxicological information

Information on likely routes of exposure

**Inhalation** Harmful if inhaled. May cause damage to organs through prolonged or repeated exposure by

inhalation.

**Skin contact** Harmful in contact with skin. Causes skin irritation.

**Eye contact** Causes serious eye irritation.

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**Ingestion** Droplets of the product aspirated into the lungs through ingestion or vomiting may cause a serious

chemical pneumonia.

Symptoms related to the physical, chemical and toxicological characteristics

Aspiration may cause pulmonary edema and pneumonitis. Narcosis. Dizziness. Nausea, vomiting. Abdominal pain. Behavioral changes. Decrease in motor functions. Severe eye irritation. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. May cause respiratory irritation. Skin irritation. May cause redness and pain. Edema. Jaundice.

#### Information on toxicological effects

Acute toxicity May be fatal if swallowed and enters airways. Harmful if inhaled. Harmful in contact with skin. May

cause respiratory irritation.

	oddoo roopiidtory irritation.	
Components	Species	Test Results
Cumene (CAS 98-82-8)		
Acute		
Dermal		
LD50	Rabbit	> 3160 mg/kg, 24 Hours
Inhalation		
LC50	Rat	8000 ppm, 4 Hours
Oral		
LD50	Rat	2910 mg/kg
Ethylbenzene (CAS 100-41-	-4)	
Acute		
Dermal		
LD50	Rabbit	15400 mg/kg
Inhalation		
LC50	Rat	17.4 mg/m³, 4 Hours
Oral		
LD50	Rat	35000 - 47000 mg/kg
Stearic acid (CAS 57-11-4)		
Acute		
Dermal		
LD50	Rabbit	> 2000 mg/kg, 24 hours
Xylene (CAS 1330-20-7)		
Acute		
Dermal	B 1111	40400 # 0444
LD50	Rabbit	12126 mg/kg, 24 Hours
Inhalation	D /	0050 411
LC50	Rat	6350 ppm, 4 Hours
Oral	<b>5</b> .	0500 #
LD50	Rat	3523 mg/kg

**Skin corrosion/irritation** Causes skin irritation.

Serious eye damage/eye Causes serious eye irritation.

irritation

Respiratory or skin sensitization

**Respiratory sensitization** Not a respiratory sensitizer.

**Skin sensitization** This product is not expected to cause skin sensitization.

Germ cell mutagenicity

No data available to indicate product or any components present at greater than 0.1% are

mutagenic or genotoxic.

Carcinogenicity Suspected of causing cancer.

IARC Monographs. Overall Evaluation of Carcinogenicity

Cumene (CAS 98-82-8)

Ethylbenzene (CAS 100-41-4)

2B Possibly carcinogenic to humans.

2B Possibly carcinogenic to humans.

Xylene (CAS 1330-20-7) 3 Not classifiable as to carcinogenicity to humans.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

**Reproductive toxicity**This product is not expected to cause reproductive or developmental effects.

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Specific target organ toxicity -

May cause respiratory irritation.

single exposure

Specific target organ toxicity -

May cause damage to organs (Central Nervous System, Kidney, Liver) through prolonged or repeated exposure.

repeated exposure

May be fatal if swallowed and enters airways.

**Aspiration hazard Chronic effects** 

May cause damage to organs through prolonged or repeated exposure. Prolonged inhalation may

be harmful. Prolonged exposure may cause chronic effects.

## 12. Ecological information

Toxic to aquatic life. **Ecotoxicity** 

Components		Species	Test Results
Cumene (CAS 98-82-	8)		
Aquatic			
Fish	LC50	Rainbow trout,donaldson trout (Oncorhynchus mykiss)	2.7 mg/l, 96 hours
Ethylbenzene (CAS 1	00-41-4)		
Aquatic			
Crustacea	EC50	Daphnia	1.81 mg/l, 48 hours
Fish	LC50	Bluegill (Lepomis macrochirus)	32 - 88 mg/l, 96 hours
		Fathead minnow (Pimephales promelas)	12.1 mg/l, 96 hours

<sup>\*</sup> Estimates for product may be based on additional component data not shown.

Persistence and degradability

No data is available on the degradability of this product.

Bioaccumulative potential

Partition coefficient n-octanol / water (log Kow)

Ethylbenzene (CAS 100-41-4) 3.15 Xylene (CAS 1330-20-7) 3.2

Mobility in soil The product is miscible with water. May spread in water systems.

Other adverse effects None known.

#### 13. Disposal considerations

**Disposal instructions** Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Do not allow

this material to drain into sewers/water supplies. Do not contaminate ponds, waterways or ditches

with chemical or used container. Dispose of contents/container in accordance with

local/regional/national/international regulations.

Local disposal regulations

Hazardous waste code

D001: Waste Flammable material with a flash point <140 F

Dispose in accordance with all applicable regulations.

D018: Waste Benzene

The waste code should be assigned in discussion between the user, the producer and the waste

disposal company.

Waste from residues / unused

products

Dispose of in accordance with local regulations. Empty containers or liners may retain some

product residues. This material and its container must be disposed of in a safe manner (see:

Disposal instructions).

Since emptied containers may retain product residue, follow label warnings even after container is Contaminated packaging

emptied. Empty containers should be taken to an approved waste handling site for recycling or

disposal.

### 14. Transport information

DOT

UN1210 **UN** number

**UN proper shipping name** Printing ink, flammable

Transport hazard class(es)

Class 3 Subsidiary risk 3 Label(s) Ш Packing group

Special precautions for user Read safety instructions, SDS and emergency procedures before handling.

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149, IB2, T4, TP1, TP8 **Special provisions** 

Packaging exceptions 150 Packaging non bulk 173 242 Packaging bulk

IATA

**UN** number UN1210

**UN proper shipping name** Printing ink flammable

Transport hazard class(es)

3 **Class** Subsidiary risk Ш Packing group **Environmental hazards** No. **ERG Code** 3L

Special precautions for user Read safety instructions, SDS and emergency procedures before handling.

**IMDG** 

**UN** number UN1210

PRINTING INK FLAMMABLE **UN proper shipping name** 

Transport hazard class(es)

3 Class Subsidiary risk Ш **Packing group Environmental hazards** 

Marine pollutant No. **EmS** F-E. S-D

Special precautions for user Read safety instructions, SDS and emergency procedures before handling.

Not established.

Transport in bulk according to

Annex II of MARPOL 73/78 and

the IBC Code

## 15. Regulatory information

This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication **US** federal regulations

Standard, 29 CFR 1910.1200.

All components are on the U.S. EPA TSCA Inventory List.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

**CERCLA Hazardous Substance List (40 CFR 302.4)** 

Cumene (CAS 98-82-8) LISTED Ethylbenzene (CAS 100-41-4) LISTED Xylene (CAS 1330-20-7) LISTED

Superfund Amendments and Reauthorization Act of 1986 (SARA)

**Hazard categories** Immediate Hazard - Yes

Delayed Hazard - Yes Fire Hazard - Yes Pressure Hazard - No Reactivity Hazard - No

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous Yes

chemical

SARA 313 (TRI reporting)

Chemical name	CAS number	% by wt.	
Xylene	1330-20-7	50-85	
Ethylbenzene	100-41-4	10-15	
Cumene	98-82-8	<1	

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#### Other federal regulations

## Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Cumene (CAS 98-82-8) Ethylbenzene (CAS 100-41-4) Xylene (CAS 1330-20-7)

### Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act

Not regulated.

(SDWA)

#### **US** state regulations

#### **US. Massachusetts RTK - Substance List**

Cumene (CAS 98-82-8) Ethylbenzene (CAS 100-41-4) Xylene (CAS 1330-20-7)

#### US. New Jersey Worker and Community Right-to-Know Act

Cumene (CAS 98-82-8) Ethylbenzene (CAS 100-41-4) Xylene (CAS 1330-20-7)

### US. Pennsylvania Worker and Community Right-to-Know Law

Cumene (CAS 98-82-8) Ethylbenzene (CAS 100-41-4) Xylene (CAS 1330-20-7)

#### **US. Rhode Island RTK**

Cumene (CAS 98-82-8) Ethylbenzene (CAS 100-41-4) Xylene (CAS 1330-20-7)

#### **US. California Proposition 65**

WARNING: This product contains a chemical known to the State of California to cause cancer and birth defects or other reproductive harm.

#### US - California Proposition 65 - Carcinogens & Reproductive Toxicity (CRT): Listed substance

Aniline (CAS 62-53-3) Benzene (CAS 71-43-2) Cumene (CAS 98-82-8) Ethylbenzene (CAS 100-41-4) Toluene (CAS 108-88-3)

#### **International Inventories**

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

<sup>\*</sup>A "Yes" indicates this product complies with the inventory requirements administered by the governing country(s).

#### 16. Other information, including date of preparation or last revision

07-July-2015 Issue date

**Revision date** Version # 01

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A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

**HMIS®** ratings

Health: 2\* Flammability: 3 Physical hazard: 0

**NFPA** ratings



**Disclaimer** 

Diagraph MSP cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

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