

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 1 of 11

1. COMPOSITION AND PRODUCT USE:

<u>CHEMICAL NAME</u>	<u>APPROXIMATE PERCENTAGE</u>	<u>CAS NUMBER</u>
Calcium Chloride	> 60 - < 69	10043-52-4
Urea	> 25 - < 35	00057-13-6
Water	> 2 - < 5	07732-18-5
Potassium Chloride	> 1 - < 3	07447-40-7
Sodium Chloride	< 1	07647-14-5
Calcium Bromide (CaBr ₂)	< 1	07789-41-5
Potassium Acetate	< 1	00127-08-2
Colorant	< 1	N/A

PRODUCT USE: Ice Melting
TECHNOLOGY: Process and formulation patented – Additional patents may be pending

2. HEALTH HAZARD DATA:

Emergency Overview Notice

This product contains Urea. Urea, when heated, decomposes to carbon dioxide and ammonia; if burned, emits small amounts of nitrogen oxides. Can cause redness and irritation of skin and eyes. Green granules with either no odor or having a slight odor of ammonia (in the presence of moisture).

INHALATION: Dust may cause irritation to upper respiratory tract (nose and throat).

EYE CONTACT: For solid: May cause slight eye irritation, mechanical injury only. Dust formation should be avoided, as dust can cause severe eye irritation with corneal injury.

SKIN CONTACT: Brief contact is essentially nonirritating to skin. Prolonged contact may cause skin irritation, even a burn. Not classified as corrosive to the skin according to DOT guidelines. May cause more severe response if skin is damp. May cause more severe response if skin is abraded (scratched or cut). May cause more severe response on covered skin (under clothing, gloves).

INGESTION: 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. Swallowing may result in gastrointestinal irritation or ulceration.

See Section 10: TOXICOLOGICAL PROPERTIES

3. FIRST AID:

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

SKIN CONTACT: Wash off immediately with plenty of water.

EYE CONTACT: Immediately flush with plenty of water. After initial flushing, remove any contact lenses and continue flushing for at least 15 minutes. If effects occur, consult a physician, preferably an ophthalmologist. May cause injury due to mechanical action.

INGESTION: If swallowed, do not induce vomiting. Give one cup (8 ounces or 240 ml) of water or milk if available and transport to a medical facility. Never give anything by mouth to an unconscious or convulsive person.

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 2 of 11

PROTECTION OF FIRST-AIDERS:

If potential for exposure exists refer to Section 8 for specific personal protective equipment.

NOTES TO PHYSICIAN:

Due to irritant properties, swallowing may result in burns/ulceration of mouth, stomach and lower gastrointestinal tract with subsequent stricture. Aspiration of vomitus may cause lung injury. Suggest endotracheal/esophageal control of lavage is done. If burn present, treat as any thermal burn, after decontamination. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

4. FIRE AND EXPLOSION HAZARD DATA:

FIRE HAZARD: This material does not burn

EXTINGUISHING MEDIA: Use extinguishing agents appropriate for surrounding fire.

FIRE-FIGHTING: Keep unnecessary people away, isolate hazard area and deny entry. This material does not burn. Fight fire for other material that is burning. Water should be applied in large quantities as fine spray. Wear NIOSH approved positive-pressure self-contained breathing apparatus operated in pressure demand mode. Wear 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 and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.

LOWER FLAMMABILITY LEVEL (air): Not applicable

UPPER FLAMMABILITY LEVEL (air): Not applicable

FLASH POINT: Not applicable

AUTOIGNITION TEMPERATURE: Not applicable

Unusual Fire and Explosion Hazards: At elevated temperatures, urea forms hazardous decomposition products, including ammonia. Refer to Section 10 for details. Explosive on contact with halogens such as chlorine.

5. ACCIDENTAL RELEASE MEASURES:

OCCUPATIONAL RELEASE: Small and large spills: Contain spilled material if possible. Collect in suitable and properly labeled containers. Flush residue with plenty of water. See Section 13, Disposal Considerations, for additional information.

PERSONAL PRECAUTIONS: Isolate area. Keep unnecessary and unprotected personnel from entering the area. Use appropriate safety equipment. For additional information, refer to Section 7, Exposure Controls/Personal Protection. Refer to Section 6, Safe Handling and Storage Precautions for additional precautionary measures.

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 3 of 11

ENVIRONMENTAL PRECAUTIONS:

SMALL SPILLS: Incorrect application of this product from its intended use is not expected to be harmful to the environment.

CLEAN UP: Contain spill if possible. Collect material in a suitable and properly labeled container and flush area with plenty of water.

LARGE SPILLS: Avoid contamination of drinking water, natural water ways, or ground water supply. Incorrect application of this product from its intended use is not expected to be harmful to the environment.

CLEAN UP: Dike spill and transfer to suitable and properly labeled containers. Flush residue with plenty of water.

Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 11 Ecological Information.

6. SAFE HANDLING AND STORAGE PRECAUTIONS:

STORAGE: Store in a dry place. Protect from atmospheric moisture.

STORAGE (Urea): Keep dry. Reacts with hypochlorites to form nitrogen trichloride, which explodes spontaneously in air. Reacts with nitric acid to form urea nitrate that decomposes explosively when heated.

HANDLING PROCEDURES: Heat developed during diluting or dissolving is very high. Use cool water when diluting or dissolving (temperature less than 80°F, 27°C). Avoid contact with eyes, skin, and clothing. Do not swallow. Wash thoroughly after handling. The use of respiratory protection is advised when dust concentrations exceed any established exposure limits. Keep container tightly closed. See Section 7, Exposure Control/Personal Protection.

7. EXPOSURE CONTROLS/PERSONAL PROTECTION:

Regulatory Exposure Limit(s):

COMPONENT	CAS NUMBER	OSHA FINAL PEL TWA	OSHA FINAL PEL STEL	OSHA FINAL PEL CEILING
Particulates Not Otherwise Regulated	Not Assigned	TWA 15 mg/m ³ (total) TWA 5 mg/m ³ (resp)	-----	-----

OEL: Occupational Exposure Level; OSHA: United States Occupational Safety and Health Administration; PEL: Permissible Exposure Level; TWA: Time Weighted Average; STEL: Short Term Exposure Level

Non-Regulatory Exposure Limit(s):

- The Non-Regulatory United States Occupational Safety and Health Association (OSHA) limits shown in the table are the Vacated 1989 PEL's (vacated by 58 FR 35338, June 30, 1993).
- The American Conference of Governmental Industrial Hygienists (ACGIH) is a voluntary organization of professional industrial hygiene personnel in government or educational institutions in the United States. The ACGIH develops and publishes recommended occupational exposure limits each year called Threshold Limit Values (TLVs) for hundreds of chemicals, physical agents, and biological exposure indices.

Print date: 12/5/2011

Page 3 of 11

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 4 of 11

COMPONENT	CAS NUMBER	ACGIH TWA	ACGIH STEL	ACGIH CEILING	OSHA TWA (Vacated)	OSHA STEL (Vacated)	OSHA CEILING (Vacated)
Particulates Not Otherwise Specified (PNOS)	Not Assigned	TWA 10 mg/m ³ (inhalable) TWA 3 mg/m ³ (resp)	----	----	----	----	----

Additional Advice: Ingestion: Use good personal hygiene. Do not consume or store food in the work area. Wash hands before smoking or eating.

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.

PERSONAL PROTECTIVE EQUIPMENT:

EYE PROTECTION: Wear safety glasses with side-shields. For dusty operations or when handling solutions of the material, wear chemical goggles.

SKIN AND BODY PROTECTION: Wear clean, body-covering clothing.

HAND PROTECTION: Use gloves chemically resistant to this material. If hands are cut or scratched, use gloves chemically resistant to this material even for brief exposures. Examples of preferred glove barrier materials include: Neoprene, Polyvinyl chloride ("PVC" or "vinyl"), Nitrile/butadiene rubber ("nitrile" or "NBR"). 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, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. In dusty or misty atmospheres, use an approved particulate respirator. The following should be effective types of air-purifying respirators: High efficiency particulate air (HEPA) N95. A respiratory protection program that meets 29 CFR 1910.134 must be followed whenever workplace conditions warrant use of a respirator.

8. PHYSICAL DATA:

COLOR:	Blend white and green, solid pellets
ODOR:	Odorless or slight ammonia odor from the Urea
FREEZING POINT/RANGE:	Not applicable to solids
MELTING POINT/RANGE (Calcium Chloride):	772 °C (1,422 °F) Literature Approximately
MELTING POINT/RANGE (Urea):	Decomposes at 132.7 °C (270.8°F)
DECOMPOSITION TEMPERATURE:	Not applicable
VAPOR PRESSURE:	Literature negligible at ambient temperature
VAPOR DENSITY (air=1):	Not applicable
SPECIFIC GRAVITY (water=1):	Not applicable to solids
BULK DENSITY:	58 – 66 lb/ft ³ Estimated
WATER SOLUBILITY (Calcium Chloride):	Readily soluble
WATER SOLUBILITY (Urea):	119 g at 25 °C (77 °F)
pH (Calcium Chloride):	Not applicable to solids
pH (Urea):	7.2 (10% Water solution)
FLASH POINT:	Not applicable

Print date: 12/5/2011

Page 4 of 11

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 5 of 11

LOWER FLAMMABILITY LEVEL (air):	NA
UPPER FLAMMABILITY LEVEL (air):	NA
AUTOIGNITION TEMPERATURE:	Not applicable
HYGROSCOPIC:	Yes

9. STABILITY & REACTIVITY DATA:

REACTIVITY / STABILITY:	Stable. Hygroscopic
CONDITIONS TO AVOID:	None known. Avoid moisture.

INCOMPATIBILITIES / MATERIALS TO AVOID (Calcium Chloride):

Heat is generated when mixed with water. Spattering and boiling can occur. Avoid contact with: Sulfuric acid. Corrosive when wet. Flammable hydrogen may be generated from contact with metals such as: Zinc. Sodium. Reaction of bromide impurity with oxidizing materials may generate trace levels of impurities such as bromate.

INCOMPATIBILITIES / MATERIALS TO AVOID (Urea):	Nitric acid, sodium nitrate, nitrosyl perchlorate, gallium perchlorate, hypochlorites, phosphorus pentachloride.
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HAZARDOUS DECOMPOSITION PRODUCTS:	Does not decompose.
HAZARDOUS POLYMERIZATION:	Will not occur.

10. TOXICOLOGICAL PROPERTIES

CALCIUM CHLORIDE

TOXICITY DATA

LD50 Oral	Typical for this family of materials. LD50, Rat 918 - 1,668 mg/kg
LD50 Dermal	For the major component(s): LD50, Rabbit > 5,000 mg/kg

CHRONIC TOXICITY (Calcium Chloride):

For the minor component(s): Potassium chloride - In animals, effects have been reported on the following organs after ingestion: Gastrointestinal tract, Heart, and Kidney. Dose levels producing these effects were many times higher than any dose levels expected from exposure due to use. Medical experience with sodium chloride has shown a strong association between elevated blood pressure and prolonged dietary overuse. Related effects could occur in the kidneys.

CARCINOGENICITY (Calcium Chloride):

Calcium Chloride is not classified as a carcinogen by NTP, IARC or OSHA.

MUTAGENIC DATA (Calcium Chloride):

The data presented are for the following material: Calcium chloride (CaCl₂) - In vitro genetic toxicity studies were negative. The data presented are for the following material: Potassium chloride - In vitro genetic toxicity studies were positive. However, the relevance of this to humans is unknown. For the minor component(s): Sodium chloride - In vitro genetic toxicity studies were predominantly negative.

DEVELOPMENTAL TOXICITY (Calcium Chloride):

For the major component(s): Did not cause birth defects or any other fetal effects in laboratory animals.

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 6 of 11

UREA

TOXICITY DATA

LD50 Oral	Ranges from 11.5 g/kg (female mouse) to 15 g/kg (female rat)
LD50 Dermal	No data available
LC50 Inhalation	No data available
	Urea dust at 22 mg/m3 caused mild irritation (species not specified).

SUBCHRONIC TOXICITY (Urea):

In a repeated dose toxicity study, Urea at 10%, 20% and 40% in ointment was applied to the back skin of rats for 4 weeks. No dose-dependent toxicity was observed. There were no consistent treatment-related effects on standard hematological parameters, clinical chemistry, organ weights or organ histopathology, including the testicles, prostate, seminal vesicles, ovaries and the uterus.

CHRONIC TOXICITY (Urea):

In a chronic toxicity and carcinogenicity screening study conducted in mice over 12 months, urea was administered at 0, 0.45%, 0.9%, and 4.5% in the diet. No pathology was reported immediately following treatment period. After 4 months, testes, prostate and uterus were histologically examined for occurrence of tumors in the survivors. Although there was a statistically increased incidence of interstitial cell adenomas of the testis in the high dose group, its biological significance was deemed questionable, since the lesion may occur in 100% of controls.

TERATOGENICITY (Urea):

In a single oral dose study in mice, 2,000 mg/kg administered on day 10 of pregnancy was not teratogenic. Urea in water was given in 2 doses 12 hours apart by gavage to rats during pregnancy for 14 days and the dams were allowed to deliver. No hypertrophy or other kidney changes were detected nor were any teratogenic effects noted. Urea caused developmental effects in chick embryos when injected into eggs.

CARCINOGENICITY (Urea):

Urea is not classified as a carcinogen by NTP, IARC or OSHA.

MUTAGENICITY (Urea): Urea was negative in tests of bacterial mutagenicity and demonstrated low clastogenic potential in non-bacterial mutagenicity tests. Chromosome breakage has been observed in some laboratory tests using extremely high concentrations of urea. At near lethal doses, urea was mutagenic in in-vivo non-bacterial tests in mice.

11. ECOLOGICAL INFORMATION

ECOTOXICITY DATA (Calcium Chloride):

Aquatic Toxicity: Material is practically non-toxic to aquatic organisms on an acute basis (LC50/EC50/EL50/LL50 >100 mg/L in the most sensitive species tested)

Freshwater Fish Toxicity:

Calcium Chloride: LC50, bluegill (*Lepomis macrochirus*): 8,350 - 10,650 mg/l
Potassium Chloride: LC50, rainbow trout (*Oncorhynchus mykiss*), 96 h: 4,236 mg/l
Sodium Chloride: LC50, fathead minnow (*Pimephales promelas*): 10,610 mg/l

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 7 of 11

Invertebrate Toxicity:

Calcium Chloride: LC50, water flea Daphnia magna: 759 - 3,005 mg/l

Potassium Chloride: EC50, water flea Daphnia magna, 24 h, immobilization: 590 mg/l

LC50, water flea Ceriodaphnia dubia, 96 h: 3,470 mg/l

Sodium Chloride: LC50, water flea Daphnia magna: 4,571 mg/l

Microorganism Toxicity:

Sodium Chloride: IC50, OECD 209 Test; activated sludge, respiration inhibition: > 1,000 mg/l

FATE AND TRANSPORT:

BIODEGRADATION: Biodegradation is not applicable.

BIOCONCENTRATION: No bioconcentration is expected because of the relatively high water solubility. Potential for mobility in soil is very high (Koc between 0 and 50). Partitioning from water to n-octanol is not applicable.

EXOTOXICITY DATA (Urea):

Large amounts of urea can damage plant seedlings and inhibit germination. As a readily available source of nitrogen, urea can also foster excessive growth of algae or microorganisms in water systems.

Urea is non-toxic to aquatic organisms as defined by USEPA.

Fish 96 hour LC50: > 9,100 mg/L

Daphnia 24 hour EC50: > 10,000 mg/L

Exotoxicity information (Urea):

The cell multiplication toxicity threshold values for bacteria, green algae, and protozoa are > 10,000, > 10,000, and 29 mg/L, respectively. The critical range for the creek chub is 16,000 to 30,000 mg/L in Detroit river water.

Environmental Fate Information (Urea):

Particulate-phase urea is physically washed out of the atmosphere by dry and wet deposition. In the soil, urea degrades rapidly, usually within 24 hours; however, degradation may be slower depending on soil type, moisture content and urea formulation. The ultimate degradation products are carbon dioxide and ammonia. The soil mobility is high based on an organic carbon partition coefficient of 8. In water, biodegradation to carbon dioxide and ammonia is the major fate pathway. The biodegradation rate increases with increasing temperature and presence of phytoplankton. Oxidation of urea by nitrifying bacteria can increase biological oxygen demand. Bioaccumulation of urea is very low. The 72-hour bioconcentration factor (BCF) for carp is reported to be 1.

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 8 of 11

12. ENVIRONMENTAL AND DISPOSAL INFORMATION: (See Section 14 for Regulatory Information)

Reuse or recycle if possible. All disposal practices must be in compliance with all Federal, State/Provincial and local laws and regulations. Regulations may vary in different locations. Report spills if applicable. Waste characterizations and compliance with applicable laws are the responsibility solely of the waste generator. AS YOUR SUPPLIER, WE HAVE NO CONTROL OVER THE MANAGEMENT PRACTICES OF PARTIES HANDLING OR USING THIS MATERIAL. THE INFORMATION PRESENTED HERE PERTAINS ONLY TO THE PRODUCT AS SHIPPED IN ITS INTENDED CONDITION AS DESCRIBED IN MSDS SECTION: Composition Information. FOR UNUSED & UNCONTAMINATED PRODUCT, the preferred options include sending to a licensed, permitted: Landfill and waste water treatment system.

13. TRANSPORT INFORMATION:

UNITED STATES DOT INFORMATION:

This product is not regulated by D.O.T. when shipped domestically by land.

CANADIAN TDG INFORMATION:

This product is not regulated by T.D.G. when shipped domestically by land.

14. REGULATORY & SHIPPING DATA: (Not meant to be all-inclusive- selected regulations represented)

D.O.T. PROPER SHIPPING NAME:	N/A
HAZARDOUS SUBSTANCE 49CFR CERCLA:	N/A
D.O.T. HAZARD CLASS	N/A
D.O.T. LABELS REQUIRED	N/A
D.O.T. PLACARDS REQUIRED	N/A

U.S. REGULATIONS

OSHA REGULATORY STATUS:

This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200) (US)

CERCLA SECTIONS 102a/103 HAZARDOUS SUBSTANCES (40 CFR 302.4):

Not regulated

EPCRA EXTREMELY HAZARDOUS SUBSTANCES (40 CFR 355.30):

Not regulated

EPCRA SECTIONS 311/312 HAZARD CATEGORIES (40 CFR 370.21):

Acute Health Hazard

EPCRA SECTION 313 (40 CFR 372.65):

To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

OSHA PROCESS SAFETY (PSM) (29 CFR 372.65):

Not regulated

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 9 of 11

NATIONAL INVENTORY STATUS

U.S. INVENTORY STATUS: TOXIC SUBSTANCE CONTROL ACT (TSCA):

All components are listed or exempt

TSCA 12(b):

This product is not subject to export notification

CANADIAN CHEMICAL INVENTORY:

All components are listed

STATE REGULATIONS

CALIFORNIA PROPOSITION 65: 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. **WARNING:** This product (when used in aqueous formulations with a chemical oxidizer such as ozone) may react to form calcium bromate, a chemical known to the State of California to cause cancer.

Component	Calcium Chloride
California Proposition 65 Cancer WARNING:	Not Listed
California Proposition 65 CRT List – Male reproductive toxin:	Not Listed
California Proposition 65 CRT List – Female reproductive toxin:	Not Listed
Massachusetts Right to Know Hazardous Substance List	Not Listed
New Jersey Right to Know Hazardous Substance List	Not Listed
New Jersey Special Health Hazards Substance List	Not Listed
New Jersey – Environmental Hazardous Substance List	Not Listed
Pennsylvania Right to Know Hazardous Substance List	Not Listed
Pennsylvania Right to Know Special Hazardous Substance List	Not Listed
Pennsylvania Right to Know Environmental Hazard List	Not Listed
Rhode Island Right to Know Hazardous Substance List	Not Listed

Component	Potassium Chloride
California Proposition 65 Cancer WARNING:	Not Listed
California Proposition 65 CRT List – Male reproductive toxin:	Not Listed
California Proposition 65 CRT List – Female reproductive toxin:	Not Listed
Massachusetts Right to Know Hazardous Substance List	Not Listed
New Jersey Right to Know Hazardous Substance List	Not Listed
New Jersey Special Health Hazards Substance List	Not Listed
New Jersey – Environmental Hazardous Substance List	Not Listed
Pennsylvania Right to Know Hazardous Substance List	Not Listed
Pennsylvania Right to Know Special Hazardous Substance List	Not Listed
Pennsylvania Right to Know Environmental Hazard List	Not Listed
Rhode Island Right to Know Hazardous Substance List	Not Listed

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 10 of 11

Component	Sodium Chloride
California Proposition 65 Cancer WARNING:	Not Listed
California Proposition 65 CRT List – Male reproductive toxin:	Not Listed
California Proposition 65 CRT List – Female reproductive toxin:	Not Listed
Massachusetts Right to Know Hazardous Substance List	Not Listed
New Jersey Right to Know Hazardous Substance List	Not Listed
New Jersey Special Health Hazards Substance List	Not Listed
New Jersey – Environmental Hazardous Substance List	Not Listed
Pennsylvania Right to Know Hazardous Substance List	Not Listed
Pennsylvania Right to Know Special Hazardous Substance List	Not Listed
Pennsylvania Right to Know Environmental Hazard List	Not Listed
Rhode Island Right to Know Hazardous Substance List	Not Listed

CANADIAN REGULATIONS

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations.

WHMIS INFORMATION:

The Canadian Workplace Hazardous Materials Information System (WHMIS) Classification for this product is:

D2B – eye or skin irritant (See sections 4 & 5) Refer to employer's workplace education program.

15. OTHER INFORMATION:

DISCLAIMER:

A calcium chloride based product – Snow and ice melting. We recommend that you use this product in a manner consistent with the listed use. If your intended use is not consistent with the stated uses in Section 1 of this MSDS, please contact your sales or technical service representative.

This information is intended solely for the use of individuals trained in the NFPA and/or HMIS systems.

HMIS: (Scale 0 – 4) (Rated using National Paint & Coatings Association HMIS: Rating Instructions, 2nd Edition)

HEALTH: 2 **FLAMMABILITY:** 0 **REACTIVITY:** 0

NFPA 704 – Hazard Identification Ratings (SCALE 0 – 4)

HEALTH: 1 **FLAMMABILITY:** 0 **REACTIVITY:** 0

ADDITIONAL HEALTH DATA COMMENT:

This Material Safety Data Sheet contains environmental, health and toxicological information for your employees. Please make sure this information is given to them. It also contains information to help you meet community right-to-know / emergency response reporting requirements under SARA Title III and many other laws. If you resell this product, this MSDS must be given to the buyer or the information incorporated in your MSDS. Discard any previous edition of this MSDS.

Latest version of this MSDS can be found at <http://www.OSSIAN.com>

WINTERGREEN® PELLET

Material Safety Data Sheet

Effective date: 12/05/2011

Print date: 12/5/2011

NFPA: Health 1, Fire 0, Reactivity 0

Page 11 of 11

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No suggestions for use are intended as, and nothing herein shall be construed as, a recommendation to infringe any existing patents or to violate any Federal, State, local or foreign laws.

OSHA Standard 29 CFR 1910.1200 requires that information be provided to employees regarding the hazards of chemicals by means of a hazard communication program including labeling, material safety data sheets, training and access to written records. We request that you, and it is your legal duty to, make all information in the Material Safety Data Sheet available to your employees.