

SAFETY DATA SHEET

According to OSHA Hazard Communication Standard, 29 CFR
1910.1200

Version 1.6

Revision Date: 10/10/2016

Print Date: 10/11/2016

SECTION 1. IDENTIFICATION

Product name : Shell Gadus S2 V220 2

Product code : 001D8451

Manufacturer or supplier's details

Manufacturer/Supplier : **Shell Oil Products US**
PO Box 4427
Houston TX 77210-4427
USA

SDS Request : (+1) 877-276-7285
Customer Service :

Emergency telephone number

Spill Information : 877-504-9351
Health Information : 877-242-7400

Recommended use of the chemical and restrictions on use

Recommended use : Automotive and industrial grease.

SECTION 2. HAZARDS IDENTIFICATION

GHS Classification

Not a hazardous substance or mixture.

GHS label elements

Hazard pictograms : No Hazard Symbol required

Signal word : No signal word

Hazard statements : **PHYSICAL HAZARDS:**
Not classified as a physical hazard under GHS criteria.
HEALTH HAZARDS:
Not classified as a health hazard under GHS criteria.
ENVIRONMENTAL HAZARDS:
Not classified as an environmental hazard under GHS criteria.

Precautionary statements : **Prevention:**
No precautionary phrases.
Response:
No precautionary phrases.
Storage:
No precautionary phrases.
Disposal:
No precautionary phrases.

Other hazards which do not result in classification

Prolonged or repeated skin contact without proper cleaning can clog the pores of the skin resulting in disorders such as oil acne/folliculitis.

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Used grease may contain harmful impurities.
High-pressure Injection under the skin may cause serious damage including local necrosis.
Not classified as flammable but will burn.

The classification of this material is based on OSHA HCS 2012 criteria.

Under normal conditions of use or in a foreseeable emergency, this product does not meet the definition of a hazardous chemical when evaluated according to the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical nature : A lubricating grease containing highly-refined mineral oils and additives.
The highly refined mineral oil contains <3% (w/w) DMSO-extract, according to IP346.

Hazardous components

Chemical name	Synonyms	CAS-No.	Concentration (%)
Naphthenic acid	Naphthenic acids	1338-24-5	0.1 - 0.9

SECTION 4. FIRST-AID MEASURES

General advice : Not expected to be a health hazard when used under normal conditions.

If inhaled : No treatment necessary under normal conditions of use.
If symptoms persist, obtain medical advice.

In case of skin contact : Remove contaminated clothing. Flush exposed area with water and follow by washing with soap if available.
If persistent irritation occurs, obtain medical attention.

When using high pressure equipment, injection of product under the skin can occur. If high pressure injuries occur, the casualty should be sent immediately to a hospital. Do not wait for symptoms to develop.
Obtain medical attention even in the absence of apparent wounds.

In case of eye contact : Flush eye with copious quantities of water.
If persistent irritation occurs, obtain medical attention.

If swallowed : In general no treatment is necessary unless large quantities are swallowed, however, get medical advice.

Most important symptoms and effects, both acute and delayed : Oil acne/folliculitis signs and symptoms may include formation of black pustules and spots on the skin of exposed areas.
Ingestion may result in nausea, vomiting and/or diarrhoea.
Local necrosis is evidenced by delayed onset of pain and tissue damage a few hours following injection.

Protection of first-aiders : When administering first aid, ensure that you are wearing the

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appropriate personal protective equipment according to the incident, injury and surroundings.

Immediate medical attention, special treatment : Treat symptomatically.

High pressure injection injuries require prompt surgical intervention and possibly steroid therapy, to minimise tissue damage and loss of function.

Because entry wounds are small and do not reflect the seriousness of the underlying damage, surgical exploration to determine the extent of involvement may be necessary. Local anaesthetics or hot soaks should be avoided because they can contribute to swelling, vasospasm and ischaemia. Prompt surgical decompression, debridement and evacuation of foreign material should be performed under general anaesthetics, and wide exploration is essential.

SECTION 5. FIRE-FIGHTING MEASURES

Suitable extinguishing media : Foam, water spray or fog. Dry chemical powder, carbon dioxide, sand or earth may be used for small fires only.

Unsuitable extinguishing media : Do not use water in a jet.

Specific hazards during fire-fighting : Hazardous combustion products may include:
A complex mixture of airborne solid and liquid particulates and gases (smoke).
Carbon monoxide may be evolved if incomplete combustion occurs.
Unidentified organic and inorganic compounds.

Specific extinguishing methods : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Special protective equipment for firefighters : Proper protective equipment including chemical resistant gloves are to be worn; chemical resistant suit is indicated if large contact with spilled product is expected. Self-Contained Breathing Apparatus must be worn when approaching a fire in a confined space. Select fire fighter's clothing approved to relevant Standards (e.g. Europe: EN469).

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures : Avoid contact with skin and eyes.

Environmental precautions : Use appropriate containment to avoid environmental contamination. Prevent from spreading or entering drains, ditches or rivers by using sand, earth, or other appropriate barriers.

Methods and materials for : Prevent from spreading or entering into drains, ditches or riv-

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containment and cleaning up : ers by using sand, earth, or other appropriate barriers.

Additional advice : For guidance on selection of personal protective equipment see Chapter 8 of this Safety Data Sheet.
For guidance on disposal of spilled material see Chapter 13 of this Safety Data Sheet.

SECTION 7. HANDLING AND STORAGE

Technical measures : Use local exhaust ventilation if there is risk of inhalation of vapours, mists or aerosols.
Use the information in this data sheet as input to a risk assessment of local circumstances to help determine appropriate controls for safe handling, storage and disposal of this material.

Precautions for safe handling : Avoid prolonged or repeated contact with skin.
Avoid inhaling vapour and/or mists.
When handling product in drums, safety footwear should be worn and proper handling equipment should be used.
Properly dispose of any contaminated rags or cleaning materials in order to prevent fires.

Avoidance of contact : Strong oxidising agents.

Storage

Other data : Keep container tightly closed and in a cool, well-ventilated place.
Use properly labeled and closable containers.
Store at ambient temperature.

Packaging material : Suitable material: For containers or container linings, use mild steel or high density polyethylene.
Unsuitable material: PVC.

Container Advice : Polyethylene containers should not be exposed to high temperatures because of possible risk of distortion.

SECTION 8. EXPOSURE CONTROLS AND PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
Oil mist, mineral	Not Assigned	TWA ((inhalable fraction))	5 mg/m3	US. ACGIH Threshold Limit Values
		(Mist)	5 mg/m3	OSHA_TRA

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				NS
		TWA (Mist)	5 mg/m3	OSHA Z-1
		TWA (Inhalable fraction)	5 mg/m3	ACGIH

Biological occupational exposure limits

No biological limit allocated.

Monitoring Methods

Monitoring of the concentration of substances in the breathing zone of workers or in the general workplace may be required to confirm compliance with an OEL and adequacy of exposure controls. For some substances biological monitoring may also be appropriate.

Validated exposure measurement methods should be applied by a competent person and samples analysed by an accredited laboratory.

Examples of sources of recommended exposure measurement methods are given below or contact the supplier. Further national methods may be available.

National Institute of Occupational Safety and Health (NIOSH), USA: Manual of Analytical Methods <http://www.cdc.gov/niosh/>

Occupational Safety and Health Administration (OSHA), USA: Sampling and Analytical Methods <http://www.osha.gov/>

Health and Safety Executive (HSE), UK: Methods for the Determination of Hazardous Substances <http://www.hse.gov.uk/>

Institut für Arbeitsschutz Deutschen Gesetzlichen Unfallversicherung (IFA), Germany <http://www.dguv.de/inhalt/index.jsp>

L'Institut National de Recherche et de Sécurité, (INRS), France <http://www.inrs.fr/accueil>

Engineering measures : The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Select controls based on a risk assessment of local circumstances. Appropriate measures include:
Adequate ventilation to control airborne concentrations.

Where material is heated, sprayed or mist formed, there is greater potential for airborne concentrations to be generated.

General Information:

Define procedures for safe handling and maintenance of controls.

Educate and train workers in the hazards and control measures relevant to normal activities associated with this product.

Ensure appropriate selection, testing and maintenance of equipment used to control exposure, e.g. personal protective equipment, local exhaust ventilation.

Drain down system prior to equipment break-in or maintenance.

Retain drain downs in sealed storage pending disposal or subsequent recycle.

Always observe good personal hygiene measures, such as washing hands 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.

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Due to the product's semi-solid consistency, generation of mists and dusts is unlikely to occur.

Personal protective equipment

Respiratory protection : No respiratory protection is ordinarily required under normal conditions of use.
In accordance with good industrial hygiene practices, precautions should be taken to avoid breathing of material.
If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker health, select respiratory protection equipment suitable for the specific conditions of use and meeting relevant legislation.
Check with respiratory protective equipment suppliers.
Where air-filtering respirators are suitable, select an appropriate combination of mask and filter.
Select a filter suitable for the combination of organic gases and vapours [Type A/Type P boiling point >65°C (149°F)].

Hand protection Remarks

: Where hand contact with the product may occur the use of gloves approved to relevant standards (e.g. Europe: EN374, US: F739) made from the following materials may provide suitable chemical protection. PVC, neoprene or nitrile rubber gloves. Suitability and durability of a glove is dependent on usage, e.g. frequency and duration of contact, chemical resistance of glove material, dexterity. Always seek advice from glove suppliers. Contaminated gloves should be replaced. Personal hygiene is a key element of effective hand care. Gloves must only be worn on clean hands. After using gloves, hands should be washed and dried thoroughly. Application of a non-perfumed moisturizer is recommended. For continuous contact we recommend gloves with breakthrough time of more than 240 minutes with preference for > 480 minutes where suitable gloves can be identified. For short-term/splash protection we recommend the same, but recognize that suitable gloves offering this level of protection may not be available and in this case a lower breakthrough time maybe acceptable so long as appropriate maintenance and replacement regimes are followed. Glove thickness is not a good predictor of glove resistance to a chemical as it is dependent on the exact composition of the glove material. Glove thickness should be typically greater than 0.35 mm depending on the glove make and model.

Eye protection : If material is handled such that it could be splashed into eyes, protective eyewear is recommended.

Skin and body protection : Skin protection is not ordinarily required beyond standard work clothes.
It is good practice to wear chemical resistant gloves.

Thermal hazards : Not applicable

Protective measures : Personal protective equipment (PPE) should meet recom-

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mended national standards. Check with PPE suppliers.

Environmental exposure controls

General advice : Take appropriate measures to fulfill the requirements of relevant environmental protection legislation. Avoid contamination of the environment by following advice given in Chapter 6. If necessary, prevent undissolved material from being discharged to waste water. Waste water should be treated in a municipal or industrial waste water treatment plant before discharge to surface water.
Local guidelines on emission limits for volatile substances must be observed for the discharge of exhaust air containing vapour.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance : Semi-solid at ambient temperature.

Colour : brown

Odour : Slight hydrocarbon

Odour Threshold : Data not available

pH : Not applicable

Drop point : 180 °C / 356 °F Method: IP 396

Initial boiling point and boiling range : Data not available

Flash point : Not applicable

Evaporation rate : Data not available

Flammability (solid, gas) : Data not available

Upper explosion limit : Typical 10 %(V)

Lower explosion limit : Typical 1 %(V)

Vapour pressure : < 0,5 Pa (20 °C / 68 °F)
estimated value(s)

Relative vapour density : > 1 estimated value(s)

Relative density : 1.000 (15 °C / 59 °F)

Density : 1,000 kg/m³ (15.0 °C / 59.0 °F)
Method: Unspecified

Solubility(ies)
Water solubility : negligible

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Solubility in other solvents	: Data not available
Partition coefficient: n-octanol/water	: Pow: > 6 (based on information on similar products)
Auto-ignition temperature	: > 320 °C / 608 °F
Viscosity	
Viscosity, dynamic	: Data not available
Viscosity, kinematic	: Not applicable
Explosive properties	: Not classified
Oxidizing properties	: Data not available
Conductivity	: This material is not expected to be a static accumulator.
Decomposition temperature	: Data not available

SECTION 10. STABILITY AND REACTIVITY

Reactivity	: The product does not pose any further reactivity hazards in addition to those listed in the following sub-paragraph.
Chemical stability	: Stable.
Possibility of hazardous reactions	: Reacts with strong oxidising agents.
Conditions to avoid	: Extremes of temperature and direct sunlight.
Incompatible materials	: Strong oxidising agents.
Hazardous decomposition products	: Hazardous decomposition products are not expected to form during normal storage.

SECTION 11. TOXICOLOGICAL INFORMATION

Basis for assessment	: Information given is based on data on the components and the toxicology of similar products. Unless indicated otherwise, the data presented is representative of the product as a whole, rather than for individual component(s).
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Information on likely routes of exposure

Skin and eye contact are the primary routes of exposure although exposure may occur following accidental ingestion.

Acute toxicity

Product:

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Acute oral toxicity : LD50 (rat): > 5,000 mg/kg
Remarks: Expected to be of low toxicity:

Acute inhalation toxicity : Remarks: Not considered to be an inhalation hazard under normal conditions of use.

Acute dermal toxicity : LD50 (Rabbit): > 5,000 mg/kg
Remarks: Expected to be of low toxicity:

Skin corrosion/irritation

Product:

Remarks: Expected to be slightly irritating., Prolonged or repeated skin contact without proper cleaning can clog the pores of the skin resulting in disorders such as oil acne/folliculitis.

Serious eye damage/eye irritation

Product:

Remarks: Expected to be slightly irritating.

Respiratory or skin sensitisation

Product:

Remarks: Not expected to be a skin sensitiser.

Components:

Naphthenic acid:

Remarks: May cause an allergic skin reaction in sensitive individuals.

Germ cell mutagenicity

Product:

: Remarks: Not considered a mutagenic hazard.

Carcinogenicity

Product:

Remarks: Not expected to be carcinogenic.

Remarks: Product contains mineral oils of types shown to be non-carcinogenic in animal skin-painting studies., Highly refined mineral oils are not classified as carcinogenic by the International Agency for Research on Cancer (IARC).

IARC

No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

ACGIH

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by ACGIH.

OSHA

No component of this product present at levels greater than or

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equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

Reproductive toxicity

Product:

Remarks: Not expected to impair fertility., Not expected to be a developmental toxicant.

STOT - single exposure

Product:

Remarks: Not expected to be a hazard.

STOT - repeated exposure

Product:

Remarks: Not expected to be a hazard.

Aspiration toxicity

Product:

Not considered an aspiration hazard.

Further information

Product:

Remarks: Used grease may contain harmful impurities that have accumulated during use. The concentration of such harmful impurities will depend on use and they may present risks to health and the environment on disposal., ALL used grease should be handled with caution and skin contact avoided as far as possible.

Remarks: High pressure injection of product into the skin may lead to local necrosis if the product is not surgically removed.

Remarks: Slightly irritating to respiratory system.

SECTION 12. ECOLOGICAL INFORMATION

Basis for assessment

: Ecotoxicological data have not been determined specifically for this product.
Information given is based on a knowledge of the components and the ecotoxicology of similar products.
Unless indicated otherwise, the data presented is representative of the product as a whole, rather than for individual component(s).(LL/EL/IL50 expressed as the nominal amount of

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product required to prepare aqueous test extract).

Ecotoxicity

Product:

Toxicity to fish (Acute toxicity) :

Remarks: Expected to be practically non toxic:
LL/EL/IL50 > 100 mg/l

Toxicity to daphnia and other aquatic invertebrates (Acute toxicity) :

Remarks: Expected to be practically non toxic:
LL/EL/IL50 > 100 mg/l

Toxicity to algae (Acute toxicity) :

Remarks: Expected to be practically non toxic:
LL/EL/IL50 > 100 mg/l

Toxicity to fish (Chronic toxicity) :

Remarks: Data not available

Toxicity to daphnia and other aquatic invertebrates (Chronic toxicity) :

Remarks: Data not available

Toxicity to bacteria (Acute toxicity) :

Remarks: Data not available

Persistence and degradability

Product:

Biodegradability :

Remarks: Expected to be not readily biodegradable. Major constituents are expected to be inherently biodegradable, but contains components that may persist in the environment.

Bioaccumulative potential

Product:

Bioaccumulation :

Remarks: Contains components with the potential to bioaccumulate.

Mobility in soil

Product:

Mobility :

Remarks: Semi-solid under most environmental conditions. If it enters soil, it will adsorb to soil particles and will not be mobile.

Remarks: Floats on water.

Other adverse effects

no data available

Product:

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Additional ecological information : Product is a mixture of non-volatile components, which are not expected to be released to air in any significant quantities. Not expected to have ozone depletion potential, photochemical ozone creation potential or global warming potential.

Poorly soluble mixture.
May cause physical fouling of aquatic organisms.

Mineral oil is not expected to cause any chronic effects to aquatic organisms at concentrations less than 1 mg/l.

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Recover or recycle if possible.
It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste classification and disposal methods in compliance with applicable regulations.
Do not dispose into the environment, in drains or in water courses

Waste product should not be allowed to contaminate soil or ground water, or be disposed of into the environment.
Waste, spills or used product is dangerous waste.

Contaminated packaging : Dispose in accordance with prevailing regulations, preferably to a recognized collector or contractor. The competence of the collector or contractor should be established beforehand. Disposal should be in accordance with applicable regional, national, and local laws and regulations.

Local legislation

Remarks : Disposal should be in accordance with applicable regional, national, and local laws and regulations.

SECTION 14. TRANSPORT INFORMATION

National Regulations

US Department of Transportation Classification (49 CFR Parts 171-180)

Not regulated as a dangerous good

International Regulations

IATA-DGR

Not regulated as a dangerous good

IMDG-Code

Not regulated as a dangerous good

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Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Pollution category : Not applicable
Ship type : Not applicable
Product name : Not applicable
Special precautions : Not applicable

Special precautions for user

Remarks : Special Precautions: Refer to Chapter 7, Handling & Storage, for special precautions which a user needs to be aware of or needs to comply with in connection with transport.

Additional Information : MARPOL Annex 1 rules apply for bulk shipments by sea.

SECTION 15. REGULATORY INFORMATION

OSHA Hazards : No OSHA Hazards

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
Naphthenic acid	1338-24-5	100	*

*: Calculated RQ exceeds reasonably attainable upper limit.

CERCLA Reportable Quantity

Calculated RQ exceeds reasonably attainable upper limit., Shell classifies this material as an "oil" under the CERCLA Petroleum Exclusion, therefore releases to the environment are not reportable under CERCLA., The components with RQs are given for information.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : No SARA Hazards

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

SARA 313 : This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

Clean Water Act

The following Hazardous Chemicals are listed under the U.S. CleanWater Act, Section 311, Table 117.3:

Naphthenic acid	1338-24-5	0.135 %
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Pennsylvania Right To Know

Distillates (petroleum), solvent-dewaxed heavy paraffinic	64742-65-0
Naphthenic acid	1338-24-5

California Prop 65

This product does not contain any chemicals known to State

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of California to cause cancer, birth defects, or any other reproductive harm.

The components of this product are reported in the following inventories:

EINECS	: All components listed or polymer exempt.
TSCA	: All components listed.
DSL	: All components listed.

SECTION 16. OTHER INFORMATION

Further information

NFPA Rating (Health, Fire, Reactivity) 0, 1, 0

A vertical bar (|) in the left margin indicates an amendment from the previous version.

Abbreviations and Acronyms : The standard abbreviations and acronyms used in this document can be looked up in reference literature (e.g. scientific dictionaries) and/or websites.

ACGIH = American Conference of Governmental Industrial Hygienists
ADR = European Agreement concerning the International Carriage of Dangerous Goods by Road
AICS = Australian Inventory of Chemical Substances
ASTM = American Society for Testing and Materials
BEL = Biological exposure limits
BTEX = Benzene, Toluene, Ethylbenzene, Xylenes
CAS = Chemical Abstracts Service
CEFIC = European Chemical Industry Council
CLP = Classification Packaging and Labelling
COC = Cleveland Open-Cup
DIN = Deutsches Institut für Normung
DMEL = Derived Minimal Effect Level
DNEL = Derived No Effect Level
DSL = Canada Domestic Substance List
EC = European Commission
EC50 = Effective Concentration fifty
ECETOC = European Center on Ecotoxicology and Toxicology Of Chemicals
ECHA = European Chemicals Agency
EINECS = The European Inventory of Existing Commercial Chemical Substances
EL50 = Effective Loading fifty
ENCS = Japanese Existing and New Chemical Substances Inventory
EWC = European Waste Code
GHS = Globally Harmonised System of Classification and Labelling of Chemicals
IARC = International Agency for Research on Cancer
IATA = International Air Transport Association
IC50 = Inhibitory Concentration fifty

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IL50 = Inhibitory Level fifty
IMDG = International Maritime Dangerous Goods
INV = Chinese Chemicals Inventory
IP346 = Institute of Petroleum test method N° 346 for the
determination of polycyclic aromatics DMSO-extractables
KECI = Korea Existing Chemicals Inventory
LC50 = Lethal Concentration fifty
LD50 = Lethal Dose fifty per cent.
LL/EL/IL = Lethal Loading/Effective Loading/Inhibitory loading
LL50 = Lethal Loading fifty
MARPOL = International Convention for the Prevention of
Pollution From Ships
NOEC/NOEL = No Observed Effect Concentration / No Ob-
served Effect Level
OE_HPVS = Occupational Exposure - High Production Volume
PBT = Persistent, Bioaccumulative and Toxic
PICCS = Philippine Inventory of Chemicals and Chemical
Substances
PNEC = Predicted No Effect Concentration
REACH = Registration Evaluation And Authorisation Of
Chemicals
RID = Regulations Relating to International Carriage of Dan-
gerous Goods by Rail
SKIN_DES = Skin Designation
STEL = Short term exposure limit
TRA = Targeted Risk Assessment
TSCA = US Toxic Substances Control Act
TWA = Time-Weighted Average
vPvB = very Persistent and very Bioaccumulative

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This information is based on our current knowledge and is intended to describe the product for the purposes of health, safety and environmental requirements only. It should not therefore be construed as guaranteeing any specific property of the product.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the integrity of the financial system and for the ability to detect and prevent fraud.

2. The second part of the document outlines the specific requirements for record-keeping, including the need to maintain original documents and to ensure that all records are properly indexed and filed.

3. The third part of the document discusses the importance of regular audits and reviews of the records to ensure their accuracy and completeness. It also highlights the need for ongoing training and education for all personnel involved in the record-keeping process.

4. The fourth part of the document provides a detailed description of the record-keeping system, including the types of records that are maintained and the methods used to store and retrieve them.

5. The fifth part of the document discusses the importance of data security and the measures that are taken to protect the records from unauthorized access and disclosure.

6. The sixth part of the document provides a summary of the key points discussed in the document and offers recommendations for further improvements to the record-keeping system.

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