# **SAFETY DATA SHEET**



### 1. Identification

Product identifier ALKERAN TABLETS

Other means of identification

Synonyms ALKERAN TABLETS 2 MG \* ALKERAN TABLETS 5 MG \* GR 64466X TABLETS \* ALKERANA

TABLETS \* MELPHALAN, FORMULATED PRODUCT

Recommended use Medicinal Product.

This safety data sheet is written to provide health, safety and environmental information for people handling this formulated product in the workplace. It is not intended to provide information relevant

to medicinal use of the product. In this instance patients should consult prescribing

information/package insert/product label or consult their pharmacist or physician. For health and safety information for individual ingredients used during manufacturing, refer to the appropriate

safety data sheet for each ingredient.

**Recommended restrictions** 

No other uses are advised.

### Manufacturer/Importer/Supplier/Distributor information

Manufacturer

GlaxoSmithKline US

5 Moore Drive

Research Triangle Park, NC 27709 USA

US General Information (normal business hours): +1-888-825-5249

Email Address: msds@gsk.com Website: www.gsk.com

EMERGENCY PHONE NUMBERS - TRANSPORT EMERGENCIES:

US / International toll call +1 703 527 3887

available 24 hrs/7 days; multi-language response

# 2. Hazard(s) identification

# **Classified hazards**

Exempt from requirements - product regulated as a medicinal product, cosmetic product or medical device.

#### Label elements

Exempt from requirements - product regulated as a medicinal product, cosmetic product or medical device.

### Hazard(s) not otherwise classified (HNOC)

Exempt from requirements - product regulated as a medicinal product, cosmetic product or medical device.

### 3. Composition/information on ingredients

### **Mixtures**

Chemical name	Common name and synonyms	CAS number	%
MICROCRYSTALLINE	AVICEL PH MICROCRYSTALLINE	9004-34-6	96 - < 98
CELLULOSE	CELLULOSE		
	ALPHA-CELLULOSE		
	AVICEL PH101		
	AVICEL PH102		
	AVICEL PH103		
	AVICEL PH105		
	AVICEL PH112		
	AVICEL PH200		
	CELLULOSE (8CI9CI)		
	CELLULOSE CRYSTALLINE		
	CELLULOSE, FOOD GRADE		
	CRYSTALLINE CELLULOSE		

Material name: ALKERAN TABLETS SDS US

Chemical name	Common name and synonyms	CAS number	%
MELPHALAN	MELFALAN L-PHENYLALANINE NITROGEN MUSTARD GR 64466X 4-(BIS(2-CHLOROETHYL)AMINO)-L- PHENYLALANINE L-SARCOLYSIN ALANINE, 3-(P-BIS(2-CHLOROETHYL) AMINO)PHENYL-, L-	148-82-3	2
MAGNESIUM STEARATE	STEARIC ACID, MAGNESIUM SALT MAGNESIUM DISTEARATE DIBASIC MAGNESIUM STEARATE MAGNESIUM DISTEARATE, PURE	557-04-0	<1
POLYVINYLPYRROLIDONE	1-ETHENYL-2-PYRROLIDINONE HOMOPOLYMER POLY(N-VINYLPYRROLIDONE) POVIDONE PLASDONE PLASDONE K29/32	9003-39-8	< = 1
SILICA, AMORPHOUS, FUMED	SILICA, AMORPHOUS, FUMED, CRYSTALLINE FREE FUMED SILICA, CRYSTALLINE-FREE FUMED SYNTHETIC AMORPHOUS SILICA PYROGENIC COLLOIDAL SILICA SYNTHETIC AMORPHOUS SILICA AMORPHOUS FUMED SILICA RTECS VV7310000	112945-52-5	< 0.5

<sup>\*</sup>Designates that a specific chemical identity and/or percentage of composition has been withheld as a trade secret.

### 4. First-aid measures

Inhalation	Move to fresh air. If breathing is difficult, trained personnel should give oxygen. Call a physician if
IIIIIaiatioii	move to need and notice and a producting to annount, trained percentiles enough give exygent. Out a proviount in

symptoms develop or persist. Under normal conditions of intended use, this material is not

expected to be an inhalation hazard.

**Skin contact** Immediately flush skin with plenty of water. Take off contaminated clothing and wash before reuse.

Get medical attention if symptoms occur.

**Eye contact** Rinse thoroughly with plenty of water for at least 15 minutes and consult a physician.

**Ingestion** If swallowed, rinse mouth with water (only if the person is conscious). If ingestion of a large

amount does occur, call a poison control center immediately. Do not induce vomiting without

advice from poison control center.

Most important

symptoms/effects, acute and

delayed

Indication of immediate medical attention and special

treatment needed
General information

Accidental exposure or contact might produce: Nausea, vomiting. symptoms of hypersensitivity (such as skin rash, hives, itching), anaemia, diarrhoea.

No specific antidotes are recommended. Treat according to locally accepted protocols. For additional guidance, refer to the current prescribing information or to the local poison control information center.

Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. IF exposed or concerned: Get medical advice/attention. The need for pre-placement and periodic health surveillance must be determined by risk assessment. Following assessment, if the risk of exposure is considered significant then a health record should be maintained for exposed individuals to document periods of exposure. This record should be retained for at least 30 years after exposure ceases (or according local regulatory requirements if

more stringent).

# 5. Fire-fighting measures

Suitable extinguishing media

Unsuitable extinguishing

media

Water. Foam. Dry chemical powder. Carbon dioxide (CO2).

None known.

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Specific hazards arising from

the chemical

During fire, gases hazardous to health may be formed.

Special protective equipment and precautions for firefighters

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

Fire fighting Move containers from fire area if you can do so without risk.

equipment/instructions

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Specific methods General fire hazards Use standard firefighting procedures and consider the hazards of other involved materials.

No unusual fire or explosion hazards noted.

#### 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Wear appropriate protective equipment and clothing during clean-up. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. 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 Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Cover with plastic sheet to prevent spreading. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water.

Small Spills: 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 discharge into drains, water courses or onto the ground.

# 7. Handling and storage

Precautions for safe handling

Obtain special instructions before use. Avoid breaking or crushing tablets. Do not handle until all safety precautions have been read and understood. Avoid breathing dust/fume/gas/mist/vapors/spray. Avoid contact with eyes, skin, and clothing. Avoid prolonged exposure. Do not taste or swallow. When using, do not eat, drink or smoke. Pregnant or breastfeeding women must not handle this product. Should be handled in closed systems, if possible. Provide adequate ventilation. Wear appropriate personal protective equipment. Wash hands thoroughly after handling. Observe good industrial hygiene practices.

Conditions for safe storage, including any incompatibilities Store locked up. Store in original tightly closed container. Store away from incompatible materials (see Section 10 of the SDS).

### 8. Exposure controls/personal protection

# Occupational exposure limits

CCK

GSK Components	Туре	Value	Note
MELPHALAN (CAS 148-82-3)	8 HR TWA	1 mcg/m3	
140-02-3)	OHC	5	REPRODUCTIVE HAZARD
		5	SKIN SENSITISER
		5	CARCINOGEN
US. OSHA Table Z-1 Limits for Air Conta	minants (29 CFR 1910.1000)		
Components	Туре	Value	Form
MICROCRYSTALLINE CELLULOSE (CAS 9004-34-6)	PEL	5 mg/m3	Respirable fraction.
		15 mg/m3	Total dust.
US. OSHA Table Z-3 (29 CFR 1910.1000)			
Components	Туре	Value	
SILICA, AMORPHOUS, FUMED (CAS 112945-52-5)	TWA	0.8 mg/m3	
,		20 mppcf	
US. ACGIH Threshold Limit Values			
Components	Туре	Value	
MAGNESIUM STEARATE (CAS 557-04-0)	TWA	10 mg/m3	
MICROCRYSTALLINE CELLULOSE (CAS 9004-34-6)	TWA	10 mg/m3	

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US. NIOSH: Pocket Guide to Chemical Hazards				
Components	Туре	Value	Form	
MICROCRYSTALLINE CELLULOSE (CAS 9004-34-6)	TWA	5 mg/m3	Respirable.	
		10 mg/m3	Total	
SILICA, AMORPHOUS, FUMED (CAS 112945-52-5)	TWA	6 mg/m3		

**Biological limit values** 

No biological exposure limits noted for the ingredient(s).

Exposure guidelines

Appropriate engineering controls

An Exposure Control Approach (ECA) is established for operations involving this material based upon the OEL/Occupational Hazard Category and the outcome of a site- or operation-specific risk assessment. Ventilate as needed to control airborne dust. Use explosion-proof ventilation equipment if airborne dust levels are high. It is strongly advised that dedicated areas and containment, such as glove boxes, isolators, and enclosed material transfer systems be used to prevent personnel exposure and spread of contamination. Special considerations apply in the planning, design, review and implementation of controls - seek specialist assistance from local occupational hygienist or safety department.

### Individual protection measures, such as personal protective equipment

**Eye/face protection** Not normally needed. If contact is likely, safety glasses with side shields are recommended.

Skin protection

**Hand protection** Glove selection must take into account any solvents and other hazards present. The choice of an

appropriate glove does not only depend on its material but also on other quality features and is

different from one producer to the other.

**Other** Wear suitable protective clothing as protection against splashing or contamination.

**Respiratory protection** Use a NIOSH/MSHA approved respirator if there is a risk of exposure to dust/fume at levels

exceeding the exposure limits. When workers are facing concentrations above the exposure limit

they must use appropriate certified respirators.

**Thermal hazards** Wear appropriate thermal protective clothing, when necessary.

General hygiene considerations

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. For advice on suitable monitoring methods, seek guidance from a qualified environment, health and safety professional. Strict control of access to the working area is essential. New or expectant mothers might be at greater risk from overexposure. Risk assessments must take this into consideration. Female employees anticipating pregnancy or with a confirmed pregnancy must be encouraged to notify an occupational health professional or their line manager. This will act as the trigger for individual re-assessment of the employee's work practices.

### 9. Physical and chemical properties

**Appearance** 

Solid. Physical state Tablet. **Form** Color Not available. Odor Not available. Not available. **Odor threshold** Not available. Melting point/freezing point Not available. Initial boiling point and boiling Not available. range Not available. Flash point **Evaporation rate** Not available.

Flammability (solid, gas) Not available.

Upper/lower flammability or explosive limits

Flammability limit - lower Not available.

(%)

Flammability limit - upper Not available.

(%)

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Explosive limit - lower (%) Not available. Explosive limit - upper (%) Not available. Vapor pressure Not available. Not available. Vapor density

Relative density Solubility(ies)

Solubility (water) Not available. **Partition coefficient** Not available.

(n-octanol/water)

**Auto-ignition temperature** Not available. **Decomposition temperature** Not available. Not available. **Viscosity** 

# 10. Stability and reactivity

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

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

Not available.

Possibility of hazardous

reactions

No dangerous reaction known under conditions of normal use.

Conditions to avoid Contact with incompatible materials. Incompatible materials Strong oxidizing agents. Fluorine.

None known. Irritating and/or toxic fumes and gases may be emitted upon the product's **Hazardous decomposition** 

decomposition. products

## 11. Toxicological information

### Information on likely routes of exposure

Inhalation Under normal conditions of intended use, this material is not expected to be an inhalation hazard.

Skin contact Health injuries are not known or expected under normal use. Eve contact Health injuries are not known or expected under normal use. Ingestion Health injuries are not known or expected under normal use.

Symptoms related to the physical, chemical and toxicological characteristics

Accidental exposure or contact might produce: symptoms of hypersensitivity (such as skin rash,

hives, itching), anaemia, Nausea, vomiting., diarrhoea.

Information on toxicological effects

Health injuries are not known or expected under normal use. Acute toxicity

**Test Results** Components **Species** 

MAGNESIUM STEARATE (CAS 557-04-0)

<u>Acute</u> Oral

Rat > 2000 mg/kg LD50

MELPHALAN (CAS 148-82-3)

**Acute** 

Oral

LD50 Rat 4.7 mg/kg

MICROCRYSTALLINE CELLULOSE (CAS 9004-34-6)

Acute

Dermal

LD50 Rabbit > 2000 mg/kg

Oral

**LD50** Rat > 2000 mg/kg

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Components Species Test Results

POLYVINYLPYRROLIDONE (CAS 9003-39-8)

Acute Oral

LD50 Rat

> 5000 mg/kg

\* Estimates for product may be based on additional component data not shown.

**Skin corrosion/irritation**Health injuries are not known or expected under normal use.

Irritation Corrosion - Skin: P.I.I. value

MAGNESIUM STEARATE

Serious eye damage/eye Health injuries are not known or expected under normal use. Direct contact with eyes may cause

irritation temporary irritation.

Eye / Kay and Calandra class - Intact

MAGNESIUM STEARATE

Recovery Period: 2 days

Respiratory or skin sensitization

**Respiratory sensitization** Under normal conditions of intended use, this material is not expected to be an inhalation hazard.

**Skin sensitization** Health injuries are not known or expected under normal use.

Sensitization

MELPHALAN Clinical use

Result: Positive

SAR

Result: Positive

Germ cell mutagenicity Not expected to be genotoxic under occupational exposure conditions. Contains components that

produced genotoxicity in laboratory tests.

Mutagenicity

MELPHALAN Ames Assay (GLP)

Result: Positive

Chromosomal Aberration Assay In Vitro

Result: Positive

GreenScreen mammalian cell mutation assay

Result: Positive

Rat micronucleus assay (GLP)

Result: Positive

SAR

Result: Alerts for Chromosomal damage or Mutagenicity. Syrian Hamster Embryo (SHE) cell transformation assay

Result: Positive

bacterial mutation test (SOS/umu)

Result: Positive

Carcinogenicity Contains a material classified as a carcinogen by external agencies. Carcinogenic effects are not

expected as a result of occupational exposure.

MELPHALAN Intraperitoneal

Result: Positive Species: Mouse Intraperitoneal Result: Positive Species: Rat

SAR

Result: Positive

IARC Monographs. Overall Evaluation of Carcinogenicity

MELPHALAN (CAS 148-82-3) 1 Carcinogenic to humans.

POLYVINYLPYRROLIDONE (CAS 9003-39-8) 3 Not classifiable as to carcinogenicity to humans. SILICA, AMORPHOUS, FUMED (CAS 112945-52-5) 3 Not classifiable as to carcinogenicity to humans.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

US. National Toxicology Program (NTP) Report on Carcinogens

MELPHALAN (CAS 148-82-3) Known To Be Human Carcinogen.

Reproductive toxicity Health injuries are not known or expected under normal use. Components in this product have

been shown to cause birth defects and reproductive disorders in laboratory animals.

Reproductivity

**MELPHALAN** Fertility and Early Embryonic Development

Result: Positive Species: Rat Literature search

Result: Reduced fertility in Humans based on similer

compounds. Species: Human

Specific target organ toxicity -

single exposure

Not assigned.

Specific target organ toxicity -

May cause damage to organs through prolonged or repeated exposure.

repeated exposure **MELPHALAN** 

Clinical use

Species

Result: Bone marrow and blood cells, rapidly dividing cells and

**Test Results** 

the gastrointestinal tract.

**Aspiration hazard** Not likely, due to the form of the product.

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

be harmful. Prolonged exposure may cause chronic effects.

**Further information** Caution - Potent pharmaceutical agent. Occupational exposure to the substance or mixture may

cause adverse effects.

# 12. Ecological information

Components

**Ecotoxicity** Not expected to be harmful to aquatic organisms.

Componente		opooloo	100t Hoodito
MAGNESIUM STEARATI	E (CAS 557-04-	0)	
Aquatic			
Acute			
Fish	EC50	Orange-red killfish (Adult Oryzias latipes)	130 mg/l, 96 hours
MELPHALAN (CAS 148-8	32-3)		
Aquatic			
Acute			
Activated Sludge Respiration	IC50	Residential sludge	> 100 mg/l, 3 hours
Crustacea	EC50	Water flea (Daphnia magna)	> 10 mg/l, 48 hours
POLYVINYLPYRROLIDC	NE (CAS 9003-	39-8)	
Acute			
	IC50	Activated sludge	> 1000 mg/l, 3 hours Static test
Aquatic			
Acute			
Crustacea	EC50	Water flea (Daphnia magna)	84 mg/l, 48 hours Static test
	NOEC	Water flea (Daphnia magna)	32 mg/l, 48 hours Static test

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

# Persistence and degradability

**Photolysis** 

Half-life (Photolysis-atmospheric)

MAGNESIUM STEARATE 17 Hours Estimated

UV/visible spectrum wavelength

MAGNESIUM STEARATE 210 nm

**Hydrolysis** 

Half-life (Hydrolysis-acidic)

**MELPHALAN** 4.9 Hours, pH 5 Buffer Solution

Half-life (Hydrolysis-basic)

3.9 Hours MELPHALAN

Half-life (Hydrolysis-neutral)

**MELPHALAN** 4.9 Hours, pH 7 Buffer Solution

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**Biodegradability** 

Percent degradation (Aerobic biodegradation-inherent)

MAGNESIUM STEARATE 77 %, 28 days BOD

POLYVINYLPYRROLIDONE 0 %, 28 days Modified MITI test, Activated sludge

Percent degradation (Aerobic biodegradation-ready)

MAGNESIUM STEARATE 95 %, 22 days Sturm test

Percent degradation (Aerobic biodegradation-soil)

MAGNESIUM STEARATE 50 %, 13 days

**Bioaccumulative potential** 

Partition coefficient n-octanol / water (log Kow)

MELPHALAN -0.52, at pH 7

1

**Bioconcentration factor (BCF)** 

MAGNESIUM STEARATE > 9999 Estimated
MELPHALAN 1 Estimated

Mobility in soil

Adsorption

Soil/sediment sorption - log Koc

MAGNESIUM STEARATE 5.86 Estimated

Mobility in general

Volatility

Henry's law

MELPHALAN 0 atm m<sup>3</sup>/mol, 25 C Estimated

Distribution

Octanol/water distribution coefficient log DOW

MELPHALAN -0.52, pH 7.4

Other adverse effects Not available.

13. Disposal considerations

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

discharge into drains, water courses or onto the ground. Dispose in accordance with all applicable

regulations.

**Local disposal regulations** Dispose in accordance with all applicable regulations.

Hazardous waste code

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). Avoid discharge into water courses or onto the ground.

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

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

disposal.

# 14. Transport information

DOT

Not regulated as a dangerous good.

Not available.

IATA

Not regulated as dangerous goods.

**IMDG** 

Not regulated as dangerous goods.

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

MARPOL Annex II applies to liquids used in a ship's operation that pose a threat to the marine

environment. These materials may not be transported in bulk.

the IBC Code

### 15. Regulatory information

US federal regulations

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

Not regulated.

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

MELPHALAN (CAS 148-82-3)

Listed.

# SARA 304 Emergency release notification

Not regulated.

### OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)

Not listed.

### Superfund Amendments and Reauthorization Act of 1986 (SARA)

**Hazard categories** Immediate Hazard - Yes

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

#### SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous No

chemical

### SARA 313 (TRI reporting)

Not regulated.

#### Other federal regulations

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

Not regulated.

### 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. California Controlled Substances. CA Department of Justice (California Health and Safety Code Section 11100)

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

MELPHALAN (CAS 148-82-3)

MICROCRYSTALLINE CELLULOSE (CAS 9004-34-6)

SILICA, AMORPHOUS, FUMED (CAS 112945-52-5)

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

MELPHALAN (CAS 148-82-3)

MICROCRYSTALLINE CELLULOSE (CAS 9004-34-6)

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

MELPHALAN (CAS 148-82-3)

MICROCRYSTALLINE CELLULOSE (CAS 9004-34-6)

SILICA, AMORPHOUS, FUMED (CAS 112945-52-5)

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

MELPHALAN (CAS 148-82-3)

#### **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 - CRT: Listed date/Carcinogenic substance

MELPHALAN (CAS 148-82-3) Listed: February 27, 1987

### US - California Proposition 65 - CRT: Listed date/Developmental toxin

MELPHALAN (CAS 148-82-3) Listed: July 1, 1990

#### 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)	No
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No

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Country(s) or region Inventory name On inventory (yes/no)\* Europe European List of Notified Chemical Substances (ELINCS) Inventory of Existing and New Chemical Substances (ENCS) No Japan Korea Existing Chemicals List (ECL) No New Zealand New Zealand Inventory No **Philippines** Philippine Inventory of Chemicals and Chemical Substances No (PICCS)

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

 Issue date
 09-21-2015

 Revision date
 09-21-2015

Version # 19

**Further information** HMIS® is a registered trade and service mark of the NPCA.

HMIS® ratings
Health: 2\*
Flammability: 0

Physical hazard: 0

NFPA ratings Health: 2

Flammability: 0 Instability: 0

**References** GSK Hazard Determination

**Disclaimer** The information and recommendations in this safety data sheet are, to the best of our knowledge,

accurate as of the date of issue. Nothing herein shall be deemed to create any warranty, express or implied. It is the responsibility of the user to determine the applicability of this information and

the suitability of the material or product for any particular purpose.

**Revision Information** Product and Company Identification: Product and Company Identification

Composition / Information on Ingredients: Ingredients

Physical & Chemical Properties: Toxicological Information:

Ecological Information: Ecotoxicity

**Transport Information:** 

Regulatory Information: Risk Phrases - Class.

GHS: Classification

Material name: ALKERAN TABLETS SDS US

No

United States & Puerto Rico Toxic Substances Control Act (TSCA) Inventory

<sup>\*</sup>A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

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).