

Abstract: When authoring a Safety Data Sheet under Hazcom 2012, it is sometimes difficult to obtain the complete list of hazardous ingredients in a mixture, with CAS numbers and percentages and build an SDS from the ground up. Some suppliers may wish to keep some of the ingredients found in the mixture confidential and claim a trade secret and will thus not provide the CAS number(s) or sometimes even the percentage or percentage range of that ingredient. It is then very challenging to author an accurate and representative SDS without knowing what the product contains. A solution to this challenge would be to do something similar to what is done in Europe and enter the hazards for each ingredient, as a pure so at 100% concentration, in section 3 of the SDS, next to that trade secret ingredient's name. This way, authoring an SDS for a mixture containing these 'trade secret ingredients' could be done based on the hazards shown in section 3, when considered a 100%, taking into account that ingredient's precise percentage or narrow percentage range, in order to calculate the applicable hazards in the final mixture. In addition, for any SDS, whether it contains ingredients claimed as trade secret or not, hazards shown in

In the case where we need to calculate a 1:20 dilution mixture, and without knowing the identity of any of the Secret Ingredients shown herein, we pretend that the health hazards of the diluted solution can ONLY be correctly IF the classification of each Trade Secret Ingredient is given as per the 'Extended Section 3'. In this case specifically, a 1:20 dilution would make the mixture no longer a carcinogen, to mention that again. Not knowing which of the 2 ingredients was responsible for the hazard specifically, one could not be sure of that conclusion because at 10% concentration level, the blend is 0.5% of the Proprietary Ingredient 1, leaving the other to be a carcinogen, which happens to be false in this case.

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References:
 1- OSHA, 29 CFR Parts 1910, 1915, 1917, 1918, and 1926, HAZCOM 2012, Final Rule, 2012.
 2- COMMISSION REGULATION (EU) No 453/2010 of 20 May 2010 amending Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).
 3- Official ECHA Website for Annex VI and substance classifications. <http://echa.europa.eu/web/guest/information-on-chemicals/cl-inventory-database>

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