

CAUSTIC SODA LIQUOR

ACCORDING TO EC-REGULATIONS 1907/2006 (REACH), 1272/2008 (CLP) & 2015/830

1. SECTION 1: IDENTIFICATION OF THE SUBSTANCE/MIXTURE AND OF THE COMPANY/UNDERTAKING

1.1 Product identifier

Product Name	CAUSTIC SODA LIQUOR
Alternative names	Caustic Soda, Sodium hydroxide
Chemical Formula	NaOH
CAS No.	1310-73-2
EC No.	215-185-5
REACH Registration No.	01-2119457892-27-XXXX

1.2 Relevant identified uses of the substance or mixture and uses advised against

Identified Use(s)	Chemical manufacture and processing. pH control. Reagent.
Uses Advised Against	None anticipated.

1.3 Details of the supplier of the safety data sheet

Company Identification	INOVYN Europe Limited
Address of Supplier	Runcorn Site HQ South Parade, PO Box 9 Runcorn, Cheshire
Postal code	WA7 4JE
Telephone:	+44 (0)1928 561111
Fax	+44 (0)1928 516636
E-mail	sds.ca@inovyn.com
Office hours	10:00 – 18:00 CET

1.4 Emergency telephone number

Emergency Phone No.	+44(0)1235 239 670
Contact	CareChem
National Poisons Information Service (Birmingham Centre)	+00 448 706 006 266 NHS Direct - 0845 4647 or 111

2. SECTION 2: HAZARDS IDENTIFICATION

2.1 Classification of the substance or mixture

Regulation (EC) No. 1272/2008 (CLP)	Met. Corr. 1 :May be corrosive to metals. Skin Corr. 1A :Causes severe skin burns and eye damage.
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2.2 Label elements

	According to Regulation (EC) No. 1272/2008 (CLP)
Product Name	CAUSTIC SODA LIQUOR

Hazard Pictogram(s)



GHS05

CAUSTIC SODA LIQUOR

Signal Word(s)	Danger
Hazard Statement(s)	H290: May be corrosive to metals. H314: Causes severe skin burns and eye damage.
Precautionary Statement(s)	P260: Do not breathe vapour. P280: Wear protective gloves/protective clothing/eye protection/face protection/hearing protection. P301+P330+P331: IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. P303+P361+P353: IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water. P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. P310: Immediately call a POISON CENTER/doctor.
Additional label requirements	None.

2.3 Other hazards

None known.

2.4 Additional Information

For full text of H/P Statements see section 16.

3. SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

3.1 Substances

HAZARDOUS INGREDIENT(S)	CAS No.	EC No. / REACH Registration No.	%W/W	Hazard Statement(s) *	Hazard Pictogram(s)
Sodium hydroxide	1310-73-2	215-185-5 01-2119457892-27-XXXX	10 – 75	Met. Corr. 1 H290 Skin Corr. 1A H314	GHS05

*Specific concentration limits, see Section 16.

3.2 Mixtures

Not applicable.

4. SECTION 4: FIRST AID MEASURES

4.1 Description of first aid measures

Inhalation	Remove patient from exposure, keep warm and at rest. If experiencing respiratory symptoms: Call a POISON CENTER/doctor.
Skin Contact	Take off immediately all contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Do not remove clothing if it sticks to the skin. Cover wounds with sterile bandage. Seek medical treatment. If burned surface > 10%: take victim to hospital.

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Eye Contact	Immediately irrigate with eyewash solution or clean water, holding the eyelids apart, for at least 10 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Continue irrigation until medical attention can be obtained. Immediately call a POISON CENTER/doctor.
Ingestion	Provided the patient is conscious, wash out mouth with water. Do NOT induce vomiting. Immediately call a POISON CENTER/doctor.

4.2 Most important symptoms and effects, both acute and delayed

Inhalation: Sore throat. High concentrations: Corrosive to the respiratory tract. May cause pulmonary oedema. Chemical pneumonitis.

Skin Contact : Causes burns.

Eye Contact : May cause severe damage with formation of corneal ulcers and permanent impairment of vision. Blindness.

Ingestion : Will immediately cause corrosion of and damage to the gastrointestinal tract. Symptoms may include: Abdominal pain, Nausea, Diarrhoea, Coughing, Bloodstained vomiting. Causes shortness of breath.

4.3 Indication of any immediate medical attention and special treatment needed

Immediately call a POISON CENTER/doctor. Treat symptomatically.

5. SECTION 5: FIREFIGHTING MEASURES

5.1 Extinguishing media

Suitable Extinguishing media	As appropriate for surrounding fire.
Unsuitable extinguishing media	None.

5.2 Special hazards arising from the substance or mixture

Generates heat on addition to water (exothermic). Contact with some metals e.g. aluminium, zinc can produce flammable hydrogen gas. Contact with some organic chemicals can produce violent or explosive reactions.

5.3 Advice for firefighters

Fire fighters should wear complete protective clothing including self-contained breathing apparatus. Keep containers cool by spraying with water if exposed to fire.

Fire water contaminated with this material must be contained and prevented from being discharged to any waterway, sewer or drain.

6. SECTION 6: ACCIDENTAL RELEASE MEASURES

6.1 Personal precautions, protective equipment and emergency procedures

Provide adequate ventilation. Wear appropriate personal protective equipment, avoid direct contact. Do not use metal containers for spilled liquid.

6.2 Environmental precautions

Prevent leaks and prevent soil / water pollution caused by leaks. Prevent entry into drains.

6.3 Methods and material for containment and cleaning up

Adsorb spillages onto sand, earth or any suitable adsorbent material. Use vacuum equipment for collecting spilt materials, where practicable. Transfer to a lidded container for disposal.

Small spillages: Neutralise wherever possible. Recommended: NaHCO_3 (Solid). Soak up with inert absorbent. Flush spill area with copious amounts of water.

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6.4 Reference to other sections

See Also Section 8, 13.

6.5 Additional Information

Spillages or uncontrolled discharges into watercourses must be alerted to the appropriate regulatory body.

7. SECTION 7: HANDLING AND STORAGE

7.1 Precautions for safe handling

Never dilute by pouring water to the product. Always add the product to the water. General hygiene measures for the handling of chemicals are applicable. Use corrosion-proof equipment. Remove contaminated clothing immediately. Wash hands and exposed skin thoroughly after handling. Do not eat, drink or smoke when using this product.

7.2 Conditions for safe storage, including any incompatibilities

For small quantities - Store in a corrosion-resistant container with a resistant inner liner. Keep in a cool, dry, well ventilated place.

Appropriate packaging : Steel, stainless steel, carbon steel, iron, nickel, synthetic material, polyethylene, glass, stoneware/porcelain.

Inappropriate packaging : Lead, aluminium, copper, tin, zinc, bronze.

For large quantities - Can be stored at normal or slightly elevated temperatures in mild steel tanks. Where temperature is above 40 Deg C for liquors containing 30% or more of caustic or above 60 Deg C for lower concentrations tanks must be stressed relieved.

Storage temperature

25 °C

Storage life

Stable under normal conditions.

Incompatible materials

None known.

7.3 Specific end use(s)

See Section: 1.2

8. SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

8.1 Control parameters

8.1.1 Occupational Exposure Limits

Occupational Exposure Limits						
SUBSTANCE.	CAS No.	LTEL (8 hr TWA ppm)	LTEL (8 hr TWA mg/m³)	STEL (ppm)	STEL (mg/m³)	Note
Sodium hydroxide	1310-73-2				2	

Note

Remark

United Kingdom Workplace Exposure Limits (WEL)

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Sodium hydroxide			
DNEL / DMEL	Oral	Inhalation	Dermal
Industry - Long Term - Local effects		1.0 mg/m ³	
Industry - Long Term - Systemic effects			
Industry - Short term - Local effects			2 %
Industry - Short term - Systemic effects			
Consumer - Long Term - Local effects		1.0 mg/m ³	
Consumer - Long Term - Systemic effects			
Consumer - Short term - Local effects			2 %
Consumer - Short term - Systemic effects			

Sodium hydroxide	
Environment	PNEC
Aquatic Compartment (including sediment)	Not applicable.
Terrestrial Compartment	Not applicable.
Atmospheric Compartment	Not applicable.

8.2 Exposure controls

8.2.1. Appropriate engineering controls Provide adequate ventilation, including appropriate local extraction. A washing facility/water for eye and skin cleaning purposes should be present.

8.2.2. Personal protection equipment



Eye Protection

Wear close fitting goggles or full face shield.



Skin protection

Wear protective clothing and gloves: Impervious gloves (EN 374).
The following materials are suitable for protective gloves (permeation time ≥ 8 hours): Natural rubber (0.5mm), Nitrile rubber (0.35mm), Fluorocarbon rubber (0.4 mm), Polychloroprene CR (0.5 mm), Polyvinyl Chloride PVC (0.5mm), Butyl rubber (0.5mm).

Unsuitable gloves materials : Leather



Respiratory protection

Normally no personal respiratory protection is necessary.
Wear suitable respiratory protective equipment if exposure to levels above the occupational exposure limit is likely. Filter type: P2



Thermal hazards

None known.

8.2.3. Environmental Exposure Controls Avoid release to the environment.

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9. SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

9.1 Information on basic physical and chemical properties

Appearance	Liquid.
	Colour : Colourless.
Odour	Odourless.
Odour threshold	Not established.
pH	>13
Melting point/freezing point	-6°C (10%); -27°C (20%); 17°C (40%); 6.2°C (47%); 12°C (50%); 52°C (60%)
Initial boiling point and boiling range	104.6°C (10%); 107.8°C (20%); 128.5°C (40%); 140.2°C (47%); 145.8°C (50%); 168.6°C (60%)
Flash Point	Not applicable.
Evaporation rate	Not available.
Flammability (solid, gas)	Non-flammable.
Upper/lower flammability or explosive limits	Not applicable.
Vapour pressure (Pa)	@25°C: 3000 (10%); 2270 (20%); 640 (40%); 270 (47%); 170 (50%) @60°C: 270 (60%)
Vapour density	Not known.
Density (g/ml)	@25°C: 1.11 (10%); 1.21 (20%); 1.42 (40%); 1.49 (47%); 1.51 (50%); 1.58 (60%)
Relative density	Not known.
Solubility(ies)	Solubility (Water) : Soluble. (100g NaOH/100g H ₂ O @25°C) Solubility (Other) : Ethanol
Partition coefficient: n-octanol/water	Not applicable.
Auto-ignition temperature	Not known.
Decomposition Temperature (°C)	Not applicable.
Viscosity (mPa.s)	@25°C: 1.7 (10%); 4.04 (20%); 27.8 (40%); 45.3 (47%); 58.1 (50%) @60°C: 14.8 (60%)
Explosive properties	Not explosive.
Oxidising properties	Not oxidising.

9.2 Other information

Molecular weight	40.0g/mol
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10. SECTION 10: STABILITY AND REACTIVITY

10.1 Reactivity

May be corrosive to metals. Highly reactive with aluminium, zinc, tin and alloys of these metals producing flammable hydrogen gas. Contact with some organic chemicals can produce violent or explosive reactions.

10.2 Chemical Stability

Stable under normal conditions.
This product is hygroscopic. Absorbs the atmospheric CO₂.

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10.3 Possibility of hazardous reactions

Generates heat on addition to water (exothermic).
May react violently with: Halogens, Acids, organic materials

10.4 Conditions to avoid

Avoid contact with moisture. Avoid contact with combustible material.

10.5 Incompatible materials

Strong oxidising agents, Acids, Aluminium, Light metals, chlorinated hydrocarbons, ammonia solution.

10.6 Hazardous decomposition products

Hydrogen.

11. SECTION 11: TOXICOLOGICAL INFORMATION

11.1 Information on toxicological effects

Acute toxicity - Ingestion	Not classified. Will cause corrosion of and damage to the gastrointestinal tract. Lethal dose for man is approximately 5g
Acute toxicity - Skin Contact	Not classified. Corrosive.
Acute toxicity - Inhalation	Not classified. Mist is severely irritant to the respiratory tract.
Skin corrosion/irritation	Causes severe skin burns and eye damage. Repeated or prolonged contact to dilute solutions may cause dermatitis.
Serious eye damage/irritation	Causes severe skin burns and eye damage. May cause severe damage with formation of corneal ulcers and permanent impairment of vision.
Skin sensitization data	Not classified. There is no evidence of skin sensitisation in humans.
Respiratory sensitization data	Not classified.
Germ cell mutagenicity	Not classified. There is no evidence of mutagenic potential.
Carcinogenicity	Not classified. Sodium hydroxide is corrosive to the skin and respiratory tract and will not be systemically available in the body under normal conditions of handling and use. As a consequence it is not expected to cause cancer in any organ.
Reproductive toxicity	Not classified. Sodium hydroxide will not be systemically available in the body under normal conditions of handling and use and will not be toxic to the reproductive system or the developing foetus.
Lactation	Not classified.
STOT - single exposure	Not classified.
STOT - repeated exposure	Not classified.
Aspiration hazard	Not an aspiration hazard.

11.2 Other information

None.

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12. SECTION 12: ECOLOGICAL INFORMATION

Concentrations greater than 10ppm, especially in fresh water, or a pH value equal to or greater than 10.5 may be fatal to fish and other aquatic organisms.

Toxicity - Aquatic invertebrates	Low toxicity to invertebrates. No reliable data available. EC50 (48 hour): 40.4 mg/l (Ceriodaphnia dubia)
Toxicity - Fish	Low toxicity to fish. No reliable data available. LC50 (96 hour): 35 – 189 mg/l (Various species)
Toxicity - Algae	Low toxicity to algae.
Toxicity - Sediment Compartment	Not classified.
Toxicity - Terrestrial Compartment	Not classified.

12.2 Persistence and Degradation

Sodium hydroxide is highly soluble in water and has a low vapour pressure. It will be found predominantly in the aquatic environment. It degrades readily by reaction with the natural carbon dioxide in the air.

12.3 Bioaccumulative potential

The substance has no potential for bioaccumulation.

12.4 Mobility in soil

Sodium hydroxide becomes increasingly more mobile in soil with dilution.

12.5 Results of PBT and vPvB assessment

Not classified as PBT or vPvB.

12.6 Other adverse effects

Concentrations sufficient to render effluent alkaline may cause damage to effluent treatment organisms.

13. SECTION 13: DISPOSAL CONSIDERATIONS

13.1 Waste treatment methods

Dispose of contents in accordance with local, state or national legislation. Send to a licensed recycler, reclaimer or incinerator. Dispose of this material and its container to hazardous or special waste collection point. Reuse or recycle.

13.2 Additional Information

Disposal should be in accordance with local, state or national legislation.

14. SECTION 14: TRANSPORT INFORMATION

14.1 UN number

UN No. 1824

14.2 UN proper shipping name

UN proper shipping name SODIUM HYDROXIDE SOLUTION

14.3 Transport hazard class(es)

ADR/RID Class	8
IMDG Class	8
IMDG EMS	F-A, S-B

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ICAO/IATA

Excepted Quantities	E2
Passenger and Cargo Aircraft Limited	Y840
Quantities Packing Instructions	
Passenger and Cargo Aircraft Limited	0.5L
Quantities Max net Qty	
Passenger and Cargo Aircraft Packing	851
Instructions	
Passenger and Cargo Aircraft Max net	1L
Qty	
Cargo Aircraft Packing Instructions	855
Cargo Aircraft Max net Qty	30L
Special Provisions	A3
Emergency Response Guidebook (ERG)	8L
Code	
ADR Classification Code	C5
ADR HIN	80
ADR Transport Category	2
Tunnel Restriction Code	E
Emergency Action Code	2R
APP Advice on Additional Personal	Not applicable
Protection (APP)	

14.4 Packing group

Packing group	II
Labels	8



Special Provisions	Not applicable
Limited Quantities	1 L
Excepted Quantities	E2
Mixed Packing Instructions for Packages	P001 IBC02
Special Packing Provisions for Packages	Not applicable
Mixed Packing Instructions for Packages	MP15

14.5 Environmental hazards

Environmental hazards	Not classified as a Marine Pollutant.
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14.6 Special precautions for user

Special precautions for user	Not known.
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14.7 Transport in bulk according to Annex II of Marpol and the IBC Code

Product Name	Caustic Soda Liquor
Ship Type	3
Pollution Category	Y
Packing Instructions for Portable Tanks	T7
Special Provisions for Portable Tanks	TP2
Tank Code for Tanks	L4BN
Special Provisions for Tanks	Not applicable
Vehicle for Tank Carriage	AT

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Special Provisions for Carriage - Packages	Not applicable
Special Provisions for Carriage - Bulk	Not applicable
Special Provisions for Carriage - Loading, Unloading and Handling	Not applicable
Special Provisions for Carriage - Operation	Not applicable

European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN)	ADN Danger: 8 + N3 (Environmentally hazardous substance)
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15. SECTION 15: REGULATORY INFORMATION

15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture

European Regulations - Authorisations and/or Restrictions On Use

Candidate List of Substances of Very High Concern for Authorisation	Not listed
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REACH: ANNEX XIV list of substances subject to authorisation	Not listed
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REACH: Annex XVII Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles	Not listed
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Community Rolling Action Plan (CoRAP)	Not listed
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Regulation (EC) N° 850/2004 of the European Parliament and of the Council on persistent organic pollutants	Not listed
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Regulation (EC) N° 2037/2000 on substances that deplete the ozone layer	Not listed
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Regulation (EU) N° 649/2012 of the European Parliament and of the Council concerning the export and import of hazardous chemicals	Not listed
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National regulations

Germany	Wassergefährdungsklasse (WGK) : 1 (low hazard to waters)(No. 142)
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15.2 Chemical Safety Assessment

A REACH chemical safety assessment has been carried out.

15.3 Inventory Status

Listed in: Australia (AICS), Canada (DSL/NDL), China (IECSC), European Union (EINECS/ELINCS), Japan (ENCS), South Korea (KECI), New Zealand Inventory (NZIoC), Philippines (PICCS), Switzerland, Taiwan (TCSI), United States (TSCA).

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16. SECTION 16: OTHER INFORMATION

The following sections contain revisions or new statements:

1.4, 4.1, 6.3, 7.2, 8.2.2, 10.1

Specific concentration limits

$C \geq 5\%$ Skin Corr. 1A; H314

$2\% \leq C < 5\%$ Skin Corr. 1B; H314

$0.5\% \leq C < 2\%$ Skin Irrit. 2; H315

$0.5\% \leq C < 2\%$ Eye Irrit. 2; H319

LEGEND

Hazard Pictogram(s)



GHS05

Precautionary Statement(s)

P234: Keep only in original packaging.

P260: Do not breathe vapour.

P264: Wash hands thoroughly after handling.

P280: Wear protective gloves/protective clothing/eye protection/face protection/hearing protection.

P301+P330+P331: IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

P303+P361+P353: IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water.

P304+P340: IF INHALED: Remove person to fresh air and keep comfortable for breathing.

P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P310: Immediately call a POISON CENTER/doctor.

P321: Specific treatment (see on this label).

P363: Wash contaminated clothing before reuse.

P390: Absorb spillage to prevent material damage.

P405: Store locked up.

P406: Store in a corrosion-resistant container with a resistant inner liner.

P501: Dispose of contents in accordance with local, state or national legislation.

Key Literature References

Chemical Safety Report: Sodium hydroxide
GESTIS

Disclaimers

Information contained in this publication or as otherwise supplied to Users is believed

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Appendix: Exposure scenarios

List of Exposure Scenarios
Exposure Scenario 1: Manufacturing of liquid NaOH
Exposure Scenario 2: Manufacturing of solid NaOH
Exposure Scenario 3: Industrial and Professional Use of NaOH
Exposure Scenario 4: Consumer Use of NaOH

Exposure Scenario 1: Manufacturing of liquid NaOH

List of all use descriptors

Sector of use (SU):	SU 3, 8 Manufacture of bulk, large-scale substances
Product category (PC):	not applicable
Process category (PROC):	PROC1 Use in closed process, no likelihood of exposure PROC2 Use in closed, continuous process with occasional controlled exposure PROC3 Use in closed batch process (synthesis or formulation) PROC4 Use in batch and other process (synthesis) where opportunity for exposure arises PROC8a/b Transfer of chemicals from/to vessels/large containers at (non)dedicated facilities PROC9 Transfer of chemicals into small containers (dedicated filling line)
Article category (AC):	not applicable
Environmental Release	
Category (ERC):	ERC1 Manufacture of substances

EU Risk Assessment

An EU risk assessment has been performed based on the Existing Substances Regulation (Council Regulation 793/93). A comprehensive risk assessment report has been finalised in 2007 and is available via internet:
http://ecb.jrc.ec.europa.eu/DOCUMENTS/Existing-Chemicals/RISK_ASSESSMENT/REPORT/sodiumhydroxidereport416.pdf

Contributing exposure scenario controlling environmental exposure

Product characteristics

Liquid NaOH, all concentrations

Frequency and duration of use

Continuous

Technical onsite conditions and measures to reduce or limit discharges, air emissions and releases to soil

Risk management measures related to the environment aim to avoid discharging NaOH solutions into municipal wastewater or to surface water, in case such discharges are expected to cause significant pH changes. Regular control of the pH value during introduction into open waters is required. In general discharges should be carried out such that pH changes in receiving surface waters are minimised. In general most aquatic organisms can tolerate pH values in the range of 6-9. This is also reflected in the description of standard OECD tests with aquatic organisms.

Conditions and measures related to external treatment or recovery of waste for disposal

Liquid NaOH waste should be reused or discharged to the industrial wastewater and further neutralized if needed.

Contributing exposure scenario controlling worker exposure

Product characteristic

Liquid NaOH, all concentrations

Frequency and duration of use/exposure

8 hours/day, 200 days/year

Technical conditions and measures at process level (source) to prevent release

Replacing, where appropriated, manual processes by automated and/or closed processes. This would avoid irritating mists, sprayings and subsequent potential splashes:

- Use closed systems or covering of open containers (e.g. screens)
- Transport over pipes, technical barrel filling/emptying of barrel with automatic systems (suction pumps etc.)
- Use of pliers, grip arms with long handles with manual use "to avoid direct contact and exposure by splashes (no working over one's head)"

Technical conditions and measures to control dispersion from source towards the worker

Local exhaust ventilation and/or general ventilation is good practice

Organisational measures to prevent /limit releases, dispersion and exposure

- Workers in the risky process/areas identified should be trained a) to avoid to work without respiratory protection and b) to understand the corrosive properties and, especially, the respiratory inhalation effects of sodium hydroxide and c) to follow the safer procedures instructed by the employer.
- The employer has also to ascertain that the required PPE is available and used according to instructions

Conditions and measures related to personal protection, hygiene and health evaluation

- Respiratory protection: In case of dust or aerosol formation (e.g. spraying): use respiratory protection with approved filter (P2)
- Hand protection: impervious chemical resistant protective gloves
 - material: butyl-rubber, PVC, polychloroprene with natural latex liner, material thickness: 0.5 mm, breakthrough time: >

- 480 min
 - material: nitrile-rubber, fluorinated rubber, material thickness: 0.35-0.4 mm, breakthrough time: > 480 min
- Eye protection: chemical resistant goggles must be worn. If splashes are likely to occur, wear tightly fitting safety goggles, face – shield
- Wear suitable protective clothing, aprons, shield and suits, if splashes are likely to occur, wear: rubber or plastic boots, rubber or plastic boots

Exposure estimation and reference to its source

Worker exposure:

NaOH is a corrosive substance. For the handling of corrosive substances and formulations, immediate dermal contacts occur only occasionally and it is assumed that repeated daily dermal exposure can be neglected. Therefore, dermal exposure to NaOH was not quantified.

NaOH is not expected to be systemically available in the body under normal handling and use conditions and therefore systemic effects of NaOH after dermal or inhalation exposure are not expected to occur.

Based on NaOH measurements and following the proposed risk management measures controlling worker exposure, the reasonable worst-case inhalation exposure of 0.33 mg/m³ (typical value is 0.14 mg/m³) is below the DNEL of 1 mg/m³.

Environmental exposure:

The aquatic effect and risk assessment only deals with the effect on organisms/ecosystems due to possible pH changes related to OH⁻ discharges, as the toxicity of the Na⁺ ion is expected to be insignificant compared to the (potential) pH effect. The high water solubility and very low vapour pressure indicate that NaOH will be found predominantly in water. When the risk management measures related to the environment are implemented, there is no exposure to the activated sludge of a sewage treatment plant and there is not exposure of the receiving surface water.

The sediment compartment is not considered, because it is not considered relevant for NaOH. If emitted to the aquatic compartment, sorption to sediment particles will be negligible.

Significant emissions to air are not expected due to the very low vapour pressure of NaOH. If emitted to air as an aerosol in water, NaOH will be rapidly neutralised as a result of its reaction with CO₂ (or other acids).

Significant emissions to the terrestrial environment are not expected either. The sludge application route is not relevant for the emission to agricultural soil, as no sorption of NaOH to particulate matter will occur in STPs/WWTPs. If emitted to soil, sorption to soil particles will be negligible. Depending on the buffer capacity of the soil, OH⁻ will be neutralised in the soil pore water or the pH may increase.

Bioaccumulation will not occur.

Exposure Scenario 2: Manufacturing of solid NaOH

List of all use descriptors

Sector of use (SU):	SU 3, 8 Manufacture of bulk, large-scale substances
Product category (PC):	not applicable
Process category (PROC):	PROC1 Use in closed process, no likelihood of exposure PROC2 Use in closed, continuous process with occasional controlled exposure PROC3 Use in closed batch process (synthesis or formulation) PROC4 Use in batch and other process (synthesis) where opportunity for exposure arises PROC8a/b Transfer of chemicals from/to vessels/large containers at (non)dedicated facilities PROC9 Transfer of chemicals into small containers (dedicated filling line)
Article category (AC):	not applicable
Environmental Release	
Category (ERC):	ERC1 Manufacture of substances

EU Risk Assessment

An EU risk assessment has been performed based on the Existing Substances Regulation (Council Regulation 793/93). A comprehensive risk assessment report has been finalised in 2007 and is available via internet:

http://ecb.jrc.ec.europa.eu/DOCUMENTS/Existing-Chemicals/RISK_ASSESSMENT/REPORT/sodiumhydroxidereport416.pdf

Contributing exposure scenario controlling environmental exposure

Product characteristics

Solid NaOH

Frequency and duration of use

Continuous

Technical onsite conditions and measures to reduce or limit discharges, air emissions and releases to soil

Risk management measures related to the environment aim to avoid discharging NaOH solutions into municipal wastewater or to surface water, in case such discharges are expected to cause significant pH changes. Regular control of the pH value during introduction into open waters is required. In general discharges should be carried out such that pH changes in receiving surface waters are minimised. In general most aquatic organisms can tolerate pH values in the range of 6-9. This is also reflected in the description of standard OECD tests with aquatic organisms.

Conditions and measures related to external treatment or recovery of waste for disposal

There is no solid waste of NaOH. Liquid NaOH waste should be reused or discharged to the industrial wastewater and further neutralized if needed.

Contributing exposure scenario controlling worker exposure

Product characteristic

Solid NaOH, all concentrations

Frequency and duration of use/exposure

8 hours/day, 200 days/year

Technical conditions and measures at process level (source) to prevent release

Replacing, where appropriated, manual processes by automated and/or closed processes. This would avoid irritating mists, sprayings and subsequent potential splashes:

- Use closed systems or covering of open containers (e.g. screens)
- Transport over pipes, technical barrel filling/emptying of barrel with automatic systems (suction pumps etc.)
- Use of pliers, grip arms with long handles with manual use "to avoid direct contact and exposure by splashes (no working over one's head)"

Technical conditions and measures to control dispersion from source towards the worker

Local exhaust ventilation and/or general ventilation is good practice

Organisational measures to prevent /limit releases, dispersion and exposure

- Workers in the risky process/areas identified should be trained a) to avoid to work without respiratory protection and b) to understand the corrosive properties and, especially, the respiratory inhalation effects of sodium hydroxide and c) to follow the safer procedures instructed by the employer.
- The employer has also to ascertain that the required PPE is available and used according to instructions

Conditions and measures related to personal protection, hygiene and health evaluation

- Respiratory protection: In case of dust or aerosol formation (e.g. spraying): use respiratory protection with approved filter (P2)
- Hand protection: impervious chemical resistant protective gloves

- material: butyl-rubber, PVC, polychloroprene with natural latex liner, material thickness: 0.5 mm, breakthrough time: > 480 min
- material: nitrile-rubber, fluorinated rubber, material thickness: 0.35-0.4 mm, breakthrough time: > 480 min
- Eye protection: chemical resistant goggles must be worn. If splashes are likely to occur, wear tightly fitting safety goggles, face – shield
- Wear suitable protective clothing, aprons, shield and suits, if splashes are likely to occur, wear: rubber or plastic boots, rubber or plastic boots

Exposure estimation and reference to its source

Worker exposure:

NaOH is a corrosive substance. For the handling of corrosive substances and formulations, immediate dermal contacts occur only occasionally and it is assumed that repeated daily dermal exposure can be neglected. Therefore, dermal exposure to NaOH was not quantified.

NaOH is not expected to be systemically available in the body under normal handling and use conditions and therefore systemic effects of NaOH after dermal or inhalation exposure are not expected to occur.

Based on NaOH measurements and following the proposed risk management measures controlling worker exposure, the reasonable worst-case inhalation exposure of 0.26 mg/m³ (measured at the drumming/bagging place) is below the DNEL of 1 mg/m³.

Environmental exposure:

The aquatic effect and risk assessment only deals with the effect on organisms/ecosystems due to possible pH changes related to OH⁻ discharges, as the toxicity of the Na⁺ ion is expected to be insignificant compared to the (potential) pH effect. The high water solubility and very low vapour pressure indicate that NaOH will be found predominantly in water. When the risk management measures related to the environment are implemented, there is no exposure to the activated sludge of a sewage treatment plant and there is not exposure of the receiving surface water.

The sediment compartment is not considered, because it is not considered relevant for NaOH. If emitted to the aquatic compartment, sorption to sediment particles will be negligible.

Significant emissions to air are not expected due to the very low vapour pressure of NaOH. If emitted to air as an aerosol in water, NaOH will be rapidly neutralised as a result of its reaction with CO₂ (or other acids).

Significant emissions to the terrestrial environment are not expected either. The sludge application route is not relevant for the emission to agricultural soil, as no sorption of NaOH to particulate matter will occur in STPs/WWTPs. If emitted to soil, sorption to soil particles will be negligible. Depending on the buffer capacity of the soil, OH⁻ will be neutralised in the soil pore water or the pH may increase.

Bioaccumulation will not occur.

Exposure Scenario 3: Industrial and Professional Use of NaOH

List of all use descriptors

Sector of use (SU): SU 1-24

Because sodium hydroxide has so many uses and is used so widely it can potentially be used in all sectors of end use (SU) described by the use descriptor system (SU 1-24). NaOH is used for different purposes in a variety of industrial sectors.

Product category (PC): PC 0-40

Sodium hydroxide can be used in many different chemical product categories (PC). It can be used for example as an adsorbent (PC2), metal surface treatment product (PC14), non-metal-surface treatment product (PC15), intermediate (PC19), pH regulator (PC20), laboratory chemical (PC21), cleaning product (PC35), water softener (PC36), water treatment chemical (PC37) or extraction agent. However, it could potentially also be used in other chemical product categories (PC 0 – 40).

Process category (PROC): PROC1 Use in closed process, no likelihood of exposure
PROC2 Use in closed, continuous process with occasional controlled exposure
PROC3 Use in closed batch process (synthesis or formulation)
PROC4 Use in batch and other process (synthesis) where opportunity for exposure arises
PROC5 Mixing or blending in batch processes (multistage and/or significant contact)
PROC8a/b Transfer of chemicals from/to vessels/large containers at (non)dedicated facilities
PROC9 Transfer of chemicals into small containers (dedicated filling line)
PROC10 Roller application or brushing
PROC11 Non industrial spraying
PROC13 Treatment of articles by dipping and pouring
PROC15 Use of laboratory reagents in small scale laboratories

The process categories mentioned above are assumed to be the most important ones but other process categories could also be possible (PROC 1 – 27).

Article category (AC): not applicable

Although sodium hydroxide can be used during the manufacturing process of articles, the substance is not expected to be present in the article. The article categories (AC) do not seem applicable for sodium hydroxide.

Environmental Release

Category (ERC): ERC1 Manufacture of substances
ERC2 Formulation of preparations
ERC4 Industrial use of processing aids in processes and products, not becoming part of articles
ERC6A Industrial use resulting in manufacture of another substance (use of intermediates)
ERC6B Industrial use of reactive processing aids
ERC7 Industrial use of substances in closed systems
ERC8A Wide dispersive indoor use of processing aids in open systems
ERC8B Wide dispersive indoor use of reactive substances in open systems
ERC8D Wide dispersive outdoor use of processing aids in open systems
ERC9A Wide dispersive indoor use of substances in closed systems

The environmental release categories mentioned above are assumed to be the most important ones but other industrial environmental release categories could also be possible (ERC 1 – 12).

Further explanations

Typical uses include: production of organic and inorganic chemicals, formulation of chemicals, production and whitening of paper pulp, production of aluminium and other metals, food industry, water treatment, production of textiles, professional end use of formulated products and other industrial uses.

EU Risk Assessment

An EU risk assessment has been performed based on the Existing Substances Regulation (Council Regulation 793/93). A comprehensive risk assessment report has been finalised in 2007 and is available via internet:

http://ecb.jrc.ec.europa.eu/DOCUMENTS/Existing-Chemicals/RISK_ASSESSMENT/REPORT/sodiumhydroxidereport416.pdf

Contributing exposure scenario controlling environmental exposure

Product characteristics

Solid or liquid NaOH, all concentrations (0-100%), if solid: low dustiness class

Frequency and duration of use

Continuous

Technical onsite conditions and measures to reduce or limit discharges, air emissions and releases to soil

Risk management measures related to the environment aim to avoid discharging NaOH solutions into municipal wastewater or to surface water, in case such discharges are expected to cause significant pH changes. Regular control of the pH value during introduction into open waters is required. In general discharges should be carried out such that pH changes in receiving surface waters are minimised. In general most aquatic organisms can tolerate pH values in the range of 6-9. This is also reflected in the description of standard OECD tests with aquatic organisms.

Conditions and measures related to external treatment or recovery of waste for disposal

There is no solid waste of NaOH. Liquid NaOH waste should be reused or discharged to the industrial wastewater and further neutralized if needed.

Contributing exposure scenario controlling worker exposure

Product characteristic

Solid or liquid NaOH, all concentrations (0-100%), if solid: low dustiness class

Frequency and duration of use/exposure

8 hours/day, 200 days/year

Technical conditions and measures at process level (source) to prevent release

For worker, both solid and liquid NaOH containing products at concentration > 2%:
Replacing, where appropriated, manual processes by automated and/or closed processes. This would avoid irritating mists, sprayings and subsequent potential splashes:

- Use closed systems or covering of open containers (e.g. screens)
- Transport over pipes, technical barrel filling/emptying of barrel with automatic systems (suction pumps etc.)
- Use of pliers, grip arms with long handles with manual use "to avoid direct contact and exposure by splashes (no working over one's head)"

Technical conditions and measures to control dispersion from source towards the worker

For worker, both solid and liquid NaOH containing products at concentration > 2%:
Local exhaust ventilation and/or general ventilation is good practice

Organisational measures to prevent /limit releases, dispersion and exposure

- For worker, both solid and liquid NaOH containing products at concentration > 2%:
- Workers in the risky process/areas identified should be trained a) to avoid to work without respiratory protection and b) to understand the corrosive properties and, especially, the respiratory inhalation effects of sodium hydroxide and c) to follow the safer procedures instructed by the employer.
 - The employer has also to ascertain that the required PPE is available and used according to instructions
 - Where possible for professional use, use of specific dispensers and pumps specifically designed to prevent splashes/spills/exposure to occur.

Conditions and measures related to personal protection, hygiene and health evaluation

- For worker and professional, both solid and liquid NaOH containing products at concentration > 2%:
- Respiratory protection: In case of dust or aerosol formation (e.g. spraying): use respiratory protection with approved filter (P2)
 - Hand protection: impervious chemical resistant protective gloves
 - material: butyl-rubber, PVC, polychloroprene with natural latex liner, material thickness: 0.5 mm, breakthrough time: > 480 min
 - material: nitrile-rubber, fluorinated rubber, material thickness: 0.35-0.4 mm, breakthrough time: > 480 min
 - If splashes are likely to occur, wear tightly fitting chemical resistant safety goggles, face –shield
 - If splashes are likely to occur, wear suitable protective clothing, aprons, shield and suits, rubber or plastic boots, rubber or plastic boots

Exposure estimation and reference to its source

Worker/professional exposure:

NaOH is a corrosive substance. For the handling of corrosive substances and formulations, immediate dermal contacts occur only occasionally and it is assumed that repeated daily dermal exposure can be neglected. Therefore, dermal exposure to NaOH was not quantified.

NaOH is not expected to be systemically available in the body under normal handling and use conditions and therefore systemic effects of NaOH after dermal or inhalation exposure are not expected to occur.

Based on NaOH measurements in the pulp and paper industry, de-inking waste paper, aluminium, textile and chemical industry and following the proposed risk management measures controlling worker and professional exposure, the inhalation exposure is below the DNEL of 1 mg/m³.

In addition to the measured exposure data the ECETOC TRA tool has been used to estimate the inhalation exposure (see Table below). It was assumed that there is no local exhaust ventilation and no respiratory protection unless specified otherwise. The duration of exposure was set at more than 4 hours per day as a worst-case assumption and professional use was specified where relevant as

a worst-case assumption. For the solid, the low dustiness class was selected because NaOH is very hygroscopic. Only the most relevant PROCs were considered in the assessment.

PROC	PROC description	Liquid (mg/m ³)	Solid (mg/m ³)
PROC 1	Use in closed process, no likelihood of exposure	0.17	0.01
PROC 2	Use in closed, continuous process with occasional controlled exposure (e.g. sampling)	0.17	0.01
PROC 3	Use in closed batch process (synthesis or formulation)	0.17	0.1
PROC 4	Use in batch and other process (synthesis) where opportunity for exposure arises	0.17	0.2 (with LEV)
PROC 5	Mixing or blending in batch processes for formulation of preparations and articles (multistage and/or significant contact)	0.17	0.2 (with LEV)
PROC 7	Spraying in industrial settings and applications	0.17	Not applicable
PROC 8a/b	Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non dedicated or dedicated facilities	0.17	0.5
PROC 9	Transfer of substance or preparation into small containers (dedicated filling line, including weighing)	0.17	0.5
PROC10	Roller application or brushing of adhesive and other coating	0.17	0.5
PROC11	Spraying outside industrial settings or applications	0.17	0.2 (with LEV)
PROC13	Treatment of articles by dipping and pouring	0.17	0.5
PROC14	Production of preparations or articles by tableting, compression, extrusion, pelettisation	0.17	0.2 (with LEV)
PROC15	Use a laboratory reagent	0.17	0.1
PROC19	Hand-mixing with intimate contact and only PPE available.	0.17	0.5
PROC23	Open processing and transfer operations (with minerals) at elevated temperature	0.17	0.4 (with LEV and RPE(90%))
PROC24	High (mechanical) energy work-up of substances bound in materials and/or articles	0.17	0.5 (with LEV and RPE(90%))

Environmental exposure:

The aquatic effect and risk assessment only deals with the effect on organisms/ecosystems due to possible pH changes related to OH⁻ discharges, as the toxicity of the Na⁺ ion is expected to be insignificant compared to the (potential) pH effect. The high water solubility and very low vapour pressure indicate that NaOH will be found predominantly in water. When the risk management measures related to the environment are implemented, there is no exposure to the activated sludge of a sewage treatment plant and there is not exposure of the receiving surface water.

The sediment compartment is not considered, because it is not considered relevant for NaOH. If emitted to the aquatic compartment, sorption to sediment particles will be negligible.

Significant emissions to air are not expected due to the very low vapour pressure of NaOH. If emitted to air as an aerosol in water, NaOH will be rapidly neutralised as a result of its reaction with CO₂ (or other acids).

Significant emissions to the terrestrial environment are not expected either. The sludge application route is not relevant for the emission to agricultural soil, as no sorption of NaOH to particulate matter will occur in STPs/WWTPs. If emitted to soil, sorption to soil particles will be negligible. Depending on the buffer capacity of the soil, OH⁻ will be neutralised in the soil pore water or the pH may increase.

Bioaccumulation will not occur.

Exposure Scenario 4: Consumer Use of NaOH

List of all use descriptors

Sector of use (SU): SU 21 Private households

Product category (PC): PC 0-40

Sodium hydroxide can be used in many different chemical product categories (PC): PC 20, 35, 39 (neutralisation agents, cleaning products, cosmetics, personal care products). The other PCs are not explicitly considered in this exposure scenario. However, NaOH can also be used in other PCs in low concentrations e.g. PC3 (up to 0.01%), PC8 (up to 0.1%), PC28 and PC31 (up to 0.002%) but it can be used also in the remaining product categories (PC 0-40).

Process category (PROC): not applicable

Article category (AC): not applicable

Environmental Release

Category (ERC):
ERC8A Wide dispersive indoor use of processing aids in open systems
ERC8B Wide dispersive indoor use of reactive substances in open systems
ERC8D Wide dispersive outdoor use of processing aids in open systems
ERC9A Wide dispersive indoor use of substances in closed systems

The environmental release categories mentioned above are assumed to be the most important ones but other wide dispersive environmental release categories could also be possible (ERC 8 – 11b).

Further explanations

NaOH (up to 100%) is also used by consumers. It is used at home for drain and pipe cleaning, wood treatment and it also used to make soap at home. NaOH is also used in batteries and in oven-cleaner pads.

EU Risk Assessment

An EU risk assessment has been performed based on the Existing Substances Regulation (Council Regulation 793/93). A comprehensive risk assessment report has been finalised in 2007 and is available via internet:

http://ecb.jrc.ec.europa.eu/DOCUMENTS/Existing-Chemicals/RISK_ASSESSMENT/REPORT/sodiumhydroxidereport416.pdf

Contributing exposure scenario controlling environmental exposure

Product characteristics

Solid or liquid NaOH, all concentrations (0-100%), if solid: low dustiness class

Conditions and measures related to external treatment or recovery of waste for disposal

This material and its container must be disposed of in a safe way (e.g. by returning to a public recycling facility). If container is empty, trash as regular municipal waste.

Batteries should be recycled as much as possible (e.g. by returning to a public recycling facility). Recovery of NaOH from alkaline batteries includes emptying the electrolyte, collection and neutralization with sulphuric acid and carbon dioxide.

Contributing exposure scenario controlling worker exposure

Product characteristic

Solid or liquid NaOH, all concentrations (0-100%), if solid: low dustiness class

Typical concentrations: floor strippers (<10%), hair straighteners (<2%), oven cleaners (<5%), drain openers (liquid: 30%, solid: <100%), cleaning products (<1.1%)

Conditions and measures related to the design of the product

- It is required to use resistant labelling-package to avoid its auto-damage and loss of the label integrity, under normal use and storage of the product. The lack of quality of the package provokes the physical loss of information on hazards and use instructions.
- It is required that household chemicals, containing sodium hydroxide for more than 2%, which may be accessible to children should be provided with a child-resistant fastening (currently applied) and a tactile warning of danger (Adaptation to Technical Progress of the Directive 1999/45/EC, annex IV, Part A and Article 15(2) of Directive 67/548 in the case of, respectively, dangerous preparations and substances intended for domestic use). This would prevent accidents by children and other sensitive groups of society.
- It is advisable to deliver only in very viscous preparations
- It is advisable to delivery only in small amounts
- For use in batteries, it is required to use completely sealed articles with a long service life maintenance.

Conditions and measures related to information and behavioural advice to consumers

It is required that improved use instructions, and product information should always be provided to the consumers. This clearly can efficiently reduce the risk of misuse. For reducing the number of accidents in which (young) children or elderly people are involved, it should be advisable to use these products in the absence of children or other potential sensitive groups. To prevent improper use of

sodium hydroxide, instructions for use should contain a warning against dangerous mixtures.

Instructions addressed to consumers:

- Keep out of reach of children.
- Do not apply product into ventilator openings or slots.

Conditions and measures related to personal protection and hygiene

For consumer, both solid and liquid NaOH containing products at concentration > 2%:

- Respiratory protection: In case of dust or aerosol formation (e.g. spraying): use respiratory protection with approved filter (P2)
- Hand protection: impervious chemical resistant protective gloves
- If splashes are likely to occur, wear tightly fitting chemical resistant safety goggles, face-shield

Exposure estimation and reference to its source

Consumer exposure:

Acute/short term exposure was assessed only for the most critical use: use of NaOH in a spray oven cleaner. Consexpo and SprayExpo were used to estimate exposure. The calculated short-term exposure of 0.3 – 1.6 mg/m³ is slightly higher than the long term DNEL for inhalation of 1 mg/m³ but smaller than the short term occupational exposure limit of 2 mg/m³. Furthermore, NaOH will be rapidly neutralised as a result of its reaction with CO₂ (or other acids).

Environmental exposure:

Consumer uses relates to already diluted products which will further be neutralized quickly in the sewer, well before reaching a WWTP or surface water.