



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JUL 11 2006

Mr. Perry J. Patton
Samax Enterprises
154 Eastwood Blvd.
Centereach, NY 11720

Ref. No.: 06-0136


Dear Mr. Patton:

This is in response to your May 26, 2006 letter regarding the marking and labeling requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You include a flammable liquid hazard label, an inhalation hazard label, and an orientation arrow marking in your letter. You also provide a Material Safety Data Sheet (MSDS) for the "Liquid No Wash" product. Specifically, you ask if the labels and orientation markings included in your letter are required to be displayed on a 5-gallon container of the product.

Under § 173.22, it is the shipper's responsibility to properly class and describe a hazardous material. Marking and labeling requirements are based on the proper shipping description of the hazardous material. The MSDS sheet for your product indicates the proper shipping description for "Liquid No Wash" is "Paint related material, 3, UN1263, PG II." For a material described as such, the "Flammable liquid" label specified in § 172.419 and included in your letter must be displayed on the outer surface of the package. An inhalation hazard label may not be displayed on a package containing "Liquid No Wash" because the material does not meet the definition of a poison inhalation hazard. Orientation arrow markings must be displayed on two opposite vertical sides of a combination package having inner packagings containing liquid hazardous materials. Although not required by the HMR, orientation arrows may be displayed on the surface of a single package (e.g., a 5-gallon container) or inner packaging.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards

172.419
173.22



060136

SAMAX ENTERPRISES

Eichenlaub
§172.400,419
§173.22.
labeling
06-0136

May 26, 2006

To: Edward Mazzullo
From: Perry J. Patton

Dear Sir:

We are requesting a review of the enclosed 5-gallon container labels.

Our biggest concern is the inclusion on the container of the flammable liquid label and inhalation hazard label. Are we or are we not required to use both? Which label takes precedence over the other?

Any assistance you can provide will be greatly appreciated.

If you want to speak to us directly, please contact me at the following number: 631-580-2237.

Otherwise, I can be reached at the following:


Address: 154 Eastwood Blvd.
Centereach, NY 11720

Fax: 631-580-2239

E-mail: oshacorp@optonline.net

Thank you.

Regards,


Perry J. Patton

MATERIAL SAFETY DATA SHEET**LIQUID NO WASH**

Revised: January 2003

1. Chemical Product and Company Identification

Product Name	Liquid No Wash
Synonyms and Trade Names	Proprietary Mixture
Chemical Family	Organic Solvent Mixture
Formula	Not Applicable
Telephone (General Information)	1-800-545-7658
Telephone (Emergencies)*	1-800-424-9300
Company Name	Samax Enterprises
Company Address	29-75 Riverside Ave, Newark, N.J. 07104

*In case of an emergency involving spills, leaks, fire exposure, or accidents related to this product call CHEMTREC - 1-800-424-9300.

2. Composition / Information on Ingredients

INGREDIENT	CAS NUMBER	HAZARD CLASS	ACGIH TLV-TWA
Dichloromethane	75-09-2	P002, Keep Away From Food	50 ppm TLV 25 ppm PEL**
Toluene	108-88-3	D001, Flammable Liquid	100 ppm TLV 50 ppm PEL**
Methanol	67-56-1	D001, Flammable Liquid Poison	200 ppm
Acetone	67-64-1	D001, Flammable Liquid	750 ppm TLV 1000 ppm PEL**

** PEL = OSHA Permissible Exposure Limit

3. Physical Data

Boiling Point	40°C 104°F
Vapor Pressure @ 20°C	< 1 atm.
Vapor Density @ 1 Atmosphere	NA
Specific Gravity	.98
pH	< 8.9
Percent Volatile by Volume	> 90
Appearance	Clear to Slightly Cloudy Liquid
Odor	Solvent, Aromatic
Evaporation Rate (ether =1)	> 1
Physical State	Liquid
Solubility	> 40%
Flash Point	47°C 90°F

4. Health Hazard Data

• Potential effects of a single (Acute Overexposure)

- Eye:** May cause severe burns and possible irreversible eye damage if contact is made.
- Skin:** May be irritating if confined on the skin by gloves or clothing. May be absorbed slowly through the skin into the bloodstream and cause symptoms listed below under inhalation.
- Ingestion:** May cause blindness and death. May cause headache, nausea, vomiting, diarrhea, blood in urine, dizziness and unconsciousness.
- Inhalation:** Levels of exposure at 300-700 ppm for 3-5 hours may cause loss of muscle control and coordination. Exposure for longer periods or at higher levels may cause stupor, dizziness, chest pain, arm and leg pain, loss of appetite, headache, fatigue, narcosis, and death. May cause high blood level of carboxy hemoglobin.
- Chronic:** DCM is listed as a possible carcinogen by the ACGIH. Chronic over exposure to Toluene may cause kidney and liver failure. Methanol causes toxic effect to the central nervous system.

5. First Aid Measures

Note: Specialized First Aid and Medical Treatment are Required for all Exposures

- Eyes:** Remove contact lenses (if applicable). Flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower lids. Seek medical aid immediately.
- Skin:** Flush effected area of skin with plenty of soap and water for at least 15 minutes while removing any contaminated clothing. Do not try to neutralize with chemicals. Seek medical aid immediately.
- Ingestion:** Never give anything by mouth to an unconscious person. Seek medical aid immediately. If conscious, give large amounts of water to drink and induce vomiting.
- Inhalation:** Remove from exposure to fresh air immediately. Keep the victim quiet, lying down and as comfortable as possible. Seek immediately medical attention. If not breathing, give artificial respiration at once. If breathing is difficult, give oxygen.

Notes to Physician: Treat symptomatically and supportively.

6. Fire Fighting Measures

- General Information:** Product is highly flammable. Vapors may ignite under certain conditions when exposed to an ignition source. Product is only partially soluble in water and may float and burn on top of water. Cool exposed containers.
- Extinguishing Media:** Extinguish fire using an agent suitable for type of surrounding fire e.g. foam, CO₂, or dry chemical. Water may be used as a last resort.

7. Accidental Release Measures

Spills/Leaks: Wear suitable Personal Protective Equipment (PPE). Ventilate the area as well as possible before entering. Eliminate/remove any source of ignition. Absorb liquid with vermiculite, dry sand, earth, or similar material and place into a sealed container for proper disposal.

Handling: Always wear suitable PPE. Rubber or vinyl gloves are recommended, do not wear leather or cloth. Wash thoroughly after handling. Remove contaminated clothing and wash before reuse. Use with adequate ventilation. Keep container tightly closed, avoid skin and eye contact, and avoid inhalation.

Storage: Store in tightly closed containers in cool, dry, well ventilated area away from food or food preparation materials. Keep away from incompatible substances such as strong oxidizers, strong caustics, and chemically active metals such as aluminum, magnesium powder, sodium, potassium, or lithium. Keep away from sources of heat, sparks, or any other source of ignition.

8. Exposure Controls, Personal Protection Equipment

Engineering Controls: Use adequate general or local exhaust ventilation to keep airborne concentrations below the permissible exposure limit of 25 ppm.

Personal Protective Equipment:

Eyes: Wear appropriate face shield and chemical safety goggles as described by OSHA's eye and face protection regulations in 29 CFR 1910.133 or European Standard EN 166. Do not wear contact lenses. For increased protection, use air supplied respirator with face shield.

Skin: Wear appropriate protective clothing to prevent skin exposure.

Clothing: Wear appropriate protective clothing to prevent skin exposure.

Respirators: Where required, use an appropriate NIOSH, OSHA, or MSHA respirator as applicable. Some exposures may require a SCBA. Follow the OSHA respirator regulations found in 29 CFR 1910.134 or European Standard EN 149 for approved respirator when necessary.

9. Stability and Reactivity

Chemical Stability: Stable under normal temperature and pressures.

Conditions to Avoid: Keep away from food products, acids, strong oxidizers, alkali metals, heat and spark or flame producing items.

Hazardous Decomposition Products: Not Applicable.

Hazardous Polymerization: Will not occur.

10. Regulatory Information

CERLA RQ: 75-09-2=1,000lbs
108-88-3=1,000lbs
67-64-1=5,000lbs
67-56-1=5,000 lbs

RCRA D Series: CAS# 108-88-3 - D001, CAS# 67-64-1 - D001, and CAS# 67-56-1 - D001
RCRA F Series: CAS# 75-09-2 - F002
RCRA P Series: None Listed.
RCRA U Series: None Listed.

US D.O.T. Shipping Name: Paint Related Material
US D.O.T. Hazard Class: 3
US D.O.T. Identification Number: UN 1263 Pkg II

HMIS & NFPA Information:

- Health: 3
- Flammability: 3
- Reactivity: 2
- Corrosivity: 0

TSCA:

- None of the chemicals in this product are listed.
- Health and safety list: None of the chemicals in this product are listed.
- Chemical test rules: None of the chemicals in this product are under a chemical test rule.

SARA: REPORTABLE QUANTITY (RQ):

- CAS# 75-09-2 RQ amount: 1000/454
- CAS# 108-88-3 RQ amount: 1000/454
- CAS# 67-64-1 RQ amount: 5000/2270
- CAS# 67-56-1 RQ amount: 5000/2270
- None of the chemicals in this product have a TPQ.

CLEAN AIR ACT:

- 75-09-2; clean air rule -yes
- 108-88-3; clean air rule-yes
- 67-56-1; clean air rule-yes
- This material does not contain any class 1-ozone depletors
- This material does not contain any class 2-ozone depletors

OSHA:

75-09-2 and 67-56-1 are considered toxic by OSHA

11. Toxicological Information

- CAS# 75-09-2 LC₅₀ - 200-300 mg/kg orally in rats
- CAS# 108-88-3 LC₅₀ - 7.53 g/kg orally in rats
- CAS# 67-64-1 LC₅₀ - 10.7 ml/kg orally in rats

Carcinogenicity:

75-09-2 NTP_R, IARC-2B

Epidemiology:

No information available.

Teratogenicity:

No information available.

Reproductive effects:

No information available.

Neurotoxicity:

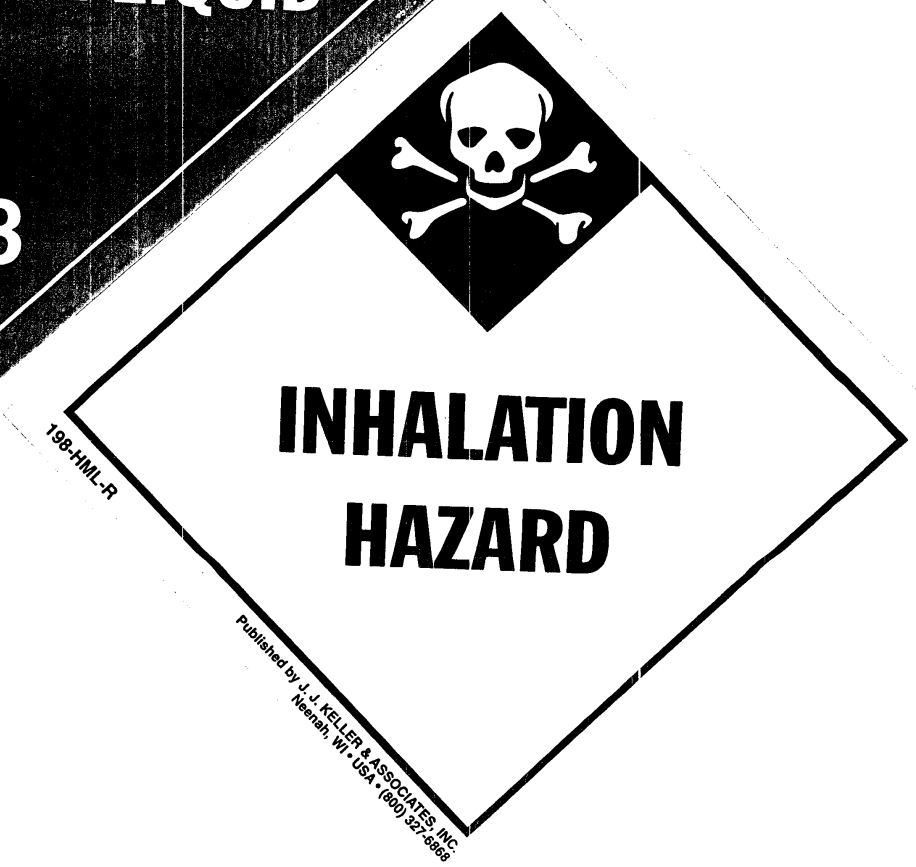
No information available.

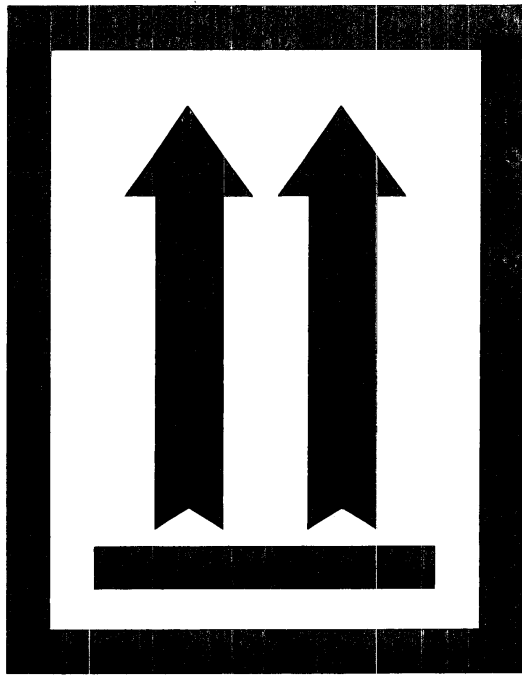
Mutagenicity:

No information available.

12. Additional Information

The information above is believed to be accurate and represents the best information currently available to SAMAX Enterprises Inc. However, SAMAX Inc. makes no warranty of merchantability or any other warranty, expressed or implied, with respect to such information and SAMAX Inc. will assume no liability resulting from its use. Users should conduct their own investigations to determine the suitability of the information for their particular purpose. In no way shall SAMAX Inc. be liable for any claims, losses, or damages of any third party or for lost profits or any special, indirect, incidental, consequential or exemplary damages, howsoever arising even if SAMAX Inc. has been advised of the possibility of such damages.





31-HML-R

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Neenah, WI • USA • (800) 327-6868

ROCK-MIRACLE™

SINCE 1936

**Removes
paint,
finishes
and varnish.**

Liquid No Wash REMOVER

No afterwash necessary!

DANGER! ☠️ POISON!

FLAMMABLE LIQUID AND VAPOR.

**MAY BE FATAL OR CAUSE BLINDNESS IF SWALLOWED.
VAPOR HARMFUL. MAY CAUSE FLASH FIRE**

Rock Miracle Liquid No Wash Remover is ideal for ornamental and carved surfaces. No afterwash is necessary. Liquid No Wash quickly softens paint, enamel, latex, lacquer, varnish, shellac and urethanes from wood, metal, plaster, and masonry without injury to these surfaces. Do not allow to drip on linoleum, asphalt, rubber tile and synthetics. It may also soften fiberglass and plastic.

DIRECTIONS: Wear protective gloves and safety glasses. Shake can well. Open slowly with container opening away from your face and close after each use. Do not transfer contents of can to unlabeled bottles or other containers. Always test a small area for removal time. Apply a heavy coat using a polyester brush or for continuous flow, pour from a glass or metal cup to a confined area of no more than 3 square feet at a time. Allow Liquid No Wash to penetrate for at least 15 minutes. Scrape off softened finish with a scraper or steel wool pad till area is completely cleaned. Use a toothbrush or pointed object for carved areas. Thoroughly wipe area with absorbant cloth to remove residue before proceeding to next area. No further surface preparation is necessary.

Made in USA

Samax Enterprises, Inc.
Newark, NJ 07104-4237

Ingredients: Contains METHYLENE CHLORIDE CAS# 75-09-02
ACETONE CAS# 67-64-1 METHYL ALCOHOL CAS# 67-51-1
TOLUENE CAS# 108-88-3 PETROLEUM WAX

**DANGER! FLAMMABLE MIXTURE! KEEP AWAY FROM
HEAT, SPARKS AND OPEN FLAME!**

**DANGER! ☠ POISON!
CANNOT BE MADE NON-POISONOUS!**

**VAPOR HARMFUL - CONTAINS METHYLENE CHLORIDE WHICH HAS BEEN SHOWN TO CAUSE
CANCER IN CERTAIN LABORATORY ANIMALS. CANNOT BE MADE NON-POISONOUS.** Reduces
blood's oxygen carrying capacity. People having or suspected of having heart trouble or any
pulmonary disorders and women who are pregnant should consult their physician before using
this product.

May affect the brain or nervous system causing dizziness, headache or nausea. Reduces the
blood's oxygen-carrying capacity. May be fatal or cause blindness if swallowed. Avoid contact
with eyes, skin and clothing. Causes eye, nose, throat and skin irritation. Risk to your health
depends on level and duration of exposure.

Notice: Reports have associated repeated and prolonged occupational overexposure to solvents
with permanent brain and nervous system damage. Intentional misuse by deliberately
concentrating and inhaling the contents may be harmful or fatal. Contact with flame or hot
surfaces may produce toxic gases. Keep away from heat and flame. Do not smoke.

USE ONLY WITH ADEQUATE VENTILATION. Use this product outdoors if possible. If you must
use it indoors, prevent buildup of vapors by opening all windows and doors to achieve good
ventilation.

Do not use in basement or other unventilated area. If properly used, a respirator may offer
additional protection. Obtain professional advice before using. A dust mask does not provide
protection against vapors. Open containers carefully and close after each use. Clean up rags,
papers and waste promptly. Allow solvent to evaporate, then dispose of in metal containers.

VAPORS MAY IGNITE EXPLOSIVELY. Keep away from heat, sparks and flame. Vapors may
cause flash fire. Do not smoke. Extinguish all flames and pilot lights and turn off stoves, heaters,
electric motors and other sources of ignition during use and until all vapors are gone. Prevent
build-up of vapors by opening all windows and doors to achieve good ventilation.

FIRST AID: Eyes and skin: In case of contact, immediately flush eyes or skin with plenty of
water for at least 15 minutes. Get medical attention immediately. Remove contaminated clothes
and shoes. Wash clothing before reuse. Thoroughly clean contaminated shoes. **Inhalation:** If
inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult,
give oxygen.

Swallowing: If swallowed, get medical attention immediately. **Spills:** If spilled, contain spilled
material and remove with inert absorbent. Dispose of contaminated absorbent, container and
unused contents in accordance with local, state and federal regulations.
Store in cool place. Do not reuse container.

KEEP OUT OF THE REACH OF CHILDREN.

Rock Miracle Liquid No Wash Paint
and Finish Remover is safe and
efficient when used properly.
Because of the wide conditions
under which this product may be
used or misused, the manufacturer

and distributor disclaim the
implied warranty or
merchantability and any or all
express or implied warranties. Any
defective product will be replaced.
The purchaser and users assume
full responsibility for the safe and
proper use of this product and for
damages to persons or properties.
The manufacturer and distributor
will not be responsible for any
damage to person or property
regardless of legal theory. For
further information refer to the
material safety data sheet.

**MAX VOC
297.5 GRAMS PER LITER**

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