

PRODUCT DATA SHEET: SODIUM CARBONATE (SOCALIM): Revision 4 Dated: 31/01/11 PRODUCT SPECIFICATION

I RODUCT SI ECHICATION		
Product Name	Sodium Carbonate Light	
Alternative Name		
Product Grade	Imported	
Specification Reference	SOCALIM/3	
SPECIFICATION		
Fraction of total mass % on heating	0.8% max	
Sodium Carbonate	99.0% minimum	
Chlorides NaCl	0.4% max	
Iron Fe_2O_3	0.003% max	
Substances Insoluble In Water	0.04% max	
Sulphates NaSO ₄	0.05% max	
NOTES		

Exclusion of Liability

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Health and Safety

A Material Safety Data Sheet has been issued describing the health, safety and environmental properties of this product, identifying the potential hazards and giving advice on the handling precautions and emergency procedures. This must be consulted fully before handling, storage and use.



1.

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E-mail sales.manchester@tennantsdistribution.com PRODUCT DATA SHEET: SODIUM CARBONATE (SOCALIM): Revision 4 Dated: 31/01/11 SAFETY DATA SHEET

IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND COMPANY

Page 2 of 7

1.1 Product Identifier

Chemical Name (EINECS) Product Name Alternative Name Chemical Formula Trade Names Synonyms CAS Number EC Number Index Number REACH Registration Number Sodium carbonate SODIUM CARBONATE Disodium carbonate, soda ash Na₂CO₃

497-19-8 207-838-8 011-005-00-2 01-2119485498-19-XXXX

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

Glass production, intermediate in chemicals production, water treatment, chemicals, washing and cleaning products, other industrial, professional and consumer uses. Exposure scenarios covering uses can be found in the Annex. Uses advised against – none identified.

1.3 Details of the supplier of the safety data sheet

Tennants Distribution Limited Hazelbottom Road Cheetham Manchester M8 0GR Tel: 44(0)161 205 4454 Fax: 44(0) 161 203 4298 Email: msds@tennantsdistribution.com

1.4 Emergency telephone number

Tel: 44(0) 844 3350001 (24 hours)

2. HAZARDS IDENTIFICATION

2.1 Classification of the substance or mixture

2.1.1 Regulation 1272/2008 (CLP)

Eye irritant 2

2.1.2 EEC Directive 67/548/EEC & Directive 1999/45/EC Irritating to eyes

2.2 Label elements

2.2.1

According to Regulation (EC) No. 1272/2008 (CLP).



Signal word : Warning
Hazard Statement
H319 - causes serious eye irritation
Precautionary statements.
P264 - Wash thoroughly after handling
P280 - Wear protective gloves/ protective clothing/ eye protection/ face protection
P305 + P351 + P338 - If in eyes, rinse cautiously with water for several minutes, remove contact lenses and continue rinsing.
P337 + P313- Get medical advice/attention.



Symbol- Xi – irritant Risk Phrases : R36- Irritating to eyes Safety Phrases :

	NANTS DISTR ELBOTTOM R	IBUTION LIMITED OAD, CHEETHAM, MANCHE	STER M8 0GR TE	L 44(0)161 205 4454 FAX 44(0)161 2	Page 3 of 7 203 4298
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S2 Koon o	UDAIA 5	HEET: SODIUM CAL	KBUNATE (SUCALINI): Revision 4	Dated: 31/01/11
$S_2 - Keep 0$ $S_{22} - Do no$	ut of the feat	t			
S22 = D0 IIC $S24 = \Delta voit$	d contact with	n skin			
524 - AVOI	a contact with	1 SKIII			
2.3 Other h	azards				
The substar	ce does not r	neet the criteria for a PBT o	r vPvB substanc	e according to Annex XIII of t	he REACH
Regulation	EC1907/2000	6 (an inorganic substance)		e	
No other ha	zards identifi	ed.			
в. со	MPOSITI	ON/INFORMATION	ON INGRE	DIENTS	
Substances	Sodium Ca	rbonate			
-	E1-	DEACH as sisteration	ECC Index		W/t Demonst
CAS Number	Formula	number	Number	Directive 67/548/EEC	Content
97-19-8	Na ₂ CO ₃	01-2119485498-19-XXXX	207-838-8		>99.0
Impurities	•			·	•
No impuriti	es relevant fo	or classification and labelling	g		
See section	16 for the ful	ll text of the R, H- and EUH	-phrases declare	d above	
Occupation	al exposure li	mits, if available, are listed	in section 8		
. FI	RST AID N	MEASURES			
.1 Descrip	tion of first a	aid measures			
	vice				
No Known d	elaved effect	S			
Following in	halation	~			
Remove to f	resh air and k	eep warm and at rest.			
f symptoms	persist consu	It medical attention.			
ollowing s	kin contact				
Wash skin w	ith soap and	water			
Remove con	taminated clo	othing and wash before re-us	se.		
If symptoms	s persist cons	ult medical attention.			
Following e	ye contact				
Remove con	tact lenses if	worn			
rrigate eye t	horoughly w	ith eye wash solution or clea	an for at least 15	minutes, Eyelids should be he	ld away from the
yeball to en	sure thoroug	h rinsing.			
f eye irritati	on persists se	ek medical attention.			
After ingest	ion				
Do not induc	e vomiting.				
Obtain medi	cal advice if	necessary.			
Wash out mouth and give plenty of water to drink (at least 300 ml)					
5. FIRE FIGHTING MEASURES					
.1 Extingu	ishing Medi	a			
Suitable exti	nguishing me	edia:			
Jse extingui	shing measu	res that are appropriate to lo	cal circumstance	s and the surrounding environ	ment.
None unsuita	able media.				
5.2 Special	hazards aris	ing from the substance or	mixture		
None					
3.3 Advice	for fire-fight	ers			
√o special p	recautions re	quired			
i. AC	CIDENT	AL RELEASE MEAS	URES		
.1 Persona	l precautions	5,			
or non em	ergency pers	onnel			
Keep dust limits to a minimum					
Wear suitable protective equipment (see section 8)					
6.2 Environmental precautions					
Parent uncontrolled discharges in the environment (rivers, water courses, sewers etc)					
Avoid any mixture with an acid into sewer/ drains (co ² gas formation)					
5.3 Method	s and mater	ial for containment and clo	eaning up		
In all cases avoid dust formation, use vacuum suction, or shovel into bags					
Collect as m	uch as possib	le in a suitable clean contain	ner, preferably for	or re-use, otherwise for disposa	al (see section 13)
6.4 Reference to other sections					
For more inf	ormation on	exposure controls/ personal	protection or dis	posal, considerations, please s	ee section 8 and 13



Flammability

Vapour pressure

Vapour Density

Upper flammability limit

Lower flammability limit

HAZELBOTTOM ROAD, CHEETHAM, MANCHESTER M8 0GR TEL 44(0)161 205 4454 FAX 44(0)161 203 4298 E-mail sales.manchester@tennantsdistribution.com PRODUCT DATA SHEET: SODIUM CARBONATE (SOCALIM): Revision 4 Dated: 31/01/11 7. HANDLING AND STORAGE 7.1 Precautions for safe handling Keep dust limits to a minimum, minimize dust generation. Ensure adequate ventilation Wear protective equipment (see section 8.2). Keep away from incompatible materials. 7.1.2 Advice on general occupational hygiene Good personal and housekeeping practises No drinking, eating and smoking at the workplace. 7.2 Conditions for safe storage, including any incompatibilities Requirements for storage: store in a cool dry place Store in original, closed and correctly labelled container. Store away from incompatible materials **EXPOSURE CONTROLS/PERSONAL PROTECTION** 8. 8.1 Control parameters **Occupational exposure limits** Not listed by H&SE (guidance note EH40) or ACGIH. Recommended limits : 10 mg/m³ (total dust) (8hr TWA) 4 mg/m^3 (respirable dust) (8hr TWA) DNEL's/PNEC Exposure route DNEL's (local effects) of relevance Workers Long term 10 mg/m^3 Inhalation PNEC The lowest L(E)C₅₀ value is > 100mg/l (48-h EC₅₀ is 200 mg/l in daphnids (ceriodaphnia sp)). Therefore Sodium Carbonate need not be classified according to Directive 67/548/EEC and EU classification, labelling and packaging of substances and mixtures (CLP) Regulation (EC) no. 1272/2008 **8.2 Exposure controls Appropriate engineering controls** Provide appropriate exhaust ventilation at places where dust is formed. Apply technical measures to comply with the occupational exposure limits. **Respiratory protection** In the case of high dust levels wear suitable respiratory protective equipment e.g. Dust mask or respirator, that conform to national/ international standard, EN143. Recommended filter tpe P2 Hand protection Wear suitable chemical resistant gloves that comply with the specification of EC Directive 89/686/EEC and the related standard EN374. Suitable materials, Neoprene or natural rubber. Eve/ face protection Wear eye/face protection rated to protect eyes against dust (EN166) e.g. safety eye shield with dust protection, goggles or face visor. **Environmental exposure controls** Contain any spillage Avoid discharges to the environment Dispose of any rinse water in accordance with local and national regulations. 9. PHYSICAL AND CHEMICAL PROPERTIES 9.1 Information on basic physical and chemical properties White Powder Appearance Colour Odour Odourless >11 (Saturated solution, study result, OECD guideline105) pН Melting point 851°c (published data) Boiling point/boiling range Not applicable (melting point $>300^{\circ}$ c) Flash point Not applicable (Inorganic substance) Not applicable (melting point >300°c) Evaporation rate

Non-flammable (study results, EU method A.3)

Not applicable (inorganic substance, vapour pressure negligible

Non-flammable

Non-flammable

Not applicable



Dermal :

TENNANTS DISTRIBUTION LIMITED Page 5 of 7 HAZELBOTTOM ROAD, CHEETHAM, MANCHESTER M8 0GR TEL 44(0)161 205 4454 FAX 44(0)161 203 4298 E-mail sales.manchester@tennantsdistribution.com

Relative Density		2.52 @ 20°c	(study result EU Method A.3)
Water Solubility		212.5g/l @ 2	20°c (study result OECD Guideline 105)
Partition coefficie	nt	Not applicat	ble (inorganic substance)
Auto-ignition tem	perature	Non-flamma	able
Decomposition te	mperature	No informat	ion available
Viscosity	•	Not applicat	ble (solid)
Explosive propert	ies	Non-explosi	we (void of chemical groups associated with explosive properties
Oxidising propert	ies	Non -oxidist oxidation sta	ing (based on the chemical structure of the substance and ates of the constituent elements.
10. STABI	LITY AND RI	EACTIVITY	
10.1 Reactivity			
Decomposes by re	eaction with strong	g acids to evolve ca	urbon dioxide.
10.2 Chemical st	ability		
Stable under record	mmended storage	conditions (see sec	tion 7)
10.3 Possibility of	of hazardous reac	tions	
None			
10.4 Conditions	to avoid		
Contact with acids unless under controlled conditions			
Exposure to moist	ture		
10.5 Incompatib	le materials		
Finely divided aluminium			
10.6 Hazardous	decomposition p	oducts	
None			
11. TOXIC	COLOGICAL	INFORMATIO	DN
11.1 Information	n on toxicological	effects	
Components:			
Acute Toxicity			
Oral	LD_{50} rat	2800mg/kg bw	
Dermal	LD_{50} rabbit	>2000mg/kg	Method: EPA 16 CFR 1500.40bw
Inhalation rat	LC_{50} rat	2300mg/kg	Method : based on OECD Guideline 403
Values exceed the classification, lab	e cut off limit of 20 elling and packagi	000mg/kg establish ng of substances a	ned by EU Directive 67/548/EEC and EU nd mixtures (CLP) Regulation (EC) No. 1272/2008

Classification for acute toxicity: is not warranted			
Skin Corrosion/Irritati	on		
Eye irritation	irritating	Method: OECD Guideline 405	
Skin irritation	not irritati	ng Method: OECD Guideline 404	
Respiratory irritation	not irritati	ng Based on available data	
Classification for eye irritancy Xi, R36 Categor Accordi		Xi, R36 (irritating to eyes) according to directive 67/548/EEC Category 2, H319 (causes serious eye irritation) According to CLP Regulation (EC) 127/2008	
Classification for skin in	ritancy	is not warranted	
Classification for Respir	atory	is not warranted	
irritancy			
Sensitisation			
No data available on the sensitisation of sodium carbonate.			
Sodium carbonate is considered not to have any sensitising properties, based on the physiological role of			
both its constituent ions and its long-term historical and wide dispersive use in individual processes and			
consumer products.			
Classification for sensitisation: is not warranted.			
Repeated dose toxicity			
Oral: Sodi	l: Sodium carbonate dissociates into ions that are present physiologically in relatively		
high	levels in ver	tebrates. Therefore, repeated dose toxicity studies are considered	
(Scie	entifically) u	nnecessary, in accordance with column 2 of REACH Annex VIII	
and	and IX. Furthermore, Sodium Carbonate is used as a food additive, which confirms		

Sodium carbonate dissociates into ions that are present physiologically in relatively

high levels in vertebrates. Therefore, repeated dose toxicity studies are considered

that the substance has a low repeated dose toxicity.

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PROD	DUCT DA	TA SHEET: SODIUM CARBONATE (SOCALIM): Revision 4 Dated: 31/01/11		
	001211	(scientifically) unnecessary, in accordance with column 2 of REACH Annex VIII		
		and IX.		
Inhala	tion :	Sodium carbonate dissociates into ions that are present, physiologically in relatively		
		(scientifically) not necessary. In accordance with column 2 of PEACH Annoy VIII		
		and IX		
Classi	fication for	repeated dose toxicity : is not warranted		
Mutag	genicity:	In vitro- the available in vitrotests (SOS chromotest with sodium carbonate and		
		Ames test with sodium bicarbonate) were negative. Furthermore sodium bicarbonate		
		is naturally present in cells and both the structure of sodium bicarbonate and sodium		
		carbonate do not indicate a genotoxic potential. Therefore, there is no reason to		
		evaluate the potential Gentoxicity of sodium carbonate further and no genotoxic		
Carci	nogenicity	No date available for carcinogenicity of sodium carbonate. Although the		
Caren	logementy.	substance has a wide and varied use, there are no indications that it can induce		
		hyperplasia, pre-neoplastic lesions or is mutagenic. Therefore a carcinogenicity		
		study is considered unnecessary.		
Classi	fication for	carcinogenicity is not warranted		
Repro	ductive tox	icity		
Fertili	ty:	No data available		
Devel	onmental	In accordance with section 1 of REACH Annex XI testing does not appear		
Toxici	tv:	Scientifically necessary, as the substance will usually not reach the foetus or the male		
		and female reproductive organs when exposed orally, dermally or by inhalation, as it		
		does not become available systemically. As such, it is considered not useful to		
		perform a reproduction study.		
Classi	fication for	reproductive toxicity according to Regulation (EC) 1272/2008 is not required		
12.	ECOI	LOGICAL INFORMATION		
12.1	l'oxicity			
Acute	(Short term	toxicity to fish		
	nic/long teri	m to toxicity to fish		
Study	scientificall	v unjustified, sodium carbonate dissociates readily into sodium and carbonate ions in an aquatic		
enviro	nment. Both	i ions originally exist in nature, and their concentrations in surface water are dependent on various		
factors	s, such as ge	ological parameters, weathering and human activities. Therefore there is a continuous source of both		
ions ir	to the envir	onment and have been measured extensively in aquatic ecosystems.		
Acute	/short term	toxicity to aquatic invertebrates		
EC_{50}	48h) for fres	Shwater invertebrates : 200-227 mg/l		
Study	scientificall	y unjustified sodium carbonate dissociates readily into sodium and carbonate ions in an aquatic		
enviro	nment. Both	i jons originally exist in nature, and their concentrations in surface water are dependent on various		
factors	s, such as ge	ological parameters, weathering and human activities. Therefore, there is a continuous source of both		
ions into the environment and have been measured extensively in aquatic ecosystems.				
Acute	toxicity to	algae and aquatic plants		
Study	scientificall	y unjustified, sodium carbonate dissociates readily into sodium carbonate ions in a aquatic		
enviro	nment. Both	1 ions originally exist in nature, and their concentrations in surface water are dependent on various		
ions ir	s, such as ge	ongical parameters, weathering and numan activities. Therefore, there is a continuous source of bour		
Toxic	ity to soil m	acro-organisms		
In accordance with REACH Annex XI a study is not required as in water sodium carbonate is dissociated into sodium				
and carbonate ions, both of which will not absorb on particulate matter. Furthermore, exposure of the soil compartment				
is unli	kely.			
Toxicity to terrestrial plants				
In acc	In accordance with REACH Annex XI a study is not required as in water sodium carbonate is dissociated into sodium			
in unli	roonate ions kelv	s, bour of which will not absolu on particulate matter. Furthermore, exposure of the soil compartment		
12.2 P	ersistence a	and degradability		
In wat	er	Not applicable (quickly dissociates)		
In soil		Not applicable (inorganic substance)		
In sed	iment	Not applicable (inorganic substance)		
12.3 I	Bio accumu	lative potential		
Not bi	o accumulat	uve (inorganic substance that in water dissociates into sodium and carbonate ions, which do not		
accuil	u1ate 111 11VII	ng ussuus/		

HAZELBOTTOM ROAD, CHEETHAM, MANCHESTER M8 0GR TEL 44(0)161 205 4454 FAX 44(0)161 203 4298 E-mail sales.manchester@tennantsdistribution.com PRODUCT DATA SHEET: SODIUM CARBONATE (SOCALIM): Revision 4 Dated: 31/01/11 12.4 Mobility in soil If sodium carbonate is emitted to soil it can escape to atmosphere as carbon dioxide, precipitate as a metal carbonate, form complexes or stay in solution. 12.5 Results of PBT and vPvB assessment According to Annex XIII of REACH Regulation, inorganic substances do not require assessment. 12.6 Other adverse effects No other adverse effects are identified 13. **DISPOSAL CONSIDERATIONS** 13.1 Waste treatment methods If recycling or re-use is not practicable, dispose of in compliance with local or national regulations Neutralise with an acid, under controlled conditions Dilute with plenty of water **Packaging:** Where possible, recycling is preferred to disposal or incineration. Clean container with water, dispose of rinse water in accordance with local or national regulations Must be incinerated in a registered incineration plant with permit from the local authorities. 14. TRANSPORT INFORMATION **UN Number** Not Regulated UN proper shipping name Not regulated **Transport Hazard Class** Land transport Not restricted ADR/RID Inland waterway transport ADN Not regulated Sea transport IMO/IMDG Not regulated Air transport ICAO-TI/IATA-DGR Not regulated 15. **REGULATORY INFORMATION** 15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture Water Hazard Class WGK1, VwVws (Germany) **TSCA** Inventory Listed 15.2 Chemical safety assessment A chemical safety assessment/ report (CSA/CSR) has been undertaken on sodium carbonate. 16. **OTHER INFORMATION Indication of changes** The new issue updates the safety data sheet in accordance with Annex II of the REACH Regulation (EC) 1907/2006 and also to include the classification, packaging and labelling (CLP) Regulation (EC) 1272/80 Abbreviations and acronyms ADR: European Agreement Concerning the International carriage of Dangerous goods by Road ADN: European Agreement concerning the International carriage of Dangerous goods by inland waterway RID: International rule for Transport of dangerous Substances by Rail IMDG: Internal Maritime Code for Dangerous Goods WEL: Workplace exposure limit TWA: Time Weighted Average DNEL: Derived No Effect Level (REACH) PBT: Persistent, Bio accumulative, Toxic vPvB: Very persistent, Very Bio accumulative PNEC: Predicted No Effect Level (REACH) IMO/IATO: International Maritime Organisation/International Air Transport Association ICAO/IMDG: International Maritime Organisation/International Maritime Dangerous Goods Code LC50: Lethal Concentration, 50 percent LD50: Lethal Dose, 50 percent SIDS: Screening information Data Sheet. OECD: Organisation for Economic Co-operation and Development Source of key data used to compile the data sheet Data is taken from the Chemical safety report (CSR) and /or OECD SIDS report for calcium chloride Date: 31/01/11

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TENNANTS DISTRIBUTION LIMITED

ANNEX TO EXTENDED SAFETY DATA SHEET (eSDS):

Page 11-13Exposure Scenario 1 (ES.I) - Soda ash - Manufacturing of sodium carbonatePage 14-16Exposure Scenario 2 (ES.2) - Soda ash - Glass productionPage 17-19Exposure Scenario 3 (ES.3) - Soda ash - FormulationPage 20-25Exposure Scenario 4 (ES.4) - Soda ash - Other industrial and professional usePage 26-28Exposure Scenario 5 (ES.5) - Soda ash - Consumer use

Exposure Scenario for communication:

ES 1: Manufacturing of sodium carbonate

0. Conoral information		
0. General mormation		
ES identifier	ES 1	
Version no	01	
Revision date	28.10.2010	
EC #	207-838-8	
CAS #	497-19-8	
1. Use descriptors		
Manufacturing of sodium carbonate		
Market sector: SU 3 (Industrial uses) Sector of use: SU 8 (Manufacture of bulk, large s	scale chemicals)	
Environment: (Environmental Release Category)	Manufacture of substances	ERC 1
Worker (Process Category -Phrase)		
Use in closed process, no likelihood of exposure PF		
Use in closed, continuous process with occasional controlled exposure		
Use in closed batch process (synthesis or formulation) PROC 3		
Use in batch and other process (synthesis) where opportunity for exposure arises PROC 4		
Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non-dedicated facilities		
Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at dedicated PROC 8 facilities		
Transfer of substance or preparation into small containers (dedicated filling line, including weighing) PROC 9		
Potentially closed processing operations with minerals/metals at elevated temperature PROC 2		
Processes, tasks, activities covered		
Manufacturing, maintenance, loading, packaging	;, sampling and monitoring.	
2. Conditions of use affecting exposure		
2.0 Default Product Characteristics		

Physical form of product/articleSolidVolatilityNot relevantDustinessMedium (PROCs 1, 2, 3, 4, 8a, 8b, 9)
Low (PROC 22)2.1. Control of environmental exposure:Volatility

Manufacture of substances - ERC 1

Amounts used

Annual site tonnage (tonnes/year): up to 1 500 000.

Frequency and duration of use

Continuous

Other given operational conditions affecting environmental exposure

Not applicable.

Technical and organizational conditions and measures

See section 8 of Safety data sheet.

Conditions and measures related to municipal sewage treatment plant

Wastewater streams from sodium carbonate production sites contain inorganic substances and are therefore not treated in sewage treatment plants.

Conditions and measures related to external treatment of waste

In Chapter 2.3.5 of the Reference Document on Best Available Techniques for the Manufacture of Large Volume Inorganic Chemicals - Solids and Others Industry (EC, 2007) two types of solid waste, generated during the manufacturing of sodium carbonate, are discussed. Both types of solid waste originate from raw materials and the concentration of sodium carbonate in the solid waste is negligible. For this reason specific waste related measures are not needed.

Additional good practice advice beyond the REACH CSR (Chemical Safety Report)

See sections 6 and 13 of Safety Data Sheet

2.2. Control of workers exposure

Valid for PROCs 1, 2, 3, 4, 8a, 8b, 9, 22.

Amounts used, frequency and duration of use

Amounts used

Frequency and duration of use

Daily 8h/day

Not Relevant

Parameter does not influence exposure estimations for this ES

Technical and organizational conditions and measures

See section 8 of Safety Data Sheet. Ensure workers are trained to minimize exposures.

Additional good practice advice beyond the REACH CSR (Chemical Safety Report)

See sections 7 and 8 of Safety Data Sheet

3. Exposure estimation and reference to its source

3.1 Environment exposure estimation and reference to its source

The table below gives the summary of the environment exposure estimation made in the Chemical Safety Report, referring to Document on Best Available Techniques for the Manufacture of Large Volume Inorganic Chemicals - Solids and Others Industry.

Compartments	Measured release (kg/d)	Explanation / source of measured data
Aquatic	Negligible	Reference Document on Best Available Techniques (EC, 2007)
Air (direct)	2.2-118	
Soil (direct only)	Negligible	Reference Document on Best Available Techniques (EC, 2007)

3.2 Workers exposure estimation and reference to its source

The ECETOC TRA tool has been used to estimate workplace exposures unless otherwise indicated.

Routes of exposure	Exposure concentrations (mg/m ³)	Explanation / source of measured data (Characteristics, Duration, Frequency, OC and RMM described above)
Modeled exposure da	ata	
Dermal exposure	Not relevant	No assessment for dermal exposure because of no local skin effects and no systemic availability after dermal contact.
Inhalation exposure	0.01	ECETOC TRA V2. PROC 1
	0.5	ECETOC TRA V2. PROC 2
	1	ECETOC TRA V2. PROC 3
	5	ECETOC TRA V2. PROC 4
	5	ECETOC TRA V2. PROC 8a
	5	ECETOC TRA V2. PROC 8b
	5	ECETOC TRA V2. PROC 9
	1	ECETOC TRA V2. PROC 22
Measured exposure of	lata	
Inhalation exposure	7.9	An extensive set (in total: 698 observations) of worker exposure data from 4 sites that manufacture sodium carbonate. Measurements are representative for a workday of 8 hours.

Production of sodium carbonate: long-term exposure concentrations to workers

4. Guidance to DU to evaluate whether he works inside the boundaries set by the ES

4.1 Environment.

Not Applicable: this scenario does not concern DU.

4.2 Health.

Not Applicable: this scenario does not concern DU.

Substance: Sodium Carbonate ; EC : 207-838-8 ; CAS : 497-19-8

Exposure Scenario for communication:

ES 2: Glass production

0. General information

ES identifier	ES 2
Version no	01
Revision date	28.10.2010
EC #	207-838-8
CAS #	497-19-8

1. Use descriptors

Glass Production

Market sector: SU 3 (Industrial uses) Sector of use: SU 3 (Industrial uses)

Environment: (Environmental Release Category) Industrial use resulting in manufacture of	
another substance (use of intermediates)	ENC Da

Worker (Process Category - Phrase)

Use in closed process, no likelihood of exposure	PROC 1
Use in closed, continuous process with occasional controlled exposure	PROC2
Use in closed batch process (synthesis or formulation)	PROC 3
Use in batch and other process (synthesis) where opportunity for exposure arises	PROC 4
Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non-dedicated facilities	PROC 8a
Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at dedicated facilities	PROC 8b
Potentially closed processing operations with minerals/metals at elevated temperature	PROC 22
Open processing and transfer operations with minerals/metals at elevated temperature	PROC 23
Handling of solid inorganic substances at ambient temperature.	PROC 26
Processes, tasks, activities covered	
Manufacturing, maintenance, loading, packaging, sampling and monitoring.	
2. Conditions of use affecting exposure	
2.0 Default Product Characteristics	

Physical form of product/article Solid
Volatility Not relevant

Dustiness

Medium (PROCs 1, 2, 3, 4, 8a, 8b, 26) High (PROCs 22 and 23)

Mixture Article Concentration

For PROCs 1, 2, 3, 4, 8a, 8b and 26 the neat substance is taken into account, because the neat substance is transferred to the process.

Percentage of 5-25% sodium carbonate in the mixture during the melting process is assumed.

2.1. Control of environmental exposure:

Use as intermediate: industrial use resulting in manufacture of another substance.

Amounts used

Up to 200 000 tonnes/year.

Frequency and duration of use

Continuous.

Other given operational conditions affecting environmental exposure

The impact of glass manufacturing on the environment has been described extensively in the Reference Document on Best Available Techniques in the Glass Manufacturing Industry (EC, 2001). The document was established in the context of the EU Directive on Integrated Pollution Prevention and Control (Directive 96/61/EC).

Technical and organizational conditions and measures

See section 8 of Safety Data Sheet.

In case of dust formation, use filter to reduce atmospheric emissions.

Conditions and measures related to municipal sewage treatment plant

Wastewater streams of the glass industry do not contain sodium carbonate as it is stored in covered silos and not linked to internal sewage systems. For this reason an emission assessment for the sewage treatment plant is not needed for the industrial end use of sodium carbonate in the glass industry.

Conditions and measures related to external treatment of waste

No specific waste related measures are to be defined.

Additional good practice advice beyond the REACH CSA

See sections 6 and 13 of Safety Data Sheet

2.2. Control of workers exposure

Valid for PROCs 1, 2, 3, 4, 8a, 8b, 9, 22, 26.

Amounts used, frequency and duration of use

Amounts used

Not Relevant Parameter does not influence exposure estimations for this ES

Frequency and duration of use

Daily 8h/day

Technical and organisational conditions and measures

See section 8 of Safety Data Sheet

Additional good practice advice beyond the REACH CSR (Chemical Safety Report)

See sections 7 and 8 of Safety Data Sheet

3. Exposure estimation and reference to its source

3.1 Environment exposure estimation and reference to its source

The table below gives the summary of the environment exposure estimation made in the Chemical Safety Report, referring to Document on Best Available Techniques in the Glass Manufacturing Industry (EC, 2001).

Compartments	Measured release (kg/d)	Explanation / source of measured data
Aquatic	Negligible	Reference Document on Best Available Techniques (EC, 2001)
Air (direct)	Negligible	Reference Document on Best Available Techniques (EC, 2001)
Soil (direct only)	Negligible	Reference Document on Best Available Techniques (EC, 2001)

3.2 Workers exposure estimation and reference to its source

The ECETOC TRA tool has been used to estimate workplace exposures unless otherwise indicated.

Routes of exposure	Estimated exposure concentrations (mg/m ³)	Explanation / source of measured data (Characteristics, Duration, Frequency, OC and RMM described above)
Dermal exposure	Not relevant	No assessment for dermal exposure because of no local skin effects and no systemic availability after dermal contact.
	0.01	ECETOC TRA V2. PROC 1
Inheletion concerns	0.5	ECETOC TRA V2. PROC 2
innalation exposure	1	ECETOC TRA V2. PROC 3
	5	ECETOC TRA V2. PROC 4
	5	ECETOC TRA V2. PROC 8a
	5	ECETOC TRA V2. PROC 8b
	1	ECETOC TRA V2. PROC 22a
	1	ECETOC TRA V2. PROC 23a

Glass production: long-term exposure concentrations to workers

PROC26 is not foreseen in ECETOC TRA but it involves activities which are described by PROC 8a and 8b. Therefore the calculation with PROC 8a and 8b covers PROC 26.

4. Guidance to DU to evaluate whether he works inside the boundaries set by the ES

4.1 Environment.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.

4.2 Health.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.

Substance: Sodium Carbonat	e;EC:207-838-8;CAS:497-19-8			
Exposure Scenario for comm	unication:			
ES 3: Formulation				
0. General information				
ES identifier	ES 3			
Version no				
Revision date	28.10.2010			
EC #	207-838-8			
CAS #	497-19-8			
1. Use descriptors				
Formulation				
Market sector: SU 3 (Industrial uses) Sector of use: SU 10 (Formulation [mixing] of	preparations and/or re-packaging (excluding alloys))			

Worker (Process Category -Phrase)
Use in closed process, no likelihood of exposure
Use in closed, continuous process with occasional controlled exposure
Use in closed batch process (synthesis or formulation)
Mixing or blending in batch processes for formulation of preparations and articles (multistage and/or significant contact)
Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non-dedicated facilities

Environment: (Environmental Release Category) Formulation of preparations

Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at
dedicated facilitiesPROC 8bTransfer of substance or preparation into small containers (dedicated filling line, including
weighing)PROC 9

Production of preparations or articles by tabletting, compression, extrusion, pelletisation

Use as laboratory reagent

Processes, tasks, activities covered

storage, materials transfers, mixing, maintenance, sampling and associated laboratory activities.

2. Conditions of use affecting exposure

2.0 Default Product Characteristics

Physical form of product/article	Solid
Volatility	Not relevant
Dustiness	Medium

Mixture Article Concentration

Not relevant: for exposure estimation the neat substance is taken into account, because the neat substance is added to

ANNEX TO SAFETY DATA SHEET: SODIUM CARBONATE

ERC 2

PROC 1

PROC 2

PROC 3

PROC 5

PROC 8a

PROC 14

PROC 15

the formulation process.	
2.1. Control of environmental exposure:	
Formulation of preparations - ERC 2 SPERC (AISE, 2010E) are also used (<u>http://www.aise.eu/reac</u>	h/exposureass_sub4.htm).
Amounts used	
Up to 5 000 tonnes/year	
Frequency and duration of use	
Continuous	
Other given operational conditions affecting environmenta	l exposure
See sections 8 and 13 of Safety Data Sheet	
Technical and organizational conditions and measures	
In case of dust formation, use filter to reduce atmospheric e	missions.
Conditions and measures related to municipal sewage treated	tment plant
Control the pH of the liquid effluent if the effluent is sent to	STP.
Conditions and measures related to external treatment of	waste
No specific waste related measures are to be defined.	
Additional good practice advice beyond the REACH CSA	
See sections 6 and 13 of Safety Data Sheet	
2.2. Control of workers exposure	
Valid for PROCs 1, 2, 3, 5, 4, 8a, 8b, 9,14,15.	
Amounts used, frequency and duration of use	
Amounts used	Not Relevant Parameter does not influence exposure estimations for this ES
Frequency and duration of use	Daily 8h/day
Technical and organisational conditions and measures	
See section 8 of Safety Data Sheet	
Additional good practice advice beyond the REACH CSR (Ch	emical Safety Report)

See sections 7 and 8 of Safety Data Sheet

3. Exposure estimation and reference to its source

3.1 Environment exposure estimation and reference to its source

The table below gives the summary of the environment exposure estimation made in the Chemical Safety Report and in Specific Environmental Release Categories (SPERC) (AISE, 2010):

Compartments	Measured release (kg/d)	Explanation / source of data
Aquatic	Negligible	
Air (direct)	2.7	Specific Environmental Release Categories (SPERC) (AISE, 2010)
Soil (direct only)	Negligible	Specific Environmental Release Categories (SPERC) (AISE, 2010)

ANNEX TO SAFETY DATA SHEET: SODIUM CARBONATE

3.2 Workers exposure estimation and reference to its source

The	ECETOC	TRA tool	has	been	used	to	estimate	workplace	exposures	unless	otherwise	indicated.	

Formulation:	long-term	exposure	concentrations	to	worker
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Routes of exposure	Estimated exposure concentrations (mg/m ³)	Explanation / source of measured data (Characteristics, Duration, Frequency, OC and RMM described above)
Dermal exposure	Not relevant	No assessment for dermal exposure because of no local skin effects and no systemic availability after dermal contact.
Inhalation exposure	0.01	ECETOC TRA V2. PROC 1
	0.5	ECETOC TRA V2. PROC 2
	1	ECETOC TRA V2. PROC 3
	5	ECETOC TRA V2. PROC 4
	5	ECETOC TRA V2. PROC 5
	5	ECETOC TRA V2. PROC 8a
	5	ECETOC TRA V2. PROC 8b
	5	ECETOC TRA V2. PROC 9
	1	ECETOC TRA V2. PROC 14
	0.5	ECETOC TRA V2. PROC 15

4. Guidance to DU to evaluate whether he works inside the boundaries set by the ES

4.1 Environment.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.

4.2 Health.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.

Substance: Sodium Carbonate ; EC : 207-838-8 ; CAS : 497-19-8

Exposure Scenario for communication:

ES 4: Other industrial and professional uses

0. General information		
ES identifier Version no Revision date EC # CAS #	ES 4 01 28.10.2010 207-838-8 497-19-8	
1. Use descriptors		
1.1 Industrial end uses		
Market sector: SU 3 (Industrial uses) Sector of use: No restriction (SUs 0-20, 23, 24)		
Environment: (Environmental Release Category)		
Formulation of preparations		ERC 4
Industrial use resulting in inclusion into or onto a	matrix	ERC 5
Industrial use resulting in manufacture of anothe	r substance (use of intermediates)	ERC 6a
Industrial use of reactive processing aids		ERC 6b
Industrial use of process regulators for polymeris polymers	ation processes in production of resins, rubbers,	ERC öd
Industrial use of sub-stances in closed systems		ERC 7
Worker (Process Category -Phrase)		
Use in closed process, no likelihood of exposure		PROC 1
Use in closed, continuous process with occasiona	l controlled exposure	PROC 2
Use in closed batch process (synthesis or formula	ition)	PROC 3
Use in batch and other process (synthesis) where	e opportunity for exposure arises	PROC 4
Spraying in industrial settings and applications		PROC 7
Transfer of substance or preparation (charging/d non-dedicated facilities	ischarging) from/to vessels/large containers at	PROC 8a
Transfer of substance or preparation (charging/d dedicated facilities	ischarging) from/to vessels/large containers at	PROC 8b

Transfer of substance or preparation into small containers (dedicated filling line, including weighing)	PROC 9
Roller application or brushing of adhesive and other coating	PROC 10
Treatment of articles by dipping and pouring	PROC 13
Use as laboratory reagent	PROC 15
Lubrication at high energy conditions and in partly open process	PROC 17
Greasing at high energy conditions	PROC 18
Hand-mixing with intimate contact and only PPE available	PROC 19
Potentially closed processing operations with minerals/metals at elevated temperature. The process temperature is higher than the melting point (High fugacity)	PROC 22
Open processing and transfer operations with minerals/metals at elevated temperature. The process temperature is higher than the melting point (High fugacity)	PROC 23
Handling of solid inorganic substances at ambient temperature	PROC 26
Processes, tasks, activities covered: Manufacturing, mixing, maintenance, loading, packaging, sampling and monitoring.	
1.2 Professional end uses	
Market sector: SU 22 (Professional uses) Sector of use: SU 22 (Professional uses)	
Environment: (Environmental Release Category)	
Wide dispersive indoor use of processing aids in open systems	ERC 8a
Wide dispersive indoor use of reactive substances in open systems	ERC 8b
Wide dispersive indoor use resulting in inclusion into or onto a matrix	ERC 8c
Wide dispersive outdoor use of processing aids in open systems	ERC 8d
Wide dispersive outdoor use of reactive substances in open systems	ERC 8e
Wide dispersive outdoor use resulting in inclusion into or onto a matrix	ERC 8f
Wide dispersive indoor use of substances in closed systems	ERC 9a
Wide dispersive outdoor use of substances in closed systems	ERC 9b
Worker (Process Category -Phrase)	

Use in closed, continuous process with occasional controlled exposure	PROC 2
Use in batch and other process (synthesis) where opportunity for exposure arises	PROC 4
Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non-dedicated facilities	PROC 8a
Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at dedicated facilities	PROC 8b
Transfer of substance or preparation into small containers (dedicated filling line, including weighing)	PROC 9
Roller application or brushing of adhesive and other coating	PROC 10
Non industrial spraying	PROC 11
Treatment of articles by dipping and pouring	PROC 13
Use as laboratory reagent	PROC 15
Hand-mixing with intimate contact and only PPE available	PROC 19

Processes, tasks, activities covered

Manufacturing, mixing, maintenance, loading, packaging, sampling and monitoring.

2. Conditions of use affecting exposure

2.0 Default Product Characteristics	
Physical form of product/article	Solid
<u>Volatility</u>	Not relevant
Dustiness	Medium (PROCs 1, 2, 3, 4, 8a, 8b, 9,15,19)
	High (PROCs 22 and 23)

2.1. Control of environmental exposure:

Industrial end uses: ERC4, ERC5, ERC 6a/6b/6d, ERC 7. Professional end uses: ERC 8a/8b/8c/8d/8e/8f; ERC 9a/9b.

Amounts used

Industrial use up to 100 000 tonnes/year. Professional use much lower

Frequency and duration of use

Up to continuous.

Other given operational conditions affecting environmental exposure

See sections 8 and 13 of Safety Data Sheet

Technical and organizational conditions and measures

In case of dust formation, use filter to reduce atmospheric emissions.

Conditions and measures related to municipal sewage treatment plant

Control the pH of the liquid effluent if the effluent is sent to STP.

Conditions and measures related to external treatment of waste

No specific waste related measures are to be defined.

Additional good practice advice beyond the REACH CSR (Chemical Safety Report)

See sections 6 and 13 of Safety Data Sheet

2.2. Control of workers exposure

Valid for PROC 1-4, 7, 8a, 8b, 9,10,11, 13, 15, 17, 18, 19, 22, 23, 26.

Amounts used, frequency and duration of use

Amounts used

Not Relevant Parameter does not influence exposure estimations for this ES

Frequency and duration of use (Exposure Frequency Duration)

Operational conditions	Process	Industrial	Professional
related to the duration of use	Category	(Data Field)	(Data Field)
	PROC 1		Less than 15 min/day
	PROC 2		Less than 15 min/day
	PROC 3	> 4 hours/day (liquid mixture)	
	PROC 4		> 4 hours/day
	PROC 7	> 4 hours/day (liquid mixture)	
	PROC 8a		15 min/day to 1 hour/day
	PROC 8b		15 min/day to 1 hour/day
Duration of exposure per day at workplace [for one worker]	PROC 9	> 4 hours/day (liquid mixture)	
	PROC10		> 4 hours/day
	PROC11		> 4 hours/day
	PROC13		15 min/day to 1 hour/day
	PROC15		15 min/day to 1 hour/day
	PROC17	> 4 hours/day (liquid mixture)	
	PROC18	> 4 hours/day (liquid mixture)	
	PROC19		15 min/day to 1 hour/day

PROC26 is not foreseen in ECETOC TRA but it involves activities which are described by PROC 8a and 8b. Therefore the calculation with PROC 8a and 8b covers PROC 26.

Technical and organisational conditions and measures

See section 8 of Safety Data Sheet.

Additional good practice advice beyond the REACH CSR (Chemical Safety Report)

See sections 7 and 8 of Safety Data Sheet

3. Exposure estimation and reference to its source

3.1 Environment exposure estimation and reference to its source

The table below gives the summary of the environment exposure estimation made in the Chemical Safety Report:

Compartments	Measured release (kg/d)
Aquatic	Negligible
Air (direct)	Small releases might be possible
Soil (direct only)	Negligible in all cases except agricultural use
	Max application use rates of soda ash as co-formulant in plant protection products: Professional agricultural: 0.0126 kg/ ha (tier 1 default use rate: 1 kg/ha)

3.2 Workers exposure estimation and reference to its source

The ECETOC TRA tool has been used to estimate workplace exposures unless otherwise indicated.

Routes of exposure	Explanation / source of measured data (Characteristics, Duration Frequency, OCand RMM	Industrial estimated exposure concentrations	Professional estimated Exposure concentrations (mg/m ³)
Dermal exposure	No local effects and no systemic	(mg/m) Not relevant	Not relevant
	PROC 1	0.01	0.0044 (liquid) 0.001 (solid)
	PROC 2	0.5 (solid)	0.044 (liquid) 0.1 (solid)
	PROC 3 PROC 4	1 (solid) 5	0.044 (liquid) 0.044 (liquid) 5 (solid)
	PROC 7	0.022	
	PROC 8a	5	0.088 (liquid) 1 (solid)
	PROC 8b	5 (solid)	0.088 (liquid)
	PROC 9	5 (solid)	0.044 (liquid)
	PROC10		0.44 (liquid mixture only)
Inhalation exposure	PROC11		0.44 (liquid mixture only)
	PROC13		0.088 (liquid mixture only)
	PROC15	5 (solid)	0.088 (liquid mixture only)
	PROC17	0.022 (liquid mixture only)	
	PROC18	0.022 (liquid mixture)	
	PROC19	5	0.088 (liquid) 1 (solid)
	PROC22	1	
	PROC23	1	
	Professional agricultural with solid mixture, outdoor, no PPE (ECPA OWB Tier 1: default use rate)		0.142 (solid)

PROC 26 is not foreseen in ECETOC TRA but it involves activities which are described by PROC 8a and 8b. Therefore the calculation with PROC 8a and 8b covers PROC 26.

4. Guidance to DU to evaluate whether he works inside the boundaries set by the ES

4.1 Environment.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.

4.2 Health.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.

Substance: Sodium Carbonate; EC : 207-838-8; CAS : 497-19-8

Exposure Scenario for communication: ES 5: Consumer use

0. General information

ES identifier	ES 5
Version no	01
Revision date	28.10.2010
EC #	207-838-8
CAS #	497-19-8

1. Use descriptor

Consumer use

Market sector: SU 21 Consumer uses: Private households (= general public = consumers) Sector of use: SU 21 Consumer uses: Private households (= general public = consumers)

Environment:

Environmental Release Category: ERC 8 a/b/c/d/e/f; ERC 9 a/b.

Product Category (PC): No restriction (from PC 0 to PC 40)

Process Category: Not applicable

Processes, tasks, activities covered Cleaning activities

2. Conditions of use affecting exposure

2.0 Default Product Characteristics
Physical form of product/article
Volatility
Dustiness

Solid or dissolved in water Not relevant Medium for powdered detergents, low for household soda

Mixture Article Concentration

Laundry detergents and surface cleaners: 30% Machine dish washing tablets: 45% Household soda (pure sodium carbonate decahydrate): 37% content of sodium carbonate Surface cleaning sprays: 10% Air care products: 5% (PC 3) Furniture, floor and leather care: 10% (PC 31)

2.1. Control of environmental exposure:

Consumer use - ERC 8 a/b/c/d/e/f; ERC 9 a/b.

Amounts used

Not relevant as the exposure is estimated to be negligible

Frequency and duration of use

Not relevant as the exposure is estimated to be negligible

Other given operational conditions affecting environmental exposure

See sections 8 and 13 of Safety Data Sheet

Technical and organizational conditions and measures

See section 8 of Safety Data Sheet

Conditions and measures related to municipal sewage treatment plant

See section 13 of Safety Data Sheet

Conditions and measures related to external treatment of waste

See section 13 of Safety Data Sheet

Additional good practice advice beyond the REACH CSR (Chemical Safety Report)

See sections 6 and 13 of Safety Data Sheet

2.2. Control of consumers exposure

Amounts used, frequency and duration of use

Amounts used	Household soda: 37 g/l (worst case)
Frequency and duration of use	Household soda: one time per week (frequency) and 5 min (duration) (worst case)

Technical and organisational conditions and measures

Keep out of reach of children and avoid contact with eyes. In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.

Additional good practice advice beyond the REACH CSR (Chemical Safety Report)

See sections 7 and 8 of Safety Data Sheet

3. Exposure estimation and reference to its source

3.1 Environment exposure estimation and reference to its source

The table below gives the summary of the environment exposure estimation made in the Chemical Safety Report, referring to HERA (2005a) and to Specific Environmental Release Categories (SPERC) (AISE, 2010).

Compartments	Measured release (kg/d)	Explanation / source of measured data	
Aquatic	Negligible	HERA (2005a); see section 9.5.2.3.2	
Air (direct)	Negligible	Specific Environmental Release Categories (SPERC) (AISE, 2010)	
Soil (direct only)	Negligible	Specific Environmental Release Categories (SPERC) (AISE, 2010)	

3.2 Consumers exposure estimation and reference to its source

Exposures have been calculated with the software tool REACT (Reach Exposure Assessment Consumer Tool) Long-term dermal exposure to consumers:

Product category	Ingredient fraction by weight	Estimated uptake value (mg/kg bw per day)
Laundry regular (AISE CI, PC35), Powder	0.3	1.56E-02
Laundry regular (AISE CI, PC35), Liquid	0.3	2.29E-02

Laundry compact (AISE C2, PC35), Powder	0.3	1.60E-02
Laundry compact (AISE C2, PC35), Liquid/Gel	0.3	2.29E-02
Laundry additives (AISE C4, PC35), Liquid Bleach	0.3	2.21E-02
Hand Dishwashing (AISE C5, PC35)	0.3	3.12E-04
Surface cleaners (AISE C7, PC35), Gel	0.3	4.29E-02

The negligible inhalation has been confirmed for the laundry washing scenario reported by HERA (2005a).

4. Guidance to DU to evaluate whether he works inside the boundaries set by the ES

4.1 Environment.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.

4.2 Health.

Predicted exposures are not expected to exceed the DNEL when the Risk Management Measures/Operational Conditions outlined in Section 2 are implemented.