

SAFETY DATA SHEET



Nycote 88

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1 Product identifier

Product name : Nycote 88

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

Identified uses : Not available.

1.3 Details of the supplier of the safety data sheet

Supplier/Manufacturer : Nycote Laboratories Corporation
12750 Raymer St., Bldg. A-3
North Hollywood, California 91605
Tel: 1-(818)-764-8177

e-mail address of person responsible for this SDS : sales@nycote.com

1.4 Emergency telephone number

National advisory body/Poison Centre

Telephone number : ChemTel
1-813-248-0585
1-800-255-3924

Hours of operation : (24/7)

SECTION 2: Hazards identification

2.1 Classification of the substance or mixture

Product definition : Mixture

Classification according to Directive 1999/45/EC [DPD]

The product is classified as dangerous according to Directive 1999/45/EC and its amendments.

Classification : R10
Repr. Cat. 3; R63
Xn; R48/20, R65
R67

Physical/chemical hazards : Flammable.

Human health hazards : Possible risk of harm to the unborn child. Harmful: danger of serious damage to health by prolonged exposure through inhalation. Harmful: may cause lung damage if swallowed. Vapours may cause drowsiness and dizziness.

See Section 16 for the full text of the R phrases or H statements declared above.

See Section 11 for more detailed information on health effects and symptoms.

2.2 Label elements

Hazard pictograms :




Signal word : Danger

Hazard statements : Highly flammable liquid and vapour.
Causes skin irritation.
Causes serious eye irritation.
Suspected of damaging the unborn child.
May cause damage to organs through prolonged or repeated exposure.

Precautionary statements

SECTION 2: Hazards identification

Prevention	: P201 - Obtain special instructions before use. P280 - Wear protective gloves. Wear eye or face protection. P210 - Keep away from heat, sparks, open flames and hot surfaces. - No smoking. P241 - Use explosion-proof electrical, ventilating, lighting and all material-handling equipment. P260 - Do not breathe vapour.
Response	: P303 + P361 + P353 - IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower.
Storage	: P235 - Keep cool.
Disposal	:
Hazard symbol or symbols	: 
Indication of danger	: Harmful
Risk phrases	: R10- Flammable. R63- Possible risk of harm to the unborn child. R48/20- Harmful: danger of serious damage to health by prolonged exposure through inhalation. R65- Harmful: may cause lung damage if swallowed. R67- Vapours may cause drowsiness and dizziness.
Safety phrases	: S16- Keep away from sources of ignition - No smoking. S53- Avoid exposure - obtain special instructions before use. S36/37- Wear suitable protective clothing and gloves. S23- Do not breathe vapour or spray. S51- Use only in well-ventilated areas.
Hazardous ingredients	: Toluene
Supplemental label elements	: Not applicable.
Special packaging requirements	
Containers to be fitted with child-resistant fastenings	: Not applicable.
Tactile warning of danger	: Not applicable.
2.3 Other hazards	
Substance meets the criteria for PBT according to Regulation (EC) No. 1907/2006, Annex XIII	: Not applicable.
Substance meets the criteria for vPvB according to Regulation (EC) No. 1907/2006, Annex XIII	: Not applicable.
Other hazards which do not result in classification	: Not available.

SECTION 3: Composition/information on ingredients

Substance/mixture : Mixture

SECTION 3: Composition/information on ingredients

Product/ingredient name	Identifiers	%	Classification		Type
			67/548/EEC	Regulation (EC) No. 1272/2008 [CLP]	
Ethyl Alcohol	EC: 200-578-6 CAS: 64-17-5 Index: 603-002-00-5	50-75	F; R11	Flam. Liq. 2, H225 Skin Irrit. 2, H315 Eye Irrit. 2, H319	[2]
Toluene	EC: 203-625-9 CAS: 108-88-3 Index: 601-021-00-3	15-20	F; R11 Repr. Cat. 3; R63 Xn; R48/20, R65 Xi; R38 R67 See Section 16 for the full text of the R-phrases declared above.	Flam. Liq. 2, H225 Acute Tox. 4, H302 Skin Irrit. 2, H315 Eye Irrit. 2, H319 Repr. 2, H361d STOT SE 3, H336 STOT RE 2, H373 Asp. Tox. 1, H304 See Section 16 for the full text of the H statements declared above.	[1] [2]

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Type

[1] Substance classified with a health or environmental hazard

[2] Substance with a workplace exposure limit

[3] Substance meets the criteria for PBT according to Regulation (EC) No. 1907/2006, Annex XIII

[4] Substance meets the criteria for vPvB according to Regulation (EC) No. 1907/2006, Annex XIII

Occupational exposure limits, if available, are listed in Section 8.

SECTION 4: First aid measures

4.1 Description of first aid measures

- Eye contact** : Immediately flush eyes with plenty of water for at least 20 minutes, occasionally lifting the upper and lower eyelids. Get medical attention if symptoms occur.
- Skin contact** : In case of contact, immediately flush skin with plenty of water for at least 20 minutes. Get medical attention if symptoms occur.
- Inhalation** : Move exposed person to fresh air. Get medical attention if symptoms occur.
- Ingestion** : Wash out mouth with water. Do not induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Call medical doctor or poison control centre immediately.

4.2 Indication of any immediate medical attention and special treatment needed

- Notes to physician** : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.
- Specific treatments** : No specific treatment.

SECTION 5: Firefighting measures

5.1 Extinguishing media

- Suitable extinguishing media** : Use dry chemical, CO₂, water spray (fog) or foam.
- Unsuitable extinguishing media** : Do not use water jet.

5.2 Special hazards arising from the substance or mixture

- Hazards from the substance or mixture** : Flammable liquid.
- Hazardous combustion products** : Decomposition products may include the following materials:
carbon dioxide
carbon monoxide

5.3 Advice for firefighters

SECTION 5: Firefighting measures

- Special precautions for fire-fighters** : Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.
- Special protective equipment for fire-fighters** : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode. Clothing for fire-fighters (including helmets, protective boots and gloves) conforming to European standard EN 469 will provide a basic level of protection for chemical incidents.

SECTION 6: Accidental release measures

6.1 Personal precautions, protective equipment and emergency procedures

- For non-emergency personnel** : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilt material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Avoid breathing vapour or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.
- For emergency responders** : If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also Section 8 for additional information on hygiene measures.

- 6.2 Environmental precautions** : Avoid dispersal of spilt material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

6.3 Methods and materials for containment and cleaning up

- Small spill** : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor.
- Large spill** : Stop leak if without risk. Move containers from spill area. Approach the release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilt product.

- 6.4 Reference to other sections** : See Section 1 for emergency contact information.
See Section 8 for information on appropriate personal protective equipment.
See Section 13 for additional waste treatment information.

SECTION 7: Handling and storage

The information in this section contains generic advice and guidance. The list of Identified Uses in Section 1 should be consulted for any available use-specific information provided in the Exposure Scenario(s).

7.1 Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Avoid exposure during pregnancy. Do not get in eyes or on skin or clothing. Do not swallow. Avoid breathing vapour or mist. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use non-sparking tools. Take precautionary measures against electrostatic discharges. To avoid fire or explosion, dissipate static electricity during transfer by earthing and bonding containers and equipment before transferring material. Empty containers retain product residue and can be hazardous. Do not reuse container.

SECTION 7: Handling and storage

Advice on general occupational hygiene

: Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

7.2 Conditions for safe storage, including any incompatibilities

: Store in accordance with local regulations. Store in a segregated and approved area. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see section 10) and food and drink. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabelled containers. Use appropriate containment to avoid environmental contamination. **Store between the following temperatures: 65°F (18.33°C) and 80°F (26.67°C). Keep from freezing.**

7.3 Specific end use(s)

Recommendations

: Not available.

Industrial sector specific solutions

: Not available.

SECTION 8: Exposure controls/personal protection

The information in this section contains generic advice and guidance. The list of Identified Uses in Section 1 should be consulted for any available use-specific information provided in the Exposure Scenario(s).

8.1 Control parameters

Occupational exposure limits

Product/ingredient name	Exposure limit values
Ethyl Alcohol	EH40/2005 WELs (United Kingdom (UK), 8/2007). TWA: 1920 mg/m ³ 8 hour(s). TWA: 1000 ppm 8 hour(s).
Toluene	EH40/2005 WELs (United Kingdom (UK), 8/2007). Absorbed through skin. STEL: 384 mg/m ³ 15 minute(s). STEL: 100 ppm 15 minute(s). TWA: 191 mg/m ³ 8 hour(s). TWA: 50 ppm 8 hour(s).

Recommended monitoring procedures

: If this product contains ingredients with exposure limits, personal, workplace atmosphere or biological monitoring may be required to determine the effectiveness of the ventilation or other control measures and/or the necessity to use respiratory protective equipment. Reference should be made to European Standard EN 689 for methods for the assessment of exposure by inhalation to chemical agents and national guidance documents for methods for the determination of hazardous substances.

8.2 Exposure controls

Appropriate engineering controls

: Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. Use explosion-proof ventilation equipment.

Individual protection measures

Hygiene measures

: Ensure that eyewash stations and safety showers are close to the workstation location. Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period.

Eye/face protection

: Safety eyewear should be used when there is a likelihood of exposure. Recommended: Safety glasses with side shields.

Skin protection

Hand protection

: Use gloves appropriate for work or task being performed. Recommended: Natural rubber (latex).

SECTION 8: Exposure controls/personal protection

- Body protection** : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. Recommended: Lab coat.
- Other skin protection** : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Respiratory protection** : Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.
- Environmental exposure controls** : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation.

SECTION 9: Physical and chemical properties

9.1 Information on basic physical and chemical properties

Appearance

- Physical state** : Liquid. [Clear.]
- Colour** : Not available.
- Odour** : Alcohol-like.
- pH** : Not available.
- Melting point/freezing point** : Not available.
- Boiling point** : 170°C
- Flash point** : Open cup: 21°C [Cleveland.]
- Evaporation rate** : Not available.
- Flammability** : Not available.
- Vapour pressure** : 0.013 kPa [20°C]
- Vapour density** : Not available.
- Relative density** : Not available.

9.2 Other information

No additional information.

SECTION 10: Stability and reactivity

- 10.1 Reactivity** : No specific test data related to reactivity available for this product or its ingredients.
- 10.2 Chemical stability** : The product is stable.
- 10.3 Possibility of hazardous reactions** : Under normal conditions of storage and use, hazardous reactions will not occur.
- 10.4 Conditions to avoid** : Avoid all possible sources of ignition (spark or flame). Do not pressurise, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.
- 10.5 Incompatible materials** : Reactive or incompatible with the following materials: oxidizing materials, acids and alkalis.
- 10.6 Hazardous decomposition products** : Decomposition products may include the following materials:
carbon dioxide
carbon monoxide

SECTION 11: Toxicological information

11.1 Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Ethyl Alcohol	LC50 Inhalation Vapour	Rat	124700 mg/m3	4 hours
	LD50 Oral	Rat	7 g/kg	-
Toluene	LC50 Inhalation Vapour	Rat	49 g/m3	4 hours
	LD50 Oral	Rat	636 mg/kg	-

Irritation/Corrosion

Product/ingredient name	Result	Species	Score	Exposure	Observation
Ethyl Alcohol	Eyes - Moderate irritant	Rabbit	-	-	-
	Skin - Moderate irritant	Rabbit	-	-	-
Toluene	Eyes - Mild irritant	Rabbit	-	-	-
	Skin - Moderate irritant	Rabbit	-	-	-

Skin : Applicable.

Eyes : Applicable.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Inhalation : Vapours may cause drowsiness and dizziness.

Ingestion : Aspiration hazard if swallowed. Can enter lungs and cause damage.

Skin contact : May cause skin irritation.

Eye contact : May cause eye irritation.

Symptoms related to the physical, chemical and toxicological characteristics

Inhalation : Adverse symptoms may include the following:
 nausea or vomiting
 headache
 drowsiness/fatigue
 dizziness/vertigo
 reduced foetal weight
 increase in foetal deaths
 skeletal malformations

Ingestion : Adverse symptoms may include the following:
 nausea or vomiting
 reduced foetal weight
 increase in foetal deaths
 skeletal malformations

Skin contact : Adverse symptoms may include the following:
 reduced foetal weight
 increase in foetal deaths
 skeletal malformations

Eye contact : No specific data.

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.

Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.

Potential delayed effects : Not available.

General : Harmful: danger of serious damage to health by prolonged exposure through inhalation.

Carcinogenicity : No known significant effects or critical hazards.

Mutagenicity : No known significant effects or critical hazards.

Teratogenicity : May cause birth defects, based on animal data.

SECTION 11: Toxicological information

- Developmental effects** : No known significant effects or critical hazards.
Fertility effects : No known significant effects or critical hazards.
Other information : Not available.

SECTION 12: Ecological information

12.1 Toxicity

Product/ingredient name	Result	Species	Exposure
Ethyl Alcohol	Acute EC50 17.921 mg/L Marine water	Algae - Ulva pertusa	96 hours
	Acute EC50 2000 ug/L Fresh water	Daphnia - Daphnia magna	48 hours
	Acute LC50 25500 ug/L Marine water	Crustaceans - Artemia franchiscana - Larvae	48 hours
Toluene	Acute LC50 42000 ug/L Fresh water	Fish - Oncorhynchus mykiss	4 days
	Chronic NOEC <6.3 g/L Fresh water	Daphnia - Daphnia magna	48 hours
	Acute EC50 12500 ug/L Fresh water	Algae - Pseudokirchneriella subcapitata	72 hours
	Acute EC50 6000 ug/L Fresh water	Daphnia - Daphnia magna - Juvenile (Fledgling, Hatchling, Weanling)	48 hours
	Acute LC50 15.5 ppm Marine water	Crustaceans - Palaemonetes pugio - Adult	48 hours
	Acute LC50 5500 ug/L Fresh water	Fish - Oncorhynchus kisutch - Fry - 1 g	96 hours
	Chronic NOEC 28000 ug/L Fresh water	Daphnia - Daphnia magna - <=24 hours	48 hours

12.2 Persistence and degradability

- Remarks** : Not available.

12.3 Bioaccumulative potential

Product/ingredient name	LogP _{ow}	BCF	Potential
Ethyl Alcohol	-0.32	-	low
Toluene	2.69	-	low

12.4 Mobility in soil

- Soil/water partition coefficient (K_{oc})** : Not available.
Mobility : Not available.

12.5 Results of PBT and vPvB assessment

- PBT** : Not applicable.
vPvB : Not applicable.

- 12.6 Other adverse effects** : No known significant effects or critical hazards.

SECTION 13: Disposal considerations

The information in this section contains generic advice and guidance. The list of Identified Uses in Section 1 should be consulted for any available use-specific information provided in the Exposure Scenario(s).

13.1 Waste treatment methods

Product

- Methods of disposal** : The generation of waste should be avoided or minimised wherever possible. This material and its container must be disposed of in a safe way. Avoid dispersal of spilt material and runoff and contact with soil, waterways, drains and sewers. Empty containers or liners may retain some product residues. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor.

- Hazardous waste** : The classification of the product may meet the criteria for a hazardous waste.





Packaging

- Methods of disposal** : The generation of waste should be avoided or minimised wherever possible. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible.

SECTION 13: Disposal considerations

Special precautions : This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Vapor from product residues may create a highly flammable or explosive atmosphere inside the container. Do not cut, weld or grind used containers unless they have been cleaned thoroughly internally. Avoid dispersal of spilt material and runoff and contact with soil, waterways, drains and sewers.

SECTION 14: Transport information

	ADR/RID	ADN/ADNR	IMDG	IATA
14.1 UN number	UN1993	UN1993	UN1993	UN1993
14.2 UN proper shipping name	FLAMMABLE LIQUIDS, N.O.S. (Ethyl Alcohol, Toluene)	FLAMMABLE LIQUIDS, N.O.S. (Ethyl Alcohol, Toluene)	FLAMMABLE LIQUIDS, N.O.S. (Ethyl Alcohol, Toluene)	FLAMMABLE LIQUIDS, N.O.S. (Ethyl Alcohol, Toluene)
14.3 Transport hazard class(es)	3 	3 	3 	3 
14.4 Packing group	II	II	II	II
14.5 Environmental hazards	No.	Yes.	No.	No.
14.6 Special precautions for user	Not available.	Not available.	Not available.	Not available.
Additional information	<u>Special provisions</u> 640 (D) <u>Tunnel code</u> (D/E)	-	-	-

PG* : Packing group

Exemption to the above classification may apply.

SECTION 15: Regulatory information

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

EU Regulation (EC) No. 1907/2006 (REACH)

Annex XIV - List of substances subject to authorisation

Substances of very high concern

None of the components are listed.

Annex XVII - Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles : Not applicable.

Other EU regulations

Europe inventory : All components are listed or exempted.

Black List Chemicals : Not listed

Priority List Chemicals : Listed

Integrated pollution prevention and control list (IPPC) - Air : Not listed

Integrated pollution prevention and control list (IPPC) - Water : Not listed

SECTION 15: Regulatory information

Product/ingredient name	Carcinogenic effects	Mutagenic effects	Developmental effects	Fertility effects
Toluene	-	-	Repr. Cat. 3; R63	-

15.2 Chemical Safety Assessment : This product contains substances for which Chemical Safety Assessments are still required.

SECTION 16: Other information

Abbreviations and acronyms : ATE = Acute Toxicity Estimate
 CLP = Classification, Labelling and Packaging Regulation [Regulation (EC) No. 1272/2008]
 DNEL = Derived No Effect Level
 EUH statement = CLP-specific Hazard statement
 PNEC = Predicted No Effect Concentration
 RRN = REACH Registration Number

Classification according to Regulation (EC) No. 1272/2008 [CLP/GHS]

Flam. Liq. 2, H225
 Skin Irrit. 2, H315
 Eye Irrit. 2, H319
 Repr. 2, H361d
 STOT RE 2, H373

Procedure used to derive the classification according to Regulation (EC) No. 1272/2008 [CLP/GHS]

Classification	Justification
Flam. Liq. 2, H225 Skin Irrit. 2, H315 Eye Irrit. 2, H319 Repr. 2, H361d STOT RE 2, H373	On basis of test data Calculation method Calculation method Calculation method Calculation method

Full text of abbreviated H statements : H225 Highly flammable liquid and vapour.
 H302 Harmful if swallowed.
 H304 May be fatal if swallowed and enters airways.
 H315 Causes skin irritation.
 H319 Causes serious eye irritation.
 H336 May cause drowsiness or dizziness.
 H361d Suspected of damaging the unborn child.
 H373 May cause damage to organs through prolonged or repeated exposure.

Full text of classifications [CLP/GHS] : Acute Tox. 4, H302 ACUTE TOXICITY: ORAL - Category 4
 Asp. Tox. 1, H304 ASPIRATION HAZARD - Category 1
 Eye Irrit. 2, H319 SERIOUS EYE DAMAGE/ EYE IRRITATION - Category 2
 Flam. Liq. 2, H225 FLAMMABLE LIQUIDS - Category 2
 Repr. 2, H361d TOXIC TO REPRODUCTION [Unborn child] - Category 2
 Skin Irrit. 2, H315 SKIN CORROSION/IRRITATION - Category 2
 STOT RE 2, H373 SPECIFIC TARGET ORGAN TOXICITY (REPEATED EXPOSURE) - Category 2
 STOT SE 3, H336 SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) [Narcotic effects] - Category 3

Full text of abbreviated R phrases : R11- Highly flammable.
 R10- Flammable.
 R63- Possible risk of harm to the unborn child.
 R48/20- Harmful: danger of serious damage to health by prolonged exposure through inhalation.
 R65- Harmful: may cause lung damage if swallowed.
 R38- Irritating to skin.
 R67- Vapours may cause drowsiness and dizziness.

Full text of classifications [DSD/DPD] : F - Highly flammable
 Repr. Cat. 3 - Toxic to reproduction category 3
 Xn - Harmful
 Xi - Irritant

History

SECTION 16: Other information

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 (dd/mm/yyyy)
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Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.



Dr. Luc Séguin, PhD chemist, 25 years as a professional in regulatory compliance



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