



Date: December 12<sup>th</sup>, 2018

## TO WHOM IT MAY CONCERN

### Inhalation toxicity classification concentrated nitric acid mixtures

Pascal VA5, Divosan BG VS35, Acidplus VA35, Clearklens Dilac VH14, Divos 1 VM46, Super Dilac VA4

The acute inhalation toxicity classification of nitric acid vapour (7697-37-2) has been extensively discussed with regulatory authorities in the European Union in recent years and has now come to a conclusion<sup>1</sup>. The agreed harmonized classification when used in formulations containing 70% nitric acid or less is now category 3 (vapour) with an ATE for inhalation of 2.65 mg/L (vapour). This new classification is expected to become mandatory after publication in the European official journal in 2020.

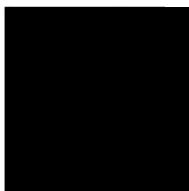
Cleaning in place descalers like Pascal Va5 are intended for end-users and are based on mixtures of more than 26% nitric acid and other solid substances. The correct classification for such mixtures requires a specific assessment taking in consideration the physical state and intended end-uses, all in combination with test data for the mixture and its substances.

The potential evaporation of nitric acid vapour from undiluted products is the critical effect inhalation classification. Requested by Diversey, a Contract Research Laboratory has measured the test atmosphere generated from Pascal according to the same OECD TG 403 protocol as where the vapour toxicity for nitric acid was identified. In this study, Pascal was shown to primarily generate an aerosol mist. This in contrast to the study that was the base for the new inhalation classification, which generated mainly nitric acid vapour. Therefore the Pascal concentrate needs to be seen as a liquid that may generate an aerosol mist.

The regulatory interpretation of this outcome is that because undiluted Pascal is not intended to be aerosolized and no relevant amounts of nitric acid vapours are shown to be released from Pascal, this vapour classification category is not relevant<sup>2</sup>. Our related products Divosan BG VS35, Acidplus VA35, Clearklens Dilac VH14, Divos 1 VM46, Super Dilac VA4 have even higher solid contents than Pascal and should therefore also be seen as liquids that may generate an aerosol mists.

Although these concentrated nitric acid mixtures remain not regulated under the SEVESO III directive<sup>3</sup>, they are corrosive mixtures for skin and metals and can generate nitrous gases after contact with weak metals and organics. We refer to our safety data sheet and product information for further safe use guidance, which will be updated early 2019.

If you have any further questions, please contact your Diversey sales representative.



<sup>1</sup> European Chemicals Agency (ECHA), [Annex to a news release](#)

<sup>2</sup> CLP regulation (EC) No 1272/2008, article 9(5)

<sup>3</sup> Control of major-accident hazards Directive 2012/18/EU



Date: December 12<sup>th</sup>, 2018

Director Global Regulatory Strategy