



# OROTAN™ 731A Dispersant

## **Global Chemical Inventory Compliance**

The Global Inventory is provided as an attachment.

## **US FDA Food Contact Status**

In response to your request for FDA information, the Dow Chemical Company opinion is attached.

Depending on the specific details of your intended use, the FDA clearances indicated may include certain additional conditions and/or limitations. We would welcome inquiries as to how such conditions and limitations may affect the FDA status of Dow Chemical Company products for your specific application.

This information relates specifically to the referenced product(s). We believe this information to be accurate and reliable as of this date. We recommend you make your own determination on the suitability of the referenced product(s) for your particular application. We cannot guarantee that the FDA status will remain unchanged indefinitely.

## **Product Composition**

Our product composition is considered proprietary. In the absence of a Confidential Disclosure Agreement, the only information that may be disclosed is the public information available on the Safety Data Sheet (SDS).

## **Disclaimer**

We are providing the chemical substance information to the best of our knowledge, based on data from our raw material suppliers and knowledge of our manufacturing process. Please note that we do not analyze any of the raw materials used in this product for the presence of the following substances. This information is accurate and reliable as of the date of this document.

## **Animal Derived Components**

We confirm that we do not knowingly add materials of animal origin in the manufacture of the referenced product. We have no reason to believe they are present. This information relates specifically to the referenced product. We believe this information to be accurate and reliable as of this date.

## **Allergen Status**

To the best of our knowledge, there are no raw materials, including additives, that have their origin in peanuts, soybeans, milk, eggs, fish, shellfish, tree nuts, and/or wheat or gluten.

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### **Genetically Modified Materials Status**

To the best of our knowledge, there are no raw materials, including additives, that have been derived from genetically modified organisms (GMO).

### **Kosher**

Although a rabbi has not inspected the raw materials used to manufacture the above product nor the manufacturing process, we consider the product to be intrinsically kosher as the raw materials used to manufacture it are synthetic materials and are not of animal origin. We cannot guarantee that the kosher status of this product will remain unchanged indefinitely; therefore we recommend that you periodically verify its status.

### **EU Directive 2011/65/EU (RoHS 2)**

This directive applies to the recycling of finished consumer electronic equipment. As we do not manufacture consumer goods, this regulation is not directly applicable to our products. However, in order to assist you with the determination of the finished good against the RoHS Directive, we are confirming that heavy metals, polybrominated biphenyls (PBBs), or polybrominated diphenyl ethers (PBDEs) are not used in the manufacture of the referenced product. If any of these substances happen to be present, they would be there only as possible trace contaminants. Please note, we do not test this product for the presence of these substances.

### **Bisphenol A**

This product is not manufactured or formulated with Bisphenol A (CAS# 80-05-7). We are providing this information to the best of our knowledge, based on data from our raw material suppliers and knowledge of our manufacturing process.

### **Natural Rubber Latex**

This product is not intentionally manufactured or formulated with natural rubber or natural latex; however, we do not analyze for these specific substances or compounds. We are providing this information to the best of our knowledge, based on data from our raw material suppliers and knowledge of our manufacturing process.

### **Alkyl Phenol Ethoxylates (APEO)**

Alkylphenol ethoxylates (APEOs) have not been intentionally added to this product.

### **Fluorotelomers, Perfluorooctanoic acid (PFOA) and Derivatives**

This product is not intentionally manufactured or formulated with Fluorotelomers, Perfluorooctanoic acid (PFOA), or Perfluorooctane sulfonate (PFOS).



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### **Hazardous Air Pollutants**

The composition of the above referenced product, as supplied, was reviewed against the United States Environmental Protection Agency list of Hazardous Air Pollutants. This product does not contain Hazardous Air Pollutant substances at or above the level of 0.1% by weight (1000 parts per million). If any of these individual substances happen to be present, they would be there only at trace levels.

### **Clean Air Act**

This product is not manufactured or formulated with Class I or II substances as defined under 40 CFR part 82 of the Clean Air Act of 1993, as amended (58 FR 8136).

### **California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)**

This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute. If a Proposition 65 listed substance is present in this product at a level which requires a warning, it will be listed in Section 15 of the Safety Data Sheet.

### **TSCA 12b Status**

We have reviewed the composition of this product and conclude that none of the components are subject to any reporting requirements associated with rules or orders under Sections 4,5,6,7 and 12b of TSCA. Since the list of affected chemicals continues to grow, our certification applies only to our products as currently defined for chemicals now regulated under these sections. Since this product is not regulated under the above TSCA Sections, there are no TSCA Sections 12b requirements associated with this product.



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## Product Stewardship

The Dow Chemical Company and its subsidiaries ("Dow") has a fundamental concern for all who make, distribute, and use its products, and for the environment in which we live. This concern is the basis for our Product Stewardship philosophy by which we assess the safety, health, and environmental information on our products and then take the appropriate steps to protect employee and public health and our environment. The success of our product stewardship program rests with each and every individual involved with Dow products—from the initial concept and research, to manufacture, use, sale, disposal and recycle of each product.

## Customer Notice

Dow strongly encourages its customers to review both their manufacturing processes and their applications of Dow products from the standpoint of human health and environmental quality to ensure that Dow products are not used in ways for which they are not intended or tested. Dow personnel are available to answer your questions and to provide reasonable technical support. Dow product literature, including safety data sheets, should be consulted prior to use of Dow products. Current safety data sheets are available from Dow.

## Medical Applications Policy

NOTICE REGARDING MEDICAL APPLICATION RESTRICTIONS: Dow will not knowingly sell or sample any product or service ("Product") into any commercial or developmental application that is intended for:

- a. long-term or permanent contact with internal bodily fluids or tissues. "Long-term" is contact which exceeds 72 continuous hours;
- b. use in cardiac prosthetic devices regardless of the length of time involved ("cardiac prosthetic devices" include, but are not limited to, pacemaker leads and devices, artificial hearts, heart valves, intra-aortic balloons and control systems, and ventricular bypass-assisted devices);
- c. use as a critical component in medical devices that support or sustain human life; or
- d. use specifically by pregnant women or in applications designed specifically to promote or interfere with human reproduction.

Dow requests that customers considering use of Dow products in medical applications notify Dow so that appropriate assessments may be conducted. Dow does not endorse or claim suitability of its products for specific medical applications. It is the responsibility of the medical device or pharmaceutical manufacturer to determine that the Dow product is safe, lawful, and technically suitable for the intended use. **DOW MAKES NO WARRANTIES, EXPRESS OR IMPLIED, CONCERNING THE SUITABILITY OF ANY DOW PRODUCT FOR USE IN MEDICAL APPLICATIONS.**

## Disclaimer

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