

SAFETY DATA SHEET

in accordance with 29 CFR 1910.1200, WHMIS 2015 and Safe Work Australia

Revision date: 11 July 2023

Date of previous issue: 28 May 2020

SDS No. 269B-23

SECTION 1: IDENTIFICATION OF THE SUBSTANCE/MIXTURE AND OF THE COMPANY/UNDERTAKING

1.1. Product identifier

ARC S2 (Part B) (GN, GY)

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

Relevant identified uses: ARC Polymer Composite. Repair damage caused by impact, abrasion, erosion or corrosion; rebuild worn areas; fill holes and cracks; provide abrasion resistant surfaces.

Uses advised against: No information available

Reason why uses advised against: Not applicable

1.3. Details of the supplier of the safety data sheet

Company:

A.W. CHESTERTON COMPANY

860 Salem Street

Groveland, MA 01834-1507, USA

Tel. +1 978-469-6446 Fax: +1 978-469-6785

(Mon. - Fri. 8:30 - 5:00 PM EST)

SDS requests: www.chesterton.com

E-mail (SDS questions): ProductSDSs@chesterton.com

E-mail: customer.service@chesterton.com

Supplier:

Canada: A.W. Chesterton Company Ltd., 889 Fraser Drive,
Unit 105, Burlington, Ontario L7L 4X8 – Tel. 905-335-5055

1.4. Emergency telephone number

24 hours per day, 7 days per week

Call Infotrac: 1-800-535-5053

Outside N. America: +1 352-323-3500 (collect)

NSW Poisons Information Centre (Australia): 13 11 26

SECTION 2: HAZARDS IDENTIFICATION

2.1. Classification of the substance or mixture

2.1.1. Classification according to 29 CFR 1910.1200 / WHMIS 2015 / Safe Work Australia / GHS

Acute toxicity, Category 4, H302

[Acute toxicity, Category 5, H313]

Skin corrosion, Category 1B, H314

Serious eye damage, Category 1, H318

Skin sensitization, Category 1, H317

Reproductive toxicity, Category 1B, H360D

Hazardous to the aquatic environment, Chronic, Category 3, H412

2.1.2. Additional information

For full text of H-statements: see SECTIONS 2.2 and 16. Any classification in brackets is a GHS building block that was not adopted by the EU, the US, Canada and Australia in their national implementations of GHS.

2.2. Label elements

Labeling according to 29 CFR 1910.1200 / WHMIS 2015 / Safe Work Australia / GHS

Hazard pictograms:



Signal word:

Danger

Hazard statements:	H302	Harmful if swallowed.
	H313	May be harmful in contact with skin.
	H314	Causes severe skin burns and eye damage.
	H317	May cause an allergic skin reaction.
	H360D	May damage the unborn child.
	H412	Harmful to aquatic life with long lasting effects.
Precautionary statements:	P201	Obtain special instructions before use.
	P202	Do not handle until all safety precautions have been read and understood.
	P260	Do not breathe mist/spray.
	P264	Wash hands, face and any exposed skin thoroughly after handling.
	P270	Do not eat, drink or smoke when using this product.
	P272	Contaminated work clothing must not be allowed out of the workplace.
	P273	Avoid release to the environment.
	P280	Wear protective gloves, protective clothing and eye/face protection.
	P303/361/353	IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower.
	P304/340	IF INHALED: Remove person to fresh air and keep comfortable for breathing.
	P305/351/338	IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
	P301/330/331	IF SWALLOWED: rinse mouth. Do NOT induce vomiting.
	P310	Immediately call a POISON CENTER or doctor.
	P308/313	IF exposed or concerned: Get medical advice/attention.
	P363	Wash contaminated clothing before reuse.
	P405	Store locked up.
	P501	Dispose of contents/container to an approved waste disposal plant.
Supplemental information:	None	
	None	

2.3. Other hazards

The safety and health hazards are detailed separately for Part A and Part B. Upon machining, refer to the precautions in the safety data sheets for Part A and Part B.

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS**3.2. Mixtures**

Hazardous Ingredients ¹	% Wt.	CAS No.	GHS Classification
Benzyl alcohol	17-35	100-51-6	Acute Tox. 4, H302/332 Eye Irrit. 2, H319
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	17-35	2855-13-2	Acute Tox. 4, H302/312 Skin Corr. 1B, H314 Skin Sens. 1, H317 Aquatic Chronic 3, H412
3-Aminomethyl-3,5,5-trimethylcyclohexylamine, reaction products with bisphenol A diglycidyl ether homopolymer	8-24	68609-08-5	[Acute Tox. 5, H303] Skin Corr. 1B, H314 Skin Sens. 1, H317 Eye Dam. 1, H318 Aquatic Chronic 3, H412
N-methyl-2-pyrrolidone*	0.1-0.5	872-50-4	Flam. Liq. 4, H227 Repr. 1B, H360D Skin Irrit. 2, H315 Eye Irrit. 2, H319 STOT SE 3, H335
Fatty acids, C18, unsatd., dimers, reaction products with N,N-dimethyl-1,3-propanediamine and 1,3-propanediamine	0.1-0.3	162627-17-0	Skin Sens. 1A, H317
N-(3-(trimethoxysilyl)propyl)ethylenediamine	0.09-0.14	1760-24-3	Acute Tox. 4, H332 Eye Dam. 1, H318 Skin Sens. 1, H317
Other ingredients:			
Silicon carbide	15-25	409-21-2	Not classified**
Silica (Quartz)	1-3	14808-60-7	Not classified**
Diiron trioxide	0-1.1	1309-37-1	Not classified**

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Any classification in brackets is a GHS building block that was not adopted by the EU, the US, Canada and Australia in their national implementations of GHS.

For full text of H-statements: see SECTION 16.

*Included on the EU Candidate List of substances of very high concern for Authorisation.

**Substance with a workplace exposure limit.

¹ Classified according to: 29 CFR 1910.1200, 1915, 1916, 1917, Mass. Right-to-Know Law (ch. 40, M.G.L..O. 111F), WHMIS 2015, Safe Work Australia, GHS

SECTION 4: FIRST AID MEASURES

4.1. Description of first aid measures

Inhalation: Remove to fresh air. If not breathing, administer artificial respiration. Contact physician.

Skin contact: Flood area with water while removing contaminated clothing. Wash clothing before reuse. Consult physician.

Eye contact: Flush eyes for at least 30 minutes with large amounts of water. Consult physician.

Ingestion: Do not induce vomiting. Contact physician immediately.

Protection of first-aiders: No action shall be taken involving any personal risk or without suitable training. Avoid contact with the product while providing aid to the victim. See section 8.2.2 for recommendations on personal protective equipment.

4.2. Most important symptoms and effects, both acute and delayed

Direct contact will cause burns to skin, eyes and mucous membranes. Harmful if swallowed. May be harmful in contact with skin. May cause allergic skin sensitization. High vapor concentrations may cause respiratory tract irritation.

4.3. Indication of any immediate medical attention and special treatment needed

Treat symptoms.

SECTION 5: FIRE-FIGHTING MEASURES

5.1. Extinguishing media

Suitable extinguishing media: Carbon dioxide, dry chemical, foam or water fog

Unsuitable extinguishing media: No data available

5.2. Special hazards arising from the substance or mixture

Hazardous combustion products: Carbon Monoxide, Carbon Dioxide, NOx, aldehydes and other toxic fumes.

Other hazards: None

5.3. Advice for firefighters

Cool exposed containers with water. Recommend Firefighters wear self-contained breathing apparatus.

Australian HAZCHEM Emergency Action Code: 2 Z

SECTION 6: ACCIDENTAL RELEASE MEASURES

6.1. Personal precautions, protective equipment and emergency procedures

Evacuate area. Provide adequate ventilation. Utilize exposure controls and personal protection as specified in Section 8.

6.2. Environmental Precautions

Keep out of sewers, streams and waterways.

6.3. Methods and material for containment and cleaning up

Scoop up and transfer to a suitable container for disposal. Flush floor with dilute (5%) Acetic Acid. Collect rinsate for proper disposal.

6.4. Reference to other sections

Refer to section 13 for disposal advice.

SECTION 7: HANDLING AND STORAGE

7.1. Precautions for safe handling

Do not breathe mist/spray. Utilize exposure controls and personal protection as specified in Section 8. Remove contaminated clothing immediately. Wash clothing before reuse. Contaminated leather including shoes cannot be decontaminated and should be discarded. Keep container closed when not in use. Avoid creating and breathing dust during removal, drilling, grinding, sawing or sanding.

7.2. Conditions for safe storage, including any incompatibilities

Store in cool, dry area.

7.3. Specific end use(s)

No special precautions.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**8.1. Control parameters****Occupational exposure limit values**

Ingredients	OSHA PEL ¹		ACGIH TLV ²		AUSTRALIA ES ³	
	ppm	mg/m ³	ppm	mg/m ³	ppm	mg/m ³
Benzyl alcohol	N/A	N/A	N/A	N/A	N/A	N/A
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	N/A	N/A	N/A	N/A	N/A	N/A
3-Aminomethyl-3,5,5-trimethylcyclohexylamine, reaction products with bisphenol A diglycidyl ether homopolymer	N/A	N/A	N/A	N/A	N/A	N/A
N-methyl-2-pyrrolidone*	N/A	N/A	N/A	N/A	25 (skin) STEL: 75	103 STEL: 309
Fatty acids, C18, unsatd., dimers, reaction products with N,N-dimethyl-1,3-propanediamine and 1,3-propanediamine	N/A	N/A	N/A	N/A	N/A	N/A
N-(3-(trimethoxysilyl)propyl)ethylenediamine	N/A	N/A	N/A	N/A	N/A	N/A
Silicon carbide	(total) (resp.)	15 5	(total) (resp.)	10 3	N/A	10 (insp.)
Silica (Quartz)	(resp.)	0.05	(resp.)	0.025	(resp.)	0.05
Diiron trioxide	(total) (resp.) (fume)	15 5 10	(resp.)	5	N/A	5 (fume, as Fe) 10

* American Industrial Hygiene Association (AIHA) recommended limit: 10 ppm (skin, 8-hr TWA)

¹ United States Occupational Health & Safety Administration permissible exposure limits² American Conference of Governmental Industrial Hygienists threshold limit values³ Safe Work Australia, Workplace Exposure Standards for Airborne Contaminants**Biological limit values**

N-methyl-2-pyrrolidone:

Control parameter	Biological specimen	Sampling Time	Limit value	Basis	Notes
5-Hydroxy-N-methyl-2-pyrrolidone	Urine	End of shift	100 mg/l	ACGIH	–

8.2. Exposure controls**8.2.1. Engineering measures**

Good general mechanical ventilation. If it is necessary to alter the final cured product such that dust may be generated, use adequate dust extraction or damp down.

8.2.2. Individual protection measures**Respiratory protection:** If exposure limits are exceeded or product is sprayed, utilize suitable respiratory equipment.**Protective gloves:** Chemical resistant gloves (e.g., butyl rubber, nitrile)**Eye and face protection:** Safety goggles.**Other:** Impervious clothing as necessary to prevent skin contact.**8.2.3. Environmental exposure controls**

Refer to sections 6 and 12.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES**9.1. Information on basic physical and chemical properties**

Physical state	gritty paste	pH	not applicable
Colour	red or yellow	Kinematic viscosity	5800 cps @ 25°C
Odour	amine	Solubility in water	not determined
Odour threshold	not determined	Partition coefficient n-octanol/water (log value)	not applicable
Boiling point or range	> 200°C (392°F)	Vapour pressure @ 20°C	not determined
Melting point/freezing point	not determined	Density and/or relative density	1.4 kg/l
% Volatile (by volume)	< 1%	Weight per volume	11.3 lbs/gal.
Flammability	not determined	Vapour density (air=1)	> 1
Lower/upper flammability or explosion limits	not applicable	Rate of evaporation (ether=1)	< 1
Flash point	> 100°C (> 212°F)	% Aromatics by weight	0%
Method	PM Closed Cup	Particle characteristics	no data available
Autoignition temperature	not determined	Explosive properties	not applicable
Decomposition temperature	not determined	Oxidising properties	not determined

9.2. Other information

None

SECTION 10: STABILITY AND REACTIVITY**10.1. Reactivity**

Refer to sections 10.3 and 10.5.

10.2. Chemical stability

Stable

10.3. Possibility of hazardous reactions

No dangerous reactions known under conditions of normal use.

10.4. Conditions to avoid

Open flames and high temperatures.

10.5. Incompatible materials

Strong acids and strong oxidizers like liquid Chlorine and concentrated Oxygen.

10.6. Hazardous decomposition products

Carbon Monoxide, Carbon Dioxide, NOx, aldehydes and other toxic fumes.

SECTION 11: TOXICOLOGICAL INFORMATION**11.1. Information on toxicological effects**

Primary route of exposure under normal use: Inhalation, skin and eye contact. Personnel with pre-existing allergies, eczema or skin conditions may be aggravated by exposure.

Acute toxicity -

Oral: Harmful if swallowed. ATE-mix = 1440 – 2601 mg/kg.

Substance	Test	Result
Benzyl alcohol	LD50, rat	1230 mg/kg
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	LD50, rat	1030 mg/kg
Silicon carbide	NOAEL, rat	2000 mg/kg
N-methyl-2-pyrrolidone	LD50, rat	3598 mg/kg
3-Aminomethyl-3,5,5-trimethylcyclohexylamine, reaction products with bisphenol A diglycidyl ether homopolymer	LD50, rat	3100 mg/kg

Dermal: May be harmful in contact with skin. ATE-mix = 2759 - 5520 mg/kg

Substance	Test	Result
Benzyl alcohol	LD50, rabbit	2000 mg/kg
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	LD50, rat	1840 mg/kg
Silicon carbide	NOAEL, rat	2000 mg/kg
N-methyl-2-pyrrolidone	LD50, rabbit	8000 mg/kg

Inhalation: Based on available data on components, the classification criteria are not met. ATE-mix = 12.03 mg/l (mist). ATE-mix = 31.6 mg/l (vapour). High vapor concentrations may cause respiratory tract irritation.

Substance	Test	Result
Benzyl alcohol	LC50, rat, 4 h	11 mg/l (vapour)
Benzyl alcohol	LC50, rat, 4 h	> 4.178 mg/l (mist)
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	LC50, rat, 4 h	> 5.01 mg/l (mist, analytical)
N-methyl-2-pyrrolidone	LC50, rat, 4 h	> 5.1 mg/l (mist)

Skin corrosion/irritation: Causes burns.

Substance	Test	Result
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	Skin irritation, rabbit	Corrosive

Serious eye damage/irritation: Causes serious eye damage.

Substance	Test	Result
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	Eye irritation, rabbit, OECD 405	Corrosive

Respiratory or skin sensitisation: May cause allergic skin sensitization.

Substance	Test	Result
3-Aminomethyl-3,5,5-trimethylcyclohexylamine	Skin sensitization, guinea pig, OECD 406	Sensitizing
N-(3-(trimethoxysilyl)propyl)ethylenediamine	Skin sensitization, guinea pig, OECD 406	Sensitizing

Germ cell mutagenicity: Benzyl alcohol, 3-Aminomethyl-3,5,5-trimethylcyclohexylamine, Silicon carbide, N-methyl-2-pyrrolidone, N-(3-(trimethoxysilyl)propyl)ethylenediamine: based on available data, the classification criteria are not met.

Carcinogenicity: The International Agency for Research on Cancer (IARC) and the National Toxicology Program (NTP) have classified inhaled silica as a human carcinogen. The silica in this product does not separate from the mixture or in of itself become air-borne, therefore it does not present a hazard in normal use. Benzyl alcohol, Silicon carbide, N-methyl-2-pyrrolidone: based on available data, the classification criteria are not met.

Reproductive toxicity: N-methyl-2-pyrrolidone has produced reproductive/teratogenic effects in animal studies.

STOT – single exposure: 3-Aminomethyl-3,5,5-trimethylcyclohexylamine, Silicon carbide: based on available data, the classification criteria are not met. N-methyl-2-pyrrolidone: May cause respiratory irritation.

STOT – repeated exposure: 3-Aminomethyl-3,5,5-trimethylcyclohexylamine, Silicon carbide, N-methyl-2-pyrrolidone: based on available data, the classification criteria are not met. Benzyl alcohol: 90-day oral subchronic study, NOAEL 400 mg/kg.

Aspiration hazard: Based on available data, the classification criteria are not met.

Other information: None

SECTION 12: ECOLOGICAL INFORMATION

Ecotoxicological data have not been determined specifically for this product. The information given below is based on a knowledge of the components and the ecotoxicology of similar substances.

12.1. Toxicity

3-Aminomethyl-3,5,5-trimethylcyclohexylamine is harmful to aquatic organisms.

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12.2. Persistence and degradability

3-Aminomethyl-3,5,5-trimethylcyclohexylamine: may biodegrade, not readily biodegradable. Benzyl alcohol, N-methyl-2-pyrrolidone: readily biodegradable.

12.3. Bioaccumulative potential

Benzyl alcohol: low potential for bioaccumulation (log Kow: 1.1). 3-Aminomethyl-3,5,5-trimethylcyclohexylamine: low potential for bioaccumulation (BCF (QSAR): 3.16). N-methyl-2-pyrrolidone: not expected to bioaccumulate (log Kow < 1).

12.4. Mobility in soil

Paste. Insoluble in water. In determining environmental mobility, consider the product's physical and chemical properties (see Section 9). Benzyl alcohol, N-methyl-2-pyrrolidone: expected to have very high mobility in soils. 3-Aminomethyl-3,5,5-trimethylcyclohexylamine: log Koc (QSAR) = 2.97.

12.5. Other adverse effects

None known

SECTION 13: DISPOSAL CONSIDERATIONS**13.1. Waste treatment methods**

Unreacted components are a special waste. Combine resin and curative. The final cured material is considered nonhazardous. Landfill sealed containers with a properly licensed facility. May be incinerated at an appropriate facility. Check local, state and national/federal regulations and comply with the most stringent requirement.

SECTION 14: TRANSPORT INFORMATION**14.1. UN number or ID number**

ADG/ADR/RID/ADN/IMDG/ICAO: UN2735
TDG: UN2735
US DOT: UN2735

14.2. UN proper shipping name

ADG/ADR/RID/ADN/IMDG/ICAO: AMINES, LIQUID, CORROSIVE, N.O.S.
 (3-AMINOMETHYL-3,5,5-TRIMETHYLCYCLOHEXYLAMINE/CYCLOALIPHATIC AMINE)
TDG: AMINES, LIQUID, CORROSIVE, N.O.S.
 (3-AMINOMETHYL-3,5,5-TRIMETHYLCYCLOHEXYLAMINE/CYCLOALIPHATIC AMINE)
US DOT: AMINES, LIQUID, CORROSIVE, N.O.S.
 (3-AMINOMETHYL-3,5,5-TRIMETHYLCYCLOHEXYLAMINE/CYCLOALIPHATIC AMINE)

14.3. Transport hazard class(es)

ADG/ADR/RID/ADN/IMDG/ICAO: 8
TDG: 8
US DOT: 8

14.4. Packing group

ADG/ADR/RID/ADN/IMDG/ICAO: II
TDG: II
US DOT: II

14.5. Environmental hazards

NO

14.6. Special precautions for user

NO SPECIAL PRECAUTIONS FOR USER

14.7. Maritime transport in bulk according to IMO instruments

NOT APPLICABLE

14.8. Other information

US DOT: ERG NO. 153
 MAY BE SHIPPED AS LIMITED QUANTITIES IN PACKAGING HAVING A RATED CAPACITY GROSS WEIGHT OF 66 LB. OR LESS
 AND IN INNER PACKAGES NOT OVER 1 LITER (49 CFR 173.154 (B),(1))

IMDG: EMS F-A, S-B, IMDG SEGREGATION GROUP 18-ALKALIS

ADR: CLASSIFICATION CODE C7, TUNNEL RESTRICTION CODE (E)

ADG HAZCHEM CODE : 2X **HIN:** 88/80

SECTION 15: REGULATORY INFORMATION**15.1. Safety, health and environmental regulations/legislation specific for the substance or mixture****15.1.1. National regulations****US EPA SARA TITLE III****312 Hazards:****Chemicals subject to reporting requirements of Section 313 of EPCRA and of 40 CFR 372:**

Acute toxicity	N-methyl-2-pyrrolidone	872-50-4	0.1 – 0.5%
Skin corrosion			
Serious eye damage			
Skin sensitization			
Reproductive toxicity			

TSCA: All components are listed or exempted.

Other national regulations: None**SECTION 16: OTHER INFORMATION**

Abbreviations and acronyms:	ADG: Australian Dangerous Goods Code
	ADN: European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways
	ADR: European Agreement concerning the International Carriage of Dangerous Goods by Road
	ATE: Acute Toxicity Estimate
	BCF: Bioconcentration Factor
	cATpE: Converted Acute Toxicity point Estimate
	ES: Exposure Standard
	GHS: Globally Harmonized System
	ICAO: International Civil Aviation Organization
	IMDG: International Maritime Dangerous Goods
	LC50: Lethal Concentration to 50 % of a test population
	LD50: Lethal Dose to 50% of a test population
	LOEL: Lowest Observed Effect Level
	N/A: Not Applicable
	NA: Not Available
	NOEC: No Observed Effect Concentration
	NOEL: No Observed Effect Level
	OECD: Organization for Economic Co-operation and Development
	(Q)SAR: Quantitative Structure-Activity Relationship
	REL: Recommended Exposure Limit
	RID: Regulations concerning the International Carriage of Dangerous Goods by Rail
	SDS: Safety Data Sheet
	STEL: Short Term Exposure Limit
	STOT RE: Specific Target Organ Toxicity, Repeated Exposure
	STOT SE: Specific Target Organ Toxicity, Single Exposure
	TDG: Transportation of Dangerous Goods (Canada)
	TWA: Time Weighted Average
	US DOT: United States Department of Transportation
	WHMIS: Workplace Hazardous Materials Information System
	Other abbreviations and acronyms can be looked up at www.wikipedia.org .

Key literature references and sources for data:	Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST)
	Chemical Classification and Information Database (CCID)
	European Chemicals Agency (ECHA) - Information on Chemicals
	Hazardous Chemical Information System (HCIS)
	National Institute of Technology and Evaluation (NITE)
	U.S. National Library of Medicine Toxicology Data Network (TOXNET)

Procedure used to derive the classification for mixtures according to GHS:

Classification	Classification procedure
Acute Tox. 4, H302	Calculation method
Acute Tox. 5, H313	Calculation method
Skin Corr. 1B, H314	Calculation method
Eye Dam. 1, H318	Calculation method
Skin Sens. 1, H317	Calculation method
Repr. 1B, H360D	Calculation method
Aquatic Chronic 3, H412	Calculation method

Relevant H-statements:

- H227: Combustible liquid.
- H302: Harmful if swallowed.
- H303: May be harmful if swallowed.
- H312: Harmful in contact with skin.
- H313: May be harmful in contact with skin.
- H314: Causes severe skin burns and eye damage.
- H315: Causes skin irritation.
- H317: May cause an allergic skin reaction.
- H318: Causes serious eye damage.
- H319: Causes serious eye irritation.
- H332: Harmful if inhaled.
- H335: May cause respiratory irritation.
- H360D: May damage the unborn child.
- H412: Harmful to aquatic life with long lasting effects.

Hazard pictogram names: Corrosion, health hazard, exclamation mark

Further information: None

Date of last revision: 11 July 2023

Changes to the SDS in this revision: Sections 1.2, 1.3, 2.1, 2.2, 3.2, 5.2, 5.3, 8.1, 9.1, 13.1, 14.1, 14.2, 14.4, 14.8, 15.1, 16.

This information is based solely on data provided by suppliers of the materials used, not on the mixture itself. No warranty is expressed or implied regarding the suitability of the product for the user's particular purpose. The user must make their own determination as to suitability.