Rosenblum Environmental LLC.
PO Box 905
Nederland, CO 80477
T: 916.201.9475
Email: EricRosenblum@hotmail.com

Date: 7/14/2015

## Toxicology Risk Assessment United States

**Client:** David Paulo

## Manufacturer:

Fire Retardant Coatings of Texas, LLC 1150 Blue Mound Rd West Suite 403 Haslet, Texas 76052

Product Name:	FX Lumber Guard / FX Lumber Guard XT and FX Fabric Guard / FX Tree Guard / FX Paper Guard		
Product Code:	n/a		
Weight/volume of Product:	quart, gallon, 5 gallon and 55 gallon containers		
Suggested Age:	Adult		
Intended Use:	Fire retardant coating		
Test Requested:	US TRA		
Test Performed By:	Eric Rosenblum PhD DABT		
Overall Rating:	No significant risks associated with use of this product		

**Regulations:** 16 CFR 1500.3 Federal Hazardous Substances Act (FHSA) of the Consumer Product Safety Commission (CPSC).

**Summary:** The FX Lumber Guard / FX Lumber Guard XT formulation and the FX Fabric Guard / FX Tree Guard / FX Paper Guard formulation are not classified as toxic, corrosive, skin or eye irritant, or a strong sensitizers as defined in 16 CFR 1500.3 Federal Hazardous Substances Act (FHSA) of the Consumer Product Safety Commission (CPSC), when used as intended or under circumstances involving reasonable foreseeable misuse..

Eric Rosenblum PhD DABT
Senior Toxicologist

This report is rendered upon the condition that it is not to be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special permission in writing. Our letters and reports apply to the samples tested and are not necessarily indicative of the qualities of apparently identical or similar products. Samples not destroyed in testing will be held a maximum of 30 days.

Date: 7/14/2015

## **Information Sources:**

The physical product was not provided for review. Review was based on the client provided product formulation. This review assumes that the formulation has been correctly reported and that there are no undeclared contaminants present. Client provided information indicates that both the FX Lumber Guard / FX Lumber Guard XT and FX Fabric Guard / FX Tree Guard / FX Paper Guard are provided in quart, gallon, 5 gallon and 55 gallon containers. The product is intended for adults. A review of the available toxicology data on the individual raw materials in the US National Library of Medicine's Toxicology Data Network TOXNET, Expert Publishing LLC's ExPub Chemical Hazard Information for EH&S Professionals Infobase, and Material Safety Data Sheets was conducted.

## **Exposure Scenarios for Intended Use:**

Client provided information indicated that the FX Lumber Guard / FX Lumber Guard XT and FX Fabric Guard / FX Tree Guard / FX Paper Guard are spray applied liquids which are used as a fire retardant coatings. Under normal intended conditions of use, there is no significant oral exposure of the consumer to the FX Lumber Guard / FX Lumber Guard XT and FX Fabric Guard / FX Tree Guard / FX Paper Guard, however, there is a potential for intermittent dermal exposure and incidental inhalation exposure to the substance. In addition incidental eye and oral contact may occur if the substance is on the hands and transferred to the eyes or mouth. Possible misuse may also include accidental, or purposeful, oral and dermal exposure by children.

Exposure Type	Insignificant	Incidental	Intermittent	Frequent
Oral		Х		
Inhalation		Х		
Skin			Х	
Eye		X		

Results: The FX Lumber Guard / FX Lumber Guard XT and FX Fabric Guard / FX Tree Guard / FX Paper Guard formulations both include a dilution of 85% phosphoric acid (CAS# 7664-38-2). This ingredient at full strength is associated with severe skin burns and eye damage and GHS hazard code H314 (Causes severe skin burns and eye damage). As indicated within the C&L Inventory harmonized hazard code for phosphoric acid, a mixture with a final phosphoric acid concentration of 10% ≤ and < 25% is associated with GHS Category 2 skin irritation (H315) and Category 2 eye irritation (H319). The FX Lumber Guard / FX Lumber Guard XT and the FX Fabric Guard / FX Tree Guard / FX Paper Guard formulations, both contain <10% phosphoric acid in the final formulation. While direct prolonged skin or eye contact with the products is likely to result in mild skin or eye irritation, the final formulations are not considered a skin or eye irritant as defined in 16 CFR 1500.3. None of the reviewed formulations are not considered to be an acute or chronic toxicant, corrosive, or a strong sensitizer as defined under 16 CFR 1500.3.

This report is rendered upon the condition that it is not to be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special permission in writing. Our letters and reports apply to the samples tested and are not necessarily indicative of the qualities of apparently identical or similar products. Samples not destroyed in testing will be held a maximum of 30 days.

Rosenblum Environmental LLC. PO Box 905 Nederland, CO 80477 T: 916.201.9475

Email: EricRosenblum@hotmail.com Date: 7/14/2015

Fragrance Ingredients- None reported.

**Conclusions:** Based on the available safety data, it is concluded that there is no significant acute or chronic hazards to consumers from use of the FX Lumber Guard / FX Lumber Guard XT or the FX Lumber Guard / FX Lumber Guard XT and FX Fabric Guard / FX Tree Guard / FX Paper Guard during normal intended usage or likely misusage conditions.

This report is rendered upon the condition that it is not to be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special permission in writing. Our letters and reports apply to the samples tested and are not necessarily indicative of the qualities of apparently identical or similar products. Samples not destroyed in testing will be held a maximum of 30 days.