19902-XXXX



## SDS Documents from Sakura of America – Important information

The Hazard Communication Standard (HCS) requires importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the new headings.

SDSs that represent non-hazardous chemicals are not covered by the HCS. Paragraph 29 CFR 1910.1200(g)(8) of the standard requires that "the employer shall maintain in the workplace copies of the required SDSs for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their workarea(s)." OSHA does not require nor encourage employers to maintain MSDSs for non-hazardous chemicals. Consequently, an employer is free to discard MSDSs for nonhazardous chemicals.

SDS are only required for materials that are <u>hazardous</u>. Often times, manufacturers are asked for MSDS's for products that do not meet this requirement - manufacturers are under **no** obligation to produce SDS's for non-hazardous materials. OSHA discourages the production of MSDS & SDS for non-hazardous materials.

An "article" means a manufactured item: (1) which is formed to a specific shape or design during manufacture (2) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (3) which does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use. Any product which meets the definition of an "article," would be exempt from the requirements of the Standard.

The definition above has been amended to permit the release of "very small quantities, e.g., minute or trace amounts" of a hazardous chemical and still qualify as an article provided that a physical or health risk is not posed to the employees (59 F.R. 6146). In evaluating an article, one must consider the health risk which exposure to that article presents. (The term "risk" as opposed to "hazard" is used here, since the hazard is an inherent property of the chemical and exists no matter the quantity of exposure. To be exempted as an article, exposure must not pose a risk to employee health.)

Note that OSHA cannot make an across-the-board determination of a products' exclusion as an "article." The standard's definition by its very wording imposes the need to make case-by-case evaluations. Consequently, a blanket exemption for specific products cannot be given by OSHA.

The HCS exempts any consumer product or hazardous substance, as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended.

According to the first OSHA interpretation listed below, "...clerical workers...may not be subject to the requirements of the HCS. Office workers who encounter hazardous chemicals only in isolated instances are not covered by the rule. The Occupational Safety and Health Administration (OSHA) considers most office products (such as pens, pencils, adhesive tape) to be exempt under the provisions of the rule, either as articles or as consumer products.

Page 2 of this memo lists the specific stock numbers which are covered under the attached SDS although not specifically noted on the SDS section 1.. Numbers listed on this 2<sup>nd</sup> page which are not noted on the SDS are due to packaging variations (i.e. blister cards, sets) but the individual contents of these packaging variations are within the SDS.

All products offered by Sakura of America are considered either a) articles b) office products and/or c) consumer products and are exempted from the requirements of the Standard(s) and do not require SDS (unless otherwise noted)

Nonetheless, some downstream clients may insist on an SDS even when one is not required. In such cases, OSHA has suggested providing a written statement such as "This product is not considered to be or to contain hazardous chemicals based on evaluations made by our company under the OSHA Hazard Communication Standard, 29 CFR 1910.1200. This gives the requesting party something that they can put in their files and saves the manufacturer from needless work.

For more information refer to: https://www.osha.gov/html/faq-hazcom.html

Item: Koi Coloring Brush series

# **SAFETY DATA SHEET 2nd Page Cover Letter Product listing**

June 19th, 2018

stock #	description
XBR-3	KOI COLORING BRUSH - YELLOW
XBR-4	KOI COLORING BRUSH - DEEP YELLOW
XBR-5	KOI COLORING BRUSH - ORANGE
XBR-205	KOI COLORING BRUSH - CORAL RED
XBR-7	KOI COLORING BRUSH - PALE ORANGE
XBR-407	KOI COLORING BRUSH - WOODY BROWN
XBR-9	KOI COLORING BRUSH - NAPLES YELLOW
XBR-110	KOI COLORING BRUSH - DARK BROWN
XBR-12	KOI COLORING BRUSH - BROWN
XBR-14	KOI COLORING BRUSH - RAW SIENNA
XBR-18	KOI COLORING BRUSH - VERMILION
XBR-19	KOI COLORING BRUSH - RED
XBR-107	KOI COLORING BRUSH - SALMON PINK
XBR-20	KOI COLORING BRUSH - PINK
XBR-221	KOI COLORING BRUSH - ROSE RED
XBR-421	KOI COLORING BRUSH - MAGENTA PINK
XBR-22	KOI COLORING BRUSH - BURGUNDY
XBR-222	KOI COLORING BRUSH - FUCHSIA
XBR-123	KOI COLORING BRUSH - LILAC
XBR-223	KOI COLORING BRUSH - BORDEAUX
XBR-24	KOI COLORING BRUSH - PURPLE
XBR-124	KOI COLORING BRUSH - IRIS
XBR-224	KOI COLORING BRUSH - LIGHT PURPLE
XBR-25	KOI COLORING BRUSH - CERULEAN BLUE
XBR-125	KOI COLORING BRUSH - SKY BLUE
XBR-225	KOI COLORING BRUSH - STEEL BLUE
XBR-226	KOI COLORING BRUSH - EMERALD GREEN
XBR-426	KOI COLORING BRUSH - PEACOCK GREEN
XBR-27	KOI COLORING BRUSH - YELLOW GREEN
XBR-28	KOI COLORING BRUSH - BLUE GREEN LIGHT
XBR-128	KOI COLORING BRUSH - ICE GREEN
XBR-29	KOI COLORING BRUSH - GREEN
XBR-130	KOI COLORING BRUSH - SAP GREEN
XBR-31	KOI COLORING BRUSH - VIRIDIAN
XBR-32	KOI COLORING BRUSH - FRESH GREEN
XBR-36	KOI COLORING BRUSH - BLUE
XBR-137	KOI COLORING BRUSH - AQUA BLUE
XBR-237	KOI COLORING BRUSH - LIGHT SKY BLUE
XBR-238	KOI COLORING BRUSH - LAVENDER
XBR-43	KOI COLORING BRUSH - PRUSSIAN BLUE
XBR-47	KOI COLORING BRUSH - RAW UMBER
XBR-49	KOI COLORING BRUSH - BLACK
XBR-44	KOI COLORING BRUSH - COOL GRAY
XBR-144	KOI COLORING BRUSH - DARK WARM GRAY
XBR-45	KOI COLORING BRUSH - WARM GRAY
XBR-145	KOI COLORING BRUSH - LIGHT WARM GRAY
XBR-46	KOI COLORING BRUSH - DARK COOL GRAY
XBR-153	KOI COLORING BRUSH - LIGHT COOL GRAY
XBR-BLEND	BC, KOI COLORING BRUSH 2 PK - BLENDER
XBR-6SA	KOI COLORING BRUSH 6 PC SET - 6 GRAYS
XBR-6CSA	KOI COLORING BRUSH 6 PC SET - 6 COLORS
XBR-12SA	KOI COLORING BRUSH 12 PC SET - 12 COLORS
XBR-24SA	KOI COLORING BRUSH 24 PC SET - 24 COLORS
<del>                                      </del>	
XBR-48SA	KOI COLORING BRUSH 48 PC SET - 48 COLORS

June 19, 2018

N.A.: Not Applicable

#### SAFETY DATA SHEET

(Required under OSHA's Hazard Communication Standard 29 CFR 1910.1200)

Page 1 of 3 Section 1. Identification Manufacturer's Name: Telephone Number: Sakura Color Products Corporation +81 (0)6 - 6910 - 8824 (Japan) FAX Number: 1-6-20, Morinomiya Chuo, Chuo-ku, Osaka, 540-8508 Japan +81 (0)6 - 6910 - 8834 (Japan) Product Name: KOI COLORING BRUSH (XBR): 49 Colors (Please see Color List.) KOI COLORING BRUSH 6 PC SET - 6 COLORS(XBR-6) KOI COLORING BRUSH 12 PC SET - 12 COLORS(XBR-12) KOI COLORING BRUSH 24 PC SET - 24 COLORS(XBR-24) KOI COLORING BRUSH 48 PC SET - 48 COLORS(XBR-48) Section 2. Hazard(S) identification This product is approved by ACMI (The Art & Creative Material Institute, Inc.), and carries the "AP" seal of non-toxic approval in USA. This product is not considered hazardous in normal use as required under OSHA's Hazardous Communication Standard 29 CFR 1910.1200. Section 3. Composition / information on ingredients Ethylene glycol (107-21-1), Water, Dye, Additive Section 4. First-Aid measures ·Inhalation: If he/she has subjective and objective symptoms, move him/her to a place fresh air, and consult a doctor. ·Skin Contact: Wash with soap and water. ·Eye Contact: Wash the eyes immediately with large amounts of running water for over 15 minutes, and see a doctor for medical advice. If the victim stops breathing, wipe away any remaining material in the mouth and Ingestion: clear the airway and administer artificial respiration. Section 5. Fire-fighting measures ·Suitable extinguishing media : In case of fire, use water spray, foam or dry chemical powder. ·For safety reasons unsuitable extinguishing media: None ·Protective equipment : No special measures required Section 6. Accidental release measure ·Person-related safety precautions : No relevant information found. ·Measures for environmental protection : No relevant information found. ·Measures for cleaning/collecting: The ink is not spilled so that it soaked into the ink reservoir by normal handling. Section 7. Handling and storage · Handling : In the case of stuck to the skin, rinse with running water and soap. Storage : Avoid high temperature, fire, direct rays of the sun, and a powerful oxidizing agent. Section 8. Exposure controls / personal protection ·General protective and hygienic measures : Unnecessary in normal use ·Breathing equipment : Unnecessary in normal use ·Protection of hands : Unnecessary in normal use ·Eve protection : Unnecessary in normal use ·Skin protection : Unnecessary in normal use

Item Numbers: 19902-0129, 19902-0249, 19902-0249, 19902-0489, 19902-1002, 19902-2020, 19902-2509, 19902-2670, 19902-2680, 19902-2690, 19902-2820, 19902-2820, 19902-2830, 19902-3010, 19902-3050, 19902-3050, 19902-3060, 19902-3050, 19902-3070, 19902-3070, 19902-3170, 19902-3170, 19902-3240, 19902-3240, 19902-3250, 19902-3070, 1990

19902-5160, 19902-5170, 19902-5220, 19902-5280, 19902-5380, 19902-6030, 19902-6030, 19902-6040, 19902-6100, 19902-6410, 19902-7010, 19902-7050, 19902-7090, 19902-7190, 19902-7190, 19902-7530, 19902-7700, 19902-8000, 19902-8030, 19902-8030, 19902-8070, 1990

N.D.: Not Determined

(XBR) Page 2 of 3

# Section 9. Physical and chemical properties for Ink

·Boiling point / boiling range : about 100 °C ·Flash point : No data ·Melting point : No data

·Solubility:

water solubility : Soluble

fat solubility (solvent - oil to be specified) : Insoluble : about 1 g/cm3 (at 25°C) ·Relative density

#### Section 10. Stability and reactivity

·Conditions to avoided:

High temperature, Direct sunlight, Fire

·Materials to avoided:

Strong acid and base

·Hazardous decomposition products:

No dangerous decomposition products known

### Section 11. Toxicological information

This product is approved by ACMI (The Art & Creative Material Institute, Inc.),

and carries the "AP" seal of non-toxic approval in USA.

# Section 12. Ecological information

No relevant information found.

#### Section 13. Ecological information

Incinerate under safe conditions or dispose of in accordance with local regulations.

#### Section 14. Transport information

·DOT : Not applicable ·IATA: Not applicable ·IMO : Not applicable

# Section 15. Regulatory information

TSCA: The product listed on Safety Data Sheet is not listed on Toxic Substances Control Act Inventory. All ingredients used to manufacture this product are listed on TSCA Inventory.

#### Section 16. Other information, including date of preparation or last revision.

HMIS Code:

Health - 1 Flammability - 0 Reactivity - 0 Personal Protection - N.A.

Date of revision: June 19, 2018

This information herein is given good faith, but no warranty, expressed or implied is made.

June 19, 2018

(XBR) Page 3 of 3

Color List

# <KOI COLORING BRUSH>

1	Yellow	XBR#3
2	Deep Yellow	XBR#4
3	Orange	XBR#5
4	Coral Red	XBR#205
5	Pale Orange	XBR#7
6	Salmon Pink	XBR#107
7	Woody Brown	XBR#407
8	Naples Yellow	XBR#9
9	Dark Brown	XBR#110
10	Brown	XBR#12
11	Raw Sienna	XBR#14
12	Vermilion	XBR#18
13	Red	XBR#19
14	Pink	XBR#20
15	Rose Red	XBR#221
16	Magenta Pink	XBR#421
17	Burgundy	XBR#22
18	Fuchsia	XBR#222
19	Lilac	XBR#123
20	Bordeaux	XBR#223
21	Purple	XBR#24
22	Iris	XBR#124
23	Light Purple	XBR#224
24	Cerulean Blue	XBR#25

25	Sky Blue	XBR#125
26	Steel Blue	XBR#225
27	Emerald Green	XBR#226
28	Peacock Green	XBR#426
29	Yellow Green	XBR#27
30	Blue Green Light	XBR#28
31	Ice Green	XBR#128
32	Green	XBR#29
33	Sap Green	XBR#130
34	Viridian	XBR#31
35	Fresh Green	XBR#32
36	Blue	XBR#36
37	Aqua Blue	XBR#137
38	Light Sky Blue	XBR#237
39	Lavender	XBR#238
40	Prussian Blue	XBR#43
41	Cool Gray	XBR#44
42	Dark Warm Gray	XBR#144
43	Warm Gray	XBR#45
44	Light Warm Gray	XBR#145
45	Dark Cool Gray	XBR#46
46	Raw Umber	XBR#47
47	Black	XBR#49
48	Light Cool Gray	XBR#153
49	Blender	XBR#00