

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 <u>non-hazardous chemicals are not covered by the HCS</u>. 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 non-hazardous 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 - <u>manufacturers are under no obligation to produce SDS's for non-hazardous materials</u>. 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 <u>hazardous chemical</u> under normal conditions of use. <u>Any product which meets the definition of an "article," would be</u> 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 <u>hazardous</u> 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 **<u>consumer product</u>** or hazardous substance, as those terms are defined in the <u>Consumer Product Safety Act</u> (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 <u>articles</u> or as <u>consumer products</u>.

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 2nd 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, <u>29 CFR 1910.1200</u>." This gives the requesting party something that they can put in their files and saves the manufacture<u>r</u> from needless work.*

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

Item Numbers: 21319-2002, 21319-3002, 21319-4002, 21319-4502, 21319-5002, 21319-6002, 21319-7002, 21319-8002

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SAFETY DATA SHEET 2nd Page Cover Letter Product listing

March 07, 2018

	stock #	description
F	44101	IDENTIPEN - BLACK
İ.	44102	IDENTIPEN - BLUE
İ	44103	IDENTIPEN - RED
T	44104	IDENTIPEN - GREEN
	44105	IDENTIPEN - BROWN
T	44106	IDENTIPEN - PURPLE
	44107	IDENTIPEN - ORANGE
	44108	IDENTIPEN - YELLOW
	1	
	44181	BC, IDENTIPEN - BLACK
	44161	CLAM, IDENTIPEN 4 PC SET - ASST
Γ	Consists of:	Black, Blue, Red, Green
	44162	CLAM, IDENTIPEN 8 PC SET - ASST
	Consists of:	Black, Blue, Red, Green, Purple, Brown, Orange, Yellow
-		
	100 C	

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SAFETY DATA SHEET

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

ection 1. Identification lanufacturer's Name:	Talanhana Numbar
Sakura Color Products Corporation	Telephone Number: +81 (0)6 - 6910 - 8824 (Japan)
ddress:	FAX Number:
1-6-20, Morinomiya Chuo, Chuo-ku, Osaka, 540-8508 Japan	+81 (0)6 - 6910 - 8834 (Japan)
roduct Name: IDENTIPEN: Black(XYK-T-49), Blue(XYK-T-36), Red(XYK-T-19 Brown(XYK-T-12), Purple(XYK-T-24), Orange(XYI	
ection 2. Hazard(S) identification	
This product is approved by ACMI (The Art & Creative Mat	erial Institute, Inc.),
This product is not considered hazardous in normal use as requ	d carries the "AP" seal of non-toxic approval in US uired under OSHA's ardous Communication Standard 29 CFR 1910.120
ection 3. Composition / information on ingredients	
1-Methoxy-2-propanol (107-98-2), Ethanol (64-17-5), bis-(2-Me	ethoxypropyl) ether(34590-94-8), 2-Propanol(67-63-0), Resin, Dye, Additive
ection 4. First-Aid measures	
Inhalation : If he/she has subjective and objective symptom	oms, move him/her to a place fresh air, and consult a docto
 Skin Contact : Wash with soap and water. Eye Contact : Wash the eyes immediately with large amount 	ts of running water for over 15 minutes,
Ingestion : If the victim stops breathing, wipe away any r	and see a doctor for medical advice emaining material in the mouth and clear the airway and administer artificial respiratio
ection 5. Fire-fighting measures	
•Suitable extinguishing media : In case of fire, use water s	pray, foam or dry chemical powder.
 For safety reasons unsuitable extinguishing media : None 	
Protective equipment : No special measures requi	red
ection 6. Accidental release measure	
·Person-related safety precautions: Removal of ignition source	9.
Provision of sufficient vent	ilation/ respiratory protection.
·Measures for environmental protection: No relevant informatio	n found.
Measures for cleaning/collecting: The ink is not spilled so tha	
Section 7. Handling and storage	
·Handling : In the case of stuck to the skin, rinse with run	ning water and soap.
•Storage : Avoid high temperature, fire, direct rays of the	
ection 8. Exposure controls / personal protection	
·General protective and hygienic measures : Unneces	ssary in normal use
·Breathing equipment : Unnecessary in normal use	9
Protection of hands : Unnecessary in normal use	e
•Eye protection : Unnecessary in normal use	e
·Skin protection : Unnecessary in normal use	9

(YK-T)	Page 2 of
Section 9. Physical and chemic	
Boiling point / boiling range	
-Flash point	: 26-27°C
Melting point	: No data
-Solubility:	
water solubility	: Insoluble
fat solubility (solvent	
Relative density	$: 1 > g/cm^{3}$ (at 25°C)
Section 10. Stability and reactiv	ity
 Conditions to avoided: 	
High temperature,	Direct sunlight, Fire
 Materials to avoided: 	
Strong acid and b	ase
 Hazardous decomposition 	products:
No dangerous de	composition products known
Section 11 Toxicological inform	ation
Section 11. Toxicological inform	
-	CMI (The Art & Creative Material Institute, Inc.),
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This product is approved by A	CMI (The Art & Creative Material Institute, Inc.), and carries the "AP" seal of non-toxic approval in US
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