Page 1 of 4



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

Page 1 of 4

SAFETY DATA SHEET 2nd Page Cover Letter Product listing

March 07, 2018

	stock #	description
	44101	IDENTIPEN - BLACK
	44102	IDENTIPEN - BLUE
	44103	IDENTIPEN - RED
	44104	IDENTIPEN - GREEN
	44105	IDENTIPEN - BROWN
	44106	IDENTIPEN - PURPLE
	44107	IDENTIPEN - ORANGE
	44108	IDENTIPEN - YELLOW
	44181	BC, IDENTIPEN - BLACK
	44161	CLAM, IDENTIPEN 4 PC SET - ASST
	Consists of	Black, Blue, Red, Green
	44162	CLAM, IDENTIPEN 8 PC SET - ASST
	Consists of	Black, Blue, Red, Green, Purple, Brown, Orange, Yellow
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Item Numbers: 21319-2002, 21319-3002, 21319-4002, 21319-4502, 21319-5002, 21319-6002, 21319-7002, 21319-8002

Page 2 of 4

SAFETY DATA SHEET

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

(XYK-T) Section 1. Identification	Page 1 of 2
Manufacturer's Name:	Telephone Number:
Sakura Color Products Corporation	+81 (0)6 - 6910 - 8824 (Japan)
Address:	FAX Number:
1-6-20, Morinomiya Chuo, Chuo-ku, Osaka, 540-8508	
Product Name: IDENTIPEN: Black(XYK-T-49), Blue(XYK-T-36), Red(X Brown(XYK-T-12), Purple(XYK-T-24), Ora	
Section 2. Hazard(S) identification	
This product is approved by ACMI (The Art & Crea	tive Material Institute, Inc.),
This product is not considered hazardous in normal use	and carries the "AP" seal of non-toxic approval in USA e as required under OSHA's Hazardous Communication Standard 29 CFR 1910.1200
Section 3. Composition / information on ingredients	
1-Methoxy-2-propanol (107-98-2), Ethanol (64-17-5),	bis-(2-Methoxypropyl) ether(34590-94-8), 2-Propanol(67-63-0), Resin, Dye, Additive
Section 4. First-Aid measures	
·Inhalation : If he/she has subjective and objectiv	e 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 larg	e amounts of running water for over 15 minutes, and see a doctor for medical advice.
Ingestion : If the victim stops breathing, wipe aw	vay any remaining material in the mouth and clear the airway and administer artificial respiration
Section 5. Fire-fighting measures	
·Suitable extinguishing media : In case of fire, use	e water spray, foam or dry chemical powder.
 For safety reasons unsuitable extinguishing media : 	None
Protective equipment : No special measu	res required
Section 6. Accidental release measure	
·Person-related safety precautions: Removal of ignition	on source.
	ient ventilation/ respiratory protection.
·Measures for environmental protection: No relevant in	
-	
Section 7. Handling and storage	ed so that it soaked into the ink reservoir by normal handling.
Handling : In the case of stuck to the skin, rinse	with running water and soap
5	ys of the sun, and a powerful oxidizing agent.
	ys of the surf, and a powerful oxidizing agent.
Section 8. Exposure controls / personal protection	
·General protective and hygienic measures :	Unnecessary in normal use
·Breathing equipment : Unnecessary in no	ormal use
·Protection of hands : Unnecessary in no	ormal use
Eye protection : Unnecessary in no	ormal use
·Skin protection : Unnecessary in no	
A.: Not Applicable N.D.: Not Determined	
tom Number: 21210 2002 21210 2002 21210 4002 21210 4502 21210 5002 21210 5002 21210 7002 21210 8	Page 3 of

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

Page 3 of 4

(XYK-T)

Page 2 of 2 Section 9. Physical and chemical properties for Ink ·Boiling point / boiling range : No data ·Flash point : 26-27°C ·Melting point : No data ·Solubility: water solubility : Insoluble fat solubility (solvent - oil to be specified) : Soluble $: 1 > g/cm^{3}$ (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 – 3 Reactivity - 0 Personal Protection - N.A. Date of revision: March 7, 2018

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

March 07, 2018