

2/17/2022

Graphic Controls SDS Exemption Policy Recording Charts and Pens

We have received your Safety Data Sheet request referencing our recording chart and marking pen products. Under OSHA 1910.1200, the OSHA Hazard Communication Standard and GHS, Safety Data Sheets are required for all hazardous chemicals with the exception of certain materials defined as articles.

Articles are defined in 29 CFR 1910.1200(c) as manufactured items other than a fluid or particle:

- (i) which is formed to a specific shape or design during manufacture;
- (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
- (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined in 1910.1200 paragraph (d)), and does not pose a physical hazard or health risk to employees.

The Canadian WHMIS regulation also contains a similar exclusion language for manufactured articles.

Products supplied by Graphic Controls, meet the exemption criteria established in the OSHA Hazard Communication Standard and GHS:

1. Marking pen products are non-hazardous and do not represent a physical, health or environmental hazard and as such non-hazardous materials do not require a SDS.
2. Recording chart products are defined as articles exempting them from SDS requirements.

These exemptions include all the recording chart and marking pen products found in the Graphic Controls catalog and as such Safety Data Sheets are NOT required for these products. We trust this clarification letter will meet your documentation requirements, please contact us at 800.669.1535 if you require further clarification.

Sincerely

Graphic Controls