LASCO®
Fittings, Inc.

August 25, 2020

Safety Data Sheets (SDS): Material Safety Data Sheets (MSDS)

To Whom It May Concern:

In response to your recent request for Safety Data Sheets (SDS) [*Formerly known as Material Safety Data Sheets (MSDS)*] under the provisions of the Hazard Communication Standard of the Occupational Safety and Health Administration, we draw your attention to the statements below and attached. You may feel free to reproduce and distribute this letter and its attachment to any concerned individuals, firms, or regulatory agencies.

All products manufactured by LASCO Products Group are "***articles***" as defined by the Hazard Communication Standard and, therefore, Safety Data Sheets are **not** required under the OSHA regulation. Shipping cartons for these products need **not** carry special labels or notations.

For a complete explanation of the meaning of "***articles***" as defined by OSHA, please read the attached Special Bulletin from the Society of the Plastics Industry, Inc.

To the best of our knowledge, the information above and enclosed, apply equally to "Right to Know" laws which have been adopted by various state governments.

Should additional information be required, please do not hesitate to contact us.

Sincerely,

Bridget Evans

Bridget Evans

Safety & Training Coordinator

Direct 731.779.1899

bevans@lascofittings.com

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OSHA Clarifies definition of Exempt 'Articles' Under Its New Hazard Communication Standard

As most SPI members are aware, the Occupational Safety and Health Administration's Hazard Communication Standard, which requires the identification of workplace hazardous chemicals and employee training, went into effect November 25, 1985 for chemical manufacturers, importers and suppliers and will go into effect on May 25, 1986 for manufacturers who use (but do not produce) chemicals in their operations.

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The Hazard Communication Standard applies to "chemical", but it **does not apply to any substance which is an "article"** within the meaning of the regulation.

The term "article" is defined in the new OSHA warning rule, as 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,

(3) which does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.

In the preamble to the OSHA standard as initially published in 1983, OSHA used "furniture" and "pieces of equipment" as examples of exempt articles. At the same time, the agency noted that hazardous chemicals used in the manufacture or use of an "article" would remain covered by the Standard unless otherwise excluded.

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Early in 1985, OSHA's Office of Health Compliance Assistance issued a memorandum outlining inspection procedures under the Standard, which clarifies the definition of exempt "articles." The agency stated that the key to the definition of "article" is the term "under normal conditions of use," and provides the following example:

An item may meet the definition of "article" - but produces a hazardous byproduct if burned. If burning is not considered as part of its normal conditions of use, the item would be an "article" under the Standard, and thus exempted.