



Acme United Corporation

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MSDS Exemption Letter and Policy Statement

Most end products sold by Acme United are exempt from the MSDS standard. We are not required to have MSDS's for all manner of cutting products such as scissors, shears, paper trimmers, and knives. Also exempt are rulers, math accessories, pencil sharpeners, hand tools, and protective safety devices.

Individual (refill) first aid products that contain one or more chemicals have MSDS's. We do provide them for the benefit of people who use them in the home or workplace for something other than first aid treatment. This includes latex gloves. First aid kits, however, are exempt because it is implicit that the contents are for first aid use only.

MSDS rules pertain only to chemicals and chemicals used in the workplace. Federal regulation 29 CFR 1910.1200(b)(6), as set forth by the United States Occupational Safety and Health Administration (OSHA), states that an MSDS is not required for an "article". The exempt items above meet this definition.

An article is described as "a manufactured item, which:

- (1) is formed to a specific shape or design during manufacture;
- (2) has end use function(s) dependent in whole or in part upon its shape or design during end use; and
- (3) does not release or otherwise result in exposure to a hazardous chemical under normal conditions of use."

Over-the-counter tablets and pills are also exempt according to a different section of the Hazard Communication Standard, 29 CFR 1910.1200(b)(6)(vii), because the product is sold in solid, final form and it is packaged by the pharmaceutical manufacturer.

Larry H. Buchtman
V. P. – Technology

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