

COMPLIANCE WITH 29 CFR § 1910.1200

CLIMAX METAL PRODUCTS COMPANY SAFETY DATA SHEET (SDS) LETTER

The Occupational Safety and Health Administration (OSHA) is a federal regulatory agency and the branch of the United States Department of Labor responsible for ensuring workplace safety. Title 29 of the Code of Federal Regulations (CFR) details the rules set forth by the Department of Labor, which includes OSHA regulations.

Standard 1910.1200, titled “Hazard Communication” is a standard included under Title 29 of the CFR, dealing with hazard classification and transmitting information about the classified hazards. This transmittal of information, per 1910.1200(a)(1), is to be achieved “by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, safety data sheets and employee training”.

1910.1200(b) deals with the scope and applications of standard 1910.1200, with 1910.1200(b)(6) listing products outside the scope of standard 1910.1200. 1910.1200(b)(6)(v) indicates that standard 1910.1200 does not apply to “Articles” as defined in 1910.1200(c).

The products manufactured by Climax Metal Products Company can be considered to be “Articles” which as defined in 1910.1200(c) are “a manufactured item 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 under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees”.

Based on this information, Climax Metal Products Company has determined that Safety Data Sheets (SDS) are not necessary for its manufactured products.

Climax Metal Products Company will continue to review its regulatory compliances and update appropriate documentation as necessary.

Feel free to contact us if you have any further questions.

Mark Rigsby
Director of Operations