



Acme United Corporation

January 21, 2013

MSDS Exemption Letter and Policy Statement

Most products sold by Acme United are exempt from the OSHA 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.

We do provide MSDS's for first aid products to customers for their transportation, warehouse, and retail store operations. We also make them available to end users on request. An MSDS for a first aid item, including latex gloves, is only applicable when used in the home or workplace for something other than first aid treatment.

MSDS rules pertain only to chemicals used in the workplace. Federal regulation 29 CFR 1910.1200(b)(6), as set forth by the Occupational Safety and Health Administration (OSHA), states that an MSDS is not required for an "article". The exempted items meet this definition. An article is "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 OSHA 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. Ingredients are listed in the "Drug Facts" statement on the package.

Larry H. Buchtman
V. P. – Technology