



## SDS Documents from Sakura of America – Important information

The Hazard Communication Standard (HCS) requires importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products.

As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the new headings.

**SDSs that represent non-hazardous chemicals are not covered by the HCS.** Paragraph 29 CFR 1910.1200(g)(8) of the standard requires that "the employer shall maintain in the workplace copies of the required SDSs for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their workarea(s)." OSHA does not require nor encourage employers to maintain MSDSs for non-hazardous chemicals. Consequently, an employer is free to discard MSDSs for non-hazardous chemicals.

**SDS are only required for materials that are hazardous.** Often times, manufacturers are asked for MSDS's for products that do not meet this requirement - **manufacturers are under no obligation to produce SDS's for non-hazardous materials.** OSHA discourages the production of MSDS & SDS for non-hazardous materials.

An "**article**" means 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; and (3) which does not release, or otherwise result in exposure to, a **hazardous chemical** under normal conditions of use. **Any product which meets the definition of an "article," would be exempt from the requirements of the Standard.**

The definition above has been amended to permit the release of "very small quantities, e.g., minute or trace amounts" of a **hazardous chemical** and still qualify as an article provided that a physical or health risk is not posed to the employees (59 F.R. 6146). In evaluating an article, one must consider the health risk which exposure to that article presents. (The term "risk" as opposed to "hazard" is used here, since the hazard is an inherent property of the chemical and exists no matter the quantity of exposure. To be exempted as an article, exposure must not pose a risk to employee health.)

*Note that OSHA cannot make an across-the-board determination of a products' exclusion as an "article." The standard's definition by its very wording imposes the need to make case-by-case evaluations. Consequently, a blanket exemption for specific products cannot be given by OSHA.*

The HCS **exempts** any **consumer product** or hazardous substance, as those terms are defined in the **Consumer Product Safety Act** (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended.

According to the first OSHA interpretation listed below, "...clerical workers...**may not** be subject to the requirements of the HCS. Office workers who encounter hazardous chemicals only in isolated instances are not covered by the rule. **The Occupational Safety and Health Administration (OSHA) considers most office products (such as pens, pencils, adhesive tape) to be exempt** under the provisions of the rule, either as **articles** or as **consumer products**.

**Page 2 of this memo lists the specific stock numbers which are covered under the attached SDS although not specifically noted on the SDS section 1.. Numbers listed on this 2<sup>nd</sup> page which are not noted on the SDS are due to packaging variations (i.e. blister cards, sets) but the individual contents of these packaging variations are within the SDS.**

**All products offered by Sakura of America are considered either a) articles b) office products and/or c) consumer products and are exempted from the requirements of the Standard(s) and do not require SDS (unless otherwise noted)**

Nonetheless, some downstream clients may insist on an SDS even when one is not required. In such cases, OSHA has suggested providing a written statement such as "*This product is not considered to be or to contain hazardous chemicals based on evaluations made by our company under the OSHA Hazard Communication Standard, 29 CFR 1910.1200.*" This gives the requesting party something that they can put in their files and saves the manufacturer from needless work.

For more information refer to: <https://www.osha.gov/html/faq-hazcom.html>



## SAFETY DATA SHEET

(Required under OSHA's Hazard Communication Standard 29 CFR 1910.1200)

(XNCW-12H, 18N, 24N)

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**Section 1. Identification**

Manufacturer's Name: Sakura Color Products Corporation	Telephone Number: +81 (0)6 - 6910 - 8824 (Japan)
Address: 1-6-20, Morinomiya Chuo, Chuo-ku, Osaka, 540-8508 Japan	FAX Number: +81 (0)6 - 6910 - 8834 (Japan)

Product Name:

KOI WATER COLOR FIELD SKETCH BX W/ BRUSH - 12 PC SET – 12 COLORS(XNCW-12H)  
 KOI WATER COLOR FIELD SKETCH BX W/ BRUSH - 18 PC SET – 18 COLORS(XNCW-18N)  
 KOI WATER COLOR FIELD SKETCH BX W/ BRUSH - 24 PC SET – 24 COLORS(XNCW-24N)

**Section 2. Hazard(S) identification**

This product is approved by ACMI (The Art & Creative Material Institute, Inc.),  
 and carries the "AP" seal of non-toxic approval in USA.  
 This product is not considered hazardous in normal use as required under OSHA's  
 Hazardous Communication Standard 29 CFR 1910.1200.

**Section 3. Composition / information on ingredients**

Titanium dioxide(13463-67-7), Carbon black(1333-86-4), Iron Oxide(1309-37-1), Resin, Pigment, Additive

**Section 4. First-Aid measures**

- Inhalation: If he/she has subjective and objective symptoms, move him/her to a place fresh air,  
and consult a doctor.
- Skin Contact: Wash with soap and water.
- Eye Contact: Wash the eyes immediately with large amounts of running water for over 15 minutes,  
and see a doctor for medical advice.
- Ingestion: If the victim stops breathing, wipe away any remaining material in the mouth and  
clear the airway and administer artificial respiration.

**Section 5. Fire-fighting measures**

- Suitable extinguishing media: In case of fire, use water spray, foam or dry chemical powder.
- For safety reasons unsuitable extinguishing media: None
- Protective equipment: No special measures required

**Section 6. Accidental release measure**

- Person-related safety precautions: No relevant information found.
- Measures for environmental protection: No relevant information found.
- Measures for cleaning/collecting: Sweep up, place in a bag and hold for waste disposal.

**Section 7. Handling and storage**

- Handling: In the case of stuck to the skin, rinse with running water and soap.
- Storage : Avoid high temperature, fire, direct rays of the sun, and a powerful oxidizing agent.

**Section 8. Exposure controls / personal protection**

- General protective and hygienic measures: Unnecessary in normal use
- Breathing equipment: Unnecessary in normal use
- Protection of hands: Unnecessary in normal use
- Eye protection: Unnecessary in normal use
- Skin protection: Unnecessary in normal use

N.A.: Not Applicable

N.D.: Not Determined

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**Section 9. Physical and chemical properties**

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- Boiling point / boiling range: No data
- Flash point: No data
- Melting point: No data
- Solubility:
  - water solubility: Soluble (except pigments)
  - fat solubility (solvent – oil to be specified): Insoluble
- Relative density: 1 < g/cm<sup>3</sup> (at 25°C)

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**Section 10. Stability and reactivity**

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- Conditions to avoided:
  - High temperature, Direct sunlight, Fire
- Materials to avoided:
  - Strong acid and base
- Hazardous decomposition products:
  - No dangerous decomposition products known

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**Section 11. Toxicological information**

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This product is approved by ACMI (The Art & Creative Material Institute, Inc.), and carries the "AP" seal of non-toxic approval in USA.

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**Section 12. Ecological information**

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No relevant information found.

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**Section 13. Ecological information**

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Incinerate under safe conditions or dispose of in accordance with local regulations.

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**Section 14. Transport information**

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- DOT: Not applicable
- IATA: Not applicable
- IMO: Not applicable

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**Section 15. Regulatory information**

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TSCA: The product listed on Safety Data Sheet is not listed on Toxic Substances Control Act Inventory. All ingredients used to manufacture this product are listed on TSCA Inventory.

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**Section 16. Other information, including date of preparation or last revision.**

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HMIS Code:  
Health - 1    Flammability – 0    Reactivity - 0    Personal Protection - N.A.  
Date of revision: 05/29/2015

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This information herein is given good faith, but no warranty, expressed or implied is made.

May 29, 2015