



October 11, 2011

To Whom It May Concern:

Per OSHA standards, our mats are a manufactured "article" and don't require an MSDS sheet. We have MSDS sheets on the material we use to make our mats, but they are based on a pellet composition of the material we receive, which is changed when we make our product.

Below is the information pertaining to the exemption. Please contact me if you have any other questions.

Thank you,

A handwritten signature in blue ink that reads "Nancy Webb".

Nancy Webb
913-894-0403, ext. 26

THE FOLLOWING ITEMS **MAY BE EXEMPTED Hazard Communication Standard 29 CFR 1910.1200** (OSHA wording is in green). If a material is hazardous and not listed below, then it generally requires an MSDS:

Articles

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.

For example, a roll of copper electrical wire sold to a hardware store would fit this definition of an article, but a load of copper ingots being shipped to a computer chip manufacturer would not (and would require an MSDS).

The definition 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.