

August 10, 2015

Metal Jacketing Article Notification and SDS Policy

On November 25, 1985, the OSHA “Right-to-Know” law, section 29 CFR 1910.1200(c), took effect nationally. This law is intended to provide the industrial work force with information concerning “hazardous materials” on both product labels and Safety Data Sheets (SDS). Further, 29 CFR 1910.1200(b) (6) (v), provides that the regulation does not apply to articles.

Aluminum and stainless steel jacketing, sheets, rolls, strapping, tie-wire, seals, springs, and fitting covers are considered “articles” under the law and, therefore, do not require an SDS. “Articles” are defined as a “manufactured item: (1) which is formed to a specific shape or design during manufacturing, (2) which has end use functions dependent in whole or in part upon its shape of design during end use, and (3) which does not release, or otherwise result in exposure to a hazardous chemical under normal conditions of sale.”

The above listed ITW Insulation Systems aluminum and stainless steel products present no health hazard in their natural state during use, storage, and transportation. OSHA only considers aluminum and stainless steel “hazardous” when in fume or dust form. Our aluminum and stainless steel products have no fumes or dust associated with them since they are manufactured and used in roll/sheet or final part form.

Please keep this letter available, in lieu of an SDS, as evidence of the above exemption.

If you have any questions concerning our SDS policy, please feel free to contact us at (800) 231-1024 or (713) 691-7002.