

## ITS

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**TO:** Ms. Christina Gregory  
**FROM:** Howard Ray  
**DATE:** August 21, 2001  
**RE:** **Why our test strips do not require MSDS sheets**

Occasionally our customers will call to request a Material Safety Data Sheet (MSDS) for their files. This is understandable, since OSHA requires MSD sheets to be available for chemicals in the workplace that employees may be exposed to under normal conditions of use or in an emergency. This section of the OSHA code (CFR 1910.1200, Hazard communication) has several exceptions for things like wood, or food, or cosmetics. There is another exception for something called an Aarticle@ (CFR1910.1200 (b)(6)(v), and paragraph (c)).

An article is defined as an item that is formed to a specific shape during manufacture that depends upon that shape to function. It also releases minute or trace amounts of a hazardous chemical (as defined in paragraphs (d) and (g) of the section) and does not pose a health risk to employees. Articles do not require MSD sheets.

Our test strips are very safe. We work hard to avoid using harmful chemicals in the formulations. One test strip is generally less than 1.0% as active ingredients, less than 0.1% of each active ingredient in most cases. Since the strip does not dissolve, the amount of chemical that is released is much less than that. For this reason our test strips are defined as articles, and are exempt from the MSDS requirement.

If you have more questions please let me know.