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## 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 work area(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>

Stock #	brief description
XNCW-12H	KOI WATER COLORS FIELD SKETCH BOX W/ BRUSH - 12 COLORS
XNCW-18N	KOI WATER COLORS FIELD SKETCH BOX W/ BRUSH - 18 COLORS
XNCW-24N	KOI WATER COLORS FIELD SKETCH BOX W/ BRUSH - 24 COLORS
XNCW-30N	KOI WATER COLORS FIELD SKETCH BOX W/ BRUSH - 30 COLORS
XNCW-36N	KOI WATER COLORS FIELD SKETCH BOX W/ BRUSH - 36 COLORS
XNCW-48N	KOI WATER COLORS FIELD SKETCH BOX W/ BRUSH - 48 COLORS
XNCW-60N	KOI WATER COLORS STUDIO SKETCH BOX W/ 2 BRUSHES - 60 COLORS
XNCW-72N	KOI WATER COLORS STUDIO SKETCH BOX W/ 2 BRUSHES - 72 COLORS
XNCW-12MH	KOI WATER COLORS <b>CAC</b> FIELD SKETCH BOX W/ BRUSH - 12 COLORS
XNCW-24MPN	KOI WATER COLORS <b>CAC</b> FIELD SKETCH BOX W/ BRUSH - 24 COLORS



Commercial product name: Koi Water Colors pocket field sketch box,  
12/18/24/30/36/48/60/72-color set with Waterbrush  
Creative Art Colors, 12/24-color set with Waterbrush  
Date: Feb. 11, 2003  
Product No: XNCW-12H/18N/24N/30N/36N/48N/60N/72N  
Date of revision: Mar. 2, 2018  
-12MH/24MPH  
Producer/supplier: Sakura Color Products Corp.

1 Identification of the substance / preparation and of the company / undertaking

1.1 Identification of the substance or preparation:

Trade name : Koi Water Colors pocket field sketch box,  
12/18/24/30/36/48/60/72-color set with Waterbrush  
Creative Art Colors, 12/24-color set with Waterbrush

Article number : XNCW-12H/18N/24N/30N/36N/48N/60N/72N and -12MH/24MPH

Color : 12/18/24/30/36/48/60/72 Colors

1.2 Use of the substance/preparation:

Art material

1.3 Company/undertaking identification:

Sakura Color Products Corp.  
1-6-20, Morinomiya Chuo, Chuo-ku, Osaka, 540-8508 Japan  
Tel: 81-(0)6-6910-8824 Fax: 81-(0)6-6910-8834

1.4 Emergency Telephone (Sakura Color Products Corp.[Japan])

Tel: 81-(0)6-6910-8824 Fax: 81-(0)6-6910-8834

2 Hazards identification

GHS Classification of the Substance or Mixture

Physical Hazards

Explosives	: Not applicable
Flammable gases	: Not applicable
Flammable aerosols	: Not applicable
Oxidizing gases	: Not applicable
Gases under pressure	: Not applicable
Flammable liquids	: Classification not possible
Flammable solids	: Not applicable
Self-reactive substances and mixtures	: Classification not possible
Pyrophoric liquids	: Classification not possible
Pyrophoric solids	: Not applicable
Self-heating substances and mixtures	: Classification not possible
Substances and mixtures, which in contact with water, emit flammable gases	: Classification not possible
Oxidizing liquids	: Classification not possible
Oxidizing solids	: Not applicable
Organic peroxides	: Classification not possible
Corrosive to metals	: Classification not possible

(Continued)

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2 Hazards identification for Ink

Health Hazards

Acute toxicity (oral)	: Classification not possible
Acute toxicity (skin)	: Classification not possible
Acute toxicity (inhalation: gas)	: Not applicable
Acute toxicity (inhalation: vapour)	: Classification not possible
Acute toxicity (inhalation: dust, mist)	: Classification not possible
Skin corrosion / irritation	: Classification not possible
Serious eye damages / eye irritation	: Classification not possible
Respiratory sensitization	: Classification not possible
Skin sensitization	: Classification not possible
Germ cell mutagenicity	: Classification not possible
Carcinogenicity	: Classification not possible
Reproductive toxicity	: Classification not possible
Specific target organ toxicity (single exposure)	: Classification not possible
Specific target organ toxicity (repeated exposure)	: Classification not possible
Aspiration hazard	: Classification not possible

Environmental Hazards

Aquatic toxicity (acute)	: Classification not possible
Aquatic toxicity (chronic)	: Classification not possible

GHS LABEL ELEMENTS INCLUDING PRECAUTIONARY STATEMENTS : None

SIGNAL WORD : None

Hazard Statement : None

3. Composition / information on ingredients for Ink

Description	: ○ substance	● preparation
Dangerous components	: None	



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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.
- Eye : Wash the eyes immediately with large amounts of running water for over 15 minutes, and see  
a doctor for medical advice.
- Ingestion : Immediately consult a doctor.
- Skin : Wash with soap and water.

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

6 Accidental release measure

- Person-related safety precautions : Not applicable
- Measures for environmental protection : No relevant information found.
- Measures for cleaning/collecting : The ink is not spilled so that it soak into the ink tank  
by normal handling.

7 Handling and storage

7.1 Handling

- Information for safe handling : Not applicable
- Information about protection against explosions and fires : Not required.

7.2 Storage:

- Requirements to be met by storerooms and containers:
- Materials to Avoid - High temperature, Fire, Direct rays of the sun, and A Powerful oxidizing agent

7.3 Specific use(s)

(conforms to 1907/2006/EC)

Commercial product name: Koi Water Colors pocket field sketch box, 12/18/24/30/36/48/60/72-color set with Waterbrush Creative Art Colors, 12/24-color set with Waterbrush	Date: Feb. 11, 2003
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**8 Exposure controls and personal protection**

8.1 Exposure limit values : Unknown

## 8.2 Exposure controls:

- 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

**9 Physical and chemical properties for Ink**

## 9.1 General information

## appearance:

- form : Liquid
- color : Same as 1.1(12/18/24/30/36/48/60/72 colors)
- odor : No odor

## 9.2 Important health, safety and environmental information

- pH : Not applicable
- Boiling point / boiling range : No data
- Flash point : No data
- Flammability (solid, gas) : None
- Explosive properties : None
- Oxidising properties : None
- Vapour pressure : No data
- Solubility:
  - water solubility : Soluble (except pigments)
  - fat solubility (solvent – oil to be specified) : Insoluble
- Partition coefficient: n-octanol /water : No data
- Viscosity : No data
- Vapour density : No data
- relative density :  $1 < \text{g/cm}^3$  (at 25°C)
- Evaporation rate : No data

## 9.3 Other information

- Melting point : No data

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10 Stability and reactivity

10.1 Conditions to avoided

High temperature, Direct sunlight, Fire

10.2 Materials to avoided

Strong acid and base

10.3 Hazardous decomposition products

No dangerous decomposition products known

11 Toxicological information

- Acute toxicity : None
- Chronic toxicity : None
- Primary irritant effect:
  - On the skin : None
  - On the eye : None
- Sensitization : No sensitizing effect known

12 Ecological information

No relevant information found.

13 Disposal considerations

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



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14 Transport information

GGVsea/IMDG-Code : Not applicable  
Page-No.of IMDG-Code : Not applicable  
UN-No. : Not applicable  
ICAO/IATA-Code : Not applicable  
Packing instructions for air flight : Not applicable  
GGVE/GGVS(Germany) : Not applicable  
RID/ADR(EC) : Not applicable  
Packing group : Not applicable  
EmS-No.(Emergency schedule) : Not applicable  
MFAG-table no : Not applicable  
Marking/label : Not applicable

15 Regulatory information for Ink

15.1 Classification, packaging and labeling of dangerous substances and preparations according to EC-Directives.: (EC) No 1272/2008

·Code letter and hazard designation of product : Not applicable  
·Risk phrases :-  
·Safety phrase :-  
·Product contains :-

15.2 Further information : No relevant information found.  
National regulations : No relevant information found.  
Marine pollution class : No relevant information found.

16 Other information

\* This SDS was changed on the basis of Commission Regulation (EU) No.453/2010.

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