



MSDS for PVC and HDPE pipe fittings

The Occupational Safety and Health Administration's Hazard Communication Standard, which requires the identification of workplace hazardous chemicals and employee training, went into effect November 25, 1985 for chemical manufacturers, importers and suppliers and will go into effect on May 25, 1986 for manufacturers who use (but do not produce) chemicals in their operations.

The Hazard Communication Standard applies to "chemicals" but it does not apply to any substance, which is an "article" within the meaning of the regulation.

1. The term "article" is defined in the new OSHA warning rule, as a manufactured item:
2. which is formed to a specific shape or design during manufacture,
3. which has end use function(s) dependent in whole or in part upon its shape or design during end use,
4. which does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.

In the preamble to the OSHA standard as initially published in 1983, OSHA used "furniture" and "pieces of equipment" as examples of exempt articles. At the same time, the agency noted that hazardous chemicals used in the manufacture or use of an "article" would remain covered by the Standard unless otherwise excluded.

Early in 1985, OSHA's Office of Health Compliance Assistance issued a memorandum outlining inspection procedures under the Standard, which clarifies the definition of exempt "articles." The agency stated that the key to the definition of "article" is the term "under normal conditions of use," and provides the following example:

An item may meet the definition of "article" but produces a hazardous byproduct if burned. If burning is not considered as part of its normal conditions of use, the item would be an "article" under the Standard, and thus exempted.

As such, PVC pipe and manufactured PVC fittings and appurtenances are considered articles and MSDS information is not required by OSHA regulation.

If you have any questions or need more information please contact me.

Sincerely,
Brad Sukolsky
Technical/QC Department
Specified Fittings