

May 4, 2017

To Whom It May Concern:

The OSHA Hazard Communication Standard, 29 CFR 1910.1200, which became effective 25 November 1985, and further revised on May 25, 2012 to align with UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS), requires the manufacturers or importers of certain hazardous chemicals or products to assess their products as to their hazard potential. Shurtape Technologies, LLC has assessed the impact of the standard of **ALL** of our finished pressure sensitive tapes. The conclusion, after a comprehensive review that included consultation with independent consultants, is that **ALL** of Shurtape's pressure sensitive tapes are **exempt from this standard**. This exemption is based upon the premise that **ALL** of Shurtape's pressure sensitive tapes are considered **"ARTICLES"** as defined in 29 CFR 1910.1200 (b) (6) (v). An **"ARTICLE,"** as defined in 29 CFR 1910.1200 (c), *"means a manufactured item, other than a fluid or particle:*

- (i) *which is formed to a specific shape or design manufacture;*
- (ii) *which has end use function (s) dependent in whole or in part upon its shape or design during end use; and*
- (iii) *which under normal conditions of use does not release more than very small quantities, e.g. minute or trace amounts of a hazardous chemical (as determined under paragraph (d)<sup>1</sup> of this section) and does not pose a physical hazard or health risk to the employee."*

Therefore, based on the above determination, Safety Data Sheets (SDS) are **not** required for any pressure sensitive tapes manufactured or sold by Shurtape Technologies, LLC.

The raw material formulations and processes used in the manufacture of our pressure sensitive tapes are considered proprietary. This standard provides for both the need to protect against potential exposure and the need to maintain confidentiality of proprietary information. The standard provides for the limited disclosure of certain proprietary information upon official request, either in a medical emergency or a non-emergency to a qualified health professional<sup>2</sup> under specific conditions of need and confidentiality. These health professionals would be furnished medical or other occupational health services in cases involving potential exposures. Since our pressure sensitive tapes do not release or otherwise result in exposure to a hazardous chemical under normal recommended conditions of use, disclosure of proprietary materials and processes is available as described in the trade secret section of the standard.

While Shurtape Technologies, LLC believes the information contained herein is accurate, it is not to be taken as a warranty of representation for which Shurtape Technologies, LLC, assumes any legal responsibility for product liability. This information is offered solely for our customers' consideration, investigation, and any necessary verification. Any use of this information or of the pressure sensitive tapes provided by Shurtape Technologies, LLC must be determined by the user to be acceptable for their intended purpose(s) and in accordance with the appropriate federal, state or local laws and regulations including 29 CFR in its entirety.

Sincerely,

Mark E. Hawes, P.E.  
Director – Environment and Safety

---

<sup>1</sup>Paragraph d, "Hazard Classification" is found in 29CFR 1910.1200 (d).

<sup>2</sup>Health professionals would be defined as physicians, industrial hygienists, toxicologists, epidemiologists, or occupational health nurses. These issues are specified in 29 CFR 1910.1200 (i) "Trade Secrets."