Factory: Jersey City, NJ USA · Sales/Marketing: 3160 Bay Rd, Redwood City, CA 94063 USA (t) 650-369-4889 · (f) 650-369-7169 · (e) Info@GeneralPencil.com · (w) www.GeneralPencil.com

April 26, 2016

RE: Safety and Compliance

In Response to SDS requests for The Masters® and Kiss-Off® Products

To Whom It May Concern:

- "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."
- All products offered by GENERAL PENCIL COMPANY 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).
- The Masters® and Kiss-Off® products are tested and certified for safety and quality by ACMI Art & Craft Materials Institute and carry the AP seal conforming to ASTM-D4236. The AP Seal means the product is safe and has been tested for safety by use of artists ages 14 and up.
- The Masters® and Kiss-Off® cleaning products contain no solvents and are environmentally friendly, made to be used to clean paint and artist brushes with only water. As a solid product, water is needed to activate cleaning.
- These seals provide the Safety statement: Conforms to ASTM-D4236.
- AP SEAL:



• The Masters® and Kiss-Off® products are intended for art & craft clean up by artists, creative people and craft professionals, ages 14 and older.

Should you have any questions, please feel free to email Info@GeneralPencil.com or fax your inquiry to 650-369-7169.

Sincerely,

Katie W. Vanoncini

President

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RE: SDS Documents from GENERAL PENCIL COMPANY - Important information

The Hazard Communication Standard (HCS) requires importers to provide Safety Data Sheets (SDS), formerly known as Material Safety Data Sheets (MSDS), 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.

<u>SDSs that represent non-hazardous chemicals are not covered by the HCS</u>. 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 that 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, OSHA cannot give a blanket exemption for specific products.

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 that are covered under the attached SDS although not specifically noted on the SDS section 1. Numbers listed on this 2^{nd} page that are not noted on the SDS are due to packaging variations (i.e. blistercards, sets) but the individual contents of these packaging variations are within the SDS.

All products offered by GENERAL PENCIL COMPANY 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).

For more information refer to: https://www.osha.gov/html/faq-hazcom.html

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Material Safety Data Sheet

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Standard must be consulted for specific requirements.

U.S. Department of Labor Occupational Safety and Health Administration (Non-Mandatory Form) Form Approved OMB No. 1218-0072



IDENTITY (As Used on Label and List) The Masters Brush Cleaner

0.25; 1.0; 2.5; 24 OZ **Brush Care Products**

Note: Blank spaces are not permitted. If any item is not applicable, or no information is available, the space must be marked to indicate that.

SECTION I

Manufacturer or Distributor's Name

General Pencil Company, Inc.

Address

(Number, Street, City, State, and ZIP

Code)

(NJ) 67 Fleet St., Jersey City, NJ 07306

(CA) 3160 Bay Rd., Redwood City, CA 94063

Emergency Telephone Number

1-800-537-0734

Telephone Number for Information

(NJ) 1-201-653-5351 or (CA) 1-650-369-4889

Date Prepared 7/25/15

Signature of Preparer (optional)

Section II - Hazardous Ingredients/Identity Information

Hazardous Components

OSHA PEL

ACGIH

Other Limits

%

(Specific Chemical Identity; Common Name(s)) N/A

TLV

Recommended

(optional)

Section III - Physical/Chemical Characteristics

Boiling Point

N/A

Specific Gravity $(H_2O = 1)$

N/A

Vapor Pressure (mm Hg)

N/A

Melting Point

53° - 58°C

Vapor Density (AIR = 1)

N/A

Evaporation Rate (Butyl Acetate = 1)

N/A Soluble, PH

Solubility in Water

Reactivity in Water

(1% Solution 10.3)

Appearance and Odor

100%

Solid cream colored soap cake with citrus fragrance

Section IV - Fire and Explosion Hazard Data

Flash Point

Flammable

(Method Used)

Limits N/A

LEL N/A UEL N/A

Extinguishing Media

N/A

Special Fire Fighting Procedures

Unusual Fire and Explosion Hazards

N/A

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Section V - Reactivity Data

Stability Unstable

Conditions to Avoid

Stable

X

Incompatibility (Materials to Avoid)

Hazardous Decomposition or Byproducts

N/A

Hazardous Polymerization May Occur

N/A

Conditions to Avoid

Will Not Occur

N/A

N/A

Section VI - Health Hazard Data

Route(s) of Entry:

Inhalation?

Skin?

Eyes?

Ingestion?

X

N/A

X

X

Health Hazards (Acute and Chronic)

None expected.

Carcinogenicity:

NTP?

IARC Monographs?

OSHA Regulated?

No

No

No

Signs and Symptoms of Exposure

N/A

Medical Conditions Generally Aggravated by Exposure

Emergency and First Aid Procedures

If contact with eyes, irrigate with flowing water until washed out.

Section VII - Precautions for Safe Handling and Use

Steps to Be Taken in Case Material is Released or Spilled

No special precautions required.

Waste Disposal Method

Dispose in accordance with federal, state, and local regulations

Precautions to Be taken in Handling and Storing

No special precautions required.

Other Precautions

N/A

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Section VIII - Control Measures

Respiratory Protection (Specify Type)

None required.

Ventilation: Local Exhaust

Special N/A

Mechanical (General)

Other N/A

N/A **Protective Gloves**

Eye Protection

N/A

N/A

N/A

Other Protective Clothing or Equipment

Work/Hygienic Practices

N/A

Section IX - Color Information

This MSDS applies to the following colors which are associated with hazardous and/or nonhazardous ingredients.

None

* U.S.G.P.O.: 1986 - 491 - 529/45775

^{**}This information sheet is for the consumer use of this product only.

^{***}The information herein is given in good faith, but no warranty, expressed or implied, is made.