



May 2nd, 2013

To: Industry professional or whom it may concern:

The following list of Carlisle Coatings and Waterproofing, Incorporated (CCWI) products are considered to be an “Article” per OSHA regulations. Under normal conditions of use, they do not pose a hazard in the workplace or to the building occupants. Since these products or “Articles” pose no health hazard under normal conditions of use, there is no requirement for an MSDS. For technical information on each of these products, please refer to the Product Data Sheet (PDS) or Technical Data Bulletin (TDB) published on the CCWI websites at www.ccwcompanies.com.

Articles as defined in 29 CFR 1910.1200:

CCW MiraDRAIN	CCW MiraDRAIN HC
CCW 200V / 300HV	CCW Protection Board
CCW MiraSTOP	PRM Roofing Fabric
MiraPLY H	MiraPLY V
Seam Tape	Detail Tape
CCW-500 Reinforcing Fabric	EJ-500 Expansion Joint
Butyl Membrane	EPDM Membrane
Neoprene Flashing	EPDM Flashing
Root Barrier	CCW-705FR
BRT 801	CRT 1602 (and All Purpose 1602)
RMR 6325	AFT 701
TGM 3300	TPO 2265
FG 1402	FG 1403-181BFX
Reinforcement Scrim	CCW Liquifiber
A-1104 Butyl Gasket Sealer	

Background Information: OSHA promulgated the Hazard Communication Standard (HCS), also known as the “Right To Know” rule, to ensure that the hazards of all chemicals produced or imported in the USA are evaluated and that information concerning their hazards is transmitted to employers and employees. The standard applies **to all chemicals**, which are known to be present in the workplace in such a manner that employees may be exposed to them **under normal conditions** of use or in a foreseeable emergency. For this reason it is incumbent upon manufacturers to assess whether or not their products present a hazard in the workplace. The current definition of “Article” in 29 CFR 1910.1200 is provided as follows:

“Article” means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which does not release, or otherwise result in exposure to, a hazardous chemical

CCWI Article Letter

Issued: 05/02/2013

Supersedes: 02/01/2012

Page 1 of 2



under normal conditions of use.

A product or “Article” meeting this criterion is **exempt** from the MSDS requirement. OSHA realizes that manufacturers often provide MSDS’s for reasons other than those of meeting the requirements of the Hazard Communication Standard and that this can cause confusion to downstream users. CCWI’s intent is to eliminate confusion by publishing MSDS sheets for the products that workers and end-users really need to operate in a safe environment. CCWI believes the information contained herein to be very accurate. It is not to be taken as warranty or representation for which CCWI 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 sheeting or accessories provided by CCWI must be determined by the user to be acceptable for their intended purpose and in accordance with the appropriate federal, state or local laws and regulations including 29 CFR in its entirety.

Should you have any further questions or need additional information please contact Research and Development or Technical Services at 800-527-7092.

Sincerely;

A handwritten signature in black ink that reads "Daniel J. Cotsakis".

Daniel J. Cotsakis
Manager, Research & Development
Carlisle Coatings and Waterproofing, Incorporated