



Reply to the attention of:

JUL 10 2015

Mr. Jonathan Snare
Morgan, Lewis, and Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20020-2541

Dear Mr. Snare:

Thank you for your April 8, 2015 letter regarding the discussions held between representatives from the Sporting Arms and Manufacturers' Institute (SAAMI) and the Occupational Safety and Health Administration (OSHA). This letter confirms OSHA's recommendations regarding labeling and safety data sheets (SDSs) for ammunition under the revised Hazard Communication standard, 29 C.F.R. § 1910.1200 (HCS 2012).

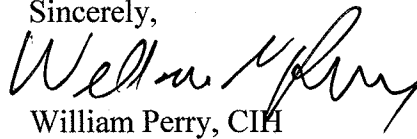
OSHA appreciates the materials that SAAMI provided at the December 17, 2014 meeting and the follow-up afterwards. Although OSHA does not approve labels or SDSs, we are able to provide feedback on the labels and SDSs SAAMI provided. As we explained at the meetings, ammunition is not an "article" as defined by § 1910.1200(c), nor is it a "consumer product" or "hazardous substance" within the meaning of § 1910.1200(b)(5)(v). A statement on a label or SDS that ammunition is an article would conflict with the required hazard information.

Under HCS 2012, manufacturers must classify their chemicals according to the requirements in Appendices A and B, 29 C.F.R. § 1910.1200(d). Manufacturers must label their chemical containers with the information required by § 1910.1200(f) and in accordance with Appendix C, and prepare SDSs with the information required in Appendix D, 29 C.F.R. § 1910.1200(g)(2). Under paragraph (f)(1), the following information must be provided on the chemical container: (i) Product identifier; (ii) Signal word; (iii) Hazard statement(s); (iv) Pictogram(s); (v) Precautionary statement(s); and (vi) Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party. The signal word, pictogram(s), and hazard statement(s) must be provided together on the label. *See* § 1910.1200(f)(3).

The label on the box of ammunition that SAAMI provided already contains some of the information required by HCS 2012, including a product identifier, a signal word, a statement about the hazards associated with lead exposure, and the manufacturer's name. The manufacturer must ensure that the label contains the correct signal word for the hazards of the chemical, the hazard statements and precautionary statements required by Appendix C, the required pictogram(s), and the manufacturer's address and phone number. OSHA notes that ammunition that is classified as a Division 1.4S explosive need not include the exploding bomb pictogram. *See* § 1910.1200, Appendix C.4.14.

Thank you for your interest in occupational safety and health. If you have further questions, please feel free to contact me at (202) 693-1950.

Sincerely,

A handwritten signature in black ink, appearing to read "William Perry". The signature is fluid and cursive, with a large initial "W" and a long, sweeping tail.

William Perry, CIH

Director

Directorate of Standards and Guidance