

Do AMC Chemical Filters Need SDS?

Our customers are asking Entegris if our chemical filters for removing airborne molecular contamination (AMC) need a safety data sheet (SDS). The short answer is no, there is no need for a safety data sheet because our AMC filters are defined as articles by OSHA (the Occupational Safety and Health Administration).

The Hazard Communication Standard (HCS) of OSHA uses the Code of Federal Regulations [29 CFR 1910.1200](#) as its guideline and that standard states the following:

Exempt: Articles

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 which meets the definition of an "article," would be exempt from the requirements of the Standard.

For example, a roll of copper electrical wire sold to a hardware store would fit this definition of an article and would not require an SDS. However, a load of copper ingots being shipped to a computer chip manufacturer would not meet the definition of an article and would require an SDS. Applying this to chemical filters, a bag of adsorbent will require an SDS, but the chemical filter is an article that does not require an SDS.

The definition 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.)

New Entegris chemical filters do not generally emit any chemicals. Minute outgassing may happen at the parts-per-trillion (ppt) level, which is one million times below most health concerns.



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, a blanket exemption for specific products cannot be given by OSHA.

Official OSHA interpretations:

- [HAZCOM: Clarification of "article" and "hazardous substance"](#) (Nov 1, 1999).
- [Definition of an "article" under the hazard communication standard](#) (Jan 27, 1993).
- [MSDS and labeling requirements for copper or aluminum wire or metal products](#) (Mar 11, 1986).
- [High speed cobalt steel drill bits evaluated as a "article" under the Hazard Communication Standard](#) (Oct 2, 1996).
- See also a discussion of articles in [Appendix A of CPL 2-2.38D - Inspection Procedures for the Hazard Communication Standard](#).

Please note that the above guidelines apply only to new, unused chemical filters. Please check with your EHS department or local environmental regulations about the most appropriate disposal methods based on your filter loading.

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