



September 30, 2015

RE: Occupational Safety and Health Act (OSHA) Chemical Hazard Labeling

Dear Valued Partners,

This letter applies to EPA Registered disinfectants offered by Metrex Research that are regulated by the US Environmental Protection Agency (EPA) under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

EPA requires pesticide labeling to comply with FIFRA (FIFRA § 3(c)(5)(B)). Labeling which is written, printed, or graphic matter accompanying the pesticide cannot be misbranded which is false or misleading as per FIFRA § 2(q)(1)(A)).

OSHA hazard labeling requirements comply with Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

EPA has issued a Pesticide Registration (PR) Notice 2012-1 to avoid any potential inconsistencies with OSHA hazard labeling requirements. FIFRA labels approved by EPA pre-exempt OSHA's label requirements, meaning that the pesticide product labels do not bear symbols and warnings per OSHA requirements. However, OSHA requirements still apply to the Safety Data Sheets (SDS) and worker training. For more information, please refer to [PR Notice 2012-1](#). Furthermore, as noted above, EPA considers all printed matter associated with a registered pesticide as part of the label, and so as defined, the SDS sheet is part of the product label and includes the OSHA-required hazard communication language.

SDS's can be found on Metrex.com and are OSHA and GHS compliant. Hazard information can be located in Section 16 of the SDS. GHS compliant labeling per OSHA guidelines is not required by the EPA and therefore not provided by Metrex Research. We recommend Metrex Research products be equipped with secondary GHS compliant hazard communication labels upon receipt of the product by the end user per OSHA requirements. It is the responsibility of the end user to access and apply their own secondary GHS compliant labels.

If you have any questions regarding this letters, please contact Metrex Customer Care at 800-841-1428.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anne Lo".

Anne Lo  
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Enclosures

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