



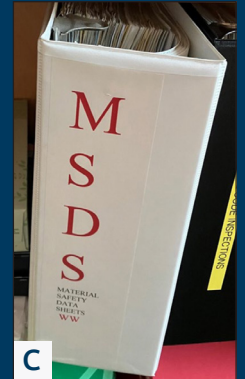
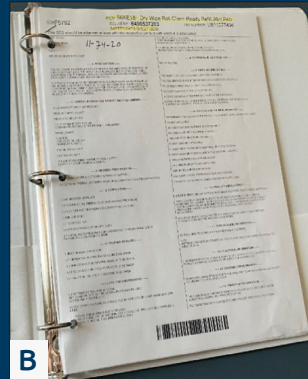
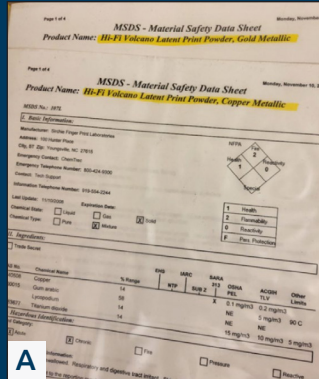
COMMON FINDS: SAFETY DATA SHEETS AND BINDERS

BACKGROUND:

Municipalities and school districts may use hazardous chemicals to maintain their facilities' cleanliness and their tools' operational capabilities. Though these chemicals can be integral in maintaining operations and keeping employees safe, they can increase risk without proper training and documentation. OSHA 29 CFR 1910.1200 gives public entities the regulations to maintain their Safety Data Sheets and train their employees appropriately. CIRMA Risk Management commonly finds Safety Data Sheets that are not updated during our Facilities Hazard Assessments.

OBSERVATION:

These Safety Data Sheet Binders included either outdated Material Safety Data Sheets that are no longer valid (see image A), Safety Data Binders with no list of hazardous chemicals or a Hazard Communication Plan (see image B), or a binder itself that still references the old standard (see image C).



RECOMMENDATIONS:

Consider updating the Safety Data Sheet Binder so that it references the current standard, updating the Safety Data Sheets within the binder to match the hazardous chemicals within the facility, and including both the Hazard Communication Plan and the list of chemicals found within the facility, in accordance with **OSHA 29 CFR 1910.1200(e)(1)**.

1910.1200(e)(1)

Employers shall develop, implement, and maintain at each workplace a written hazard communication program that at least describes how the criteria specified in paragraphs (f), (g), and (h) of this section for labels and other forms of warning, safety data sheets, and employee information and training will be met.

1910.1200(e)(1)(i)

A list of the hazardous chemicals known to be present using a product identifier that is referenced on the appropriate safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas);

1910.1200(e)(2)(i)

The methods the employer will use to provide the other employer(s) on-site access to safety data sheets for each hazardous chemical the other employer(s)' employees may be exposed to while working;

Here are some other tips for maintaining Safety Data Sheet Binders:

- Consider reviewing and updating your entity's Hazard Communication Plan annually,

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RECOMMENDATIONS - continued

- Consider inventorying the hazardous chemicals in the building and ensuring they are listed in the Safety Data Binder as the chemicals come into the facility,
- Consider providing training on hazardous chemicals in employees' work area at their initial assignment, and whenever a new chemical hazard the employees have not previously been trained in is about to be introduced into their work area in accordance with **OSHA 29 CFR 1910.1200(h)(3)**.

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