

# Why World Class MSDS & Regulatory Management Does Not Need to Cost a Fortune

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- Click Q&A button to submit your questions. Questions will be answered at the end of the presentation.
- The web seminar will be recorded. The audio and visual presentation link will be sent to you after the web seminar.

**Michael K. Beckel:**

*Manager, Consulting Services*

- Responsible for all hazardous materials inventory, training, and consulting services
- Versed in the development and implementation of employee safety and environmental compliance programs
- Professional trainer with extensive experience
- Published several technical articles in Compliance Magazine, ChemicalProcessing.com and Occupational Health & Safety Magazine.
- B.S. in Occupational Safety Management & Engineering Technology, National University
- Member of SCHC OSHA alliance working group and the ASSE

Do you manage hazardous materials at your place of business?



If you manage any HazMat, then you are regulated by multiple federal, state, and local regulatory agencies.

**OSHA**

**EPA**

**DOT**

**Fire Department**

What is the commonality in all this hazmat regulation?



Hazmat Inventory

## Customer Life Cycle



Data Flow

Chemical  
Manufacturers

Chemical  
Distributors

End  
Users

Disposer or  
Recycler

## Regulatory Agencies

Fire Department

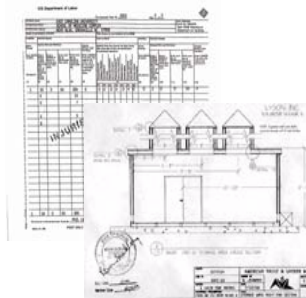
OSHA

EPA

DOT

## Mandated Actions

Permits,  
Reports,  
and  
MSDS  
Authoring

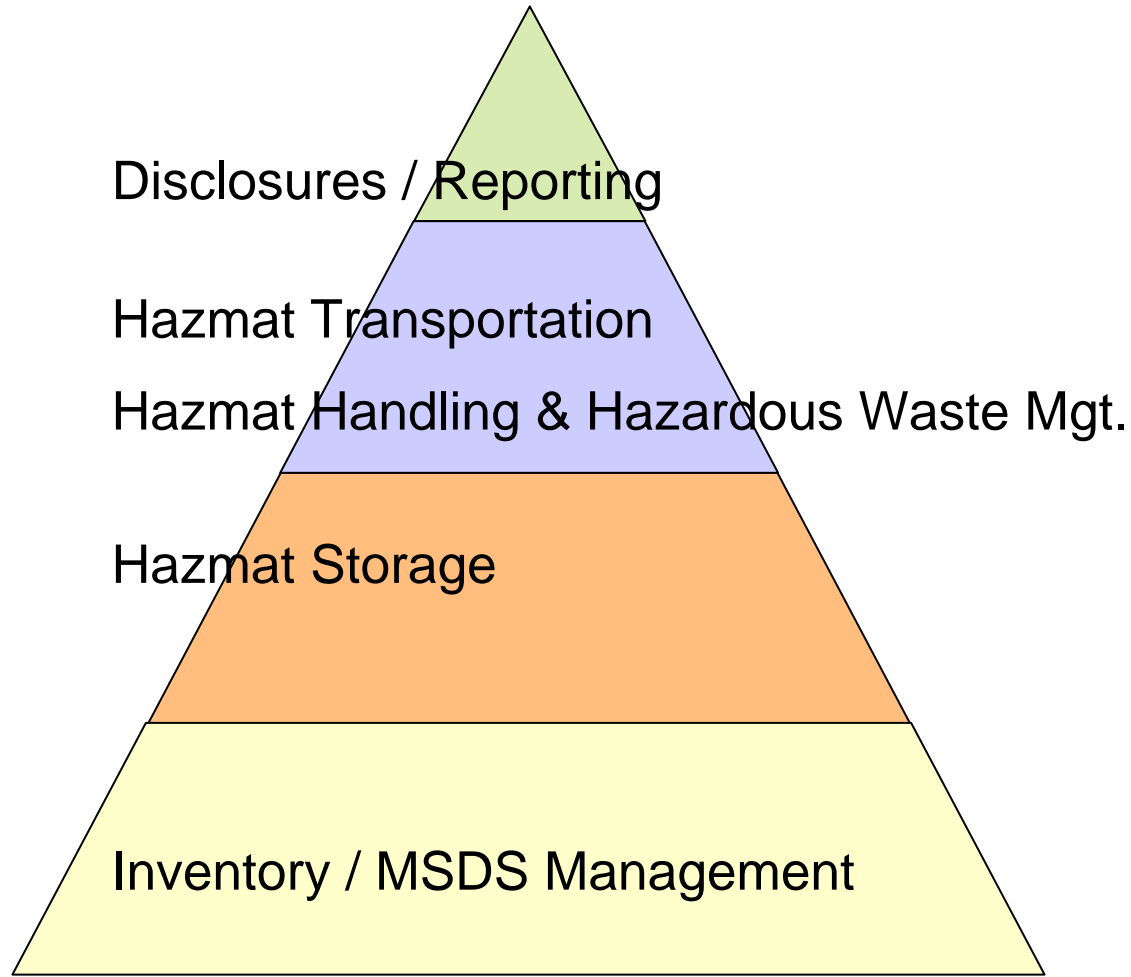


Compliance  
Programs  
Record Keeping  
Processes



Training  
Education





Inventory Assessment

+

MSDS Analysis

=

*Reduction of Risk and Liability*

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What we studied:

Analysis of hundreds of companies across major industries in North America...

- 1 Million products
- 300 companies

What did it reveal?

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- 1/3 products did not exist / not accounted for
- 12% commonality
- Toxicity of products grossly underestimated
- Average inventory contained 55 known carcinogens



# Typical Inventory Findings


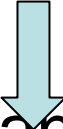


- HazMat (Toxics) were more prevalent and more diverse than expected
- Programs (MSDS, HazCom) – insufficient
- Permits (SARA, Business Plans) – insufficient
- Training - misleading / missing crucial info

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## **Start with accurate inventory and build your program around it.**

- MSDS Inventory Management
- Training
- Spill Response, Poison & Exposure, Emergency Response
- Haz Waste Management
- Transportation
- Compliance Reporting

- Look for “red flags” – constituents that may trigger compliance requirements
- Product substitution  may be the quickest route to compliance
- Outsourcing specific operations may be employed
- At minimum, focus  can be directed at materials with potential compliance thresholds

1. Inventory assessment
2. Update strategy
3. Consider activities (storage, use, transport, disposal)
4. Use MSDS to cross-reference chemicals with specific regulatory requirements
5. Perform mandated actions and record keeping

It is not cheap.

However, solid inventory and leveraging MSDS information can minimize the time and/or financial investment necessary.

And it protects your people and your reputation.

If inventory is so easy, why do so few businesses have good hazardous materials inventories?



Because it is tedious, exacting, time consuming work that must be done very well to have any appreciable value...

## Principles of inventory:

- Manage it as a project – not “fill-in” work
- Select dependable personnel
- Use a site map for complex facilities
- Use technology when it makes sense
- Pencil and paper - often the technology of choice

RF tags and smart shelves?



UPC Type Scanners?

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Product inventory is really product container inventory.

- Generally, capture data only from primary containers
- Exceptions: Bulk containers and internally manufactured products

## Capture any potentially meaningful data:

- Product name (exactly as on container)
- Manufacturer's name
- Manufacturer's phone/address
- Any model or part #
- Qualifying info if noted on label (color/denatured)
- Website if noted on label

1. Transfer (or collect) inventory into a spreadsheet
2. Print a truncated copy for inclusion in written Haz Com program
3. Cross-reference inventory against MSDS repository (database/binders)
4. Pursue missing MSDS via web/phone
5. Update your inventory (BMP – real time)

“So what if my hazmat inventory isn’t quite accurate? What is wrong with close?”



If even 10% of your inventory is inaccurate

- MSDS will not be available when needed
- Acquire and maintain MSDS unnecessarily
- Exposure archive could include phantom chemicals

Or if you assume all sites are the same

- Site specific MSDS are not available
- Unable to provide proper support documents to ER
- Top 10 OSHA citations

If even 10% of your inventory is inaccurate

- Employees are not aware of all chemicals
- All hazards are not properly evaluated
- No MSDS for guidance
- TSCA compliance at risk

Or if you assume all sites are the same

- Inadequate training
- Over training
- Chemical-specific training may be missed

If even 10% of your inventory is inaccurate

- MSDS will not be available when needed
- Med / Tox data not available or incorrect
- Exposure data will not be available or incorrect
- PPE will not be available or incorrect

If even 10% of your inventory is inaccurate

- Waste profiles may be incorrect
- Manifests improperly prepared
- DOT descriptions wrong

If even 10% of your inventory is inaccurate

- Improper classification or shipping labels
- Load weights calculated incorrectly
- Spills may be under reported

Or if you assume all sites are the same

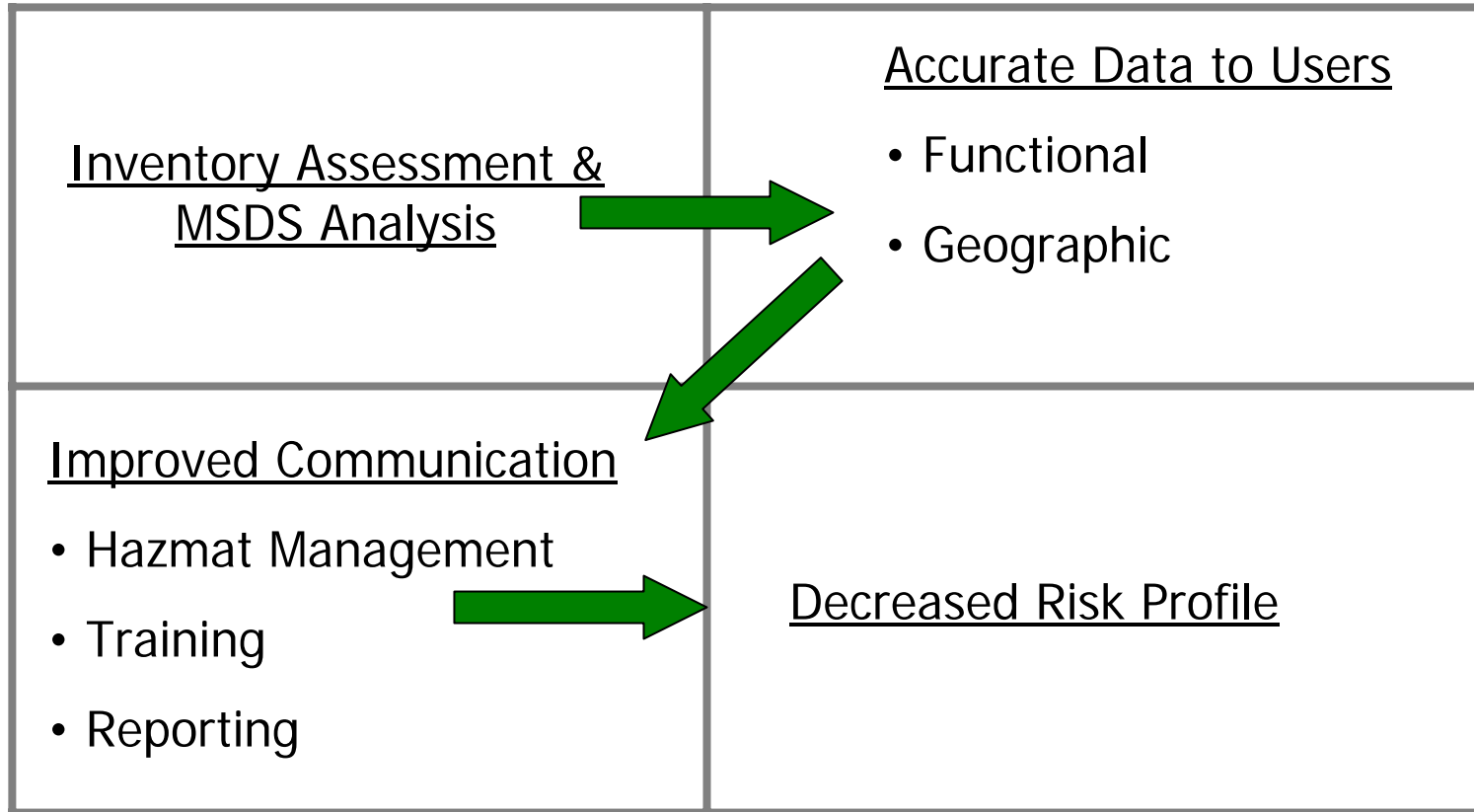
- Inadequate training of shipping personnel
- Unqualified drivers
- Top 5 FAA citations

If even 10% of your inventory is inaccurate

- Sensitive chemicals (PBTs) may be excluded
- Reporting thresholds will be improperly calculated

Or if you assume all sites are the same

- Some chemicals will be reported unnecessarily
- Chemicals specific to a site will go unreported



- Your hazardous materials inventory must be accurate for compliance to be assured
- Accurate inventory will reduce your cost and risk
- Centralize the inventory and data sheet



# Q & A

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