

Internet a Valuable Resource

New Innovations in MSDS Management

For MSDS compliance, like many other tasks that involve information management, the Internet is considered by some to be the "killer app." However, acquiring and maintaining MSDSs via the Internet is no small job. Can your company actually use the Internet to better manage its MSDS needs?

When used properly, the Internet can be a cost effective and efficient tool for researching material safety data sheet (MSDS) compliance requirements and managing the compliance process. It can enable you to maintain MSDS compliance by helping you find the MSDSs that you require and provide assistance in managing them.

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There are many benefits to using the Web to research and manage MSDSs, including universal accessibility, easy documentation, simplified data storage and low cost. The Internet offers an excellent starting point to facilitate MSDS management and maintain compliance.

The following are a few simple suggestions on how to use the Web to better manage your MSDS needs and simplify HazMat compliance.

Using the Internet to Find an MSDS

You can start using the Internet right now to search for, view, save and print MSDSs. Googling the term "MSDS" returns more than 27 million links, including hundreds of links to MSDS portals. While these portals generally do not provide MSDSs themselves, they can steer you towards other sites that do.

It should be noted that you cannot blindly trust the content of all MSDS management Web sites. Some "free" MSDS sites, many of which were launched during the Internet boom of the late 1990s, claim to have thousands of MSDSs, direct from the manufacturer, and available at no charge. In reality, these Web sites have often generated little revenue and maintain limited staff. Chances are that their MSDSs have not been kept current and many are likely outdated.

Simplify MSDS Management

Once you have located your MSDS, you can also use the Internet to manage it, either through your own company Intranet, or by using an MSDS management tool hosted by a service provider. If you publish your own MSDSs, you can make them visible to the world via the World Wide Web. However, a poorly maintained website containing outdated MSDS data can reflect negatively on your firm. You should only do it yourself if you plan to run a fairly sophisticated MSDS obtainment and information management process.

If you are a mid-sized company with more than one facility and limited staff and dollars, you may want to consider outsourcing MSDS management to a service provider. Service providers can generally reduce your cost to manage MSDSs by at least 30 percent and increase your MSDS compliance to near 100 percent.

Fact Checking and the Web

The Internet can also be a valuable fact-checking resource. OSHA's Hazard Communication Standard (HCS) is designed to be a "performance standard," meaning that its requirements al

low companies a certain degree of flexibility in applying the standard to their particular workplace.

While this flexibility can be an advantage to companies, allowing them to design a hazard communication program tailored to their needs, the guidelines can also leave some users asking questions.

Conducting a thorough search of the OSHA Web site (www.osha.gov) answers some of these questions and can dispel some of the most common myths about MSDS compliance.

Myth #1: "If a product is produced overseas, you need to contact the foreign manufacturer for questions. "

OSHA has clarified in a letter of interpretation that products produced and imported from overseas manufacturers must list the importer or other domestic responsible party as the main contact for additional technical product information. MSDSs forwarded without a U.S. contact that can answer specific questions about the chemical are not considered adequate by OSHA.

Myth #2: "An MSDS must include regulatory information including NFPA, HMIS, and Transportation classification. "

While the MSDS can often be an excellent tool for accessing such information, OSHA does not require it on MSDSs under the HCS. The HCS was written to protect employees by educating them about the hazards of the chemicals in their work environments. Therefore, just because information required by the Department of Transportation or the fire department isn't printed on the MSDS does not mean it is non-compliant.

If a company requires employees to identify this information from an MSDS, it must provide additional training on how to classify products to National Fire Protection Association (NFPA), Hazardous Materials Information System (HMIS) and/or Transportation regulations based on the physical and chemical property data provided by the MSDS and other sources as necessary.

Myth #3: "Keeping the MSDS sent from the vendor on file is all a company needs to do for compliance. "

Actually, while the standard does afford companies a great deal of flexibility when applying the standard to their workplace, HCS compliance is a bit more complex than just filing away a sheet of paper that may come with a chemical delivery.

A written Hazard Communication program, including a hazmat inventory must be maintained, container labeling must be addressed, and all employees who may be affected by a particular hazardous material in their work areas must be trained on how to access and read the MSDS associated with the hazardous product in question. MSDSs are only truly accessible - hence, making the company's hazard communication program compliant - if an employee can match the correct MSDS to the product with which he or she is working.

A Valuable Resource

The Internet can be a useful and robust tool for busy EH&S professionals. While properly acquiring and maintaining MSDSs is not a small job that can be solved with a few simple clicks of the mouse, the Internet can be a valuable resource for managing MSDS needs. **FSM**

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