

Best Management Practices
Material Safety Data Sheet Management
Updated December 2010

These notes are intended to give an overview and some suggested systems and procedures for managing Material Safety Data Sheets (MSDS). The notes cover MSDS format and updating issues, responding to vendor changes, and MSDS management systems.

MSDS Requirements

- Formatting
 - OSHA provides a list of required information, but not a format
 - ANSI provides a format, which includes the information specified by OSHA
- Timing of Revisions
 - If new information is found, the MSDS is to be revised within 3 months
 - Example information:
 - Constituents and concentrations
 - Occupational exposure limits
 - Personal Protective Equipment
 - Ancillary information:
 - SARA emergency release reporting quantities and responses
 - SARA chemical inventory and Extremely Hazardous Substance reporting
 - SARA release reporting
 - DOT hazardous materials shipping information
 - DOT 24-hour emergency response telephone number
 - State and foreign country additional requirements
 - Ozone Depleting Substances
 - FDA declarations
- How Vendor Changes Affect Facility MSDS
 - Requirements for notification to Facility
 - Vendor to provide MSDS with first shipment of material
 - Vendor to revise MSDS within 3 months of new information
 - Vendor to provide revised MSDS with next shipment of material



- Types of changes that could occur
 - Same as noted above
 - Could include change in name of person signing the MSDS (administrative changes)
- Time frame for updating Facility MSDS
 - Same as noted above, if there are material changes on the vendor MSDS and this information is used on the Facility MSDS, then the MSDS is to be revised within 3 months
- Notification issues
 - MSDS can be sent hard copy, fax, electronic
 - MSDS should be sent with the first shipment of material, and with the first shipment of material following a revision to the MSDS
 - If the MSDS is also serving to transmit DOT shipping information, an MSDS may need to accompany each shipment
 - If the MSDS is also serving as the annual SARA 313 TRI constituent notification, then an MSDS should be sent with the first shipment of each calendar year
 - Changes to MSDS
 - Requirement is to send out a revised MSDS with the next shipment of material
 - To facilitate customers checking for updates, an Internet-based MSDS list could help

MSDS System

- MSDS Flow
 - For existing materials in use at the facility
 - Compare received MSDS to MSDS in file
 - If identical, discard duplicate MSDS
 - If different, evaluate changes and determine if there is significance to handling material or to Facility MSDS
 - Initiate changes in handling or disposal practices, if necessary
 - Initiate change to Facility MSDS, if necessary
 - For proposed new materials
 - Evaluate for ability/desire to handle new material
 - Make go/no go decision, identify any future information or decision needs



- Distribute MSDS to department(s) where material will be handled
- MSDS System
 - Can be spreadsheet, database, or vendor software
 - Vendor software can include additional modules to assist with chemical inventory and release reporting requirements
 - Example information
 - Product name
 - Ingredients
 - Manufacturer
 - Distributor
 - Revision date
 - Departments where used
 - Archive system
 - Management of duplicates
 - Record retention requirements
- Forms
 - New Material Requisition Form

Possible inputs

	Occupation exposure management
	Storage and handling
	Product requirements
	Emissions requirements
	Disposal requirements
	Changes to Facility MSDS

- MSDS Requisition Form

Possible Inputs

	Reformulation of existing product
	New ingredients
	Information sources (vendor MSDS, OSHA, NIOSH, EPA, etc.)