

- Labels and Other Forms of Warning - Continued

- Every container of hazardous chemicals must be labeled. Methods of doing this can include signs, placards, process sheets, batch tickets, operating procedures, etc. A concern here is we can do alot short of using signs for our employees but the contractor issue is very sticky unless we use signs.

- Material Safety Data Sheets (MSDS)

- We must develop or obtain a MSDS for every hazardous chemical we use/produce. (To determine what is hazardous though, we have to have one on every chemical)
- The current OSHA MSDS does not satisfy the requirements of this new standard. There are a number of requirements for the content and form of any MSDS.
- New chemical information must be shared within three months of discovery of new information.
- We will need to develop a local system that requires obtaining a material safety data sheet, upon first order, annually, or within three months of discovery of new information.
- We will also need to put all material safety data sheets into a common format to facilitate the training of plant personnel.

- Employee Information and Training

- Information - we have to tell plant personnel:

- + the requirements of the standard;
- + where hazardous chemicals are present in the plant; and,
- + all about our written program, chemical list and material safety data sheets.

- Training - shall include at least:

- + methods of detection
- + hazards of chemicals
- + protection measures
- + details of labeling and MSDS Systems

We must get busy in the following areas:

1. We must inventory the plant for chemicals, manufacturers, use areas, and use volumes.