

November 1992

UNITED STATES AIR FORCE

MATERIAL SAFETY DATA SHEETS AND WARNING LABELS
AND PRODUCT INFORMATION SHEETS

HW88-0032875

Background

The Federal Occupational Safety and Health Administration (OSHA) Hazard Communication Standard 29 CFR 1910.1200 requires suppliers of hazardous materials, i.e., importers, chemical manufacturers, and distributors to provide Material Safety Data Sheets (MSDSs) to manufacturing purchasers of these materials. Each container must also contain a warning label for these materials.

Many states have also enacted employee and/or community right-to-know laws which have similar requirements.

Failure to evaluate our products for hazardous materials, provide a MSDS, and/or provide a warning label can subject (W) to substantial penalties. It is important, therefore, that each facility know the products it manufactures and the appropriate MSDS and labeling requirement of each product.

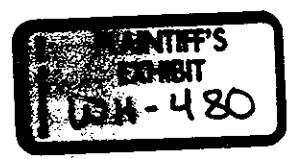
A product which is manufactured with an end use function and which does not release, or otherwise result in exposure to a hazardous material under normal use, is defined in the Standard as an "article." Although a MSDS is not required for "articles," many customers require some product information; therefore, a Product Information Sheet was developed for this application.

Responsibilities

Industrial Hygiene Representative

The industrial hygiene representative at each (W) facility on behalf of the facility manager, will:

- 1) Be familiar with the ingredients contained in the facility products.
- 2) Be familiar with the Federal Hazard Communication Standard, the State or Community Right-to-Know Law (if applicable), and the elements of this procedure.
- 3) Prepare MSDS for materials manufactured at his facility.
- 4) Prepare Product Warning Label.
- 5) Maintain a file of facility MSDSs and Product Information Sheets, on materials they manufacture or distribute, and provide finalized copies to each customer.



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SERIALS ACQUISITION
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- 6) Ensure that facility products containing hazardous materials⁽¹⁾ have appropriate warning labels.
- 7) Submit label and MSDS to Environmental Affairs for review.

Environmental Affairs and R&D Waste and Environmental Technology Section

Environmental Affairs with the assistance of the R&D Waste and Environmental Technology Section will:

- 1) Provide technical assistance to facilities in all matters pertaining to the Federal Hazard Communication Standard and/or State Right-to-Know Laws.
- 2) Receive all (W) MSDSs, Product Information Sheets and Warning Labels, review them for completeness and technical accuracy, and return them to the facility industrial hygiene representative.
- 3) Maintain a master list of all (W) MSDSs.
- 4) Interpret regulations in determining when a MSDS and/or label is necessary.
- 5) Reviews MSDSs, Product Information Sheets or Warning Labels as necessary for a new category of products, or products containing acutely toxic materials.
- 6) Provide legal advice on any other matter pertaining to the OSHA Hazard Communication or State Right-to-Know Program.

⁽¹⁾ Refer to the OSHA Hazard Communication Standard for the list of hazardous materials and the per cent composition.

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Procedures

Westinghouse Facility

Industrial Hygiene Representative

The Industrial Hygiene Representative will:

- 1) Determine what product requires a MSDS, Product Information Sheet and/or Warning Label.
- 2) Prepare a (W) MSDS, Product Information Sheet and/or Warning Label for each appropriate product*
Note! Environmental Affairs and the R&D Waste and Environmental Technology Section will provide technical and legal assistance.
- 3) Forward the MSDS, Product Information Sheet and/or Warning Label to Environmental Affairs.
Note! No (W) MSDS or Warning Label will be issued without review from Environmental Affairs and the R&D Waste and Environmental Technology Section.
- 4) Maintain a master list of facility product MSDSs, Product Information Sheets and Warning Labels.
- 5) Provide a copy of each MSDS or Product Information Sheet to the appropriate customers for products they manufacture, import or distribute that contain hazardous materials.
- 6) Establish a system to ensure each product that contains hazardous materials has an appropriate warning label.
- 8) Provide a copy of the revised MSDS to the appropriate customers.

Environmental Affairs

Environmental Affairs with the assistance of the R&D Waste and Environmental Technology Section will:

- 1) Receive the MSDS and Warning Label from the facility.
- 2) Review the MSDS and Warning Label for completeness and technical adequacy.
- 3) If this review shows need for additional information, assist the facility in determining the information.

* Blank forms are available from Environmental Affairs.

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- 4) Provide interpretation of Federal and State health and safety regulations.
- 5) Return the reviewed MSDS, Product Information Sheet and Warning Label to the facility.
- 6) Maintain a master file of (W) MSDSs, Product Information Sheets and Warning Labels.

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