I clean up sites... Why should I worry about SDSs?



D. Levine - Product Safety Solutions

A little review -- What do the regulations say?

- OSHA HAZWOPER is supposed to protect me, right?
- Let's start with training. Am I a boss or a "worker bee"?

I'm a supervisor	I'm a worker at the site
 40 hours of initial training 24 hours supervised field experience 8 hours specialized training (health & safety included) 	 40 hours of initial training. 24 hours supervised field experience.

So what's in the training relative to safety?

- 29CRF1910.120(b) safety and health program
 - Organizational structure
 - Comprehensive work plan
 - The safety and health training program;
 - Medical surveillance program
 - SOPs for health and safety
 - Site specific variations from the general program









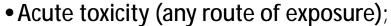


8/29/2016

What are the hazards?

- Health hazard means a chemical or a pathogen where acute or chronic health effects may occur in exposed employees. It also includes stress due to temperature extremes.
- The term *health hazard* includes chemicals that are classified in accordance with the Hazard Communication Standard, 29 CFR 1910.1200, as posing one of the following hazardous effects:

These are.....



- Skin corrosion or irritation;
- Serious eye damage or eye irritation;
- Respiratory or skin sensitization;
- Germ cell mutagenicity; carcinogenicity;
- Reproductive toxicity;
- Specific target organ toxicity (single or repeated exposure);
- Aspiration toxicity or simple asphyxiant



What are the physical hazards?

- Hazwoper doesn't define physical hazards...... But we know what they are....
- Fire, explosions, water reactivity, pyrophoric...
- Instability, temperature sensitive, spontaneously combustible....
- Metal corrosives, incompatibilities with other substances.

How do we find out about these hazards?

- Step 1: Documentation... what did they make here? Are there any SDSs or MSDSs available? MSDSs are often all you can find.
- Step 2: We do testing to identify what's around....
- Step 3: In some cases we can actually interview former employees and tap their memories. (Careful....)







8/29/2016

If we're lucky enough to have SDSs and MSDSs..

- They make great tools to prepare training but do we know how to read them
- And can we trust them?





8/29/2016

4

If we have pure substances



- There are lots of references for pure substances in addition to the safety data sheets we might find.
 - Free public resources: NLM databases, EPA & OSHA listings, IARC, NTP, OSHA Z-Lists, CRW, DOT's ERM, CHRIS, CLP database, WISER, the Internet (but be careful about this last one..)
 - Paid resources: List-of-lists vendors (e.g., ChemAdvisdor, 3E, etc.) Books & databases: Sacs, ACGIH documents, etc.

8/29/2016

If it's a mixture.....



- The SDS or the MSDS becomes a primary reference, especially is there are "trade secret" substances.
- If we have SDSs....We know were to find things.
 - Hazards Section 2 & Section 11
 - Ingredients Section 3
 - First aid Section 4
 - Fire fighting Section 5
 - Personal protection Section 8
 - Physical properties Section 9
 - Reactivity Section 10

If it's a mixture.....



 MSDS? You might get lucky and have it in 16 section format already.... But the reality is that so many formats existed you might have to hunt to be able to find things.



- But do SDSs and MSDSs show you all the ingredients?
- Some do and some don't. Does the total of ingredients at least add up to 100%?
- There might be something there that is not an OSHA hazard to people but kills fish very quickly...



8/29/2016

What if two documents don't agree?

 It happens more often than you would imagine.



- Irritation, toxicity, aspiration, cancer, target organs, & reproductive effects.
- Weight of evidence....



So what have been your experiences?

