



Ditch The Book

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Ditch the book. Which book? That “big honkin’ binder” out in the shop with all of your Material Safety Data Sheets (MSDSs).

While it is common knowledge that you need to have a copy of the MSDS for “any chemical which is known to be in the workplace in a manner that employees may be exposed,” it is not so well known that the copy need not be on paper. Any chemical to which an employee can be exposed must be identified, the hazards documented and communicated, and be accessible. But the means may be electronic.

So why ditch the book? Because the book is never up to date.

Because the book can have sheets that are lost, removed deliberately or accidentally and not replaced. “Big honkin’” binders are not systems; they are compliance targets (especially in large shops where departmental or multiple binders might be present). Because putting papers in notebooks is never a reliable process.

The Hazard Communications Standard is the applicable regulation for MSDS maintenance. OSHA directive CPL 2-2.38D, effective date March 20, 1998, makes clear that paper copies are not your only option:

(g)(8) “MSDSs must be readily accessible and there must be no barriers to employee access during the work shift...the use of electronic means such as computers with printers, microfiche machines, the Internet, CD-ROMS, fax machines, etc. is acceptable.”

“Employers may use off-site MSDS management services to meet the requirements of the HCS only if MSDSs are readily available to employees, either as hard copies in the workplace or through electronic means and as long as the provisions outlined in the previous paragraph are ensured.”



So why would you want to go to an electronic system for maintaining MSDSs? Better control, security and accessibility come to mind immediately. Better legibility, ease of finding, and ability to have open, multiple copies. Having a single authoritative repository (rather than the office saying the shop book is complete and the shop personnel saying that the office files are more complete than the book in the shop).

Here are three considerations before making the move to electronic storage of your MSDSs.

First, you must ensure that the sheets or their alternatives are maintained in a place and condition where the employees can access them during each work shift, when they are in their work areas. So, if the only computer is in the office, and it is locked and separate from the employees, that will not work.

Second, your employees must know how to operate and access the system to obtain the information. If you go with an electronic system, you can expect to have an employee be asked to retrieve an MSDS when OSHA audits you. Training is important.

Third, you must create a process to ensure that each MSDS is scanned and filed. Purchasing is the key to making vendors responsible for providing MSDS information for all products to which employees may be exposed in the workplace. Improving this aspect of the process will pay dividends in both enhanced safety and inspection compliance.

While the OSHA inspection procedure says, “employees must have immediate access to MSDSs and be able to get information when they need it in order for an employer to be in compliance,” our discussions with OSHA indicated “during work shift” was the operant condition.

What are some best practices for electronic MSDS filing and maintenance?

- 1) All purchase orders must require an MSDS to be supplied with the first shipment of product. No exceptions.
- 2) All received MSDSs must be scanned as PDFs and filed on a server accessible to all employees.
- 3) Scanned PDF MSDSs can also be posted to an internal Website and then linked for easy access by employees.

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4) Those PDFs can also be emailed or synched to department iPads and maintained in iBooks.

5) Don't forget that consumer products and raw materials used in the workplace may be considered hazardous chemicals requiring MSDSs on file.

The days of the "big honkin' MSDS binder" are fading fast. Our employees have no problem using their smartphones and computers in their personal lives. Now is a great time to recognize their abilities and upgrade your MSDS system to reflect the reality of today's technology and employee capabilities.

Ditch the binder. Make this a priority project. The process of doing

it will serve as a great audit: Do you have every MSDS sheet you should? And, will improve morale as everyone is empowered to use the technology they are comfortable with to get the hazard communication information they need. Additionally, it will assure that no MSDS is ever "lost" due to its being permanently maintained on your network.

Think of "Ditch the Book" as continuous improvement for your Hazard Communications Program. Or, think of it as saving your share of the roughly \$200 million spent each year by manufacturers to make and file paper copies of MSDSs, according to my calculations.

Ditch the book.

FedEx and UPS Raise Small Package Rates for 2012

In January, both FedEx Corp. and United Parcel Service (UPS) increased their envelope and small package shipping rates for 2012.

Air Shipping Costs Increase.

Effective January 2nd, the cost to ship an overnight envelope with Memphis-based FedEx Express increased by a net average of 3.9 percent. The full average rate increase of 5.9 percent has been partially offset by an adjustment of the fuel price threshold at which the fuel surcharge begins, thus reducing the fuel surcharge by 2 percent.

Air packages shipped with Atlanta-based UPS increased by a net average of 4.9 percent on January 2nd. The rate increase for UPS air and international shipments is based on a 6.9 percent increase in the base rate, less a 2 percent reduction to the index-based air and international fuel surcharge.

Ground Shipping Rates Up As Well. Also effective January 2nd, the cost of shipping with FedEx Ground increased by a net average of 4.9 percent. The full average rate increase of 5.9 percent has been partially offset by adjusting the fuel price threshold at which the fuel surcharge begins, reducing the fuel surcharge by 1 percent.

UPS ground shipping increased by a net average of 4.9 percent for U.S. domestic services. That was achieved through a 5.9 percent increase in the base rate, less a 1 percent reduction to the index-based ground fuels surcharge.

Additionally, UPS Next-Day Air Freight and UPS 2nd-Day Air Freight rates for shipments within and between the United States, Canada and Puerto Rico increased 5.9 percent. UPS 3-Day Freight rates remain unchanged.

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Recent PMPA Listserve Topics

PMPA members use email Listserves to share ideas, solve problems, sell excess material and equipment, and learn about new business opportunities. Here is a list of topics that were recently discussed:

- Local service tech for Allen Bradley PLC
- 62A-T8 or T9 and/or 6020-T8 or T9
- 14.5 X 1.5mm/looking for thread data?
- Floor scrubbers
- E2 shop tech software
- Citizen bar loader collets
- Question on wash process selection on Durr
- Motion sensors for shop lights
- DFARS-compliant 416 SS
- Tool vending
- Commercial tile on shop floor
- Employee survey help
- 2D barcodes
- Flags for Cucchi bar loaders
- Internal groove diameter gage
- Escomatic machining

PMPA CALENDAR

Below is the calendar of upcoming conferences and events scheduled for the 2012 program year. For the latest district/chapter meeting information, please view the Calendar of Events at pmpa.org/calendar/. If you have questions about PMPA conferences or regional meetings, please contact Rob Kiener, Director of Government Affairs & Communications: 440-526-0300 or rkiener@pmpa.org.

PMPA 2012 National Technical Conference
April 21-24, 2012
Westin Northshore, Chicago (Wheeling), Ill.

PMPA 2012 Annual Meeting
October 27-30, 2012
The Ritz Carlton, Palm Beach, Fla.



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