

Electronic Copies of SDSs in Schools

The Ohio Department of Health (ODH) was asked to re-evaluate its recommendation to have hard copies of Safety Data Sheets (SDSs) accessible at a chemical's point of use and a master copy located in a central administrative area. Some schools have been using electronic SDS lists or have been using a telephone service to obtain this information.

Based on the information listed below, ODH will continue to strongly recommend the use of hard copy SDSs accessible at a chemical's point of use and a master copy located in an administrative area. If hard copies are not kept, staff may be asked to access SDSs as part of inspections and inspectors may look for written backup plans.

SDSs must be available for all chemicals that are used in school buildings in the state. This applies to any place in the building where chemicals are used including science classrooms, visual and industrial arts classrooms, stage and set construction areas, and custodial closets. A hard copy of the SDS should be present in each building for each chemical or cleaning product at the chemical's point of use or where it is stored in applicable situations such as custodial closets, and a master copy of all the SDSs for the entire building should be present in the school office.

The matter of schools utilizing alternative methods of accessing these items has recently been raised. These methods include accessing SDSs via telephone/cell phone hotlines or over the internet. OSHA standard 1910.1200(g)(8) states "The employer shall maintain in the workplace copies of the required safety data sheets for each hazardous chemical and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). (Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted as long as no barriers to immediate employee access in each workplace are created by such options.)" Readily accessible according to OSHA's interpretation is considered to mean immediate access to SDSs (ILPI, 2007). Examples of barriers to access would include power failure, phone system failure, lack of internet service, inadequate number of computer terminals, and the inability of employees to properly utilize the technology. OSHA also requires that if electronic access is utilized, the employer must include a written plan for rapid access for employees to SDSs in the event of a system failure (ILPI, 2007). This plan must be included in the employer's written hazard communications plan (ILPI, 2007). Additionally, the Ohio Bureau of Workers Compensation recommends that when electronic storage of SDSs is utilized, a backup hard copy be accessible in case of a system malfunction.