

2. Procedure for managing MSDS and labels

Purpose for this Procedure

1. To ensure that personnel have ready access to information for safe use of chemical products.
2. Comply with requirements of the *Workplace Hazardous Materials Information System ("WHMIS") Regulation*.
3. To specify the processes for obtaining and maintaining material safety data sheets ("MSDSs").
4. To provide instruction on when workplace labels are required, and their format and content.

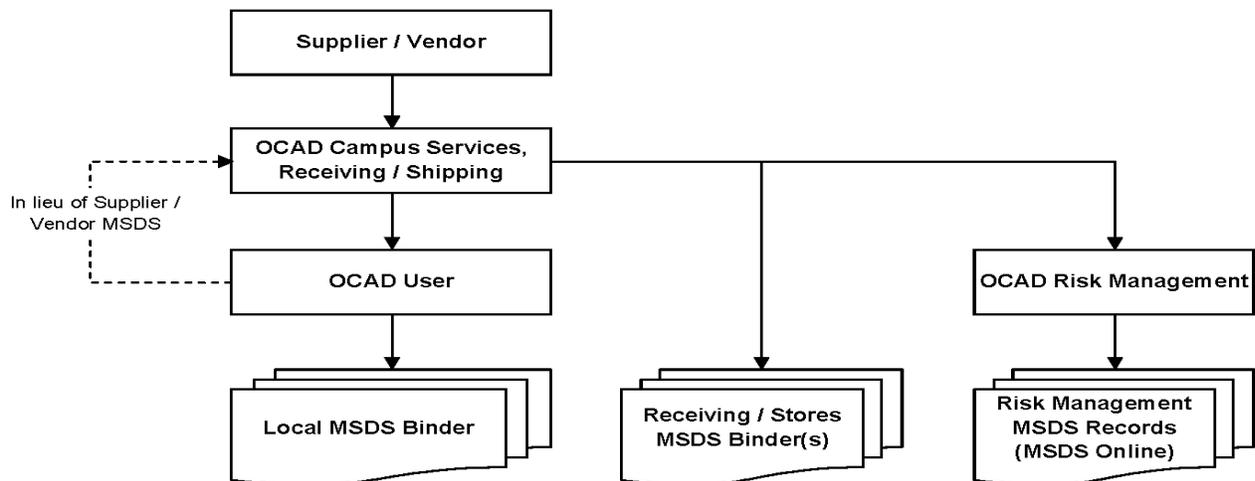
Regulatory Context

1. The *Workplace Hazardous Materials Information System Regulation – made under the Occupational Health and Safety Act*, requires employers to have and make readily available to employees material safety data sheets for all "controlled products".
2. It also requires employers to ensure that "workplace labels" are prepared and applied to any container into which a controlled product is decanted (i.e. a container other than the one in which the product was originally received from the supplier).

1. Material Safety Data Sheets (MSDS):

Obtaining Material Safety Data Sheets with Product Orders

1. OCAD University Purchase Order shall contain an instruction to vendors specifying that (a) a MSDS must accompany each shipment of a chemical substance or product, and (b) OCAD University reserves the right to decline to accept or reject any shipment or delivery of a chemical substance or product that is not accompanied by a MSDS.
2. OCAD University and the Campus Services Department will not release to any user any controlled chemical substance or product that has been received without being accompanied by a MSDS, unless the user provides the Office of Safety and Risk Management a current MSDS for the chemical substance or product prepared by the actual supplier.
3. In cases where a MSDS has not been received with a shipment or delivery, it is acceptable for an OCAD University user to download from the internet the supplier's MSDS for the chemical substance or product, and provide this to Studio Management.
4. The following diagram illustrates the flow of MSDSs:



Process for Maintaining Central Files of Material Safety Data Sheets

1. Studio Management will maintain a set of binders containing MSDSs for all products received or delivered.
2. Studio Management will provide the Office of Safety and Risk Management with an electronic copy of each MSDS received as described in 4. below.
3. The Office of Safety and Risk Management shall create a PDF file for every MSDS. PDF files shall be named as the name of the product, plus an abbreviation for the supplier, plus the MSDS creation date (in the format YYMMDD), each separated by a period (e.g. Acetone.JTBaker.090430).
4. The electronic directory of MSDS' shall be located on MSDS Online through the Office of Safety and Risk Management.

Process for Maintaining Binders of MSDSs at Work Locations

1. A white, 3-ring MSDS binder shall be kept in close proximity of locations where chemicals are stored.
2. The binder shall be labeled as follows:
 - a. Material Safety Data Sheets
 - b. Department Name
 - c. Location (Building, Floor, Room Number)
3. Each binder shall contain a set of "A" through "Z" alphabetic tab dividers. Products starting with numbers shall be filed before the "A" tab.
4. MSDSs shall be filed in the binder by product name, such that the MSDS is placed behind the tab corresponding to the first letter in the product name (e.g. acetone would be behind the "A" tab).
5. Where there are MSDSs for several products having names starting with the same letter, the MSDSs shall be filed in alphabetical order according to the subsequent letters in the product name (e.g. "acetone" would be filed behind "acetic acid").
6. A MSDS shall be added to the binder each time a new MSDS is received for a product.
7. When a MSDS is added to the binder,
 - a) the chemical inventory for the location must be updated (see "Chemical Inventory Record Keeping Requirements"),
 - b) any older version of the MSDS for the product shall be removed and disposed.
8. Should any alphanumeric tab divider be empty (due to there being no products having names beginning with that letter), a sheet shall be inserted that states "NO PRODUCTS IN THIS TAB".
9. At least once per year, at the time of reviewing and updating the location-specific inventory (see "Chemical Inventory Record Keeping Requirements"), the contents of the MSDS binder must be reconciled against the inventory, and any inconsistencies must be remedied, so that the contents of the MSDS binder match the up-to-date inventory.

2. Labels:

Supplier Container Labeling Obligations

It is a responsibility of the manufacturer and supplier to ensure WHMIS compliant labeling of every controlled product container.

Levels of compliance are typically high for Canadian and American suppliers. Should a user contemplate ordering a product from a supplier in another jurisdiction, verify that the containers will have WHMIS compliant labeling before placing the order.

Workplace Labeling Obligations for Decanted Products

1. If a controlled product is decanted or transferred from the original supplier container into a secondary or portable container, or mixed together with another controlled product or non-controlled product, the user must ensure that a WHMIS-compliant “workplace label” is affixed to the container, except in circumstances described in 3 below.
2. A workplace label can be hand-written, a pre-printed form, or downloaded from MSDS Online so long as the information described in 4. below is present.
3. A workplace label is not required to be affixed to a secondary or portable container if either of the following conditions apply:
 - c) the product will be used immediately in its entirety, or
 - d) the product is,
 - under the exclusive control of one person,
 - to be used exclusively use of one person,
 - to be used in its entirety during the course of the work shift, and
 - the product name is marked on the container.
4. Workplace labels for secondary containers must contain the following information:
 - a) The product / substance name (identical to that on the MSDS)
 - b) Safe handling information (a synopsis of key points from the supplier label)
 - c) A statement that an MSDS is available
5. Pre-printed workplace labels can be obtained online from MSDS Online as well as the Sharepoint link created for the Shops and Studio Technicians.