

Spot Check: Labs – Inventories and Safety Data Sheets

2/22/19

Goal: To enhance safety and security of laboratory environment: to test aspects of inventory management and Safety Data Sheet accessibility in laboratories; to identify need for remedial activities.

References:

29 CFR 1910.1200 [Hazard Communication](#)

29 CFR 1910.1450 [Occupational Exposure to Hazardous Chemicals in Laboratories](#)

OSHA Safety and Health Topics - [Laboratories](#)

Pre Test Activities:

- Determine Units that will be tested. A Unit may be a PI group, department, school, or university.
- Determine specific Unit to be tested and the number and locations of discrete labs.
- Determine Unit requirements for inventory and management of Safety Data Sheets. (Note that conditions imposed by the local Chemical Hygiene Plan are fully enforceable by OSHA or PESH.)
- Select a random sample of labs (e.g., using a random number generator or other tool) or otherwise decide on labs to be reviewed. The minimum sample size should be 20% but not fewer than 5 labs.
- For selected labs, determine manager or PI (Unit Manager), inventory on file if submitted, lab door signage if required.
- These tests will not be pre-announced to the specific Unit selected.
- Identify a known individual to be the Reviewer for the test exercises (e.g., personnel from EH&S).

Test Activities:

Does the laboratory door have signage that would indicate:

- Major hazards
- Emergency contacts
- Is this information available at a remote location?

The Reviewer should enter the lab and identify him or herself. The Reviewer should observe all PPE requirements and other access restrictions for visitors. The Reviewer should ask to speak to the most senior person present in the lab (Lab Representative) and explain the goal of the activity.

Identify at least five chemicals on the shelf and ask the Lab Representative to immediately retrieve Safety Data Sheets for each, as if an emergency had occurred. The chemicals chosen should be readily visible and clearly recently used. (Problems with labeling or other storage concerns or safety concerns should be noted.)

The Review should note:

- Date/Time of Visit
- Location
- Door signage or other communication of hazards and contacts
- Lab Representative Name and Title
- Chemicals Chosen (list)
- Time to obtain the 5 correct hard-copy SDSs, and the dates of the SDS version
- Notes concerning SDS access, other safety related observations

The reviewer should then ask to see the inventory (as required by the Chemical Hygiene Plan, CHP) and record:

- ease of locating the inventory
- date of last update
- whether or not the chosen chemicals were listed
- were all CHP required fields addressed in the inventory