



Oregon
Theodore R. Kulongoski, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (OR-OSHA)
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July 30, 1996

Dwayne Fund
Adventist Health
10123 SE Market Street
Portland, Oregon 97216-2599

Dear Mr. Fund:

Thank you for your letter of July 25, 1996 asking for clarification as to what chemicals or materials in your workplace would require a Material Safety Data Sheet (MSDS).

Oregon OSHA looks at the usage of materials in a workplace in two ways. There is consumer usage and occupational usage. Consumer usage of a product is similar in manner and frequency to the way you would use the product in your home (consumer products used in a consumer fashion). Occupational use is as an employee uses a chemical in accomplishing the duties of their job and is either more frequent or in greater quantity than consumer use.

For example, if an administrative employee uses furniture polish to clean their desk, we do not require an MSDS for the furniture polish since it is being used in the same fashion as a consumer would use it.

However, if an employee such as a janitor is required to use the same material for cleaning all desks, and this is their job, we would require an MSDS for the furniture polish.

In OAR 437 Division 2, 1910.1200 Hazard Communication, MSDSs are required for all occupationally used products. OAR 437 Division 2, 1910.1200 Hazard Communication does not apply to consumer products used in a consumer fashion. (See the attached OAR 437 Division 2 1910.1200 Hazard Communication (b) (6) (i) - (xii) for materials not required to have an MSDS).

If you have any additional questions or require further assistance please contact Rodney Boast at (503) 378-3272.

Sincerely,

Marilyn K. Schuster, Manager
Standards and Technical Resources Section
Oregon Occupational Safety and Health Division

Attachment: OAR 437 Division 2 1910.1200 Hazard Communication