

May 21, 1999

Al Roque, ASP, REM
Regulatory Consultant
Dolphin Software Inc
9 Monroe Parkway, Suite 150
Lake Oswego, OR 97035

Dear Mr. Roque:

This is in response to your letter of May 17, 1999, requesting information on Oregon OSHA's position on electronic access to MSDSs.

Essentially, as long as there are no barriers to employees accessing the MSDSs, storing the MSDSs electronically is acceptable, as long as there is a backup system in place in case the primary system fails or if services that the primary system relies on, such as electricity or telephones are interrupted. This backup system can also be electronic, but it must be separate from the primary system and not rely on the same services as the primary system, so that the MSDSs may be accessed immediately in the event of an emergency.

If you have any questions or if we can be of further assistance, please contact David McLaughlin in our Technical Section at (503) 947-7457.

Sincerely,

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