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From: Peggy Munsell, Manager, Standards & Technical Resources

Subject: MSDS for Metals

This issue originated as an e-mail from an employer on 10/7/08.

Issue: Do we need to have MSDS for metals used in grinding, welding, or other fabrication activities.

Answer: The answer to your question is found in Oregon's rules in Division 2, Subdivision Z: 1910.1200 "Hazard communication" available on the OR-OSHA website at: http://www.osha.oregon.gov/subjects/hazard_communication.html.

The basic idea, of course, is that employees have a right to know the identities and hazards of the chemicals to which they are exposed in the workplace and what protective measures are available to prevent adverse health and safety effects.

Normally, a piece of metal would be considered an "article." (Something that doesn't release hazardous chemicals and doesn't pose a health risk to employees.) However, when it is welded, ground, or used in fabrication, a potential is created for employee exposures to gases, vapors, fumes and particulate. Check with your supplier for the appropriate MSDS for the type of metal you are using. (I have heard that here are some "generic" MSDSs for products such as "mild steel.")

There are also substance-specific guidelines (found in Division 2, Subdivision Q: Welding, Cutting, and Brazing), that involve special precautions when working with metals that contain lead, chromium (especially hexavalent chromium), beryllium, zinc and fluorides. (More information about chemicals such as hexavalent chromium can also be found in Division 2, Subdivision Z: "Oregon Rules for Air Contaminants.")

You didn't mention fluxes, coatings, coverings, and filler metals which contain a number of potentially hazardous substances that could also be released into the air during welding, grinding and cutting. (Division 2, Subdivision Q, 1910.252 requires manufacturers or suppliers to provide MSDSs and precautionary labels for these products.)

