



Oregon

Kate Brown, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (Oregon OSHA)

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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 Safety Data Sheet (SDS).

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 SDS 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 SDS for the furniture polish.

In OAR 437 Division 2, 1910.1200 Hazard Communication, SDSs 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 SDS).

If we can be of further assistance, call Oregon OSHA's Technical Section at 503-378-3272. You are also invited to visit Oregon OSHA's website at www.osha.oregon.gov

Sincerely,

Trena VanDeHey, manager
Technical Resources Section
Oregon Occupational Safety and Health Division

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