

Chemical Inventory & SDS Management System

Guy's Construction
123 Main Street, Anytown, CA 90210

29 CFR 1910.1200 / 1926.59 / 1910.1020

Effective Date: June 08, 2026

SAMPLE DOCUMENT - NOT FOR COMPLIANCE USE

JURISDICTION AND REGULATORY FRAMEWORK

The chemical inventory and SDS requirements come from the OSHA Hazard Communication Standard:

- Safety Data Sheet (SDS)

1926.59

- SDS available for all chemicals. Hazcom training for employees. Spill response procedures. PPE per SDS. Incompatible materials segregated during storage.

29 CFR 1917.28, 1917.151

- 29 CFR 1926.59 Hazard Communication (SDS for substances without published PELs)

29 CFR 1926.1202

- HazCom employee training (chemicals, SDS interpretation, protective measures)

29 CFR 1926.59

STATE-SPECIFIC: California has additional requirements:

- fiberboard box (4G) or fiber drum (1G) with plastic inner packaging not exceeding 5 kg (11 lbs) and maximum net mass not more than 25 kg (55 lbs)
- a diagrammatic sketch of the mechanical installation along with a detailed explanation of the flow, procedures and frequency of well tests, calibration/proving of metering devices and allocation formulas
- carbon monoxide poisoning or asphyxiation
- 2.5 percent
- third physician to conduct examinations, consultations, laboratory tests and discussions with prior physicians as necessary to resolve disagreement
- high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels
- a list of interested parties (those with interests in the leases and/or units from which production is to be commingled for which the applicant has no existing commingling authority)
- the overall status of implementation of the provisions of this Part relating to the identification, inventory, and removal of underwater obstructions
- carbon monoxide poisoning
- carbon monoxide levels in breathing air shall not exceed 10 ppm
- potentially hazardous exposure levels
- its permissible exposure limit published in section 5155
- employer notification of corrective actions to reduce exposure
- employer notification of exposure level and corrective actions to reduce exposure
- at least daily or as often as necessary to maintain a clean environment
- appropriate personal protective equipment and training in exposure control methods
- ASTM E108. Class A required in WUI fire areas (California Chapter 7A). Composition shingles are typically Class A.

IBC 1505 / CBC Chapter 7A

- construction sites kept clean and orderly, waste removed at regular intervals

T8 CCR 1513

- information about every incident, post-incident response and investigation regarding an injury resulting from workplace violence
- at least five members

- SDS in English including sections 1 through 16 in specified order with associated information
- SDS must be available in languages employees understand (federal extends to training only)

T8 CCR 5194

- notify requestor of SDS availability or provide copy within 15 days
- submit information specified in section 5194(i)(15)
- provide Director with copy of the safety data sheet
- safety data sheets (SDS) maintained and accessible for each hazardous chemical in the workplace
- written hazard communication program, SDS library, and employee training
- written hazard communication program with labels, safety data sheets, and employee training
- 29 CFR 1910.1200 (HazCom)
- overhead protective covering of two-inch planking, 3/4-inch plywood or other solid material of equivalent strength on the top
- medical removal protection benefits to the employee equal to that required by paragraph (n)(9)(v) of this section
- at least eight hours before the mechanical integrity test is conducted
- a sufficient number of crossties that in combination provide effective support that will maintain alignment within the limits prescribed in § 213.55
- each circuit that receives power from that transformer when installed in the main secondary circuit at the source transformer
- either provide a warning to employees in compliance with 22 CCR Section 12601(c) in effect on May 9, 1991 or comply with the requirements set forth in subsections (d) through (k) of T8 CCR §5194
- comply with the requirements set forth in subsections (d) through (k) of T8 CCR §5194
- burden of showing that an exposure meets the criteria of subsection (b)(6)(D)
- exemption from Proposition 65 requirements
- enforcement under Health and Safety Code Section 25249.7
- loss of MRP benefits eligibility
- such overproduction is entirely eliminated
- exceeding 80 µg/dl
- compliance with all paragraphs of this section except (p) and (q)
- the interior and exterior wiring, including power, lighting, control, and signal circuit wiring with all of the associated hardware, fittings, and wiring devices, both permanently and temporarily installed, which extend from the load-end of the...
- data integration and risk assessment of the entire pipeline as specified in § 192.917
- any officer authorized to serve process or any agent or employee of the assistant secretary in the same manner as is provided by law for the service of citation in civil actions in the district courts
- microwave power densities of 10 milliwatts per square centimeter
- name, mailing address, and location of the facility
- the steps that must be followed for starting up the machinery, equipment, or system that is being serviced, in accordance with paragraph (j)

TABLE OF CONTENTS

- 1.0 Purpose and Scope
- 2.0 Regulatory Basis
- 3.0 Chemical Inventory Requirements
- 4.0 The No Small-Quantity Rule
- 5.0 SDS Management (16-Section Format)
- 6.0 SDS Accessibility Requirements
- 7.0 Electronic SDS Systems
- 8.0 New Chemical Introduction Procedure
- 9.0 Container Labeling
- 10.0 Common Construction Chemicals
- 11.0 Multi-Employer Coordination
- 12.0 Inventory Audits
- 13.0 SDS Retention (30-Year Rule)
- 14.0 Training
- 15.0 Roles and Responsibilities
- Appendix A: Chemical Inventory Form
- Appendix B: SDS Receipt Log
- Appendix C: New Chemical Approval Form
- Appendix D: Quarterly Audit Checklist

Monday Safety — Sample Document

1.0 PURPOSE AND SCOPE

Guy's Construction maintains this Chemical Inventory and SDS Management System to comply with the OSHA Hazard Communication Standard (HazCom). This system applies to all company operations, jobsites, shops, storage areas, and vehicles where hazardous chemicals are present.

The chemical inventory and SDS collection are the backbone of the entire HazCom program. Without a current inventory, you cannot train employees on the chemicals they work with. Without accessible SDS, workers and emergency responders cannot identify hazards or treatment procedures.

2.0 REGULATORY BASIS

Requirement	Citation	What It Says
Written HazCom Program	1910.1200(e)(1)	Employer must develop and maintain a written hazard communication program including a list of hazardous chemicals known to be present
Chemical Inventory	1910.1200(e)(1)(i)	The written program must include a list of hazardous chemicals using an identity referenced on the SDS
SDS Maintenance	1910.1200(g)(1)	Employers must have an SDS for each hazardous chemical they use
SDS Accessibility	1910.1200(g)(8)	SDS must be readily accessible during each work shift to employees in their work area
Construction HazCom	1926.59	Applies HazCom to construction. Contractor must maintain SDS for each hazardous chemical on the jobsite
Exposure Records	1910.1020(d)(1)(ii)	SDS are exposure records. Must be maintained for 30 years after last use

HazCom is the second most frequently cited OSHA standard in construction.

3.0 CHEMICAL INVENTORY REQUIREMENTS

3.1 What Must Be on the Inventory

- Product name (as it appears on the container label and SDS)
- Manufacturer or supplier name
- Location(s) where the chemical is used or stored
- Approximate quantity typically on hand
- Primary hazard classification (flammable, corrosive, toxic, etc.)
- Date added to inventory
- Whether an SDS is on file (with date of most recent SDS version)

3.2 What Counts as a Hazardous Chemical

If a manufacturer provides an SDS with the product, it is a hazardous chemical and belongs on the inventory:

Category	Examples Most People Forget
Aerosols	WD-40, spray paint, brake cleaner, compressed air dusters, insect repellent
Adhesives/Sealants	Construction adhesive, PVC cement, silicone caulk, epoxy, thread sealant
Fuels	Gasoline (equipment), diesel, propane (heaters), acetylene, MAP gas
Concrete Products	Portland cement (causes burns, pH 12-13), form release, curing compound, muriatic acid
Coatings	Paint, primer, stain, polyurethane, lacquer, rust inhibitor
Cleaning Products	Degreasers, bathroom cleaners, glass cleaner, disinfectants, bleach
Welding Consumables	Welding rods (fume hazards vary by rod type), shielding gas, anti-splatter
Dust/Fumes	Silica dust from cutting concrete/masonry, wood dust, welding fumes, lead dust
Office/Misc	Toner cartridges, correction fluid, permanent markers (in bulk), hand sanitizer (flammable)

4.0 THE NO SMALL-QUANTITY RULE

There is no small-quantity exemption under OSHA HazCom. One tube of adhesive, one can of spray paint, one bottle of hand sanitizer: if it is a hazardous chemical and it is present in the workplace, it must be on the inventory and there must be an SDS available.

OSHA inspectors use a simple test: they walk the jobsite, pick up a random container, and ask: (1) Is this chemical on your inventory? (2) Can you show me the SDS? If the answer to either question is no, it is a citation. The inspector does not ask how much you have or how often you use it.

Monday Safety — Sample Document

5.0 SDS MANAGEMENT (16-SECTION GHS FORMAT)

All SDS must follow the standardized 16-section GHS format:

Sec	Title	Key Information
1	Identification	Product name, manufacturer, emergency phone, recommended use
2	Hazard(s) ID	GHS classification, signal word, hazard statements, pictograms
3	Composition	Chemical name, CAS number, concentration
4	First-Aid	Symptoms, treatment by route (inhalation, skin, eye, ingestion)
5	Fire-Fighting	Suitable extinguishing media, specific hazards
6	Accidental Release	Spill cleanup, containment, PPE for cleanup
7	Handling/Storage	Safe handling, storage conditions, incompatibilities
8	Exposure/PPE	Exposure limits (PEL, TLV), engineering controls, PPE selection
9	Physical/Chemical	Appearance, odor, pH, flash point, boiling point, vapor pressure
10	Stability	Chemical stability, conditions to avoid, incompatible materials
11	Toxicological	Routes of exposure, acute/chronic effects, LD50/LC50
12	Ecological	Environmental toxicity (not enforced by OSHA but required)
13	Disposal	Waste disposal methods (follow EPA/state regulations)
14	Transport	DOT/IATA/IMDG classification for shipping
15	Regulatory	Other federal/state/international regulations
16	Other	Date of preparation, revision date, abbreviations

5.1 Obtaining SDS

- Manufacturer must provide SDS with first shipment. If missing, request in writing and document the request.
- Many manufacturers provide SDS on their websites. Verify version matches your product.
- Third-party SDS databases are acceptable. Verify SDS matches specific product and manufacturer.

5.2 Keeping SDS Current

- No fixed expiration. SDS is current until manufacturer issues a revision.
- Check manufacturer websites annually for updates on regularly used chemicals.
- When revised SDS received: replace active copy, archive old version (30-year rule).

6.0 SDS ACCESSIBILITY REQUIREMENTS

'Readily accessible during each work shift' means immediately available without leaving the work area. Not in a locked office. Not in the foreman's truck. Not 'available upon request within 24 hours.'

- Paper systems: SDS binder at each work location, organized alphabetically, in a known marked location
- Construction jobsites: binder in job trailer. Satellite binder at remote work areas.
- Must not be locked or restricted. Any employee must access them at any time during the shift.
- Emergency access: ensure responders know SDS location. SDS should travel with injured worker to hospital if possible.

7.0 ELECTRONIC SDS SYSTEMS

- OSHA permits electronic systems (tablets, phones, cloud) if accessible from work area during shift
- Workers must be trained on how to use the electronic system
- Backup required: paper SDS for most hazardous chemicals if electronic system fails

The OSHA inspector's test is the same: pick up a container, ask a worker to pull the SDS, and time it.

Monday Safety — Sample Document

8.0 NEW CHEMICAL INTRODUCTION PROCEDURE

No new hazardous chemical may be used until it has been added to the inventory, SDS obtained, and employees informed:

- 1. Review SDS before purchasing/accepting delivery
- 2. Check if less hazardous alternative already on inventory
- 3. Complete New Chemical Approval Form (Appendix C)
- 4. Add to master inventory
- 5. File SDS in all site-level binders/systems
- 6. Inform all affected employees before first use (documented)
- 7. Update secondary container labeling if transferred

A chemical that appears on a jobsite without going through this process is a compliance failure. If you find an unlabeled or un-inventoried chemical: stop. Do not use it. Report it.

9.0 CONTAINER LABELING

9.1 Original Containers

- Never remove or deface manufacturer labels
- GHS labels include: product identifier, signal word, hazard statements, pictograms, precautionary statements, supplier ID

9.2 Secondary Containers

- Must be labeled with: product identifier (same as SDS) and general hazard info
- Exception: immediate use by the person who transferred it, emptied same shift

Unmarked secondary containers are one of the most common HazCom citations. A Gatorade bottle filled with muriatic acid, a spray bottle of unlabeled degreaser. This kills people. Label everything.

10.0 COMMON CONSTRUCTION CHEMICALS

Chemical	Common Use	Primary Hazards	Key SDS
Portland Cement	Concrete, mortar	Skin burns (pH 12-13), eye damage, silica, chromium sensitizer	Sec 2,8,11
Muriatic Acid (HCl)	Etching, cleaning	Corrosive (severe burns), toxic fumes, reacts with metals	Sec 2,4,10
Spray Paint	Marking, touch-up	Flammable, CNS depression, respiratory irritant	Sec 2,5,8
PVC Cement	Plumbing, conduit	Flammable, CNS effects, may contain THF	Sec 2,3,8
Diesel Fuel	Equipment	Flammable, skin irritant, suspected carcinogen	Sec 2,8,11
Gasoline	Equipment, generators	Extremely flammable, known carcinogen (benzene)	Sec 2,3,5
Acetylene	Welding, cutting	Extremely flammable gas, asphyxiant, unstable >15 psi	Sec 2,5,10
Welding Rods	Welding	Fume hazards: manganese, hex chrome (SS), fluorides	Sec 2,3,8
Epoxy (2-part)	Repair, coating	Skin sensitizer (Part A), exothermic if bulk mixed	Sec 2,3,11
Propane	Heaters, torches	Extremely flammable gas, asphyxiant, BLEVEs	Sec 2,5,7

Monday Safety — Sample Document

11.0 MULTI-EMPLOYER WORKSITE COORDINATION

- Each employer maintains inventory and SDS for their chemicals
- GC must ensure all subs are aware of chemical hazards that could affect their workers
- Subs must provide SDS to GC when introducing chemicals that could expose other contractors
- Include SDS exchange requirement in subcontract agreements
- On large sites: consider central SDS station consolidating all contractors' SDS

29 CFR 1926.59(e)

12.0 INVENTORY AUDITS

12.1 Quarterly Audit

- Walk entire worksite. Document every chemical container found.
- Compare against inventory. Flag discrepancies.
- Verify SDS exists for every chemical. Obtain if missing.
- Check SDS version dates. Flag if >5 years old.
- Check secondary container labels.

12.2 Audit Triggers

- New construction phase, new sub mobilizes, chemical incident, OSHA inspection, employee report of unknown chemical

Monday Safety — Sample Document

13.0 SDS RETENTION (30-YEAR RULE)

OSHA 1910.1020 classifies SDS as employee exposure records. SDS must be retained for 30 years after the last date the chemical was used.

- When chemical removed from active use: move SDS to archive. Do not discard.
- Archive must include: SDS, date first used, date last used
- Occupational diseases can take decades to manifest. The SDS is the exposure record.
- Practical recommendation: retain all SDS indefinitely in electronic archive.

29 CFR 1910.1020(d)(1)(ii)

14.0 TRAINING

- At hire: HazCom program, inventory, SDS locations, how to access them
- At project startup: project-specific chemical inventory and SDS locations
- When new chemical introduced: hazards, required PPE, SDS location (before use)
- Workers must be able to: find the inventory, locate any SDS, read key sections (2,4,8), report unlabeled chemicals
- Training in language employees understand
- Document all training: date, topic, trainer, attendee signatures

15.0 ROLES AND RESPONSIBILITIES

Role	Responsibilities
Safety Coordinator	Maintain master inventory. Ensure SDS on file. Quarterly audits. 30-year archive. Multi-employer coordination. Training.
Superintendent/Foreman	Maintain jobsite SDS binder. Ensure all on-site chemicals inventoried. Enforce labeling. New Chemical Approval. Sub SDS collection.
Purchasing	Verify SDS arrives with every chemical purchase. Flag new chemicals not on inventory.
All Employees	Know SDS location. Do not use unlabeled chemicals. Report un-inventoried chemicals. Label secondary containers.
Subcontractors	Provide chemical inventory and SDS for all chemicals brought to project. Notify GC of new chemicals.

California STATE-SPECIFIC REQUIREMENTS

- fiberboard box (4G) or fiber drum (1G) with plastic inner packaging not exceeding 5 kg (11 lbs) and maximum net mass not more than 25 kg (55 lbs)
- a diagrammatic sketch of the mechanical installation along with a detailed explanation of the flow, procedures and frequency of well tests, calibration/proving of metering devices and allocation formulas
- carbon monoxide poisoning or asphyxiation
- 2.5 percent
- third physician to conduct examinations, consultations, laboratory tests and discussions with prior physicians as necessary to resolve disagreement
- high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels
- a list of interested parties (those with interests in the leases and/or units from which production is to be commingled for which the applicant has no existing commingling authority)
- the overall status of implementation of the provisions of this Part relating to the identification, inventory, and removal of underwater obstructions
- carbon monoxide poisoning
- carbon monoxide levels in breathing air shall_not_exceed 10 ppm
- potentially hazardous exposure levels
- its permissible exposure limit published in section 5155
- employer notification of corrective actions to reduce exposure
- employer notification of exposure level and corrective actions to reduce exposure
- at least daily or as often as necessary to maintain a clean environment
- appropriate personal protective equipment and training in exposure control methods
- ASTM E108. Class A required in WUI fire areas (California Chapter 7A). Composition shingles are typically Class A.

IBC 1505 / CBC Chapter 7A

- construction sites kept clean and orderly, waste removed at regular intervals

T8 CCR 1513

- information about every incident, post-incident response and investigation regarding an injury resulting from workplace violence
- at least five members
- SDS in English including sections 1 through 16 in specified order with associated information
- SDS must be available in languages employees understand (federal extends to training only)

T8 CCR 5194

- notify requestor of SDS availability or provide copy within 15 days
- submit information specified in section 5194(i)(15)
- provide Director with copy of the safety data sheet
- safety data sheets (SDS) maintained and accessible for each hazardous chemical in the workplace
- written hazard communication program, SDS library, and employee training
- written hazard communication program with labels, safety data sheets, and employee training
- 29 CFR 1910.1200 (HazCom)
- overhead protective covering of two-inch planking, 3/4-inch plywood or other solid material of equivalent

strength on the top

- medical removal protection benefits to the employee equal to that required by paragraph (n)(9)(v) of this section
- at least eight hours before the mechanical integrity test is conducted
- a sufficient number of crossties that in combination provide effective support that will maintain alignment within the limits prescribed in § 213.55
- each circuit that receives power from that transformer when installed in the main secondary circuit at the source transformer
- either provide a warning to employees in compliance with 22 CCR Section 12601(c) in effect on May 9, 1991 or comply with the requirements set forth in subsections (d) through (k) of T8 CCR §5194
- comply with the requirements set forth in subsections (d) through (k) of T8 CCR §5194
- burden of showing that an exposure meets the criteria of subsection (b)(6)(D)
- exemption from Proposition 65 requirements
- enforcement under Health and Safety Code Section 25249.7
- loss of MRP benefits eligibility
- such overproduction is entirely eliminated
- exceeding 80 µg/dl
- compliance with all paragraphs of this section except (p) and (q)
- the interior and exterior wiring, including power, lighting, control, and signal circuit wiring with all of the associated hardware, fittings, and wiring devices, both permanently and temporarily installed, which extend from the load-end of the service lateral conductors to the outlets
- data integration and risk assessment of the entire pipeline as specified in § 192.917
- any officer authorized to serve process or any agent or employee of the assistant secretary in the same manner as is provided by law for the service of citation in civil actions in the district courts
- microwave power densities of 10 milliwatts per square centimeter
- name, mailing address, and location of the facility
- the steps that must be followed for starting up the machinery, equipment, or system that is being serviced, in accordance with paragraph (j)

APPENDIX A: CHEMICAL INVENTORY FORM

Company: _____

Location/Project: _____

Date: _____

Compiled By: _____

#	Product Name	Manufacturer	Location	Qty	Hazard	SDS?	Date
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							

Compiled By: _____

Date: _____

Monday Safety — Sample Document

APPENDIX C: NEW CHEMICAL APPROVAL FORM

Complete BEFORE any new hazardous chemical is introduced to a company worksite.

Date: _____ Requested By: _____
 Project/Location: _____ Trade/Task: _____

Product Name: _____

Manufacturer: _____

Purpose: _____

GHS Classification: Flammable Corrosive Toxic Irritant Oxidizer Compressed Gas Carcinogen Other: _____

Required PPE (SDS Sec 8): _____

Storage Requirements (SDS Sec 7): _____

Incompatible Materials (SDS Sec 10): _____

Less hazardous alternative on inventory? Yes (use it) No

Approved Denied Approved with conditions: _____

SDS Obtained: Yes | Added to Inventory: Yes | Employees Notified: Yes

Approved By: _____

Date: _____

Monday Safety — Sample Document

APPENDIX D: QUARTERLY INVENTORY AUDIT CHECKLIST

Location: _____ Date: _____
 Auditor: _____

Item	Result	OK	Fix
Walked entire site, identified all chemical containers			
Compared site chemicals against inventory - all match	<input type="checkbox"/> Y <input type="checkbox"/> N		
SDS exists for every chemical on inventory	<input type="checkbox"/> Y <input type="checkbox"/> N		
SDS binder/system accessible from work area	<input type="checkbox"/> Y <input type="checkbox"/> N		
Pulled 3 random SDS in <2 minutes	<input type="checkbox"/> Pass <input type="checkbox"/> Fail		
SDS version dates checked (>5yr flagged)			
All original container labels legible	<input type="checkbox"/> Y <input type="checkbox"/> N		
All secondary containers labeled	<input type="checkbox"/> Y <input type="checkbox"/> N		
All employees have documented HazCom training	<input type="checkbox"/> Y <input type="checkbox"/> N		
Asked 2 random workers SDS location	<input type="checkbox"/> Pass <input type="checkbox"/> Fail		
New chemicals since last audit properly documented	<input type="checkbox"/> Y <input type="checkbox"/> N/A		

Auditor: _____ Date: _____

Safety Coordinator Review: _____ Date: _____

Monday Safety — Sample Document