

**From:** Debbi Brady  
**To:** [zzMSHA-OSRVRegulatoryReform](mailto:zzMSHA-OSRVRegulatoryReform)  
**Subject:** 30 CFR Subpart F  
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To Whom It May Concern:

This is a request to consider updating Part 47, Subpart F – Material Safety Data Sheets (MSDS) section of the 30 CFR.

Justification:

- To conform with the UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS) OSHA adopted.
- My understanding is MSHA's HazComm plan was to reflect OSHA Standards...MSDS is no longer the standard.
- Regarding safety data sheets, in Subpart F, 47.52, it states "(a) Be legible, accurate and in English;"....if it were accurate it would be in the GHS SDS format. :)

Today I was working on the best way to get across to our company buyers, planners and warehouse personnel why it is important to ensure we always make sure we verify the chemicals we have on site have an SDS on file. I was disappointed when I looked at our MSHA 30 CFR handbook and found the part I was planning to use to back up my compliance justification was outdated. I went online to [msha.gov](http://msha.gov) to find the eCFR was also outdated. I called the General Inquiries number and was told to contact my district manager's office and talk to them. After speaking to one of our district representatives and he worked on the best way to get my message heard, I was ultimately directed to this regulatory reform contact email.

Why I care: A couple of years ago, I, along with two coworkers, took on the task of updating all of our site MSDS files to SDS files. After a physical audit of our site (an open pit copper mine), which includes 21+ areas we were able to convert or archive more than 4,000 MSDS files down to 2,800 active SDS files. I currently process all new chemical requests for review by our Environmental and Health & Safety departments. We only accept the updated GHS SDS format for product approval requests.

I understand that I may be sensitive about this due to the time and energy I spent/spend updating our database. And I was told that MSHA ultimately was currently not interested in updating this area. I'm sure there must be a good reason. But it's been a bit since this became a standard, so maybe it can be reconsidered? Thank you for listening!

Regards,

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