

Findings

In review of the current Chemical Management system and updating it to become more effective as required by the Sustainability standards, all of our MSDS sheets have been uploaded to eSynergy and a new electronic system, including a data system & tracking system, to make MSDS information easily accessible was created. The new data system includes product name, picture, item number/code, inventory tracking, purchasing codes, intended use, area of intended use, instructions for final disposition, chemicals of concern, percent of the weight of the total product that is composed of chemicals of concern, instructions for transportation and an attachment for the MSDS. The new tracking system includes a workflow that will allow the Facility Superintendent or other assigned personnel to maintain all transactions such as inventory, purchasing information, disposal or any other activity taken with the specific chemical.

All chemicals were analyzed for containment of the chemicals of concern as designated by BIFMA and assigned with total percent of the weight of the chemical of concern. This information is specified within the electronic data system to be used as a tool for alternative sourcing initiatives.

Audit & Verification

During the review and development of the system, we found expired MSDS sheets and MSDS sheets for chemicals no longer used at Neutral Posture. For expired MSDS sheets, new information has been requested. For the MSDS sheets where chemicals are no longer used at the facility, the MSDS sheets will not be added to electronic version of the system and will be kept in eSynergy for historical purposes.

All expired chemicals have been separated and sorted for proper disposition, and documentation on proper disposal will be tracked through the system, or documented within the historical files for chemicals no longer in use, once the selection of the disposal company has been finalized.

A verification audit was conducted to make sure all chemicals actually used within the facility were captured by the system. I visually audited each area of the production process, maintenance duties and engineering activities for verification against the chemical list and intended use and found the current system is comprehensive and complete. During this visual audit, the storage and maintenance of chemicals was evaluated and documented for the data system. Currently, there are 10 areas throughout the facility used for chemical storage in our facility when they are not in use which are identified within the data system.

Summary

The Chemical Management system is complete in terms of including all chemicals used throughout the facility. With the updated processes, activities within the system should be easily monitored and reportable.