SKILLSIGNAL™
Construction Safety & Compliance

TOOLBOX TALK

Safety Data Sheets: Sixteen Sections, Same Order, Every Product on Earth

TOPIC NO.	DURATION	AUDIENCE
HC-03	10 to 15 min	All Crew

OSHA REFERENCE 29 CFR 1910.1200(g) · 29 CFR 1926.59 · 1910.1200 Appendix D

PROJECT / JOBSITE	DATE	PRESENTED BY

01 THE HOOK

START HERE

Somebody just got a face full of concrete cleaner. Eyes burning, cannot see, yelling. You have the jug in your hand. What do you do first, and for how long? Do you call 911 or the number on the label? Is water the right thing or the wrong thing? The answer is in Section 4 of a document that is required by law to be within reach of you right now. The old MSDS might have been eleven pages in a random order with the first aid on page nine. The SDS puts first aid in the same place on every sheet for every product made anywhere in the world. If you know the sixteen sections, you know where to look before the emergency, not during it.

02 WHAT THE LAW SAYS

29 CFR 1910.1200(g) requires the manufacturer to write a Safety Data Sheet for every hazardous chemical and the employer to have one for **every hazardous chemical on the site**. Then the part that gets cited: **1910.1200(g)(8)** says SDSs must be **“readily accessible during each work shift to employees when they are in their work area(s).”** Electronic is fine, with a backup for when the tablet dies. A binder locked in a trailer that is locked at night does not count on the night shift. “Call the office and they will email it” does not count at all.

SECTIONS, ALWAYS IN THIS ORDER

16

SECTIONS

1910.1200(g)(2)

THE ORDER IS THE POINT

An SDS from a German adhesive maker and an SDS from a Texas concrete supplier put **the same information in the same numbered section**. You do not have to read the whole thing. You have to know which number answers your question. Sections 1 to 8 are the ones a crew uses. Sections 9 to 11 are for the safety person. Sections 12 to 15 are environmental and transport (OSHA does not enforce their content). Section 16 is the date.

03 THE EIGHT SECTIONS A CREW ACTUALLY USES

SECTION	TITLE	WHAT YOU GET FROM IT
1	**Identification**	Product name (must match the label), manufacturer, and the **24-hour emergency phone number**. Recommended use and restrictions.
2	**Hazard(s) identification**	Everything on the label in one place: classification, signal word, pictograms, hazard and precautionary statements. **Read this one before you open the container.**
3	**Composition**	What is in it, by chemical name, CAS number, and percentage. This is how you find out the “cleaner” is 30 percent hydrochloric acid.
4	**First-aid measures**	What to do **by route of exposure**: inhaled, on skin, in eyes, swallowed. Symptoms, immediate and delayed. This is the section for the face full of cleaner.
5	**Fire-fighting measures**	What extinguisher works, what makes it worse (water on some products), and what it gives off when it burns.
6	**Accidental release**	Spill response: evacuate or not, what to contain it with, what PPE for cleanup. Read it before the spill.
7	**Handling and storage**	Incompatibles (what it cannot sit next to), temperature limits, ventilation, and hygiene: no eating or smoking around it.
8	**Exposure controls / PPE**	The **OSHA PEL** and other exposure limits, the engineering controls, and the specific gloves, respirator, and eye protection. Not “wear gloves.” Which gloves.

Sections 9 through 11 are the technical back half: **physical properties** (flash point, vapor density, pH), **stability and reactivity** (what it reacts with), and **toxicological information** (what overexposure does, by route). The safety person lives there. You should know they exist.

04 WHAT CHANGED IN 2024

The HazCom 2024 update did not change the sixteen sections or their order. It tightened what goes in them. **Section 2** now has to address hazards that show up when the product is used the way it is reasonably expected to be used downstream, like dust from cutting or vapor from heating. **Section 9** adds particle characteristics for solids. And SDSs must be updated as manufacturers reclassify: single substances by **May 19, 2026**, mixtures by **November 19, 2027**. If you get a new SDS with a shipment, it replaces the old one in the binder. Do not keep both.

⚠ **NO SDS, NO USE**

If a product is on this site and there is no SDS for it, the employer is out of compliance the moment it arrived, and you have no first-aid information if it goes wrong. The fix is not to use it anyway. The fix is to pull the SDS from the manufacturer's website (most post them), print or save it, and add the product to the chemical inventory. Fifteen minutes. If the manufacturer will not provide one, the product does not get used.

05 WHY IT MATTERS

[JOBSITE]

FOR THE CREW

SDS access is one of the top HazCom citation items every year, and it is the easiest to fix. A crew that knows the sixteen sections finds the first-aid answer in ten seconds instead of calling the office. That shows up in incident outcomes and in inspections.

[INDIVIDUAL]

FOR YOU

Section 4 is written for the person standing next to the injured worker. Section 8 is written for you before you start. Know those two numbers and you can handle almost anything that comes out of a container.

[HOME]

FOR LIFE OFF-SITE

Every product in your garage has an SDS online. The next time you mix a two-part epoxy or a concrete cleaner at home, pull it up. Section 2 and Section 4. Takes a minute.

06 TODAY'S DRILL

TODAY'S DRILL **SECTION 4 IN SIXTY SECONDS**

Pick a product you will use today. Start a timer. Find its SDS wherever this site keeps them (binder, trailer, phone app). Turn to Section 4 and read the "in eyes" first-aid instructions out loud. Then turn to Section 8 and read the glove and respirator spec. Stop the timer. If it took more than sixty seconds to find the sheet, that is the problem to report today.

07 CREW DISCUSSION

Take 2 minutes. Pick one.

1. Where are the SDSs on this site right now? Could the night crew or a new hire find them without asking?
2. Has anyone ever had to use an SDS during an actual emergency? What section did you need, and did you find it?
3. Which product on this site do you suspect has no SDS in the binder? Who is going to check?

08 ATTENDANCE & SIGN-OFF

All attendees confirm they participated in this Toolbox Talk and understand the content covered.

NAME (PRINT)	SIGNATURE

SUPERVISOR SIGNATURE

_____ Date: _____

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