

# Complying with the Revised OSHA Hazard Communication Rule



Presented by:

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# Complying with the Revised OSHA Hazard Communication Rule



# Today's Topics

- ✓ **What the heck happened?**
- ✓ **What is GHS?**
- ✓ **Why did OSHA change the Standard?**
- ✓ **What do I need to know now?**
- ✓ **What should be in my gap analysis plan?**

# Hazard Communication

- ✓ **OSHA revised its current Hazard Communication Standard (29 CFR 1910.1200)**
- ✓ **Aligns it with GHS (more in a minute)**
- ✓ **Original Hazard Communication Standard (1983) gave the workers the “right to know”, the revised Standard gives workers the “right to understand”.**

# Hazard Communication

## OSHA Sez:

- 1. Enhance worker comprehension of hazards, especially for low and limited-literacy workers**
- 2. Reduce confusion in the workplace**
- 3. Facilitate safety training**
- 4. Safer handling and use of chemicals**
- 5. Provide workers quicker and more efficient access to information on the safety data sheets**

# Hazard Communication

## OSHA Sez:

- 1. Result in cost savings to American businesses of more than \$475 million in productivity improvements**
- 2. Need for fewer safety data sheet and label updates**
- 3. Provides simpler hazard communication training**
- 4. Reduces trade barriers by harmonizing with systems around the world**

# Global Harmonization



## **Globally Harmonization System for Classifying and Labeling Chemicals (GHS)**

**Provides a common,  
coherent approach to  
defining, classifying and  
communicating hazards  
from chemicals.**

# Global Harmonization

## GHS History

- ✓ **United Nations Conference on Environment and Development (UNCED) 1992**
- ✓ **Agreement that system should be developed**
- ✓ **UN General Assembly agrees with UNCED recommendations**
- ✓ **Shortly after, working group created to develop system recommendations**



# Global Harmonization

## GHS History

- ✓ **Process managed by international group of countries**
- ✓ **Existing systems in US, Canada and Europe used as models**
- ✓ **System was adopted by UN in 2003**
- ✓ **Goal was for countries to adopt by 2008**
- ✓ **Each country has its own process to implement**

# Why is GHS Better?

- ✓ **Standardizes system across countries**
- ✓ **Enhance global trade by reducing burdens of complying with various systems**
- ✓ **Enhances protection of humans and the environment**
- ✓ **Creates system in countries where none currently exists**
- ✓ **Less animal testing for data**

# Why is GHS Better?

**Should not fundamentally change what is considered hazardous, just standardize the methods of classifying and communicating the hazards**



# Scope of GHS

## ➤ **Classification Criteria**

- ✓ **Health and environmental hazards**
- ✓ **Physical hazards**

## ➤ **Communication Requirements**

- ✓ **Labels**
- ✓ **Safety Data Sheets (SDS)**
- ✓ **Training**

**\* Just like the current Hazard  
Communication Standard**

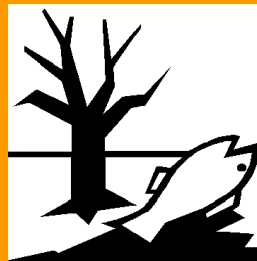
# Health and Environmental Hazards

- **Acute Toxicity**
- **Reproductive toxicity**
- **Target organ toxicity – single and repeat dose**
- **Aspiration toxicity**
- **Skin Corrosion/Irritation**
- **Carcinogenicity**
- **Hazardous to aquatic environment**
- **Serious eye damage/irritation**
- **Respiratory/skin sensitization**
- **Germ cell mutagenicity**

# Health and Environmental Hazards

## Exceptions – Environmental Effects

- ✓ **GHS covers aquatic toxicity**
- ✓ **OSHA has no jurisdiction**



# Physical Hazards

- ✓ **Explosives**
- ✓ **Flammability**
- ✓ **Oxidizers**
- ✓ **Self-reactive**
- ✓ **Pyrophoric**
- ✓ **Self-heating**
- ✓ **Organic peroxides**
- ✓ **Corrosive to metals**
- ✓ **Gases under pressure**
- ✓ **Water activated flammable gases**

# GHS Implications

- ✓ **Some countries have to started from scratch**
  - **easiest way – less to change**
- ✓ **“Building-block” approach for others**
  - **like the US**
- ✓ **Varying levels of implementation schedules and time frames**
- ✓ **All relevant sectors will be involved**
  - **workplace, consumers, pesticides, and transport**



# US Implementation

## DOT and GHS

- **Fewest changes needed**
- **Already harmonized with international transport system except for aquatic toxicity**



# OSHA and GHS



- ✓ **OSHA Staff were participants in UN Subcommittee of Experts on GHS**
- ✓ **Extensive involvement in UN recommendations**

# OSHA and GHS

- ✓ **Has the most requirements impacted by GHS**
- ✓ **Covers 7 million workplaces/945,000+ chemical products**
- ✓ **Covers all acute and chronic hazards**



# OSHA and GHS

- ✓ **Published an Advance Notice of Public Rulemaking (ANPR) in 2009 (second one)**
- ✓ **Published Final Rule on March 26<sup>th</sup>**
- ✓ **Effective May 26<sup>th</sup> (60 days)**
- ✓ **Full implementation not until 2016**

<b>Effective Completion Date</b>	<b>Requirement(s)</b>	<b>Who</b>
<b>December 1, 2013</b>	<b>Train employees on the new label elements and safety data sheet (SDS) format.</b>	<b>Employers</b>
<b>June 1, 2015</b>  <b>December 1, 2015</b>	<b>Compliance with all modified provisions of this final rule, except</b>  <b>The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label</b>	<b>Chemical manufacturers, importers, distributors and employers</b>
<b>June 1, 2016</b>	<b>Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.</b>	<b>Employers</b>

# Hazard Communication Revisions

## What Happens Between Now and 2016?

- ✓ **Can comply with either the existing HCS or the revised HCS - or both**
- ✓ **For a time labels and SDSs under both standards will be present in the workplace**
- ✓ **This is perfectly fine**
  - ✓ **Employers are not required to maintain two sets of labels and SDSs for compliance purposes**

# Hazard Communication Revisions

## Final Rule Did Not Change:

- ✓ **Who is covered by the HCS**
- ✓ **The ability to protect trade secrets on labels and in SDSs**
- ✓ **What type of substances are covered – what is a hazardous substance?**
- ✓ **Documents will look different, but chemicals the same**

# Hazard Communication Revisions

**Some terminology changes in the Standard, even when provisions did not change - the term "hazard determination" has been changed to "hazard classification"**

**GHS** Globally Harmonised System  
New Classification and Labelling of Chemicals

**Physical Hazards**

 Explosive  Flammable  Gases under pressure  Oxidising  Corrosive

**Health Hazards**

 Corrosive  Harmful / Irritant  Toxic  Health

**Environmental Hazards**

 Dangerous to the Environment

For more information visit:  
[www.hse.gov.uk/ghs](http://www.hse.gov.uk/ghs)  
[www.unece.org](http://www.unece.org)

The GHS pictograms above replace the following :





# Hazard Communication Revisions

- ✓ **Hazard Classification process is the biggest change**
- ✓ **Only employers who manufacture products/by-products are involved**
- ✓ **Like most recent standards the previous HCS was a performance-oriented approach**
  - **Provides parameters for the evaluation, but not specific, detailed criteria**

# Hazard Communication Revisions

## New Classification Process

- ✓ **Specific criteria for each health and physical hazard**
- ✓ **Detailed instructions for hazard evaluation and determinations**
- ✓ **Hazard classes and hazard categories**
  - **The classes are divided into categories that reflect the relative severity of the effect**

# Label Changes

- ✓ **Chemical manufacturers and importers must create harmonized labels**
  - ✓ **Signal word**
  - ✓ **Pictogram**
  - ✓ **Hazard statement**
  - ✓ **Precautionary statement**
- ✓ **For each hazard class and category**
- ✓ **Six months to update labels when new information becomes known**

# Label Changes

## Signal Words

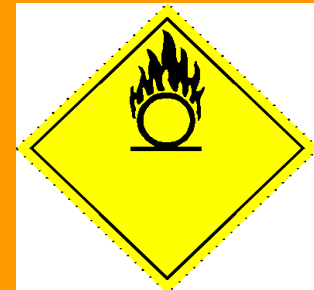
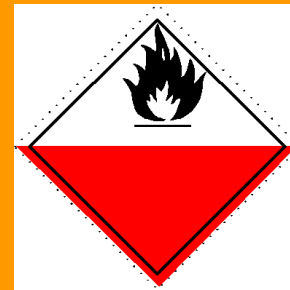
- ✓ **Signal word used to indicate the relative level of severity of hazard**
- ✓ **Alerts the reader to a potential hazard on the label.**
- ✓ **"Danger" is used for the more severe hazards, while "Warning" is used for less severe hazards.**
- ✓ **No more "Caution"**

# Label Changes

## Pictogram

- ✓ **Symbol plus other graphic elements (border, background pattern, or color) that**
- ✓ **Intended to convey specific information about the hazards of a chemical**
- ✓ **White background within a red square frame set on a point (i.e. a red diamond).**
- ✓ **Nine pictograms under the GHS - only eight pictograms are required under the HCS**

# Transport Pictograms





- **Carcinogen**
- **Mutagenicity**
- **Reproductive Toxicity**
- **Respiratory Sensitizer**
- **Target Organ Toxicity**
- **Aspiration Toxicity**

- **Flammables**
- **Pyrophorics**
- **Self-Heating**
- **Emits Flammable Gas**
- **Self-Reactives**
- **Organic Peroxides**

- **Irritant (skin and eye)**
- **Skin Sensitizer**
- **Acute Toxicity (harmful)**
- **Narcotic Effects**
- **Respiratory Tract Irritant**
- **Hazardous to Ozone Layer (Non Mandatory)**



**Gases under Pressure**



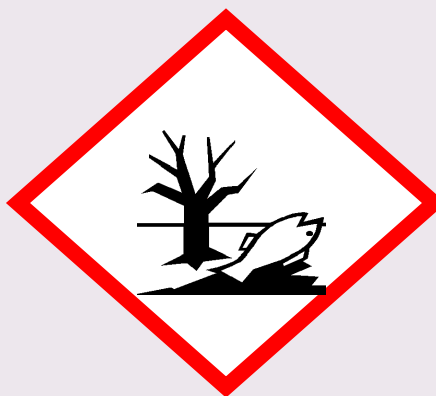
- **Skin Corrosion/ burns**
- **Eye Damage**
- **Corrosive to Metals**



- **Explosives**
- **Self-Reactives**
- **Organic Peroxides**



**Oxidizers**



- **Aquatic Toxicity**



- **Acute Toxicity (fatal or toxic)**



# Label Changes

## Hazard Statement

- ✓ **A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard**
- ✓ **Ex. – “fire or protection hazard”  
“fatal if inhaled”**

# Label Changes

## Precautionary Statement

- ✓ **A phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling of a hazardous chemical**

# Label Changes

## Precautionary Statement

**“Do not spray on open flame or other ignition source” (prevention)**

**“Wash contaminated clothing before reuse” (response)**

**“Protect from sunlight. Store in a well ventilated place” (storage)**

# Key Label Elements

**Product identifier**

**Supplier identifier**

**Chemical identity**

**Hazard pictograms\***

**Signal words\***

**Hazard statements\***

**Precautionary information**

**\*Harmonized**

# CHEMICAL X

## DANGER

### HAZARD STATEMENTS:

Fatal If swallowed.

Causes severe skin burns and eye damage.



### PRECAUTIONARY STATEMENTS:

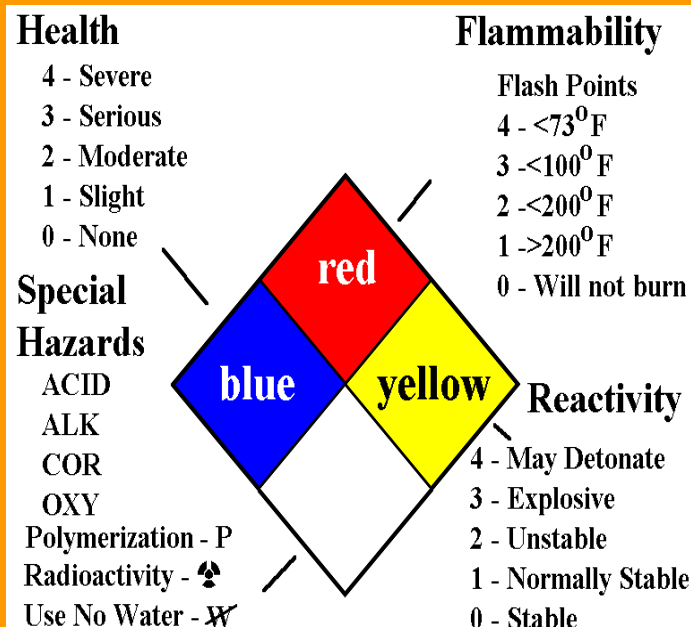
- Wear protective gloves.
- Wear face protection.
- Do not eat drink or smoke when using this product.
- Wash hands thoroughly after use.
- Store in a sealed container.
- **IF ON SKIN:** Rinse immediately with with cool water.
- **IF IN EYES:** Rinse thoroughly with water and seek medical attention.
- **IF SWALLOWED:** Do not induce vomiting. Seek medical attention.

Dispose of contents/container in accordance with local regulations.

Chemical X Manufacturing, 1234 Over There St., (123) 456-7890

**See the S.D.S for more information.**

# Label Changes



## What about NFPA and HMIS?

- ✓ **Alternative labeling systems are permitted for workplace containers**
- ✓ **The information supplied on these labels must be consistent with the revised HCS, e.g., no conflicting hazard warnings or pictograms**

(??)

# MSDS versus SDS

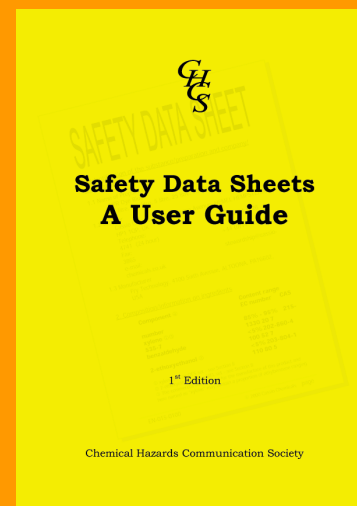
## MSDS

- **Has content requirements, but not format**



## SDS

- **Has content and format requirements (follows ANSI)**



# MSDS versus SDS

- **SDS Content (order counts!):**
  - ✓ **Identification**
  - ✓ **Hazard Identification**
  - ✓ **Composition**
  - ✓ **First Aid Measures**
  - ✓ **Firefighting measures**
  - ✓ **Accidental release measures**
  - ✓ **Handling and storage**
  - ✓ **Exposure controls/personal protection**



# MSDS versus SDS

- **SDS Content (continued):**
  - ✓ **Physical and chemical properties**
  - ✓ **Stability and reactivity**
  - ✓ **Toxicological information**
  - ✓ **Ecological information**
  - ✓ **Disposal considerations**
  - ✓ **Transport information**
  - ✓ **Regulatory information**
  - ✓ **Other information**

# What About Training?

- ✓ **Training should include:**
  - **Information on how to read labels and SDSs**
  - **How to respond safely to chemical hazards**
- ✓ **Major changes in training are just the revised elements of HCS**
- ✓ **Ongoing training can continue as usual**

# Label Changes and Training

**Since some products will soon (if not already) have GHS label/SDSs, it's important to time the new training for when they begin to proliferate but still making sure new shipments are understood by employees.**



# Miscellaneous Issues



## Threshold Limit Values (TLVs)

- ✓ **Retaining the requirement to include on the SDS**
- ✓ **Provides useful information to help assess the hazards**
- ✓ **OSHA PELs and other exposure limits are also required**

# Miscellaneous Issues

## What about Cancer?

**If a chemical is listed as a carcinogen by either International Agency for Research on Cancer (IARC) or National Toxicology Program (NTP), it must be noted on the SDS. Additionally, if OSHA finds a chemical to be a carcinogen, it must be noted on the SDS as well**



International Agency for  
Research on Cancer (IARC)



**NTP**  
National Toxicology Program  
U.S. Department of Health and Human Services

# Global Harmonization

## What about HNOC – Combustible Dust

- ✓ **No definition for combustible dust**
  - ✓ **Given ongoing activities in the specific rulemaking as well as in the United Nations Sub-Committee of Experts on the GHS (UN/SCEGHS).**
- ✓ **Combustible dust hazards must be addressed on labels and SDSs**
  - ✓ **Signal word “Warning”**
  - ✓ **Hazard statement “May form combustible dust concentrations in the air”**

# Ready References

## The Purple Book

- ✓ **Fairly comprehensive**
- ✓ **Published by UN – available at OSHA website**

**<http://www.osha.gov/dsg/hazcom/ghs.html>**



# Ready References

## OSHA Quick Cards

**SDS – Shows 16 section format with explanation for each**

**[http://www.osha.gov/Publications/HazComm\\_QuickCard\\_SafetyData.html](http://www.osha.gov/Publications/HazComm_QuickCard_SafetyData.html)**

**Labels – Shows sample label with hazard statements and pictograms**

**[http://www.osha.gov/Publications/HazComm\\_QuickCard\\_Labels.html](http://www.osha.gov/Publications/HazComm_QuickCard_Labels.html)**



# Ready References

## OSHA Quick Cards

**Pictograms - Shows each pictogram and what substances they are used to represent**

**[http://www.osha.gov/Publications/HazComm\\_QuickCard\\_Pictogram.html](http://www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html)**

**Coming soon from OSHA! – PowerPoint slides**

# What Else?

- ✓ **OSHA has to change other standards?**
- ✓ **Example – flammable liquids**
  - ✓ **OSHA – flash point <100°F**
  - ✓ **DOT/GHS – flash point <141°F**



# **Complying with the Revised OSHA Hazard Communication Rule**

**Questions??**

# Complying with the Revised OSHA Hazard Communication Rule



**Questions:**

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