

# New Hazard Communication Requirement

By Robert (Bob) Momany, COSS, CCI, CSS

## Introduction

In May of 2012, the Occupational Safety and Health Administration (OSHA) announced it was revising the Hazard Communication Standard (HCS). The revision aligns HCS with the United Nations' global chemical labeling system or Global Harmonization System (GHS). The alignment will prevent an estimated 43 deaths and prevent an estimated 585 injuries and illnesses annually according to OSHA.

In addition to the safety and health benefits with this revision there is also a financial benefit for businesses. This revision will result in an estimated \$475.2 million in enhanced productivity for U.S. businesses each year. In addition, it reduces trade barriers for those businesses that regularly trade, store and use hazardous chemicals.

## Discussion

So what does this revision mean for the majority of U.S. businesses that do not produce and manufacture hazardous chemicals but use them or keep them on-site as part of the operation of the business?

To maintain compliance under the revised standard, a business first should conduct an inventory of all on-site hazardous chemicals. This action is beneficial as businesses can identify items that may be in the workplace that do not contain proper labeling. It is also an opportunity to identify items no longer used in the workplace that the employer can dispose. OSHA recommends employers conduct the inventory routinely or on a scheduled basis to keep up to date on hazardous chemicals entering the business. This helps prevent unwanted material to accumulate.

Once the inventory is complete, label all un-labeled hazardous chemicals found. Under the new HCS, workplace labels are no longer performance oriented but are standardized. The standardization includes the label elements listed below.

### Signal words

Based on the GHS criteria, only two signal words, Danger and Warning, remain. GHS drops Caution. The signal word indicates the relative degree of severity of a hazard.

- o **Danger**, for the more severe hazards
- o **Warning**, for the less severe hazards

### Hazard statements

These are standard phrases assigned to a hazard class and category that describe the nature of the hazard. There is a single harmonized hazard statement for each level of hazard within each hazard class.

### Precautionary statements

Standardized precautionary statements describe recommended measures to minimize or prevent adverse effects resulting from exposure, improper handling or incorrect storage methods of a hazardous chemical. Example: Wear face protection. First aid is included in precautionary information.

### Pictograms

These convey health, physical and environmental hazard information, assigned to a GHS hazard class and category. The GHS designates eight pictograms to identify a hazard category. Manufacturers and producers are already producing updated labels. Businesses will need to contact the manufacturers and producers for updated labeling.

Along with labeling, a safety data sheet (SDS) must accompany all the material identified in the inventory. Under the revised standard, SDSs replace material safety data sheets (MSDSs). SDSs provide a standardized order of information whereas MSDSs provide a detailed reference source on a hazardous material, but do not specify a format or order of information.

**The new SDSs contain 16 headings.**

1. Identification
2. Hazard identification
3. Composition/information on ingredients
4. First aid measures
5. Firefighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information

**Of the 16 headings, OSHA will regulate 12. It will not regulate:**

- o Ecological information;
- o Disposal considerations;
- o Transport information;
- o Regulatory information.

Employers will need to update written Haz Com programs to reflect the changes in the work environment brought about by the new regulations. Written programs should include how the facility implemented the standard, contain a list of all chemicals, address non-routine tasks and discuss contractors' responsibilities.

Finally, don't forget about the training. Training will be necessary to ensure employees understand the new elements, particularly on the new pictograms and the standardized format of the SDSs. Employers must communicate these changes to the written program at this time.

There are four dates to be aware of when considering times employers need to comply with the new regulations.

- o **Dec. 1, 2013** - Covered employers must complete all training regarding the new label elements and SDS format. Employees will see the new style labels considerably earlier than the compliance date for labeling.
- o **June 1, 2015** - All other provisions to be in effect. NOTE: - If distributors are not passing along manufacturer labels, they MUST comply with the June 1, 2015, date for labels.
- o **Dec. 1, 2015** - Distributors who pass on manufacturer labels to customers shall ensure all labels are updated (these distributors have an extra six months.)
- o **June 1, 2016** - Employers will also be given an additional year to update their hazard communication programs or any other workplace signs, if applicable.

During the transition period, chemical manufacturers, importers, distributors and employers may comply with the provisions of the current HCS, the revised HCS or both.

### References

Review further information for workers, employers and downstream users of hazardous chemicals at OSHA's Hazard Communication Safety and Health topics at <http://www.osha.gov/dsg/hazcom/index.html>. This site includes links to OSHA's revised Hazard Communication Standard and guidance materials such as Q and As, OSHA fact sheet and Quick Cards.

### Author

Robert (Bob) Momany, COSS, CCI, CSS is the vice president of programs and services and a practicing occupational safety and health professional for the Safety Council of Northwest Ohio. The organization is a not-for-profit 501(c) 3 community based safety services agency. The Safety Council provides safety and regulatory compliance education, training and consultation to a wide variety of employers and industries. In his executive role, Momany oversees and manages agency services, programs and IT; conducting training, safety audits and consultations; assisting with day-to-day operations, sales, marketing and program development.

Momany's areas of expertise are in safety program development, safety management, safety consulting, safety training, regulatory compliance, safety auditing, accident investigation and remedial driver education. He completed the Harvard School of Public Health program for Management & Leadership Skills Training for Emerging Leaders in Environmental Health and Safety as well as its program in comprehensive industrial hygiene. Momany attained professional certificates in executive safety management, corporate safety management, safety leadership, safety management systems, and effective safety business practices. He's a graduate of the Ohio State & Toledo Regional Chamber of Commerce Leadership Academy.