

# OSHA Hazcom 2012 – June 1<sup>st</sup> has come. What's next?

A recap of the changes implemented as of June 1<sup>st</sup>.

How is OSHA viewing changes SDSs and labels?

What happens next?

# Some assumptions

- Everyone has a basic understanding of OSHA's revisions to the Hazard Communication Standard.
- You know what GHS is...

# Some things changed.. Others did not!

## HCS 1994

Hazard Determinations  
Labels (3 elements)  
MSDSs – any format  
Training required  
Written program  
Trade secrets allowed  
Formulators rely on  
supplier data sheets

## HCS 2012

Hazard Classifications  
Labels ( 6 elements)  
SDSs – 16 sections  
Training required  
Written program  
Trade secrets allowed  
Formulators responsible  
for data if substance known

# Some things changed a lot...

## HCS 1994

Performance standard

Floor of hazardous chemicals

One study rule

Standard mixture cut-offs (bright lines)

## HCS 2012

Specification standard

No floor of hazardous chemicals

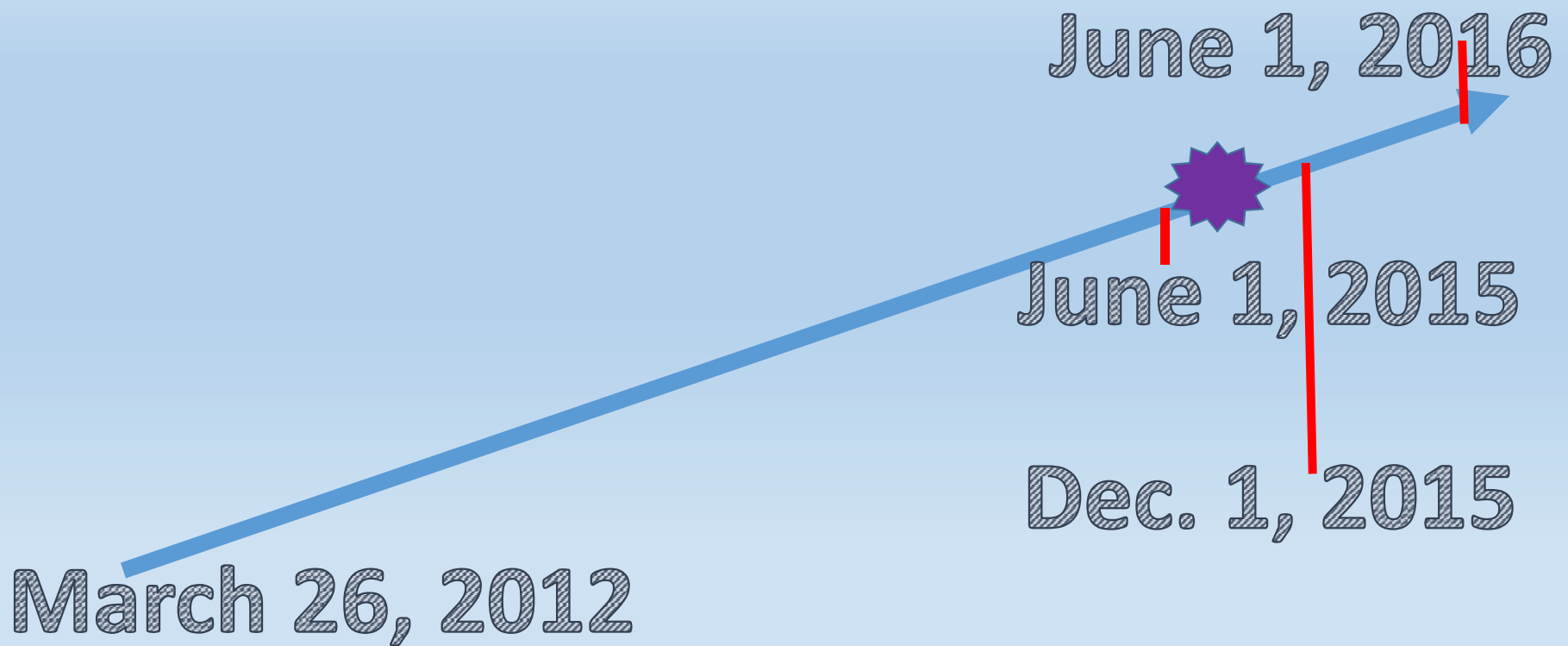
Weight of evidence

Each property calculated based on ingredients

# Where are we on the timeline?



# Where are we on the timeline?



# Let's look at what you need....

- Are you a chemical product producer?  
Then June 1, 2015 was your compliance date for SDSs and Labels.
- Do you use chemical products?  
Then June 1, 2016 is your compliance date for 'in-plant' labeling.



# Chemical product producers.....

- Calculate the new product classification....
  - Mixtures can take lots of work.
- Produce the SDS. (big job)
- Produce the label. (from the SDS)
- Launch the SDS and the Label at the same time.



# Some issues to consider....

- Under GHS, the TOXIC category is bigger.  
Oral LD<sub>50</sub> of 500 mg/kg now is 2000 mg/kg



- However, the number of irritants gets smaller.










1% of an irritant no longer defines an untested mixture as an irritant. It now takes 10% of an irritant to classify the mixture as an irritant.



# Chemical SDSs and Labels.....

- We now see symbols on both documents.\*

- \* Actual graphics not mandatory on SDSs...descriptor is okay

<b>Health Hazard</b>  <ul style="list-style-type: none"><li>■ Carcinogen</li><li>■ Mutagenicity</li><li>■ Reproductive Toxicity</li><li>■ Respiratory Sensitizer</li><li>■ Target Organ Toxicity</li><li>■ Aspiration Toxicity</li></ul>	<b>Flame</b>  <ul style="list-style-type: none"><li>■ Flammables</li><li>■ Pyrophorics</li><li>■ Self-Heating</li><li>■ Emits Flammable Gas</li><li>■ Self-Reactives</li><li>■ Organic Peroxides</li></ul>	<b>Exclamation Mark</b>  <ul style="list-style-type: none"><li>■ Irritant (skin and eye)</li><li>■ Skin Sensitizer</li><li>■ Acute Toxicity</li><li>■ Narcotic Effects</li><li>■ Respiratory Tract Irritant</li><li>■ Hazardous to Ozone Layer (Non-Mandatory)</li></ul>
<b>Gas Cylinder</b>  <ul style="list-style-type: none"><li>■ Gases Under Pressure</li></ul>	<b>Corrosion</b>  <ul style="list-style-type: none"><li>■ Skin Corrosion / Burns</li><li>■ Eye Damage</li><li>■ Corrosive to Metals</li></ul>	<b>Exploding Bomb</b>  <ul style="list-style-type: none"><li>■ Explosives</li><li>■ Self-Reactives</li><li>■ Organic Peroxides</li></ul>
<b>Flame Over Circle</b>  <ul style="list-style-type: none"><li>■ Oxidizers</li></ul>	<b>Environment (Non-Mandatory)</b>  <ul style="list-style-type: none"><li>■ Aquatic Toxicity</li></ul>	<b>Skull and Crossbones</b>  <ul style="list-style-type: none"><li>■ Acute Toxicity (fatal or toxic)</li></ul>

# So ask yourself these questions.

- Have I begun to receive SDSs and labels that comply with HCS 2012?
- Do my employees remember last year's training and know what they are seeing?
- Do I need new SDSs for my own formulations?
  - Have I produced and distributed them?
- If I need ingredient SDSs and haven't gotten them yet, what can I do?
- Document, document, document.





# Inspection by OSHA?

- No statistics yet for June.
- Doubtful that a massive inspection program started on June 1<sup>st</sup>.
- But you just might be on the cusp.... Someone always is..



The next deadline is December 1, 2015

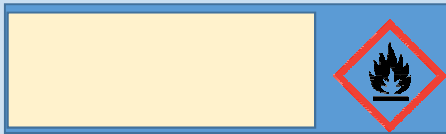
- Distributors
- They can no longer ship products that are not labeled in compliance with HCS-2012



The next BIG deadline is  
June 1, 2016

# Chemical product users

- Decide which system of labeling to use.
- GHS
- HMIS
- NFPA
- Something of your own design.....



# Labeling in the plant...

- Make sure that you have a current SDS for the material. (And make sure these are available to employees 24/7...)
- If it is an internal intermediate , it must still be evaluated for hazards.
- Labels should reference a list of chemicals present if not already on the vessel.
- If using NFPA, try to determine if it was based on a 'spill' or a 'fire'.. The ratings for 'health' can be very different..
- Remember that "corrosive" can be a health hazard or a physical hazard (corrosion to metal).
- Labels need to be durable and waterproof....

