



Provided By: ENVIRO-SAFETECH INC

### *New Hazcom Requirements*

## **GHS Changes are Official; Are You Preparing for Dec. 1 Training Deadline?**

Although it is not in finished Golden State form, the Globally Harmonized System of hazard communication officially became part of Cal/OSHA's regulations with the announcement that the "temporary" Horcher adoption has been approved by California's Office of Administrative Law.

The hazcom changes, which went into effect on May 6, include a requirement that employers train their workers on the new chemical labeling format and the revamped safety data sheets (SDSs). One safety trainer warns that many employers are not giving themselves enough time to comply with this requirement and could find themselves facing a daunting deadline.

The adoption revises Construction Safety Orders §§ 1529, 1532 and 1532.1; General Industry Safety Orders §§ 5189, 5190, 5191, 5192 and 5194, plus §§ 5194 and 5198 appendices A through G, §§ 5200, 5201, 5202, and Appendix A to §§520-5214, 5217, 5218 and 5220; and Ship Building, Repairing and Breaking Safety Orders §8358 and 8359.

The purpose portion of the revised hazcom standard, GISO §5194, is to "ensure that the hazards of all chemicals produced or imported are classified, and that information concerning the classified hazards is transmitted to employers and employees," the regulation states.

GHS is an international effort spearheaded by the United Nations to establish a common framework for hazcom. Employers are required to determine the hazards of the chemicals they produce or import and new hazard classifications provide specific criteria to address health and physical hazards, and classification of mixtures.


The Division of Occupational Safety and Health is considering comments from the regulated public on several other GHS issues and will recommend further changes down the line, but the main elements of GHS are now in place. The Cal/OSH Standards Board adopted the 78-page regulatory package on March 21, following a Nov. 15, 2012, public hearing.

Because it is a "Horcher" adoption, taking language directly from the federal final rule, OAL set the effective date as May 6.

Chemical manufacturers and importers must provide labels, including signal words, pictograms, a hazard statement and a precautionary statement for each hazard class and category.

In the California version, the following substances require hazard information, including warning signs and labels:

- 1,3-Butadiene
- Asbestos
- Cadmium
- Lead
- Chromium
- Methylenedianiline
- PSM Category 1 flammable gases
- Cotton dust
- Laboratory chemicals
- Hazardous waste
- Vinyl chloride
- Coke oven emissions

SAMPLE LABEL	
<p style="text-align: center;"><b>PRODUCT IDENTIFIER</b></p> <p>CODE _____ Product Name _____</p> <p style="text-align: center;"><b>SUPPLIER IDENTIFICATION</b></p> <p>Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____</p> <p style="text-align: center;"><b>PRECAUTIONARY STATEMENTS</b></p> <p>Keep container tightly closed. Store in cool, well ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measure against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors.</p>	<p style="text-align: center;"><b>HAZARD PICTOGRAMS</b></p>  <p style="text-align: center;"><b>SIGNAL WORD</b> Danger</p> <p style="text-align: center;"><b>HAZARD STATEMENT</b></p> <p>Highly flammable liquid and vapor. May cause liver and kidney damage.</p> <p style="text-align: center;"><b>SUPPLEMENTAL INFORMATION</b></p> <p>Directions for use _____ _____</p> <p>Fill weight: _____ Lot Number _____</p> <p>Gross weight: _____ Fill Date: _____</p> <p>Expiration Date: _____</p>

- 1,2-Dibromo-3-chloropropane
- Acrylonitrile
- Inorganic arsenic
- Formaldehyde
- Benzene
- Ethylene oxide

Under the rule, chemical manufacturers and importers must determine the hazards of the chemicals they produce or import, classify the hazards and provide compliant labels.

Wear Protective gloves.  
Do not eat, drink or smoke when using the product.  
Wash hands thoroughly after handling.  
Dispose of in accordance with local, regional, national, international regulations as specified.  
**In Case of fire:** use dry chemical (BC) or Carbon dioxide (CO<sub>2</sub>) fire extinguisher to extinguish.  
**First Aid**  
If exposed call Poison Center.  
If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.

Manufacturers, importers and distributors must comply with all new provisions of the California hazcom standard, GISO §5194, by June 1, 2015.

But by Dec. 1, 2013, employers must train their workers on the new label elements and safety data sheet (formerly material safety data sheet) format. Fed-OSHA says this training is essential because “workers are already beginning to see the new labels and SDSs on the chemicals in their workplaces. The new labeling elements include:

**Product identifiers**, describing the hazardous chemical, including the chemical name, code number or batch number.

**Signal words**, indicating of the relative severity of the hazard. GHS has two signal words, “danger” and “warning,” the former used for more severe hazards. A label may contain only one of the two signal words.

**Pictograms**, denoting the nature of the hazard, such as fire, explosion, corrosion or environmental.

**Hazard statements**, describing the nature and degree of the hazard. All the applicable hazard statements must appear on the label.

**Precautionary statements**, including measures recommended to minimize or prevent adverse effects.

**Name, address and phone number** of the chemical manufacturer, distributor or importer.

In addition to training on the new label elements, employers also must explain how employees might use them in the workplace, such as ensuring proper storage of hazardous chemicals, first aid information or how the label elements work together. Employees also must be trained on the new 16-section format of SDSs and how the information contained on them relates to the labels.

The SDS format includes:

**Mandatory:**

Product identifier

Hazard(s) identification

Composition/information on ingredients

First-aid measures

Firefighting measures

Accidental release measures

Handling and storage

Exposure controls and personal protection

Physical and chemical properties

Stability and reactivity

Toxicological information

Other information, such as when the SDS was prepared, when the last revision made or where changes have been made to the previous version.

**Non-mandatory:**

Ecological information

Disposal considerations

Transport information

Regulatory information

Jay Jamali, environmental, safety and health director for San Jose's Enviro Safetech, says he recommends that employers transition to the new labels and train workers as soon as possible. Workers who see the new pictograms for the first time can be "thrown for a loop" and the "supercharged" data sheets require considerable training.

"Set up a hard date, draw a line in the sand and say, 'At this point this is what we're going to do,'" Jamali suggests. Employers might see the Dec. 1 deadline and think it's "way out there," choosing to deal with more pressing matters. That could be a mistake, Jamali says.

"Do you want to shut down your company for a number of days to get this done?" he asks, recommending employers conduct a "pilot class" to learn from, then hold training sessions. If you plan to use a third party for training, remember that going through the approval and purchasing process can take a month or more. "Your drop-dead date is about 90 days before the Dec. 1 deadline," Jamali says.

To see a complete copy of Cal/OSHA's "part one" of the GHS adoption, [click here](#).



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