

# *TerranearPMC Safety Share*

## **Week of May 28, 2012 – Haz Com 2012 and Labels**

Earlier this year, on March 26, OSHA announced that it would revise the hazard communication standard so that it would conform with the United Nations Globally Harmonized System for Classification and Labeling of Chemicals; known as GHS. Included with OSHA's announcement was that the effective date would be within 60 days; thus compliance began last Friday, on May 25, 2012. This does not mean we need to go into panic mode and frantically start changing things in the belief that we are out of compliance with one of OSHA's most cited regulations (the fact is, the number of violations due to non-compliance with the hazard communications standard consistently ranks in the top 3 every year). OSHA has set a reasonable timetable in which the various elements that require modifications can be addressed. These revisions include: changing labels on containers (during shipping and in the work place), a formalized method to classify hazardous chemicals and a standardized format for Safety Data Sheets (formally known as Material Safety Data Sheets). With all these changes, OSHA has included the requirement that all employees will need to be trained. The deadline for training requirements has been established for December 1, 2013.

Ever since the hazard communications standard was first introduced back in 1983, labels on hazardous chemical containers have been required. However, the information that was presented on labels was not consistent. Therefore, a company could have three containers of the same material, say acetone, that were supplied by three different manufacturers. Yet, the labels could be so different that workers could easily mistake the three containers to have three different materials. This is because information presented on labels has not been standardized. In addition, international trade (importing/exporting) increases this confusion for label identification as different countries present hazards differently than in the U.S. Therefore, by standardizing container labels, a certain amount of confusion should be removed.

The revised Hazard Communication standard, unofficially referred to as "Haz Com 2012" is designed to reduce this confusion for labels. Pictograms shall now be required. While internationally, GHS has recognized nine different standardized pictures, OSHA has determined that eight of these pictograms shall be required. The ninth symbol is a picture of a barren tree and a fish floating upside-down, indicating environmental toxicity. Because environmental issues in the U.S. fall under the jurisdiction of the EPA, OSHA does not have any authority to regulate concerns within this area and therefore cannot demand compliance (nevertheless, it is believed that the EPA may adopt this symbol and therefore, may be required for packaging in the future).

The eight pictograms that shall be required are:

1. A flame – flammables, self-reactives, pyrophorics, self-heating, emits flammable gas, organic peroxides
2. A flame over a circle – oxidizer
3. Gas cylinder – gases under pressure

4. Test tubes pouring material – corrosives
5. Skull and crossbones – acute toxicity
6. Human chest – carcinogen, respiratory toxicity, target organ toxicity, mutagenicity, aspiration toxicity
7. Exploding bomb – explosives, self reactives, organic peroxides
8. Exclamation point – irritant, dermal sensitizer, acute toxicity, narcotic effects, respiratory tract, irritation

Notice that there are a number of duplicate hazards associated with different pictograms. GHS specifies a decision path, referred to as the building block approach, which will determine the appropriate pictogram to use. Such decisions will be based upon the target audience (or end users) as well as the purpose of the label (transportation, workplace, consumer, agriculture – referred to as “sectors”). All pictograms must be diamond shaped, with a red border, set within a white background.

In addition to pictograms, OSHA will require the *Signal Words*, “Danger” or “Warning” to be placed on labels, signifying the level of severity. A Hazard Statement shall also be required. These statements are standardized (like the pictograms) and are presented in the revised Haz Com Standard appendices. Examples of hazard statements include “unstable explosive,” and “causes damage to organs (specific organ(s) must be named) through prolonged or repeated exposure (state route of exposure, if no other routes of exposure cause the hazard).”

Another mandatory inclusion of labels is *Precautionary Statements*. Such statements may be “keep container tightly closed,” or “use in a well ventilated area.” Precautionary statements are designed to address four separate scenarios: prevention, response, storage and disposal. If the manufacturer, importer or responsible party can demonstrate that a precautionary statement is inappropriate to a specific substance (or mixture), the precautionary statement may be omitted from the label.

Labels will be required to have the identification information of the supplier, indicating their name, address and telephone number. While all this information is mandatory, a specific design as to where all this information needs to appear on a label is not specified.

Providing labels shall be the responsibility of the manufacturer, importer and distributor. However, it will be the employer’s responsibility to ensure all containers (of hazardous chemicals) within all work areas are properly labeled. While the current labeling system may still be used, by June 15, 2015, compliance per GHS provisions must be met. By December 1, 2015, it will be illegal for distributors to ship containers (labeled by the manufacturer and/or importer) that do not meet GHS requirements.

**You gain strength, courage and confidence by every  
experience in which you really stop to look fear in the face -**

Eleanor Roosevelt.