

# TerranearPMC Safety Share

## Week of November 9, 2015 – HAZCOM Labels and Pictograms

In 2012, OSHA promulgated its revised Hazard communication standard, HAZCOM 2012. Sometimes referred to as the “Worker-Right-to-Know,” law, Hazard Communication, or HAZCOM, requires employers to properly label containers that store hazardous materials, while ensuring all employees are trained and have Safety Data Sheets (SDS), as well as the employer having a written program. The purpose for OSHA’s revision is to ensure information of hazardous materials is appropriately communicated to all persons that may handle a specific chemical and thus ensure they understand the hazards and properly handle the contents – whether in the United States or any other country. Hence the new HAZCOM standard is often referred to as the Globally Harmonized System.

While the new HAZCOM standard became law in 2012, OSHA realized the potential confusion that would occur if rules and regulations were instantly changed overnight. Therefore, OSHA established a transition period, whereby various elements were instituted gradually. Below is a brief description of the numerous deadlines for meeting compliance with the new HAZCOM 2012 standard.

**December 1, 2013** — This was the date by which employers need to train employees on how to read SDSs and labels in the GHS format. OSHA has this as the first deadline because it believes employers will be seeing GHS formatted labels and safety data sheets in their facilities sooner rather than later, and it’s important that employees be comfortable with the new formats, even if their companies are not yet fully compliant.

**June 1, 2015** — This is the date by which manufacturers and importers must reclassify their chemicals and produce/update GHS formatted labels and safety data sheets.

**December 1, 2015** — Distributors actually get a little special dispensation—they have until this date to get rid of old inventory with old labels. Effectively, they can continue using the pre-GHS labeling system until December 1.








**June 1, 2016** — The final deadline, this is the date by which employers must be in full compliance with GHS. That means making any necessary updates to their hazard communication programs, training employees on new hazards identified in during the reclassification process, updating workplace labels, and anything else required by HazCom 2012.

This means that this past June, manufactures and distributors needed to stop producing old lables and MSDS and update these items to meet the new format. All SDSs need to have 16 sections (the last four are NOT worker S&H related) and thus present important information about the specific chemical in a consistent manner. By December 1, old labels and MSDSs need to be removed we should be receiving new materials with the appropriate labels and SDSs. By next year, June 1, 2016, all employers, manufacturers and distributors need to be in full compliance.





And now for a little entertainment. This is a fun way to understand what the new OSHA-designated pictograms mean. They will be on container labels and SDSs. The answer key is at the bottom of the last page.

## Match the pictogram to the right message

HAZ Com Pictogram	Pictogram Information
<p>1</p> 	<p><b>A</b> Carcinogen, Mutagenicity, Reproductive Toxicity, Respiratory Sensitizer, Target Organ Toxicity, Aspiration Toxicity,</p>
<p>2</p> 	<p><b>B</b> Gases under pressure</p>
<p>3</p> 	<p><b>C</b> Aquatic Toxicity</p>
<p>4</p> 	<p><b>D</b> Irritant (skin and eye), Skin Sensitizer, Acute Toxicity (harmful), Narcotic Effects, Respiratory Tract Irritant, Hazardous to Ozone Layer (Non-Mandatory)</p>
<p>5</p> 	<p><b>E</b> Flammables, Pyrophorics, Self-Heating, Emits Flammable Gas, Self-Reactives, Organic Peroxides</p>
<p>6</p> 	<p><b>F</b> Oxidizers</p>
<p>7</p> 	<p><b>G</b> Skin Corrosion/Burns, Eye Damage, Corrosive to Metals</p>



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 8	<b>H</b> Acute Toxicity (fatal or toxic)
 9	<b>I</b> Explosives, Self-Reactives, Organic Peroxides

## Bonus Questions!

1. Which pictogram is not mandatory to comply with **OSHA** regulations?
2. Which pictogram can designate toxicity, skin corrosivity, and respiratory irritant but at a lower severity than other materials which are required to have more specific pictograms?

**When I look back on all these worries, I remember the story of the old man who said on his deathbed that he had had a lot of trouble in his life, most of which had never happened - Winston Churchill**

## Answer Key:

**1 – F (Flame Over Circle), 2—E (Flame), 3-I (Exploding Bomb), 4-H (Skull and Crossbones), 5-G (Corrosion), 6-B (Gas Cylinder), 7-A (Health Hazard), 8-C (Environment), 9-D (Exclamation Mark)**

**Bonus Questions: #1 – Pictogram #8 (Aquatic Toxicity- not an OSHA requirement, but mandatory per EPA documents); #2 Pictogram #9 (Exclamation Mark)**

