

New Requirements for Chemical Handling

June 1, 2016

In 2012, the OSHA Hazard Communication Standard (HCS) aligned with the international Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. The new standard covers 43 million workers in 5 million workplaces across the country and is expected to prevent over 500 workplace injuries and illnesses and 43 fatalities annually. Fewer data sheets, updated labels, simpler training and improve productivity is projected to save American businesses \$475 million annually. Changes include new:

- Chemical hazard classifications
- Labeling of chemicals
- Safety Data Sheets (SDS) which are replacing Material Safety Data Sheets (MSDS)
- Employee training

Health Hazard  • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	Flame  • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	Exclamation Mark  • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  • Gases Under Pressure	Corrosion  • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals	Exploding Bomb  • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle  • Oxidizers	Environment (Non-Mandatory)  • Aquatic Toxicity	Skull and Crossbones  • Acute Toxicity (fatal or toxic)

What is the June 2016 GHS Timetable?

Because the GHS alignment a transition timetable is established:

- **December 1, 2013** – employees who use, handle, or store chemicals trained on the new label elements and SDS format.
- **June 1, 2015** – chemical manufacturers and distributors must provide customers updated SDS and GHS labels on containers. There was a December 1, 2015 grace period for shipping existing inventory with older labels.
- **June 1, 2016** – all employers must be in full compliance with GHS. This includes having updated their written workplace hazard communication program to incorporate the new GHS requirements. Training of employees on their new workplace GHS/HCS program must be completed.

June 2016 GHS Timetable – What Needs to be Done?

There are six steps for being in compliance.

1. Identify Responsible Staff

Assign responsibility for implementation of GHS/HCS activities such as reviewing and maintaining SDS's (centralize this task), labeling secondary containers (school lead custodians), etc.

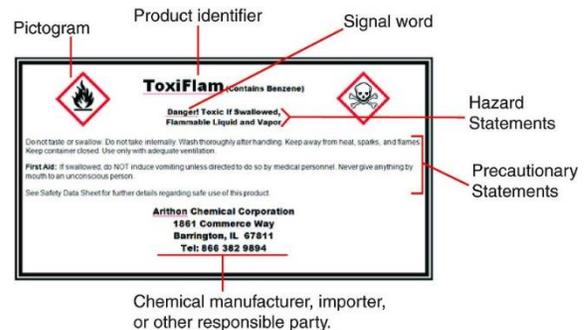
2. Implement a Written GHS/Hazard Communication Program

All workplaces must have a written GHS/HCS plan, except for laboratories and work operations where employees only handle chemicals in sealed containers.

3. Ensure ALL Containers are Labeled

Chemicals will arrive at your facility in containers having **GHS labels**. Your chemical supplier may also provide you GHS-compliant labels for secondary container such as those on custodial cleaning carts. Rolls of labels are also available for purchase.

New labels must contain a statement describing the product and its hazards, a pictogram identifying the type of hazard, the signal word “Danger” or “Warning”, supplier information and a precautionary statement on how to protect yourself.



4. Maintain Safety Data Sheets (SDSs)

You must have readily available safety data sheets for every hazardous chemical in your workplace. Have copies in binders placed around the workplace is one example or train employees on how to access them online.

5. Inform and Train Employees

Initial training was required December 31, 2013. Provide all new employees with the same training. Focus training on interpreting pictograms, how to read labels hazard warnings, signal words, precautionary statements and SDS.

6. Evaluate Your Program

Periodically review the written hazard communication program if there are changes in the workplace, new chemicals are introduced or any other changes that might result in exposure to chemical hazards. Your hazard communication program must remain current and applicable.

Need Help Complying?

Contact your Worker’s Compensation loss prevention services provider, Caitlin Morgan Insurance Services or Mike Reed, Reed Environmental, Inc. directly at [765.447.4446](tel:765.447.4446) / 800.866.8084 or via email at mike@reedenvironmental.com.

Available resources include a GHS/HCS written policy document, OSHA GHS Safety Data Sheet Quick Card, OSHA GHS Pictogram Quick Card, GHS/HSC employee training program, training agenda sheet and an attendance sign-in form. On-site training is also available.