

Checklist for compliance



■ By Louisa Mayers

➤ In 1983, OSHA enacted the Hazard Communication Standard to ensure the hazards of all chemicals produced or imported are classified and information on the classified hazards is communicated to employers and their employees through a comprehensive hazard communication program, container labeling, material safety data sheets and employee training.

The United Nations Globally Harmonized System for the classification and labeling of chemicals provides a specific set of criteria to standardize the classification and labeling of chemicals worldwide according to their health and physical hazards.

OSHA's final rule to align with the UN GHS took effect on May 25, 2012. With the final rule, OSHA modified the HCS to improve the overall safety and health of workers through more effective and standardized communications on hazardous chemicals in the workplace. Under the revised HCS, chemical manufacturers and importers are to provide labels that include an applicable GHS signal word, pictograms, as well as hazard and precautionary statements for each hazard class and category. The United States Safety Data Sheet (formerly known as the MSDS) must now follow a specified 16-section format.

The importance of OSHA HCS 2012.

Employee training

OSHA HCS 2012 requires employers to train their employees on the new GHS label elements and SDS format by Dec. 1, 2013. This training applies to all employees and chemical users in the U.S. workplace, including wholesalers, distributors and manufacturers whose employees may be exposed to chemicals posing a physical or health hazard.

Under OSHA HCS 2012, chemical manufacturers and importers must label their chemical containers with the applicable GHS elements. In turn, employers must convey these GHS elements on the workplace label for each hazardous chemical. These GHS elements include:

■ **Signal word:** The term "Danger" or "Warning" indicates the severity of the hazard.

■ **GHS pictograms:** Pictograms convey the health, physical and environmental hazard information assigned to a specified GHS hazard class and category.

■ **Hazard statements:** Describe the nature and degree of the stated hazard.

■ **Precautionary statements:** Describe measures to minimize or prevent the effects from exposure or improper storage of the hazardous chemical.

■ **Safety data sheets:** The revised HCS requires manufacturer SDSs follow a uniform format, including section number and associated information.

Since May 2012, an increasing number of chemical manufacturers and distributors have started shipping new product labels and SDSs that conform to the revised HCS. As such, employers have several examples available to incorporate into their existing hazardous chemical training programs. Chemical users should feel free to ask questions on the GHS label elements and SDSs to ensure their comprehension and understanding.

Compliance checklist

Employers must ensure the most current supplier SDS for each chemical product used in the workplace is available to their employees and chemical users. Do not presume chemicals previously considered "non-hazardous" by the manufacturer remain so under OSHA HCS 2012.

Use the following checklist to help comply with the final rule:

■ **Audit** your chemicals. Conduct a physical audit of all chemicals in the workplace.

■ **Confirm** the use of workplace labels. As you conduct your inventory, ensure all are labeled.

■ **Obtain** updated supplier MSDSs. Contact the manufacturer for an updated MSDS for each chemical in the workplace.

■ **Distribute** your supplier MSDSs. Ensure your chemical users have free, unlimited access to manufacturer MSDSs.

■ **Train** your employees. Update your existing hazardous chemical training program to include the GHS data elements and format of the SDS.

The underlying purpose of OSHA HCS 2012 is to reduce the incidence of injuries and illnesses. Giving your workers a better understanding of chemical hazards within the workplace will help reduce risks due to chemical exposure.

Part 2 next month: OSHA HCS 2012 compliance for U.S.-based manufacturers of articles and specialty chemicals. ☞

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