Toolbox Talk

HAZARD COMMUNICATION STANDARD CHANGES

According to the Bureau of Labor Statistics, exposure to chemicals was the source of 12,640 injuries in private industry in 2011. The median number of days away from work due to these types of injuries was three days. With statistics like this, it’s no surprise that the Occupational Safety and Health Administration (OSHA) listed their Hazardous Communication Standard (29 CFR 1910.1200) as the third most frequently cited standard in 2012.

OSHA’s Hazard Communication Standard (HCS) assures that information about the chemicals and their associated hazards in the workplace are readily available and easy to understand. Additionally, the HCS provides employers with the information necessary to establish programs to effectively protect employees from the hazardous chemicals that they may be exposed to.

The standard requires chemical manufacturers and importers to evaluate the hazards of the chemicals they produce/import, and provide information about them to downstream customers through labels and Safety Data Sheets (SDSs, formerly known as MSDSs). Every employer that uses hazardous chemicals in the workplace is required to prepare and implement a written hazard communication program, ensure that all containers are appropriately labeled and stored, ensure that employees have access to SDSs, and an effective training program is created for all potentially exposed employees.

In 2012, OSHA published changes to the HCS. The changes incorporate the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS) requirements for chemicals.

What is the Globally Harmonized System?

The Globally Harmonized System (GHS) is an internationally recognized approach to hazard communication. Hazard communication experts from around the world created criteria for the classification of chemicals and a standardized approach to label elements and safety data sheets. Classification criteria for health and physical hazards of chemicals will be harmonized and recognizable internationally along with appropriate signal words, pictograms, and hazard and precautionary statements to convey hazards to users (environmental hazards are regulated by EPA).

Major Changes to the Hazard Communication Standard (paragraph d)

1. **Hazard Classification**: Provides specific criteria for classification and severity of health and physical hazards, in addition to classification of mixtures.
2. **Labels**: Manufacturers and importers of chemicals will be required to provide a label that includes a signal word, pictogram, hazard statement(s), precautionary statements, and the name/address/phone number of the manufacturer or responsible party.
3. **Safety Data Sheets (SDSs)**: (formerly known as MSDSs), will now require the use of a 16-section format, which specifies the order of the information and the content of each section.
4. **Information and Training**: Employers are required to train workers by December 1, 2013 on the new label elements and Safety Data Sheet format to facilitate recognition and understanding.
What does this mean for you?

If you have the potential of exposure to chemicals at work, your employer must provide training and meet other requirements of the HCS. The following are some ways you can protect yourself at work.

When in doubt, consult the Safety Data Sheet:
Don’t use chemicals you are unfamiliar with unless first consulting the SDS. They contain detailed information on proper use, labeling, storage, exposure and explanations of any necessary personal protection or first aid measures. The SDSs will be even easier to navigate as they will have consistent sections.

Read container labels:
Your employer must ensure that all containers with liquids, paints, adhesives, or any other hazardous substances are appropriately labeled to ensure protection. You may think it’s not important to label a spray bottle with water inside, but labeling all secondary containers is very important. If an unassuming person happens upon a bottle they think is filled with water, but instead it is filled with another clear chemical that could be hazardous, they may use it in an unsafe manner and be put in danger.

Never assume:
As a result of the changes in the HCS, some chemicals will be reclassified and could potentially be classified as hazardous, even if they weren’t previously. There is also the introduction of the “hazard not otherwise classified” (HNOC). This classification alerts you to the fact that the chemical poses some adverse effect identified through scientific research, however it falls below the concentration level for the applicable hazard class, or it is under a GHS category that has not yet been adopted by OSHA.

Know the signs:
With the introduction of pictograms, it’s easier for you to understand, at a glance, hazards you may face when working with a chemical. Employers must provide training on the meanings of pictograms.

See the attached document that gives details on pictograms, effective dates, and labels.

For additional information, go to: http://www.osha.gov/hazcom

Safety Recommendations:

____________________________________________________________________________________

Job Specific Topics:

____________________________________________________________________________________

Attended By:

____________________________________________________________________________________
HAZARD COMMUNICATION STANDARD CHANGES

HCS Pictograms and Hazards

<table>
<thead>
<tr>
<th>Health Hazard</th>
<th>Flame</th>
<th>Exclamation Mark</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Carcinogen</td>
<td>• Flammables</td>
<td>• Irritant (skin and eye)</td>
</tr>
<tr>
<td>• Mutagenicity</td>
<td>• Pyrophorics</td>
<td>• Skin Sensitizer</td>
</tr>
<tr>
<td>• Reproductive Toxicity</td>
<td>• Self-Heating</td>
<td>• Acute Toxicity (lunar)</td>
</tr>
<tr>
<td>• Respiratory Sensitizer</td>
<td>• Explosives</td>
<td>• Narcotic Effects</td>
</tr>
<tr>
<td>• Target Organ Toxicity</td>
<td>• Skin Damage</td>
<td>• Respiratory Tract Irritant</td>
</tr>
<tr>
<td>• Aspiration Toxicity</td>
<td>• Corrosive to Metals</td>
<td>• Hazardous to Ozone Layer (Non-Mandatory)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Gas Cylinder</th>
<th>Corrosion</th>
<th>Exploding Bomb</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Gases Under Pressure</td>
<td>• Skin Corrosion/Burns</td>
<td>• Explosives</td>
</tr>
<tr>
<td></td>
<td>• Eye Damage</td>
<td>• Self-Reactive</td>
</tr>
<tr>
<td></td>
<td>• Corrosive to Metals</td>
<td>• Organic Peroxides</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Flame Over Circle</th>
<th>Environment (Non-Mandatory)</th>
<th>Skull and Crossbones</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Oxidizers</td>
<td>• Aquatic Toxicity</td>
<td>• Acute Toxicity (fatal or toxic)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Effective Completion Date</th>
<th>Requirement(s)</th>
<th>Who</th>
</tr>
</thead>
<tbody>
<tr>
<td>December 1, 2013</td>
<td>Train employees on the new label elements and safety data sheet (SDS) format.</td>
<td>Employers</td>
</tr>
<tr>
<td>June 1, 2015</td>
<td>Compliance with all modified provisions of this final rule, except:</td>
<td>Chemical manufacturers, importers, distributors and employers</td>
</tr>
<tr>
<td>December 1, 2015</td>
<td>The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label</td>
<td></td>
</tr>
<tr>
<td>June 1, 2016</td>
<td>Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.</td>
<td>Employers</td>
</tr>
<tr>
<td>Transition Period to the effective completion dates noted above</td>
<td>May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both</td>
<td>Chemical manufacturers, importers, distributors, and employers</td>
</tr>
</tbody>
</table>

Sample Label

Paint (METHYL FLAMMALINE, LEAD CHROMIUM)

DANGER
Causes damage to the liver and kidneys through prolonged or repeated exposure to the skin. Keep away from food and drink. Wash hands thoroughly after use and before eating. Highly flammable liquid and vapour. Keep away from heat and ignition sources.

FIRST AID
Call emergency medical care. Wash affected area of body thoroughly with soap and fresh water.
Oxydol Chemicals, Rochester, NY 14610 585-456-7990

Pictograms
• Conveys specific information about the hazard(s) of a chemical

Product Identifier
• Chemical name or number to identify the chemical

Signal Word
• Alerts level of severity of hazard

Hazard Statement
• Describes the nature of hazard(s) associated with a chemical

Precautionary Statement
• Recommended measures to take to prevent adverse effects

First Aid Statement
• Emergency care information

Supplier Information
• Name, address and telephone number of the chemical manufacturer, importer or other responsible party
Under the Occupational Safety and Health Act, employers are responsible for providing a safe and healthy workplace and workers have rights. OSHA can help answer questions or concerns from employers and workers. OSHA’s On-site Consultation Program offers free and confidential advice to small and medium-sized businesses, with priority given to high-hazard worksites. For more information, contact your regional or area OSHA office, call 1-800-321-OSHA (6742), or visit www.osha.gov.

Through the OSHA and Airline Group Safety Panel Alliance, the Airline Ground Safety Panel developed this toolbox talk for informational purposes only. It does not necessarily reflect the official views of OSHA or the U.S. Department of Labor.