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# KSU Facilities Safety Bulletin

# Hazard Communication Standard

The <u>Hazard Communication Standard</u> (HCS), also known as the "Right-to-Know Law", was enacted on November 25, 1983, by the Occupational Safety and Health Administration (OSHA). Minor technical amendments and changes were made in 1987-1989 and 1994.

On March 26, 2012, OSHA adopted portions of the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS), Revision 3 into the HCS with an effective date of 60 days thereafter (May 25, 2012) and a four-year transition period.

The revised HCS provides harmonized criteria for classifying chemicals and requires specific label elements on shipped containers and mandatory 16-section standardized <u>safety data sheets</u> (SDSs). Prior to this revision, information was conveyed on labels and material safety data sheets (MSDSs) in whatever formats the supplier chose. For more information on the GHS alignment, please refer to <u>A Closer Look at GHS</u>.

The purpose of the HCS has remained the same since it was first enacted-to ensure that the hazards of all hazardous chemicals imported, produced or used in U.S. workplaces are evaluated and that the information is transmitted to affected employers and potentially exposed employees. This transfer of information is to be accomplished by means of a comprehensive hazard communication program that includes container labeling and other forms of warning, Safety Data Sheets (SDS) and employee training.

# **Categories of the Hazard Communication Standard**

The HCS contains six major categories: Hazard Classification, Written Hazard Communication Program, Labels and other Forms of Warning, Safety Data Sheets, Employee Information and Training and Trade Secrets.

#### **Hazard Classification**

The first category, Hazard Classification (29 Code of Federal Regulations (CFR) 1910.1200 (d)) requires chemical manufacturers and importers to evaluate the chemicals produced in their workplaces or imported by them to determine the hazard classes, and, where appropriate, the category of each class. Mandatory classification considerations are given in 29 CFR 1910.1200 Appendix A (Health Hazard Criteria) and Appendix B (Physical Criteria).

Chemicals exempt from the standard include: wood and wood products (except wood dust), regulated hazardous waste, tobacco products, food, drugs, cosmetics, alcoholic beverages, agricultural or vegetable seed treated with pesticides, various types of pesticides, nuisance particulate and articles. These are exempt because they are all regulated by separate government agencies.

### Written Hazard Communicating Program

The second category is the Written Hazard Communication Program (29 CFR 1910.1200(e)). It requires employers to fully document the actions taken to comply with all of the provisions of the HCS and to list the responsible person(s) for each area of the program. A copy of the written program must be made available, upon request, to all employees and OSHA officials.

#### Labels and other Forms of Warning

The third category, Labels and other Forms of Warning (29 CFR 1910.1200(f)), requires chemical manufacturers, importers or distributors to ensure that each container of hazardous chemicals leaving their workplace is labeled, tagged or marked with the following six elements:

1. Product Identifier - name or number used for a hazardous chemical on a label or SDS and a unique means to identify the chemical.

**2. Pictogram** - symbol plus other graphic elements to convey specific hazard information. There are nine <u>pictograms under GHS</u>. The HCS requires eight of the nine - environmental hazards are not governed by OSHA.

**3. Signal Word** is used to indicate the relative level of severity of hazard. DANGER is used for the more severe hazards and WARNING is used for less severe hazards.

4. Hazard Statement - describes the nature and degree of the hazard(s).

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**5. Precautionary Statement** - phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure or improper storage or handling.

**6. Supplier Information** - name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

The signal word, hazard statement(s), and pictogram(s) must be grouped together on the shipped container label and NOT separated on the container or outside packaging.

With this revision to the HCS, OSHA is continuing to give employers the flexibility to determine what types of workplace labels they will use. Employers have the ability to choose to label workplace containers either with the same label information that the chemical manufacturer or importer used on the shipped containers or with alternate labels that meet the requirements of the standard.

Each shipped container and workplace label must be prominently displayed in English, however other languages may also be included if appropriate for your workplace.

#### Safety Data Sheets

The fourth category, Safety Data Sheets (SDSs) (29 CFR 1910.1200(g)) requires that chemical manufacturers, importers or distributors provide SDSs for each hazardous chemical to downstream users to communicate information on the hazards. All of the information on the SDS must be in English and be available to employees working with or near the hazardous chemical. SDSs are now presented in a consistent user-friendly, 16-section format.

Sections 1 through 8 of the SDS contain general information about the chemical, identification, hazards, composition, safe handling practices, and emergency control measures. Sections 9 through 11 and 16 contain other technical and scientific information, such as physical and chemical properties, stability and reactivity information, toxicological information, exposure control information, and other information including the date of preparation or last revision. To be consistent with the GHS, the SDS must also contain Sections 12 through 15 - ecological information, disposal considerations, transport information and other regulatory information. OSHA does not enforce the content of these sections because they fall outside of its' jurisdiction. A description of all 16 sections of the SDS, along with their contents, is given below:

1. Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restriction on use.

2. Hazard Identification includes all hazards regarding the chemical; required label elements.

3. Composition information on ingredients include information on chemical ingredients; trade secret claims.

4. First-aid measures include important symptoms/effects acute, delayed; and required treatment.

5. Fire-fighting measures list suitable extinguishing techniques, equipment; and chemical hazards from fire.

6. Accidental release measures list emergency procedures, protective equipment; proper methods of containment and cleanup.

7. Handling and storage lists precautions for safe handling and storage, including incompatibilities.

8. Exposure controls/personal protection list OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate

engineering controls; and personal protective equipment.

9. Physical and chemical properties list the chemical's characteristics.

10. Stability and reactivity list chemical stability and possible hazardous reactions.

11. Toxicological information includes routes of exposure; related symptoms, acute and chronic effects and numerical measures of toxicity.

Ecological information provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment.
Disposal considerations provide guidance on proper disposal practices, recycling or reclamation of the chemical or its container and safe handling

practices.

14. Transport information provides guidance on classification information for shipping and transporting of hazardous chemicals by road, air, rail or sea.

15. Regulatory information provides guidance on classification information for shipping and transporting of hazardous chemicals by road, air, rail or sea.

16. Other information includes the date of preparation or last revision.

#### **Employee Information and Training**

The fifth category, Employee Information and Training (29 CFR 1910.1200(h)), requires employers to provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new physical or health hazard is introduced into the area. The training must include methods and observations used to detect the presence or release of the chemical, physical and health hazards, protective measures, labeling and explanation of the SDS.

#### **Trade Secrets**

The sixth and final category involves manufacturer Trade Secrets (29 CFR 1910.1200(i)). The chemical manufacturer may withhold the chemical identity, including the chemical name and other specific information, from the SDS. If a trade secret is claimed, it must be indicated on the SDS. However, under special conditions, the substance's proprietary information may be obtained by health care professionals immediately if a medical emergency exists or requested in a non-emergency situation. Provisions for a written statement of need and confidentiality agreement will be based on the situation circumstances.

Source: https://safety.grainger.com/facilities/hazard-communication-standards

