



GHS and OSHA Hazard Communication Virtual Summit – Feb. 26, 2013

FREQUENTLY ASKED QUESTIONS – FAQ's

Note: The Global Harmonizing System is dynamic and will undergo periodic changes. It is incumbent upon you to keep current with these changes.

Answers to these questions are based on information available as of February 20, 2013.

Labels

1. Are labels and pictograms currently commercially available?

- Yes, there are several companies that either create labels, or have software available for your company to create its own labels. A Google search for 'labels' and 'GHS' will give you a number of companies that provide this service.

2. For secondary containers – do you have all the information or the same information from the original label? I noticed the hazard class or the number is not needed?

- Secondary containers must have the same information as the original label. You may add hazard class or number under the "Supplemental Information" heading

3. Can you explain in more detail the secondary container labeling requirements?

- You can choose to label workplace containers either with the same label that would be on shipped containers, or with label alternatives that meet the requirements with the revised HCS.
- Secondary containers (portable containers) that will be used immediately by the employee and the contents used completely, will not be required to have a GHS label.

4. What is the difference between GHS product labels, Packaging, and Container labels?

- Product Labels and Packaging Labels will contain a Product Identifier, Supplier Identification, Precautionary Statements, Pictograms, Signal Word, Hazard Statements, and Supplemental Statements. Product and Packaging Labels for pesticides will also include % of active ingredients.
- Container Labels will also have a transport pictogram on the container.

5. The workplace labeling need not conform (1st bullet on page 113) seems to contradict bullet 3 on the same page.....if the portable container is in the workplace GHS is not required?

- You can choose to label workplace containers either with the same label that would be on shipped containers, or with label alternatives that meet the requirements with the revised HCS.
- Portable workplace containers that will be used immediately by the employee and its contents used completely will not be required to have a GHS label.

6. Say that 2016 rolls around and we have a few old chemical containers. Do these old containers need to be updated to be compliant with GHS?

- It depends. You are required to update labels unless you have old chemicals in inventory and the manufacturer is no longer in business, or you have stopped receiving shipment from the supplier.

7. Just to confirm based on slides 107 and 108; product and container labels will NOT be required to display a hazard rating?

- Correct. Product and container labels are required to have the product identifier (name), supplier identification, hazard pictograms, signal words, hazard statements, precautionary statements, and supplemental information (directions for use, expiration date, etc.)

Safety Data Sheets

1. Will there be a global database to pull SDS sheets from?

- The vendor or manufacturer will be transitioning to SDSs and are required to provide them to their customers before the June 1, 2015 deadline. If you are authoring a SDS help may be found in the “Purple Book, rev. 4” which will give you all the criteria needed. In addition, there are many companies that provide this service.

2. Must the GHS hazard symbols on the SDS also have a red border – so the SDS must be printed on a color printer?

- Color is required on labels and DOT placards. The SDS is not required to be printed on a color printer.

3. Where do you put the state right to know and CA prop 65 – does it go under Section 15 or 16?

- All regulatory information is under Section 15.

4. What about regulatory?

- All regulatory information is under Section 15.

5. Where do we find the OSHA PEL on the SDS?

- PELs, TLVs and any other exposure limits are in Section 8.

6. Must you have a hard copy of the SDS at Construction Jobsites or is an electronic version acceptable?

- As per the Hazard Communication Guidelines for Compliance (2000) MSDSs must be readily accessible to employees when they are in their work areas during their shifts. MSDSs may be kept in a binder in a central location, or electronically. As long as employees can access the information when they need it, any approach may be used. MSDS information can be read to employees only under the mobile worksite provision, paragraph (g)(9), when employees must travel between workplaces during the shift. In this situation, they have access to the MSDSs prior to leaving the primary worksite, and when they return, so the telephone system is simply an emergency arrangement.

7. Do we have to have all our MSDS files converted to SDS by Dec. 1st?

- Your active MSDSs will have to be converted to SDSs by December 1, 2015. If you are an end user, the manufacturer or distributor will supply you with new SDSs. Remember to replace your MSDSs with the new SDSs in your Right-to-Know book.

8. Will the term ‘MSDS’ no longer be used and only be referred to ‘SDS’?

- Correct. Material Safety Data Sheets will be called Safety Data Sheets.

NFPA

1. Is the NFPA adopting the GHS system? In our industry the NFPA is the governing regulation?

- NFPA is waiting to see what transpires with HMIS and GHS before revising its standards.

2. What is going to be the status of the HMIS/NFPA numbering system for health, Reactivity and Flammability?

- HMIS has released its new labeling system (GHMIS) that now complies with GHS (It uses symbols in place of the numbered rating system, and includes GHS, PPE, and target organ effects symbols on the labels).
- NFPA is waiting to see what transpires with HMIS and GHS before revising its standards.

3. According to slide 113, it is acceptable to continue using HMIS or NFPA labels in-house?

Please explain this exception further.

- Per OSHA “Employers may choose to label workplace containers either with the same label that would be on shipped containers for the chemical under the revised rule, or with label alternatives that meet the requirements for the standard. Alternative labeling systems such as the National Fire Protection Association (NFPA) 704 Hazard Rating and the Hazardous Material Information System (HMIS) are permitted for workplace containers. However, the information supplied on these labels must be consistent with the revised HazCom standard, e.g., no conflicting hazard warnings or pictograms.” Please note since this statement was made,
- HMIS has released its new labeling system (GHMIS) that now complies with GHS (It uses symbols in place of the numbered rating system, and includes GHS, PPE, and target organ effects symbols on the labels). You will have to comply with the new HMIS rating system.
- However, NFPA can be included on your work-place labeling (see first bullet under this question). Note that NFPA is waiting to see what transpires with HMIS and GHS before revising its standards.

4. You said you can have NFPA and HMIS labeling if they are consistent with GHS. But how will that be possible if the degree of hazard numbering is directly opposite.

- Work place labels must contain GHS elements, but they may also include NFPA and/or HMIS numbering. However, because the severity of hazard represented by the NFPA/HMIS and GHS numbers is opposite one another, it is extremely important that employees know and understand this discrepancy to avoid misinterpretation.
- Note that in the time since this PowerPoint presentation was written HMIS released its new labeling system (GHMIS) that now complies with GHS. (It uses symbols in place of the numbered rating system, and includes GHS, PPE, and target organ effects symbols on the labels). For information on the new HMIS rating go to: <http://www.ghmis.com/hmissystem.html>
- NFPA is waiting to see what transpires with GHMIS before revising its standards.
- The take-away from this is that GHS is dynamic so expect periodic updates, therefore thorough training is imperative. Employees must UNDERSTAND the changes in labeling and SDSs – and be trained when there are new updates.

5. Can you still list HMIS & NFPA under other (Sec. 16) on SDS?

- Yes, at this time, you can list HMIS and NFPA under Section 16, However,
- HMIS has released its new labeling system that now complies with GHS, so you will have to comply with the new rating system.
- At this time you may use the NFPA numbering system in Section 16. Be aware that this may change in the near future.

Training

1. Please confirm whether or not the training is required for all employees not just new employees by Dec. 2013.

- All employees who handle chemicals and/or are required to interpret label and/or SDS information must be trained to understand the new label elements and SDS format.

2. Do we have to train office employees on GHS and SDS?

- All Employees who handle chemicals and/or are required to interpret label and/or SDS information must be trained to understand the new label elements and SDS format.

HazCom

1. What do the hazard categories 1A, 1B and 1C mean?

- Under Health Hazards, the hazard class for Skin Corrosion/Irritation category 1 has three subcategories – Subcategory 1A, 1B, and 1C. Skin Corrosion is defined as the destruction of dermal tissue: visible necrosis in at least one animal. Subcategory 1A is the visible necrosis of dermal tissue when the exposure to the substance is less than 3 minutes with an observation of less than 1 hour. Subcategory 1B is dermal destruction observed with an exposure of less than 1 hour, and an observation of less than 14 days. Subcategory 1C is visible dermal destruction when exposed for less than 4 hours and under less than 14 days observation.

2. Can you clarify what changes should/could be required in the written facility specific HazCom Programs?

- With respect to incorporating GHS elements, your facility's existing HazCom plan will have to describe how the new elements will be implemented. The plan would have to include changes in container labeling and other forms of warning (such as pictograms, hazard statements, etc.), changes in safety data sheets, and how the employee training program will disseminate these changes.

Deadlines

1. I think we've seen the first deadline as December 1 and December 31. Which one is it?

- December 1, 2013 is the deadline to have all employees trained on the new label elements and SDS format.

Miscellaneous

1. Is there a change to the Inventory List format?

- OSHA says the inventory list shall include the name of the chemical, the work area where the chemical is used or stored, the date the chemical arrived at the facility, and when the chemical was spent or removed from the facility. Currently, there are no additional requirements concerning GHS. However, your facility may adopt a format that requires GHS to be included in the chemical list.