2013 Required Training

- Employers are already required to provide effective information and training on the hazardous chemicals in their work areas
  - Must be done at the time of initial assignment to work with a chemical, and when a new chemical hazard is introduced into the work area
  - May be done by chemical, or by hazard (e.g., flammable liquids)

Required Training, cont.

- In addition, the training required includes the following:
  - The details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.

Required Training, cont.

- Since HazCom 2012 is requiring a new label and SDS, OSHA has specified that employers must provide training on the new approach
- This training will help ensure that workers can access and use the information on the new labels and SDSs effectively
- New labels and SDSs are already being produced and are coming into American workplaces

Required Training, cont.

- Specifically, OSHA has stated:
  - Employers shall train employees regarding the new label elements and safety data sheet format by December 1, 2013
- The 2013 training thus does NOT include a requirement to re-train on all hazards
- The training is to ensure that employees understand the new label and SDS approach

Other Factors

- While new labels and SDSs are required to be provided by manufacturers and importers by June 1, 2015, employers have until June 1, 2016 to make adjustments to their workplace programs for any new hazards identified as a result of the transition to the GHS system

- If workplace labeling changes (i.e., alternative systems are used), workers will have to be trained on this as well—timing will depend on when the workplace labeling is updated

Topics to Address in Training

- Why is the training being done now?
  - Labels and SDSs are changing
  - Information is being standardized and specified
  - All suppliers of a chemical should communicate hazards in the same way

Topics to Address in Training, cont.

- Role of labels
  - Immediate source of information
  - New labels have more information
- What is a label element?
  - Each label element should be explained
  - Hazard class should also be addressed to help understand the label elements
  - Example label should be provided

Topics to Address in Training, cont.

- Safety Data Sheet (SDS)
  - Format (sections)
  - Information found on SDSs

- Requirements (accessibility and use)

Role of Labels

- Labels are the immediate source of information on a chemical
- New labels will have more information than current labels
- There may also be additional information (known as supplemental information) on the label that is not required—the required information should be presented together on the label

Training on Label Elements

- Labels on shipped containers of hazardous chemicals will be changing by June 1, 2015
- The primary change is that information on labels has been standardized
  - There are certain types of information required to appear on labels
  - All suppliers have the same requirements, so labels should be more consistent in approach than current labels

Label Requirements

- Labels on shipped containers must include:
  - Product Identifier
  - Signal Word
  - Pictogram
  - Hazard Statement(s)
  - Precautionary Statement(s)
  - Supplier Identification (Name, Address, Phone Number)

SAMPLE LABEL

CODE _____
Product Name _____

Product Identifier

Company Name _____
Street Address _____
City _____ State _____
Postal Code _____ Country _____
Emergency Phone Number _____

Supplier Identification

Hazard Pictograms

Signal Word
Danger

Keep container tightly closed. Store in a cool, well-ventilated place that is locked.
Keep away from heat/sparks/open flame. No smoking.
Only use non-sparking tools.
Use explosion-proof electrical equipment.
Take precautionary measures against static discharge.
Ground and bond container and receiving equipment.
Do not breathe vapors.
Wear protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispose of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO2) fire extinguisher to extinguish.

First Aid
If exposed call Poison Center.
If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with Water.

Precautionary Statements

Highly flammable liquid and vapor.
May cause liver and kidney damage.

Hazard Statements

Supplemental Information

Directions for Use

_____
_____
_____

Fill weight: _____ Lot Number: _____
Gross Weight: _____ Fill Date: _____
Expiration Date: _____

OSHA 3492-02 2012

Signal Word

- “Signal word” means a word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label
- The signal words used in this section are “danger” and “warning.” “Danger” is used for the more severe hazards, while “warning” is used for the less severe

Pictogram

- “Pictogram” means a composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical
- Nine pictograms are designated under this standard for application to a hazard category

HCS Pictograms and Hazards

HCS Pictograms and Hazards

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)

Hazard Statement

- "Hazard statement" means a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard
  - Example: Fatal if swallowed (Acute Oral Toxicity)

Precautionary Statement

- "Precautionary statement" means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling
  - Example: Do not eat, drink, or smoke when using this product
  - Example: Keep container tightly closed

Precautionary Statements, cont.

- The statements assigned to a chemical address the following four areas
  - Prevention
  - Response
  - Storage
  - Disposal

Role of the Safety Data Sheet

- The Safety Data Sheet is the detailed source of information about the chemical
  - The SDS has many audiences
  - The SDS is thus a reference to help ensure a chemical is handled safely

Safety Data Sheet Format

- New safety data sheets will be organized using a specified order of information
- The required information will appear in the same sections of an SDS regardless of the supplier
- The most important information will be listed in the first sections of the SDS

SDS Sections

- Identification
- Hazard(s) identification
- Composition/information on ingredients
- First-aid measures
- Fire-fighting measures
- Accidental release measures
- Handling and storage
- Exposure control/personal protection

SDS Sections, cont.

- Physical and chemical properties
- Stability and reactivity
- Toxicological information
- ***Ecological information***
- ***Disposal considerations***
- ***Transport information***
- ***Regulatory information***
- Other information

SDS Requirements

- SDSs must be readily accessible to workers when they are in their work areas, during each work shift

- Hazard communication works when employers also use SDS information to make sure that proper protective measures are being implemented