

RISK BULLETIN

GHS Training Required by December 1, 2013

All employers are required to train employees on the new shipping labels and Safety Data Sheet (SDS) format by December 1, 2013. This training must include how to read the updated labels, how to interpret the new pictograms, and what the various signal words, hazard statements, and precautionary statements mean.

Labels

Labels on shipping containers will be required to have a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Below is an example of a label meeting GHS labeling requirements:

2 	1 Sulfuric Acid	2 
	3 Danger! May be harmful if swallowed. Causes severe skin burns and eye damage. Fatal if inhaled. Harmful to aquatic life.	
	Do not breathe dust/fume/gas/mist/vapors/spray. Wear protective gloves/protective clothing/eye protection/face protection. Wear respiratory protection.	
	5 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/physician.	
	In case of fire Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.	
	See Material Safety Data Sheet for further details regarding safe use of this product.	
	6 Sigma-Aldrich 3050 Spruce Street SAINT LOUIS MO 63103 USA Telephone : +18003255832	
1 Product Identifier	4 Hazard Statements	
2 Pictograms	5 Precautionary Statements	
3 Signal word, "Danger!"	6 Supplier Information	

In-house labels are not required to replicate the GHS label on the shipped container. Employers can continue to use their current in-house labeling system. However, the more an employer's in-house labels deviate from the shipping label, the more training will be needed to ensure employees understand both labeling systems. Given the potential for confusion, employers may prefer to label workplace containers in accordance with the new GHS shipping labels and use the pictograms seen to the right.

Pictograms

OSHA designated 9 pictograms under the GHS to convey the health, physical, and environmental hazards of each substance.

Health Hazard  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	Flame  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	Exclamation Mark  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  <ul style="list-style-type: none"> • Gases Under Pressure 	Corrosion  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	Exploding Bomb  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle  <ul style="list-style-type: none"> • Oxidizers 	Environment (Non-Mandatory)  <ul style="list-style-type: none"> • Aquatic Toxicity 	Skull and Crossbones  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

*Pictograms must have a red border

As a reminder, all in-house labels must include:

- ❖ Identification of the hazardous chemical
- ❖ The hazards of that chemical
- ❖ Precautionary steps for handling the chemical

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Safety Data Sheets (SDS)

The information on the SDS will remain essentially the same as required in the current hazard communication standard for Material Safety Data Sheets (MSDSs). The current hazard communication standard dictates the content of the SDS but does not specify its format. The GHS revisions require that information to be in a specified sequence. The new format is a 16-section SDS that must include the following sections:

- Section 1. Identification
- Section 2. Hazard(s) identification
- Section 3. Composition/information on ingredients
- Section 4. First-Aid measures
- Section 5. Fire-fighting measures
- Section 6. Accidental release measures
- Section 7. Handling and storage
- Section 8. Exposure controls/personal protection
- Section 9. Physical and chemical properties
- Section 10. Stability and reactivity
- Section 11. Toxicological information
- Section 12. Ecological information *
- Section 13. Disposal considerations *
- Section 14. Transport information *
- Section 15. Regulatory information *
- Section 16. Other information, including date of preparation or last revision *

*Sections 12-16 may be included in the SDS, but they are not required by OSHA.



Transition to GHS

While chemical manufacturers are not required to be in compliance with the new labels and SDS format until June 1, 2015, OSHA is requiring that employees be trained on the new labels and SDS format by December 1, 2013. OSHA expects chemical manufacturers to begin distributing chemicals with updated labels and new SDSs before the required deadline of June 1, 2015.

During this transition period, it is acceptable to have both MSDSs and SDSs in the same binder. As you begin to receive the updated SDSs, replace your MSDSs with the new SDSs for each chemical. By June 1, 2016 employers are required to have completely converted their MSDS files to SDS files.

It is important to ensure that when employees begin to see the new labels and SDSs they are already familiar with them and understand how to use them.

Here are some tips to help you with this transition:

1. Perform a complete chemical inventory to make a master list of what is currently used in order to determine needs, properly discard chemicals that are no longer needed.
2. Contact your chemical suppliers to determine when they will be providing the new SDSs.
3. Determine within your organization if you will keep, or change, your in-house chemical labeling system.
4. Conduct employee training by December 1, 2013. Explain how to read the updated labels, how to interpret the new pictograms, and what the various signal words, hazard statements, and precautionary statements mean.

