GHS – NO BIG DEAL, A STRAIGHT TALK ON GHS

We wrote to you about Globally Harmonized System (GHS) in the July 2013 Newsletter and the July 2013 monthly training memo on GHS & SDS. Clients have received last minute newsletters and seminars drumming up business for GHS and some are uncertain as to whether they have complied with their obligations in a timely manner. We write this memo to reassure clients that they have met the training deadline, presuming the July training was done in a timely manner. Needless to say, each CSI client will receive training on GHS as part of an ongoing annual Hazard Communication Program (HCP). Here are answers to some common questions.

1. *Why was GHS put in place?* The global trade in chemicals is well over a billion dollars and the auto industry imports chemicals from Japan, Germany, Korea, etc.. These chemicals are often labeled under the statutes in effect in that country. So a chemical imported from Germany may not have the US-OSHA required labels. The GHS provided a universal global labeling system that is acceptable in 60 countries.
2. *What is the GHS labeling system*? The pictogram on GHS labels was mailed to all clients in July 2013. Employees only need to review the pictogram and the training is done, presuming the employees have received and completed the training on HCP. Post a copy of the pictogram on your parts dispensing counter for quick reference by employees. A copy of the pictogram can be downloaded from <https://www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html>. **The deadline for GHS training is December 1, 2013**.
3. *Are these signs new?* 6 out of 9 signs have been in effect for decades. The GHS has a red box around these old signs. The three new signs are : “!” for skin irritant, “human with glowing lungs” for cancer hazard, and a tree with no leaves and a dead fish around it indicating aquatic toxicity i.e. disposing under a tree would cause duress to plant life and that disposal into a river, ocean, or stream would be harmful to aquatic life.
4. *Why these three new signs*? Globally, the functions inside a factory and the toxic chemicals leaving the factory are not as well defined as in the US, where EPA (toxic chemicals entering and leaving factory) and OSHA (toxic chemicals affecting employees inside factory) have well defined roles. So educating workers on the environmental impact via labeling the chemicals through GHS was adopted.
5. *Who does the GHS labeling*? Manufacturer, vendors, and distributors of chemicals label the chemicals shipped to your facility. If you transfer these chemicals to spray bottles (secondary containers), have your vendor give you pre-labeled bottles with all necessary signs. There is no way an employee with a sharpie can label the bottle with all the complicated signage. Worse yet, any hand written labeling washes off in a day. Aboveground tanks and drums will need new labeling. Call your vendor and get them to label! **Deadline for shipment of chemicals (and at your facility) with GHS is December 1, 2015**.
6. *What is the SDS?* This is the new format for the old MSDS. One could get an MSDS for gasoline that is 2 pages long and also 16 pages long. In essence, the old law gave manufacturers too much flexibility to write the MSDS and they were often difficult to understand. OSHA believes that the new SDS will be easier to understand which will better protect workers, chemicals users, and their employers.
7. *Does SDS have any new sections*? Four new sections have been added to the SDS over the old MSDS. They are Environmental Hazard (EPA guided), Ecological Information (dead tree etc.), Disposal Consideration (EPA guided), and Transport Information (DOT guided). These were added in order to use SDS as the channel of communication since one is available on other safety matters. OSHA will not have any enforcement on these sections or training matters. EPA and DOT have other enforcement mechanisms. In summary, this is merely information that will be beneficial to end users.
8. *Do written Hazard Communication Programs have to be updated indicating the GHS, labeling, and other matters*? Yes, training programs must be updated. **Deadline for updating the Hazard Communication Program and training under the new hazards reported under the SDS regime’s June 1, 2016**.
9. *Is CSI doing any seminars on GHS*? No client has requested one after reading the Newsletter, training memo, or the pictogram. To date, none is deemed necessary.