



VMCLI

*Veterinary Medical Center of Long Island
24 Hour Emergency & Specialty Services*

GHS HAZARD COMMUNICATION

OSHA 29 CFR 1910.1200

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BENEFITS OF ADOPTING THE GHS

- Increase the quality and consistency of information
- Reduce confusion – Increase comprehension of hazards
- Help address literacy problems

NOTABLE CHANGES

- Labels are more defined and will now require:
 - Product identifier
 - Pictogram
 - Signal word
 - Hazard statement(s)
 - Precautionary statement(s)
 - Name, address, and phone number
- Safety Data Sheet (not Material Safety Data Sheet)
 - Uses a 16 section format

ORGANIZATION OF STANDARD

- a) Purpose
- b) Scope and Application
- c) Definitions *
- e) Written Hazard Communication
- f) Labels and Other Forms of Warning *
- g) Safety Data Sheets *
- h) Employee Information and Training
- i) Trade Secrets
- j) Effective Dates *
- Appendices A-F

a) PURPOSE

- All hazards to be **CLASSIFIED** not Evaluated
 - "**Classification**" means to identify the relevant data regarding the hazards of a chemical; review those data to ascertain the hazards associated with the chemical; and decide whether the chemical will be classified as hazardous according to the definition of hazardous chemical in this section. In addition, classification for health and physical hazards includes the determination of the degree of hazard, where appropriate, by comparing the data with the criteria for health and physical hazards.
 - "**Hazard class**" means the nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity.

b) SCOPE AND APPLICATION

- All chemicals known to be present are covered.
- Practical accommodations for special situations
- Address interface with other Federal laws.

c) DEFINITIONS

- Physical hazard definitions removed and placed in new Appendix B
- Deleted terms: flashpoint, hazard warning, material safety data sheets.
- Some definitions were revised to be consistent with the GHS.
- New definitions added for classification.
- 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.

d) HAZARD CLASSIFICATION

- Chemical manufacturers and importers shall evaluate chemicals produced in their workplaces or imported by them to classify the chemicals in accordance with this section. For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and where appropriate, the category of each class that apply to the chemical being classified. **Employers are not required to classify chemicals unless they choose not to rely on the classification performed by the chemical manufacturer or importer for the chemical to satisfy this requirement.**

e) WRITTEN HAZARD COMMUNICATION PROGRAM

- Employers must have a written program describing how the rule will be implemented, including a list of hazardous chemicals, methods for informing employees about non-routine tasks.
- Employers must make sure the program is current when the new provisions are implemented (e.g., list of hazardous chemicals may have to be updated).

f) LABELS AND OTHER FORMS OF WARNING

- Shipped containers to be labeled with product identifier; signal word; hazard statement(s); pictograms; precautionary statements; and responsible party.
- Specifies information by hazard class and category
- Appendix "C" is a cookbook approach for labeling.

LABEL REQUIREMENTS - SHIPPING CONTAINERS

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address, and phone number of the responsible party.

PICTOGRAMS



HEALTH
HAZARD



GAS
CYLINDER



FLAME
OVER
CIRCLE



FLAME



CORROSION



ENVIRONMENT



EXCLAMATION
MARK



EXPLODING
BOMB



SKULL
&
CROSSBONES

The final rule requires containers shipped six months after the information is available to be labeled correctly.

FLAME OVER CIRCLE

- Oxidizers



FLAME

- Flammables
- Pyrophorics
- Self-Heating
- Emits Flammable Gas
- Self-Reactives
- Organic Peroxides



EXPLODING BOMB

- Explosives
- Self-Reactives
- Organic Peroxides



SKULL AND CROSSBONES

- Acute Toxicity (fatal or toxic)



CORROSION

- Skin Corrosion/Burns
- Eye Damage
- Corrosive to Metals



GAS CYLINDER

- Gases Under Pressure



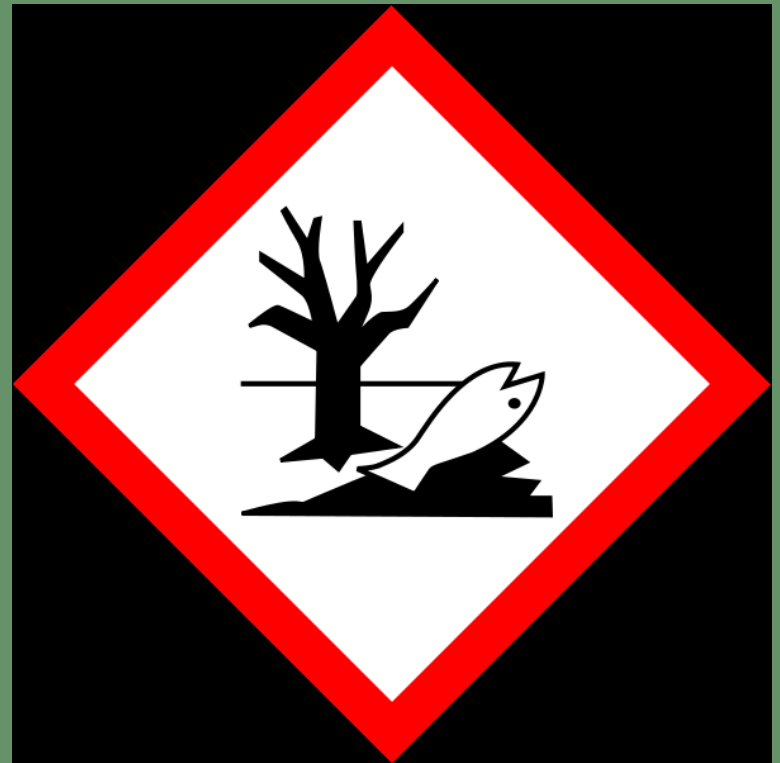
HEALTH HAZARD

- Carcinogen
- Mutagenicity
- Reproductive Toxicity
- Respiratory Sensitizer
- Target Organ Toxicity
- Aspiration Toxicity



ENVIRONMENT

- Aquatic Toxicity
 - (Non-Mandatory)



EXCLAMATION MARK

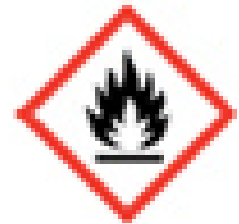
- Irritant (skin and eye)
- Skin Sensitizer
- Acute Toxicity
- Narcotic Effects
- Respiratory Tract Irritant
- Hazardous to Ozone Layer (Non-Mandatory)





LABEL EXAMPLE

Xyz Chemical Co.



Warning

Flammable Liquid and Vapor

Harmful if Swallowed

May Cause Damage to Organs (Liver)

May Cause Damage to Organs through prolonged or repeated exposure (Heart)

First Aid

If swallowed

If on skin

WORKPLACE LABELING

- Same workplace –specific labeling.
- Make sure the labeling system is updated to be consistent with the new classifications.
- NFPA/HMIS Systems - NO
 - (rating systems v. classification)
 - **GHS and NFPA/HMIS Reversed**

SECONDARY LABELING

- Employers have more flexibility. The basic requirement for workplace labeling is as follows:
- “the final rule retains the flexibility by indicating that the employer can 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.”
- The HCS 2012 specifically states for workplace container labeling that labels must contain GHS label elements (pictograms, etc.) OR
- “Product identifier and words, pictures, symbols, or combination thereof, which, in conjunction with the other information immediately available to the employee under the HC program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.”

g) SAFETY DATA SHEETS

- Mandates 16-section SDS headings, order of information, and what information is to be provided under the headings.
- Will not enforce sections 12-15 that require information outside OSHA's jurisdiction.

16- SECTION SAFETY DATA SHEET

1. Identification of the substance or mixture and of the supplier
2. Hazard identification
3. Composition/information on ingredients Substance/Mixture
4. First aid measures
5. Firefighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological
12. *Ecological information*
13. *Disposal considerations*
14. *Transport information*
15. *Regulatory information*
16. Other information including information on preparation and revision of the SDS

h) EMPLOYEE INFORMATION AND TRAINING

- Clarifies that the labels on shipped containers and workplace labels must be explained, as well as SDS format.
- Workers will have to be trained on the new label and SDS formats before all the provisions of the rule are effective.

TRAINING, CONTINUED

- Labeling elements
 - Train the employees on the type of information that the employee would expect to see on the new labels.
 - How they might use that information
 - Product identifier, Signal Word, hazard statement(s), pictogram(s), precautionary statement(s), and name, address and phone number of the responsible party.
 - General understanding of how the elements interact
 - For example – explain there are two signal words: Danger means a more severe hazard within a hazard class. Warning is for less severe hazard.
 - Safety Data Sheet
 - Train the employees on the standardization 16 section format and the type of information they would find in the various sections.

i) TRADE SECRETS

- Allows specific chemical identity to be protected when it is a legitimate trade secret.
- Specifies conditions for protection or for release when there is a safety and health need for information.
- The percentage of a substance in a mixture is also considered to be a type of trade secret subject to the provisions in the rule.

COMPLIANCE DATES

- Became effective **May 25, 2012**
- Employees to be trained by **December 1, 2013**
- Update alternative workplace labeling and hazard communication program as necessary by **June 1, 2016**

PERSONAL PROTECTION EQUIPMENT

- Assessment required
- Each task
- Signed by CEO

PPE ASSESSMENT

Operation	Hazard	PPE Required
Emptying Patient Trash	BBP	Nitrile/Latex Gloves
Cleaning Patient Room	BBP	Nitrile/Latex Gloves