



Think Safety!

A Publication Of The West Virginia Propane Gas Association

First Quarter 2018

OSHA Hazardous Chemical Labeling Requirements

In 2013, we told you about, at that time, the new OSHA hazardous chemical labeling requirements enacted as part of Hazard Communication Standard, 29 CFR 1910.1200 (HCS). The new standards brought them in alignment with the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

The changes were intended to ensure improved quality and consistency in the classifications and labeling of all chemicals and enhance employee comprehension and awareness of the chemicals with which they work, and thus improve workplace safety.

The improved labeling uses quick visual notations to allow

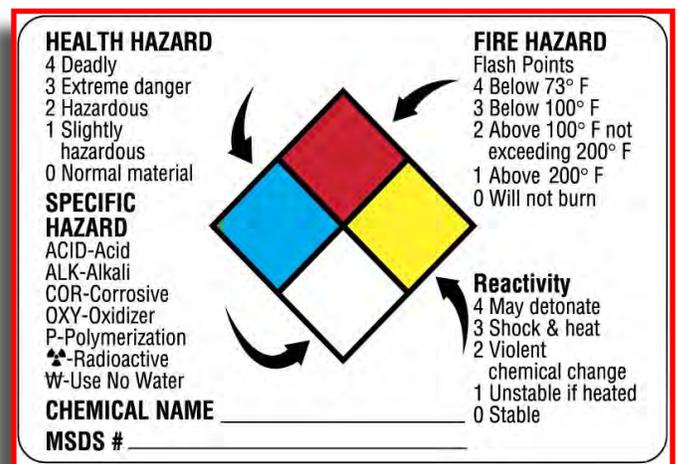
workers to more quickly and readily identify the hazards associated with particular chemicals.

While the labels will not replace the Safety Data Sheets (SDS) for comprehensive instructions, the labels do provide limited information on how to safely handle the chemical.

Employees were mandated to be trained on the label modifications by December 1, 2013. HCS was to be phased in completely by in 2015. In reviewing these standard enhancements, judge how well you have done to meet the requirements outlined in GHS. What changes do you need to make if any to reach full compliance and provide the safest

working environment for your employees possible. How well

have you continued the training since the initial mandate.



Training Requirements:

Training on label elements must consist of information on what the employee would expect to see on actual labels including:

- **Product Identifier:** This includes the product name and the code number or batch number. The correct product identifier can be determined by the importer or manufacturer. The product identifier must be consistent on the label and Section 1 of the SDS.
- **Signal Word:** The signal word is used on the label

to alert the employee of the potential danger of the chemical. Signal words are limited to only two words, "Danger" and "Warning." The severity of the hazard extends from "Warning" to "Danger" with the latter being the more severe hazard. Only one signal word will appear on a label, so if any characteristic of that chemical meets the "Danger" criteria, "Danger" will appear on the label.

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Training Requirements:

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- **Pictogram:** OSHA has strict criteria for its pictogram requirements. It must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame wide enough to be clearly visible. Under this standard, OSHA has designated eight pictograms apply to a hazard category.
- **Hazard Statement(s):** These describe the nature of the hazard presented by the chemical and the severity of the

hazard. For example: "Causes damage to the lungs if inhaled." All potential hazards of the chemical must appear on the label.

- **Precautionary Statement(s):** This describes the recommended treatment to minimize the adverse effects of exposure to the chemical.
- **Name, address and phone number of the chemical manufacturer, distributor, or importer.**

Of course once the employee is instructed on what appears on the label, the next part of the training will



involve how to apply the information from the label to ensure proper storage and handling, locate information for proper first aid, understand how the elements of the label work together.

Training must also include the type of information found in each of the 16 sections of the label and how the information on the label is related to the SDS.

Labeling Requirements:

HCS labeling requirements are intended to enhance employee comprehension of potential dangers and create a safer work environment.

Labels use visual recognition to convey the warning information and how to safely handle the chemical. The labels are limited in the information they convey, however, and must be accompanied by the actual SDS.

The labels must be written, printed or use graphic information concerning hazardous chemicals, and they must be affixed to, printed or otherwise attached to each immediate container of the specified chemical or the outside packaging.

The labels must contain the name, address and telephone number of the manufacturer or importer as well as the

product identifier, signal word, hazard statement(s), precautionary statement(s) and pictogram.

Anyone creating a chemical label must first consult the revised Hazard Communication Standard (HCS) to identify a chemical's relation to Appen-

dices A, B, and C. Appendix A is the health hazards, Appendix B is physical hazards, and Appendix C includes the appropriate pictograms, signal words, and hazard and precautionary statement(s) for the chemical label.

A label may also include

supplemental information deemed helpful such as hazards not otherwise classified on the label. It might also include proper personal protection equipment (PPE) needed to protect the employee from

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OXI252
(disodiumflammy)
CAS #: 111-11-11xx




Danger
May cause fire or explosion; strong oxidizer
Causes severe skin burns and eye damage

Keep away from heat. Keep away from clothing and other combustible materials. Take any precaution to avoid mixing with combustibles. Wear protective neoprene gloves, safety goggles and face shield with chin guard. Wear fire/flame resistant clothing. Do not breathe dust or mists. Wash arms, hands and face thoroughly after handling. Store locked up. Dispose of contents and container in accordance with local, state and federal regulations.

First aid:
IF ON SKIN (or hair) or clothing⁶: Rinse immediately contaminated clothing and skin with plenty of water before removing clothes. Wash contaminated clothing before reuse.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
IF INHALED: Remove person to fresh air and keep comfortable for breathing.
IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
Immediately call poison center.
Specific Treatment: Treat with doctor-prescribed burn cream.

Fire:
In case of fire: Use water spray. In case of major fire and large quantities: Evacuate area. Fight fire remotely due to the risk of explosion.

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

Labeling Requirements:

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the chemical's potential hazards. It may also include directions for use, the expiration date, fill date or any other information deemed helpful by the label creator.

The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) uses nine classifications of pictograms to illustrate potential hazards. OSHA will enforce eight classifications for the labels including: Health Hazard, Flame, Exclamation Mark, Gas Cylinder, Corrosion, Exploding Bomb, Flame Over

Circle and Skull and Crossbones. A ninth pictogram, Environment, used by GHS is not mandatory for OSHA labels, but it may be used.

These pictograms do not replace the diamond-shaped labels required by the U.S. Department of Transportation (DOT). The DOT required labels must be used when transporting chemicals. Chemicals in smaller packages within the larger DOT marked shipping container do not require the OSHA pictogram.

An employer can create their own labels as long as they

meet HazCom 1994 requirements. Employers may use a system such as the National Fire Protection Association (NFPA) diamonds or HMIS requirements. The OSHA labels must be legible and in English, although it is acceptable to display labels written in other languages in addition to the English labels.

The employer is responsible for maintaining the labels to make sure that they remain legible. If the label is removed or defaced, it must be replaced. The

employer is not responsible for updating the label, however employees must be made aware of any newly identified hazards.

(Chemical Name)

HEALTH HAZARD **FIRE HAZARD** **INSTABILITY**

4 Severe
3 Serious
2 Moderate
1 Slight
0 Minimal

SPECIFIC HAZARD

ACID Acid
ALK Alkali
COR Corrosive
OXI Oxidizer
P Polymerization (Self-reacting with water)
R Radioactive
W Use No Water

Consult Corresponding MSDS for Further Hazardous Information and Instructions

Personal Protection
(✓ Mark Appropriate Protection Required)

<input type="checkbox"/> Respirator	<input type="checkbox"/> Apron	<input type="checkbox"/> Safety Glasses
<input type="checkbox"/> Self Contained Air Respirator	<input type="checkbox"/> Boots	<input type="checkbox"/> Face Shield
<input type="checkbox"/> Full Protection Suit	<input type="checkbox"/> Splash Goggles	<input type="checkbox"/> Gloves
<input type="checkbox"/> OTHER	<input type="checkbox"/> OTHER	<input type="checkbox"/> OTHER

Articles in this publication are for information only. Nothing in this publication is to be construed as setting standards or requirements. Please consult with appropriate regulatory and rulemaking bodies for all legal requirements.



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Training Quiz

Name _____ Social Security Number _____

1. It is mandated that workers receive the proper training to identify new chemical labeling formats by _____.
A. December 1, 2013 B. January 26, 2014 C. April 8, 2014 D. July 4, 2014
2. Which of the following must be included on the product label?
A. Product Identifier B. Signal Word C. Pictogram D. A, B, and C
3. Label signal words are limited to just two words: Warning and Danger with danger being more severe.
A. True B. False
4. The chemical labels are limited in the information they convey, and must be accompanied by the actual SDS.
A. True B. False
5. Chemical labels must be written, printed or use graphic information concerning hazardous chemicals
A. True B. False
6. Chemical labels must be affixed to, printed or otherwise attached to each immediate container of the specified chemical or the outside packaging.
A. True B. False
7. Anyone creating a chemical label must first consult the revised Hazard Communication Standard (HCS) to identify a chemical's relation to Appendices A, B, and C.
A. True B. False
8. Nine pictograms will be enforced by OSHA on chemical labels including "Environment."
A. True B. False
9. The pictograms required by OSHA for chemical labeling replace the diamond-shaped labels required by the U.S. Department of Transportation (DOT).
A. True B. False
10. Chemicals in smaller packages within the larger DOT marked shipping container do not require the DOT diamond, but they do require the OSHA pictogram.
A. True B. False
11. An employer can create his or her own labels as long as they meet HazCom 1994 requirements.
A. True B. False
12. Employers may use a system such as the following to create chemical labels.
A. NFPA diamonds B. HMIS requirements C. OSHA pictograms D. A, B, and C
13. If the chemical label is removed or defaced, it must be replaced.
A. True B. False

Training Quiz Answers

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B. Signal Word

C. Pictogram

D. A, B, and C

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A. True

B. False

4. The chemical labels are limited in the information they convey, and must be accompanied by the actual SDS.

A. True

B. False

5. Chemical labels must be written, printed or use graphic information concerning hazardous chemicals

A. True

B. False

6. Chemical labels must be affixed to, printed or otherwise attached to each immediate container of the specified chemical or the outside packaging.

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7. Anyone creating a chemical label must first consult the revised Hazard Communication Standard (HCS) to identify a chemical's relation to Appendices A, B, and C.

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B. False

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10. Chemicals in smaller packages within the larger DOT marked shipping container do not require the DOT diamond, but they do require the OSHA pictogram.

A. True

B. False

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A. True

B. False

12. Employers may use a system such as the following to create chemical labels.

A. NFPA diamonds

B. HMIS requirements

C. A and B

D. Neither A or B

13. If the chemical label is removed or defaced, it must be replaced.

A. True

B. False