Memorandum

Date: June 25, 2014

To: Campus Community

From: Marvin Pratt
Director of Environmental Health and Safety

Subject: Upcoming Deadline for OSHA Hazard Communication Standard

Recently, there was a significant change in OSHA’s Hazard Communication Standard. The updated standard is commonly referred to as GHS HazCom. This revised standard applies (with some specific exemptions) to every employer and every employee who handles chemicals in the United States. Because of the significance and large scope of this change, it is being implemented in stages over the period of a few years. In fact, one major milestone has already occurred – by Dec. 1, 2013, affected employees needed to have been trained on the content of the GHS HazCom Standard. EHS released the GHS training on-line through the Learning Management System and in mid-October to allow employees time to complete the training prior to the December 1st deadline.

The next milestone (June 1, 2015) is the date by which manufacturers and employers need to label chemical containers according to the GHS HazCom labeling requirements. NOTE: chemical labs (typically chemistry, biology, and similar labs) that fall under the OSHA Lab Standard and thus the Chemical Hygiene Plan have different labeling requirements are being addressed separately. This memo is being sent to alert you, hopefully with plenty of time to allow you to develop a plan for how operations under your direction will be able to comply with this new labeling requirement. As a reminder, the new labeling requirement includes:

- Pictograms
- Signal Words (Danger or Warning)
- Product Identifier
- Hazard Statements
- Precautionary Statements
- Manufacturer Information

There are actually some categories of products exempt from this labeling requirement (if the product is in the original manufacturer’s labeled container) because the labeling of these products is already governed by different regulatory agencies or programs. Those exempt categories include items listed below. Note however, that if an item belonging to one of these exempt categories is opened and transferred into another container, the new container will need to be labeled identically to the original container or labeled per the GHS HazCom standard.

- Foods
- Drugs
- Alcoholic beverages
- Pesticides

- Hazardous wastes
- Radioactive materials
- Tobacco products
- Consumer products

- Wood products
- Biohazards
To comply with the new labeling requirements, it is suggested that you consider one or more of the following methods:

- Only purchase chemicals from vendors who promise to provide labels for your secondary containers. This could be very helpful for custodial products. In fact, the idea came from a vendor.
- Purchase a labeling machine for the purpose of creating and printing your own GHS-compliant HazCom labels.
- Photocopy an original manufacturer’s product label and adhere the photocopy to your newly-created secondary bottle (i.e.: spray bottles). Black and white photocopied labels are acceptable on secondary containers as long as those containers are not shipped or transferred off campus for any reason.

While most affected employees have been assigned the GHS HazCom training, please share this information with them as a reminder of the approaching deadline. In addition to sharing information and reminders, EHS will be hosting information sessions regarding the changes and new requirements. Please watch Campus Announcements for information on the times and locations of the sessions. In the meantime, if you have any questions, please feel free to contact Kenny Wahl, Hazardous Materials Manager, Department of Environmental Health and Safety, at 898-5126.