Hazard Communication Training Program for Fabricators & Erectors (including GHS revisions)

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Based on OSHA 1910-1200 Subpart Z

"This presentation is based upon information derived from OSHA publications. Questions and requests for interpretations of this information or these publications should be directed to OSHA. AISC does not endorse any interpretation of these publications other than those interpretations formally issued by OSHA."

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Hazard Communication and the Globally Harmonized System (GHS) Overview

- What is GHS
- Why OSHA adopted the GHS
- Overview of the changes to the HazCom Standard
 - Labeling requirements
 - ➤ Safety Data Sheets (SDS) format 16 sections
 - Supplemental Employee Training (to be provided by employer)

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What is GHS?

Globally Harmonized System of Classification and Labeling of Chemicals is a system for standardizing and harmonizing. It is a logical and comprehensive approach to:

- Defining health, physical and environmental hazards of chemicals;
- Classification processes that use available data on chemicals for comparison with the defined hazard criteria; and
- Communicating hazard information, as well as protective measures, on labels and Safety Data Sheets (SDS).

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Why did OSHA align the HCS with GHS?

- GHS is used in over 65 countries
- A common, coherent approach to classifying and communicating chemical hazards.
 - » Harmonized definitions of hazards
 - » Specific criteria for labels
 - » Harmonized format for safety data sheets

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Organization of the Final Rule

- a) Purpose
- b) Scope and Application
- c) Definitions
- d) Hazard Classification
- e) Written Hazard Communication Program
- f) Labels and Other Forms of Warning

- g) Safety Data Sheets
- h) Employee Information and Training
- i) Trade Secrets
- j) Effective DatesAppendices A-F

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Appendices

- Appendix A, Health Hazard Criteria (Mandatory) (NEW)
- Appendix B, Physical Hazard Criteria (Mandatory) (NEW)
- Appendix C, Allocation of Label Elements (Mandatory) (NEW)
- Appendix D, Safety Data Sheets (Mandatory) (NEW)
- Appendix E, Definition of "Trade Secret" (Mandatory)
- Appendix F, Guidance for Hazard Classifications re: Carcinogenicity (Non-Mandatory) (NEW)

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Notable changes

- "Specification" approach rather than a "Performance-Oriented" approach
 - » "Hazard classification" rather than "hazard determination"
- Labels requirements:
 - » Product identifier
 - » Pictogram
 - » Signal word
 - » Hazard statement(s)
 - » Precautionary statement(s)
 - » Name, address, and telephone number

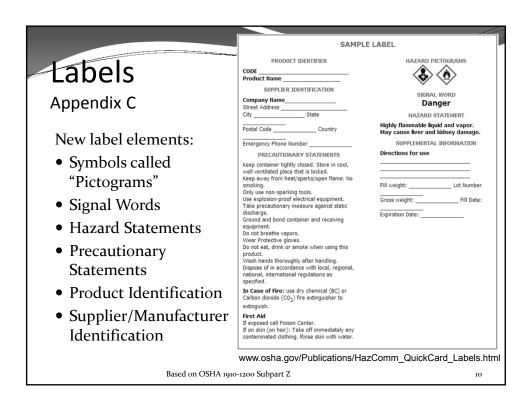
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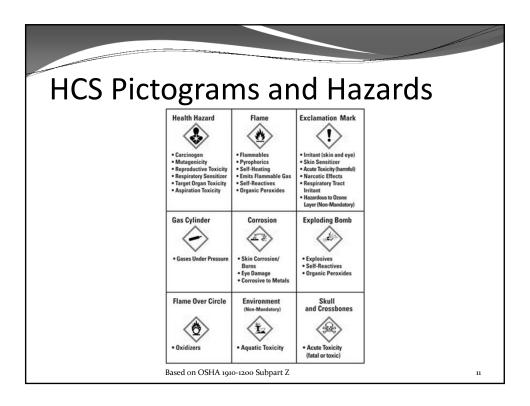


Notable changes, cont.

• "Safety data sheet" (rather than "material safety data sheet") uses a 16-section format.

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Red vs. Black Borders

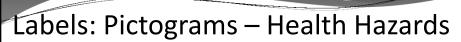
- OSHA is requiring red borders
- The red borders increase comprehensibility.
- Blank red diamonds are not permitted on a label.
- On SDS's the pictograms are not required but if included they are permitted to have black borders.





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Acute toxicity (Severe)



Acute toxicity (Less Severe):

Irritant

Dermal sensitizer

Acute toxicity (harmful)

Narcotic effects

Respiratory tract irritation

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Labels: Pictograms – Health Hazards (continued)



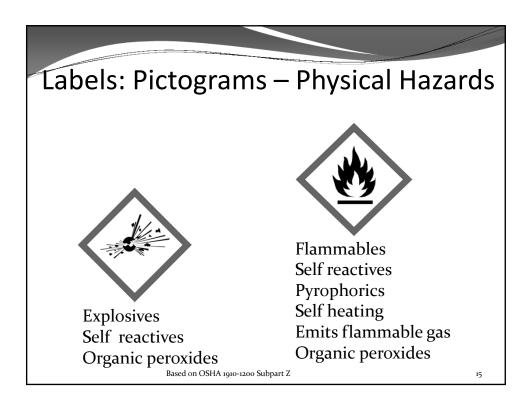
Skin corrosion Serious eye damage/ Eye irritation

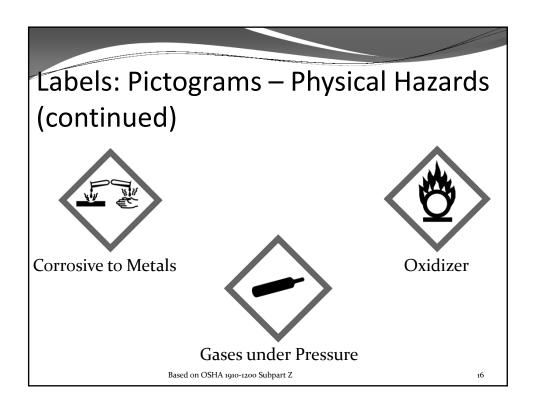


Carcinogen Respiratory sensitizer Reproductive toxicity Target organ toxicity Mutagenicity Aspiration Hazard

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Labels: Signal Word

Indicates the severity of the hazard and alerts employees to the potential hazard.

Only 2 signal words will appear:

- "DANGER" (more severe hazard)
- "WARNING" (less severe hazard)

Not all labels will have a signal word. Some chemicals are not hazardous enough to require that a signal word appear on the label.

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Labels: Hazard Statement

Specific hazard statements must appear on the label based on the chemical hazard classification.

Examples:

- Flammable liquid and vapor
- Causes skin irritation
- May cause cancer

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Label: Precautionary Statements

 Precautionary statements describe recommended measures that should be taken to protect against hazardous exposures, or improper storage or handling of a chemical.

Examples:

- Wear respiratory protection
- Wash with soap and water
- Store in a well ventilated place
- Not necessarily a mandate for employees to follow.

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Label: Other information

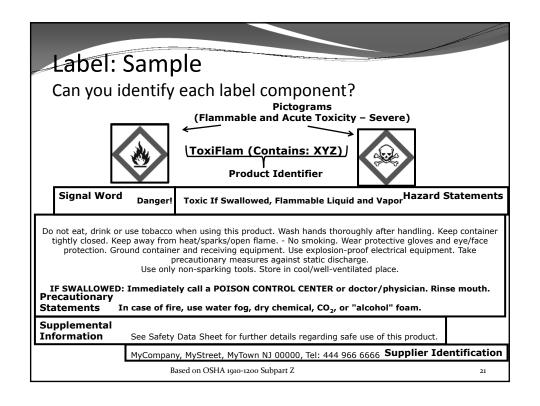
Other information that may be included on the label:

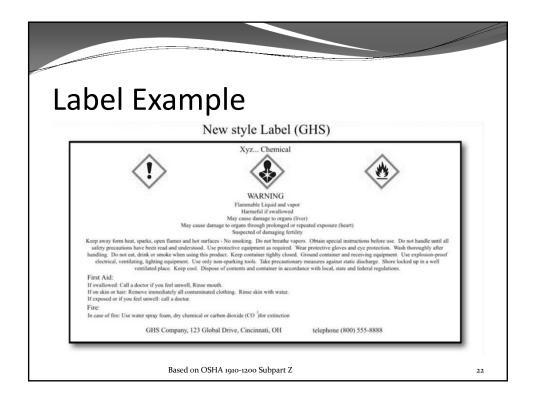
- Physical state
- Color
- Hazards not otherwise classified
- Route of exposure
- Storage and disposal
- Hazard prevention and emergency response instructions



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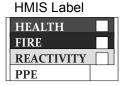






Labels: Secondary containers

- Secondary labeling systems are still permitted
- Must be consistent with the revised Haz Comstandard
- No conflicting hazard warnings or pictograms.
- May use written materials (e.g., signs, placards, etc.) in lieu of affixing labels to individual stationary process containers.
- Employer can use GHS compliant labels (same as shipping).



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NFPA Label



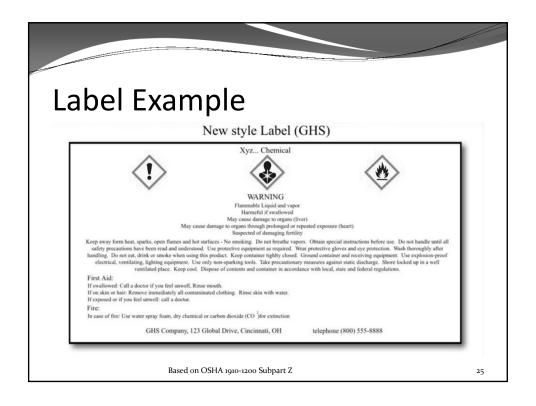
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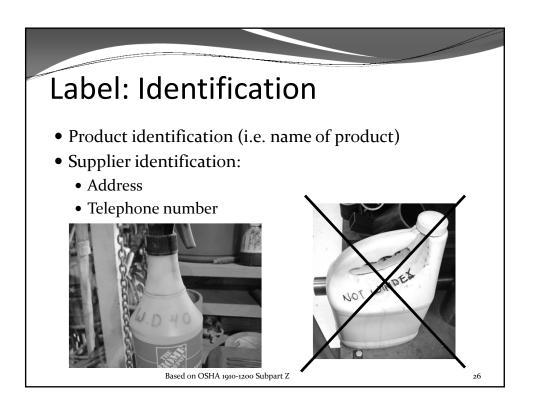
Workplace Labeling

- OSHA is maintaining the approach used in the current HCS that allows employers to use workplace-specific labeling systems as long as they provide the required information.
- However, such workplace label systems may need to be updated to make sure the information is consistent with the new classifications.
- NFPA/HMIS Systems
 - » (ratings systems v. classification)

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Safety Data Sheets

HazCom 1994

 Specifies what information is required, but chemical manufacturer or importer can use whatever format or order of information they want.

HazCom 2012

- 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.

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16-Section Safety Data Sheet

- Identification of the substance or mixture and of the supplier
- 2. Hazards identification
- 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

- o. Stability and reactivity
- Toxicological
- 12. Ecological information (non mandatory)
- 13. Disposal considerations (non mandatory)
- 14. Transport information (non mandatory)
- 15. Regulatory information (non mandatory)
- 16. Other information including information on preparation and revision of the SDS

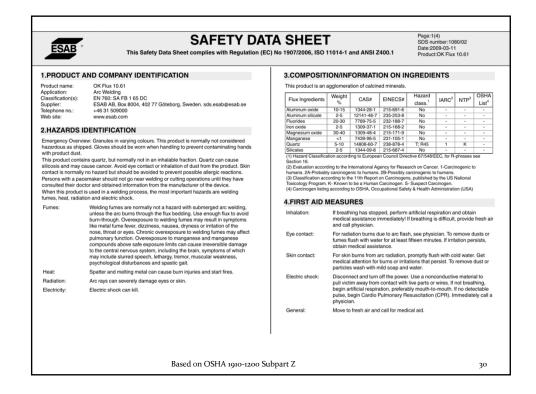
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Appendix D

- Specifies the minimum information to be included in each of the 16 sections.
- Most significant revision in this information are in the final rule:
 - » ACGIH TLVs to be required on the SDS.

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SAFETY DATA SHEET

This Safety Data Sheet complies with Regulation (EC) No 1907/2006, ISO 11014-1 and ANSI Z400.1

Page:2(4) SDS number:1080/02 Date:2009-03-11 Product:OK Flux 10.61

No specific recommendations for welding consumables. Welding arcs and sparks can ignite combustible and flammable materials. Use the extinguishing media recommended for the burning materials and fire situation. Wear self-contained breathing apparatus as fumes or vapors may be harmful.

6.ACCIDENTAL RELEASE MEASURES

Solid objects may be picked up and placed into a container. Liquids or pastes should be scooped up and placed into a container. Wear proper protective equipment while handling these materials. Do not discard are refuse. Personal precautions: refer to section 8. Environmental precautions: refer to section 9.

7.HANDLING AND STORAGE

Handling:

Handle with care to avoid stings and cuts. Wear gloves when handling welding consumables. Avoid exposure to dust. Do not ingest. Some individuals can develop an allergic reaction to certain materials. Retain all warning and identity labels.

Storage: Keep separate from chemical substances like acids and strong bases, which could cause chemical reactions.

8.EXPOSURE CONTROLS/PERSONAL PROTECTION

Avoid exposure to welding fumes, radiation, spatter, electric shock, heated materials and dust.

Engineer measure

Ensure sufficient ventilation, local exhaust, or both, to keep weldin furmes and gases from breathing zone and general area. Keep wo place and protective clothing clean and dyr. Train welders to avoid contact with live electrical parts and insulate conductive parts. Ch condition of protective clothing and equipment on a regular basis.

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Use industrial hygiene monitoring equipment to ensure that exposure does not exceed applicable national exposure limits. The following limits can be used as guidance. Unless

noted, all values are for 8 hour time weighted averages (TWA). For information about welding fume analysis refer to Section 10.

Substance	CAS#	ACGIH TLV 1 mg/m3	OSHA PEL 2 mg/m3
Aluminum oxide	1344-28-1	1**	15*, 5**
Aluminum silicate	12141-46-7	1**	15*, 5**
Fluorides	7789-75-5	2,5(F)	2,5(F)
Iron oxide	1309-37-1	5**	10(f)
Magnesium oxide	1309-48-4	10***	15*
Manganese	7439-96-5	0,2	5(ceil)
Quartz	14808-60-7	0,025**	10mg/m3/(%SiO2+2)**
Silicates	1344-09-8		

(2) Permissible Exposure Limits according to the Occupational Safety & Health Administration (USA).

(3) "Total dust, "Respirable fraction, ""Inhalable fraction.(f) fume, (d) dust, (m) mist, (ceil) ceiling.

9.PHYSICAL AND CHEMICAL PROPERTIES

Appearance: Granules, non-volatile with varying color Melting point: >1000°C />1800°F

10.STABILITY AND REACTIVITY

This product is only intended for normal welding purposes. General:

This product is stable under normal conditions.

Reactivity: Contact with chemical substances like acids or strong bases could cause generation of gas.

When this product is used in a welding process, hazardous decomposition products would include those from the volatilization, reaction or oxidation of the materials listed in section 3

When this product is used in a weldring process, hazardous decomposition products would include those from the volatilization, neaction or oxidation of the materials isted in section 3 and those from the base metal and coaling. Terms are normally not generated in submerged are welding, provided that a sufficient flux bedding is used to prevent the arc from burning through. If the arc burns through the flux bedding, reasonably expected furne constituents of this product would include fluorides and oxides of metals such as iron, manganese, magnesium, sodium, aluminum and silicon. Refer to applicable national exposure limits for furne compounds, including those exposure limits for furne compounds found in Section 8. Manganese has a low exposure limit, in some countries, that may be easily exceeded.

Reasonably expected gaseous products would include carbon oxides, introgen oxides and ozone. Air contaminants around the welding area can be affected by the welding process and influence the composition and quantity of furnes and gases produced.

Based on OSHA 1910-1200 Subpart Z

ESAB °

SAFETY DATA SHEET

This Safety Data Sheet complies with Regulation (EC) No 1907/2006, ISO 11014-1 and ANSI Z400.1 11.TOXICOLOGICAL INFORMATION

Page:3(4) SDS number:1080/02 Date:2009-03-11 Product:OK Flux 10.61

Inhalation of welding turnes and gases can be dangerous to your health. Classification of welding furnes is difficult because of varying base materials, coatings, air contamination and processes. The International Agency for Research on Cancer has classified welding furnes as possibly carcinogenic to humans (Group 2B).

Overexposure to welding furnes may affect pulmonary function. Overexposure to welding furnes may affect pulmonary function. Overexposure to manganese and manganese compounds above sale exposure limits can cause irreversible damage to the central nervous system, including the brain, symptoms of which may include shurred speech, therapy, temor, muscular weakness, psychological disturbances and spastic gait. Inhalable quartz is a respiratory cancingen however the process of welding covernest cystalline quartz to the amorphous form which is not considered to be a carcinogen.

12.ECOLOGICAL INFORMATION

Welding consumables and materials could degrade/weather into components originating from the consumables or from the materials used in the welding process. Avoid exposure to conditions that could lead to accumulation in soils or groundwater.

13.DISPOSAL CONSIDERATIONS

Discard any product, residue, disposable container or liner in an environmentally acceptable manner, in full compliance with federal and local regulations. Use recycling procedures if USA RCRA: This product is not considered hazardous waste if discarded.

Residues from welding consumables and processes could degrade and accumulate in soils and groundwater.

14.TRANSPORT INFORMATION

No international regulations or restrictions are applicable.

15.REGULATORY INFORMATION

Read and understand the manufacturer's instructions, your employer's safety practices and the health and safety instructions on the label. Observe any federal and local regulations. Take precautions when welding and protect yoursel and others. WARNING: Welding turnes and gases are hazardous to your health and may damage lungs and other organs. Use adequate ventilation.

ELECTRIC SHOCK can kill.

ARC RAYS and SPARKS can injure eyes and burn skin.

WHMIS classification: Class D; Division 2, Subdivision A

Canadian Environmental Protection Act (CEPA): All constituents of this product are on the Domestic Substance List (DSL).

Under the OSHA Hazard Communication Standard, this product is

considered hazardous.

This product contains or produces a chemical known to the state of California to cause cancer and birth defects (or other reproductive harm). (California teath 8 Safety Code § 25249, 6 steep.) United States EPA Toxic Substance Control Act; All constituents of this product are on ist or are excluded from listing the TSCA inventory list or ar CERCLA/SARA Title III

Reportable Quantities (RQs) and/or Threshold Planning Quantities (TPQs):

Ingredient name RQ (lb) TPQ (lb)
No ingredients listed in this section Spills or releases resulting in the loss of any ingredient at or above its RQ require immediate notification to the National Response Center and to your Local Emergency Planning Committee.

Section 311 Hazard Class

As shipped: Immediate In use: Immediate delayed

EPCRA/SARA Title III 313 Toxic Chemicals

The following metallic components are listed as SARA 313 "Toxic Chemicals" and potential subject to annual SARA 313 reporting. See Section 3 for weight percent.

Ingredient name Disclosure threshold
a 1.0% de minimis concentration

16.OTHER INFORMATION

This Safety Data Sheet has been revised due to modifications to several paragraphs and/or new format. This SDS supersedes... 1080/01.

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Employee Information and Training

HazCom 1994

- · "Right to Know"
 - Employees need to know the information on the chemicals are available and how to get the information on the hazards involved.

HazCom 2012

- "Right to Understand"
 - Employees need to understand and identify the hazards related to a chemical by pictogram and reading the label on the product.

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Employee Information and Training

HazCom 1994

 Requires employee information and training before a worker is exposed to the hazardous chemicals in the workplace, and whenever the hazard changes.

HazCom 2012

- 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.

Based on OSHA 1910-1200 Subpart Z



Training

• Employers shall train employees regarding the new label elements and safety data sheets format by December 1, 2013.

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Training, cont.

- Label elements
 - » Train 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 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 the less severe hazard
- Safety Data Sheet Format
 - » Train the employees on the standardized 16 section format and the type of information they would find in the various sections.

Based on OSHA 1910-1200 Subpart Z



Supplemental Employee Training

Details of the **facility specific** hazard communication program:

- Location and availability of written program and SDSs
- Physical hazards, health hazards and hazards not otherwise classified (HNOC) of the chemicals in the work area
- Chemical list, location and use of hazardous chemicals
- Secondary container labeling system
- Specific procedures to protect employees from the chemical hazards
- Methods used to detect the presence or release of hazardous chemicals (sensor alarms, odors, visual other monitoring devices)

Based on OSHA 1910-1200 Subpart Z

Effective Dates and Requirements			
Effective Completion Date	Requirement(s)	Responsible Party	
December 1, 2013	Train employees on the new label elements and SDS format	Employers	
June 1, 2015	Compliance with all modified provisions of the final rule except:	Chemical manufacturers, importers, distributors, and employers	
December 1, 2015	The distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label	Distributor	
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified hazards [and affected vertical standard specific signage]	Employer	
Transition Period: 10/2012 to the effective completion dates noted above	Comply with either 29 CFR 1910.1200 (this final standard), or the current standard, or both Based on OSHA 1910-1200 Subpart Z	Chemical manufacturers, importers, distributors, and employers 38	



Other Affected Standards

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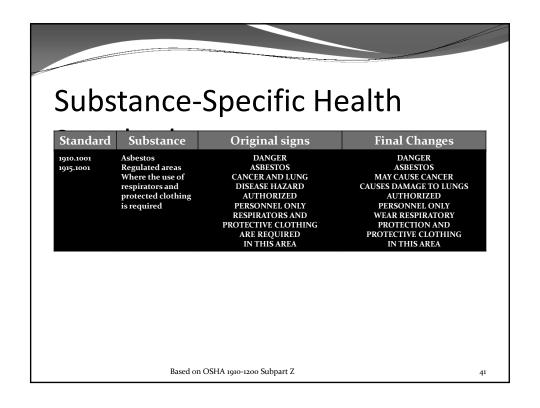
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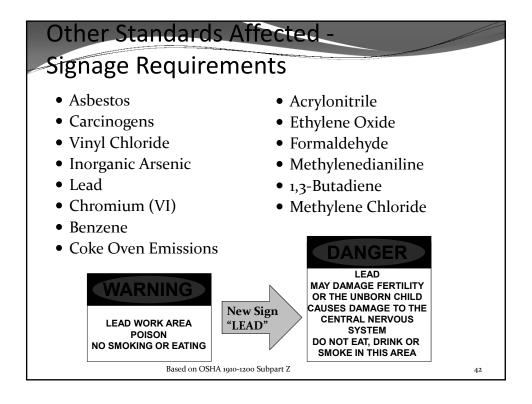
Health Standards

- The substance-specific standards generally pre-date the HCS, and do not have a comprehensive approach to hazard communication.
- The final rule references HazCom 2012 in each of these standards to ensure they have all the protections of the rule.
- In addition, OSHA updated the provisions regarding what is to be communicated to workers to ensure the health effects are consistent with the GHS criteria.
- Regulated area signs will need to be updated to reflect the new language.
- Employers have until June 1, 2016 to update the signs.

 Based on OSHA 1910-1200 Subpart Z







Health Standards

- Asbestos (1910.1001; 1926.1101; 1915.1001)
- 13 Carcinogens (1910.1003)
- Vinyl Chloride (1910.1017)
- Inorganic Arsenic (1910.1018)
- Lead (1910.1025; 1926.62)
- Chromium (VI) (1910.1026; 1926.1126; 1915.1026)
- Cadmium (1910.1027; 1926.1127)
- Benzene (1910.1028)
- Coke Oven Emissions (1910.1029)
- Cotton Dust (1910.1043)
- 1,2-dibromo-3-chloropropane (1910.1044)

- Acrylonitrile (1910.1045)
- Ethylene Oxide (1910.1047)
- Formaldehyde (1910.1048)
- Methylenedianiline (1910.1050; 1926.60)
- 1,3-Butadiene (1910.1051)
- Methylene Chloride (1910.1052)
- Occupational exposure to hazardous chemicals in laboratories (1910.1450)

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Safety Standards

- OSHA updated a number of safety standards to be consistent with the criteria in the HazCom 2012.
- The manner in which this was done depended on the provisions of the standard being considered, and approaches varied.
- In some cases, it was decided that changes could not be made at this time given the source of the standard or other constraints.
- OSHA sought to minimize the impact on the scope or substantive provisions of the standards that were updated.

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Safety Standards

- Flammable Liquids (1910.106; 1926.52)
- Spray finishing using flammable and combustible materials (1910.107)
- Process safety management of highly hazardous chemicals (1910.119; 1926.64)
- Hazardous waste operations and emergency response (1910.120; 1926.65)
- Dipping and coating operations: Coverage and definitions (1910.123)
- General requirements for dipping and coating operations (1910.124)
- Additional requirements for dipping and coating operations that use flammable liquids or liquids with flashpoints greater than 199.4 °F (93 °C) (1910.125)
- Welding, Cutting, and Brazing (1910.252)

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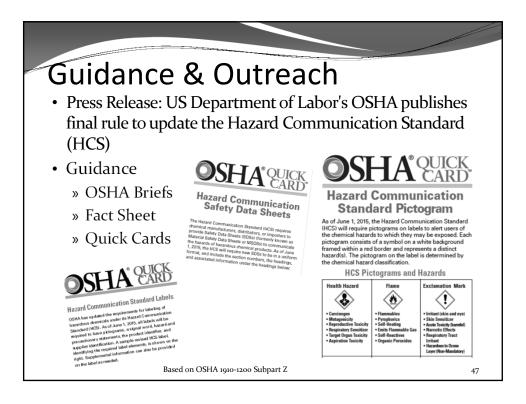
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The Workplace by December 1, 2013

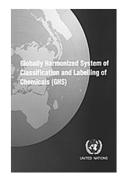
- For Employers
 - » Initial employee training on the label elements
 - » Initial employee training on identifying hazards by use of Pictograms and Signal Words
 - » Minimal training on new SDS format
 - » Continue to maintain the updated SDSs
 - » Review current hazard communication program and update as necessary

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UN GHS Links & Information



- United Nations
 Economic Commission
 for Europe GHS Sub-committee
- http://www.unece.org/t rans/danger/publi/ghs/ ghs_welcome_e.html

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