



Next GHS Hazcom Update May Land Before Year Ends

OSHA plans to issue a Final Rule to align its Hazard Communication Standard with the 7th revised edition of the Globally Harmonized System for Classifying and Labeling Chemicals (GHS) in December 2022.

Proposed changes to the Hazard Communication Standard (HCS) for chemical manufacturers, importers, distributors, and employers will impact labeling of chemical containers, hazard classification, Safety Data Sheet (SDS) requirements, and more.

Labeling Small Containers

The proposed update would codify a number of [existing OSHA interpretations](#) related to labeling of containers that are too small to fit a full GHS-style label.

A new paragraph (f)(12) would allow for reduced information to appear on small containers when it is demonstrated that using a pull-out label, fold-back label, or tag is not feasible.

Containers *less than or equal to 100 ml capacity* would require:

- a product identifier,
- pictogram(s),
- signal word,
- chemical manufacturers' name and phone number, and
- a statement that the full label information is provided on the immediate outer package.

For containers *less than or equal to 3 ml capacity*, OSHA would require only the product identifier to appear on the immediate container (such as a vial).

OSHA also proposes to **require the immediate outer package to include:**

- Full label information, and
- a statement indicating that the smaller containers inside must be stored in the immediate outer package when not in use.

GHS Labels on Bulk Chemical Shipments

For bulk shipments, OSHA would allow for labels to be placed on the immediate container, like is currently required, or be transmitted with shipping papers or bills of lading (or electronically) as long as the label is available to workers in printed form at the receiving end of the shipment. This would be added to paragraph (f)(5). That paragraph would be re-titled "Transportation."

Updating Hazard Labels

When a chemical manufacturer, importer, distributor, or employer learns significant new information about the hazards of a chemical, paragraph (f)(11) requires them to update container labels within 6 months.

New HCS Hazard Classes & Categories

The proposed rule would add one new hazard class: Desensitized explosives.

Three new hazard categories would be added as well. Under the Flammable Gases class, OSHA would add categories for *unstable gases* and *pyrophoric gases*. Under the Aerosols class, OSHA would add a category for *nonflammable aerosols*.

OSHA is also proposing to add a new sentence to the hazard classification requirements in 29 CFR 1910.1200(d)(1) that would require the classification to include "any hazards associated with a change in the chemical's physical form or resulting from a reaction with other chemicals under normal conditions of use."

Trade Secrets on Safety Data Sheets

OSHA proposes two significant changes concerning trade secrets that may appear on a Safety Data Sheet.

The proposed rule would allow manufacturers, importers, and employers to withhold a chemical's concentration range as a trade secret.

OSHA also requested comment on whether the Agency should adopt a set schedule for updating the HCS in the future, such as updating the HCS every four years or updating after every two GHS revisions.



Monthly Toolbox Talk

According to the NFPA, December and January are the peak months for home fires, deaths and injuries

- December is the peak time of year for home candle fires; the top two days for home candle fires are Christmas and Christmas Eve.
- Candles started an average of 7,600 home fires annually (2% of all home fires), resulting in an average of 80 deaths (3%), 680 injuries (6%), and \$278 million in direct property damage (4%) per year.

Use Candles Safely

- Place candles where they cannot be knocked down or blown over and out of reach of children.
- Keep matches and lighters up high, preferably in a locked cabinet, and out of children's reach.
- Use flameless candles near flammable objects; consider battery-operated candles throughout.

Home Heating

- Heating is the second leading cause of U.S. home fires and home fire injuries and the leading cause of home fires and deaths.
- December, January and February are the peak months for heating fires.

Fireplace and Chimney Safety

- If you use a fireplace, have it inspected annually and make repairs as needed.
- Clean the fireplace regularly after use and never leave a burning fire unattended.
- Ensure you have the correct fire door or screen.
- Do not hang stockings or other decorations near a lit fire.
- Keep all flammable materials, fabrics, and liquids away from any lit fire.
- Embers smolder; ensure all embers are completely out before going to bed or leaving home.
- Keep all flammable materials, fabrics, and liquids away from any lit fire.

Space Heaters

- Space heaters should always be placed on the smoothest floor surface possible.
- Avoid placing a space heater within three feet of anything flammable.
- Do not leave unattended.

