

Avoiding Sticker Shock

June 1, 2015, deadline approaching for new OSHA labeling

Move over, skull and crossbones: You're about to be replaced with all new symbols that allow hazardous material containers to be more easily recognized by workers—including health care personnel—across the world.

As part of its revision of the Hazard Communication Standard (HCS), 29 CFR 1910.1200, OSHA announced in 2013 the implementation of new hazardous chemical labeling requirements that conform to the United Nations's Globally Harmonized System of Classification and Labeling of Chemicals (see the July 2013 issue of *Environment of Care News*).¹ The amended HCS requires that chemical hazard details be displayed on labels via simple visual notations designed to quickly get the user's attention and convey easily understood information and immediate warnings of the hazards, no matter what country the container is shipped from or what accompanying text language is used. The new HCS labels also must offer handling instructions for the contents.

The new label transition deadline is coming up. All containers with hazardous chemicals shipped after June 1 are required to use HCS labels, which must contain the following:

- The **name, address, and phone number** of the chemical manufacturer, importer or other responsible party
- The **product identifier**, which can include the chemical name, code number, or batch number
- **Signal word(s)**, such as "Danger" and "Warning," used to communicate the hazard's relative level of severity
- **Hazard statement(s)** describing the nature of a chemical's hazard(s); for example, "Highly flammable liquid and vapor. May cause liver and kidney damage"

- **Precautionary statement(s)** detailing suggested steps you can take to prevent or minimize the negative consequences of being exposed to the chemical or improperly handling or storing it; for example, "Keep container tightly closed. Store in a cool, well-ventilated place that is locked"
- **Pictogram(s)** conveying particular information about a chemical's danger by employing up to nine graphic symbols
- **Supplemental information** from the manufacturer that lists any additional details regarding the chemical above and beyond what the HCS requires, including hazards not otherwise classified on the label


HCS labels aren't intended to tell the whole story about the harmful contents inside, however. The more complete resource for details about hazardous chemicals is safety data sheets (SDS), which must accompany the container and be stored in work areas where chemicals are kept and used. SDSs will also bear a new standardized appearance for easier comprehension among workers internationally; OSHA's revised standard mandates the use of a 16-section SDS format (see <http://www.osha.gov/Publications/OSHA3514.pdf> for more details).²

Employers have been required to instruct their employees about the new labeling requirements; the deadline to train workers was December 1, 2013. Health care organizations will also be responsible for maintaining HCS labels on the containers (which include drums, totes, and tanks)—meaning that labels must be legible and remain intact without fading, washing off, or being removed in any way. If its HCS label is removed or defaced, a container must be relabeled, but organizations are not responsible for updating or relabeling containers that

arrive with old labels complying with HazCom 1994 (see <http://www.osha.gov/dsg/hazcom/index2.html>). They are, however, obligated to make workers aware of any newly identified hazard that comes to their attention that is not displayed on the label.

Before the June 1 deadline, keep in mind that manufacturers, distributors, and importers are allowed to either use HCS labels early or follow HazCom 1994 compliance requirements. In addition, distributors are permitted to ship containers labeled by manufacturers or importers as being in compliance with HazCom 1994 until December 1, 2015.

Abiding by the new labeling system is a requirement for Joint Commission–accredited health care organizations. Joint Commission Environment of Care Standard EC.02.01.01 states that these organizations must manage "risks related to hazardous materials and waste," and its elements of performance (EP 11 and EP 12) require organizations to possess the "safety data sheets required by law" and to label "hazardous materials and waste. The labels identify the contents and hazard warnings."

For complete details on OSHA's HCS labels and pictograms, visit <http://www.osha.gov/Publications/OSHA3636.pdf>; for more information on the 2012 Hazard Communication Standard, visit <http://www.osha.gov/dsg/hazcom/index.html>. See also *EC News*, July 2013, pages 1 and 3–4. 

References

1. Occupational Safety and Health Administration. Hazard Communication Standard: Labels and Pictograms. *OSHA Brief*. Washington, DC: OSHA; 2013. Accessed Dec 15, 2014. <https://www.osha.gov/Publications/OSHA3636.pdf>.
2. Occupational Safety and Health Administration. Hazard Communication Standard: Safety Data Sheets. *OSHA Brief*. Washington, DC: OSHA; 2013. Accessed Dec 15, 2014. <https://www.osha.gov/Publications/OSHA3514.pdf>.