

TRANSNEWS



Hazard Communication: Managing the Transition to GHS

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Inside this Issue:

Hazard Communication: Managing the Transition to GHS 1

Quick Tips

For additional information on Hazard Communication Compliance and the OSHA Standard, check out the link below:

A guide to the Globally Harmonized System of Classification and Labelling of Chemicals

www.osha.gov/dsg/hazcom/ghs.html

Many transportation operations are overwhelmed with DOT and State regulations pertaining to drivers operating fleet vehicles and have limited interest and time to keep step with workplace safety regulations. However, knowing OSHA inspectors may only be a complaint away (they are REQUIRED to respond to complaints), and knowing the fine structures, transportation operators should consider making workplace safety regulation compliance someone's responsibility. This article highlights important changes to one of the most commonly cited violations across all industries – and one that IS applicable to transportation operations!

In 2012, OSHA revised the Hazard Communication Standard and aligned it with the Global Harmonization System (GHS), the model hazard communication system developed by the United Nations. As part of the revised standard, employers are required to train workers exposed to hazardous chemicals on big changes the update brings to labels and safety data sheets.

As we try to understand the obligations of OSHA's new standard – called "HazCom 2012" – the more questions

arise about GHS adoption in general. So we have come up with four tips or easy action items for you to keep in mind as your organization makes the transition to HazCom 2012.

Tip 1: Comply with HazCom Basics

One of the biggest HazCom 2012 transition issues is that employers were not compliant with the old HazCom Standard, which OSHA is now calling "HazCom 1994." The five key responsibilities employers had under HazCom 1994 are the same key responsibilities you will have under HazCom 2012:

1. Have a written site-specific hazard communication program
2. Keep a list of hazardous chemicals present in the workplace
3. Maintain safety data sheets for all hazardous chemicals
4. Ensure proper use of labels and warning signs in the workplace
5. Train employees on HazCom and specific workplace chemical hazards

If your workplace is not compliant in these five areas, this is the place to start your HazCom 2012 compliance

activities. Having an up-to-date chemical inventory and ensuring there is a safety data sheet for every chemical in the workplace is an especially critical component of managing the transition to HazCom 2012.

Tip 2: Tackle Changes to Labels and Safety Data Sheets

HazCom 2012 standardizes safety data sheets and labels on shipped containers. By June 1, 2015, chemical manufacturers and distributors must reclassify their chemicals using GHS criteria spelled out in HazCom 2012 and then revise their safety data sheets and labels in the formats covered below.

Employees should be trained on the format changes to labels and safety data sheets sooner rather than later because manufacturers and distributors can make the changes any time before their June 1, 2015 deadline. In fact, updated labels and safety data sheets already have entered the marketplace.

Changes to Labels

Under HazCom 2012, label information has six standardized elements:

1. Product Identifier -- Same product identifier as found on safety data sheet

HazCom (Continued on Page 2)

HazCom (Continued from Page 1)

2. Supplier Information -- Including name, address, and phone number of responsible party
3. Pictogram(s) -- Black hazard symbol on white background with red diamond border
4. Signal Word -- Must use either "Danger" or "Warning," depending upon hazards
5. Hazard Statement(s) -- Declarative statement regarding nature or degree of hazard
6. Precautionary Statement(s) -- Descriptions of appropriate prevention, storage, response, and spill measures

For training purposes, employees should know these six elements, how they work together, how the information provides guidance on product handling and emergency response. Employers are not expected to update labels on shipped containers, even if labeled with HazCom 1994-styled labels. They are, however, expected to update workplace labels as necessary, as discussed later in Tip 4.

Safety data sheets get a refresh under HazCom 2012 that includes organizing information into 16 mandatory sections with a strict ordering. To meet training requirements, employers should train employees on the 16 sections and their order.

Another change under HazCom 2012 is that safety data sheets are called SDSs, dropping the M from MSDS. Nonetheless, their role in the new HazCom 2012 standard is largely unchanged.

Tip 3: Be Prepared to Get Messy

Employers should expect that almost their entire safety data sheet library will need to be updated. This is causing some employers to ask whether they have to keep two sets of MSDS books until all of the updates are made. The answer is no. During the transition, employers can be in compliance with the old standard or the new standard or a combination of the two.

For example, employers will likely find their MSDS library contains safety data sheets in both the new format as well as the myriad of formats that were allowed under HazCom 1994. Still, even though two sets of books are not required, employers will need to pay special attention to MSDSs as they enter the workplace to see exactly what updates, if any, have been made.

Other MSDS questions many employers have are over the timing of the updates and who has to do what. Some employers worry they must ask the chemical manufacturers for the updated documents or even update the manufacturer safety data sheets themselves. This is not the case.

Chemical manufacturers and distributors are responsible for sending the updated documents to the end users of their chemicals with the first shipment or the next shipment after a change has been made. This means employers can realistically update their libraries only as quickly as manufacturers and distributors update their own safety data sheets. Manufacturers are not required to proactively send updated safety data sheets to past customers independent of a new shipment.

Now, if an employer receives a chemical shipment after the June 1, 2015 deadline, they are expected to make a good-faith effort to secure an updated document from the supplier.

Tip 4: Don't Forget about Workplace/ Secondary Container Labels

Under HazCom 2012, workplace labels are still performance based -- meaning OSHA doesn't tell employers exactly what has to go on secondary container labels, it judges workplace label compliance by how well it does its job: effectively communicating hazards. In case you need a refresher: any time you transfer chemicals from their shipped-in container to a secondary container (spray bottle, fluid can, etc.), that secondary container must be labeled with information to identify the contents and their health hazards.

OSHA says explicitly in the final rule on HazCom 2012, and elsewhere, that employers can continue to use their current workplace labeling systems so long as they effectively communicate to employees the hazards of the chemicals to which the workers are exposed.

The OSHA brief, "Hazard Communication Standard: Labels and Pictograms," says employers can "Either provide all of the required information that is on the label from the chemical manufacturer or, the product identifier and words, pictures, symbols or a combination thereof, which in combination with other information immediately available to employees, provide specific information regarding the hazards of the chemicals."

One last thing to keep in mind: employee training is required with HazCom 2012. Employees need to be trained on the new GHS formatted shipping label. Also, any deviation from that style on the workplace label will also need to be addressed via training.

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Safety Tips

Drivers Edition

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Driver Fatigue

When people drive while they are tired, drowsy, or sleepy, this is referred to as “driver fatigue.” Driver fatigue is a major cause of vehicle accidents, since fatigued drivers are unable to make rapid decisions, and they may have slower reaction times. As a result, many companies have education programs to alert drivers to the dangers of driving while tired, and drivers are encouraged to avoid conditions that may lead to driver fatigue.

Tired drivers often have a difficult time processing and using information; for example,

a driver may not recognize that he or she has drifted into the wrong lane until it is too late. Driver fatigue can also lead to reduced vigilance and slower reaction times. In extreme cases, a driver may actually fall into a micro-sleep, briefly losing consciousness on the road, and this can be extremely dangerous. The risks of driver fatigue goes up dramatically between 10:00 p.m. and dawn, especially for people who work unusual hours or who may have sleep disorders.

A number of symptoms can suggest driver fatigue, including

yawning, tired eyes, boredom, an inability to remember the last segment of the road, oversteering, restlessness, and difficulty concentrating. Drivers who notice these symptoms should pull over to rest, but in a manner that will not alarm your passengers. For example, pulling over and allowing a cigarette break for passengers or notifying passengers that the tire pressure indicator came on and you want to inspect everything. This will allow you to get out of the vehicle and stretch, while not alarming your passengers.

Fatigue (Continued on Page 2)

Autumn Driving

Falling Leaves

Autumn leaves piling along the roadside may be a scenic part of fall, but if those leaves get wet, they can be as big a hazard as driving on ice. If you hit a patch of wet leaves, you can lose traction, causing skidding and the possibility of losing control of your vehicle. Braking and steering may be difficult and leaves often cover the painted road markings, making it difficult to know the locations of lanes.

- Slow down if you are driving on a road covered with leaves, especially when driving around turns.
- Allow yourself plenty of room to stop in an emergency and keep a greater distance with the vehicle in front of you.
- Leaves can obscure potholes, bumps and other hazards.
- A pile of leaves near the side of the road can be an

inviting place for children. Never drive through a pile of leaves and use caution around turns and where children can play.

School is in

Watch for children walking to and from school, especially in early morning hours when they might not be as readily visible. Children walking in groups with their friends may be distracted and careless about stepping out

Autumn (Continued on Page 2)

Inside this issue:

Driver Fatigue	1
Autumn Driving	1
Safe Driving After Dark	2

Fatigue (Continued from Page 1)

A great way to combat driver fatigue is by getting better sleep at night. By losing sleep, employee drivers risk becoming fatigued a lot faster than drivers who sleep a full eight hours. Improving the sleeping environment can be helpful in getting a full night of restful sleep. This may include sleeping in a dark and quiet room, having a cool temperature, turning on a white noise machine, and having a comfortable bed and pillow.

You should also watch your caffeine intake. You may think by drinking caffeine you are staying awake longer, but the end result may be worse for you. You will get a

very short burst of energy after caffeine, but you may experience a much longer crash. This crash is much worse than the tiredness you would have felt if you never had caffeine in the first place. You don't have to give it up altogether, but limit how much you have overall.

It is also important to rest before a major trip. Stretching and setting aside time for breaks during trips is also a great way to prevent driver fatigue. It is important to recognize the signs of sleepy driving early. It is better to pull over and be a bit late than get into an accident.

The National Sleep Foundation estimates that around 20% of crashes may involve

fatigued drivers. 37% of drivers in a National Highway Traffic Safety Administration study admitted that they had fallen asleep while driving. The risk of traffic accidents goes up at night due to a variety of factors, but fatigue is a major issue, and this risk also increases in rural and remote areas. The National Sleep Foundation asks drivers to "Drive Alert, Arrive Alive."

For additional information on Driver Fatigue, visit the North American Fatigue Management Program at www.NAFMP.com.

Autumn (Continued from Page 1)

in traffic. Slow down and expect they unexpected.

Weather

Fall is a time of variable weather. Sunny days can give way to frosty nights, and sudden showers may leave roads slick. Make sure your wiper blades, tires, and brakes are all in good working order. If you find frost on your windshield in the morning, take the time to clean it off so you have full visibility.

Animals

Autumn is a time of greater activity in the animal world. It's mating season for deer, elk, moose and other larger mammals. A buck in pursuit of a doe may not stop for traffic. Bears are focused on ingesting as many calories as possible as the days dwindle, so are less cautious about being out at all hours. Smaller animals, too, are more active in autumn as they gather food stores. Slow down and be extra alert if you live in an area where these animals roam. Get in the habit of scanning the road ahead. If you see movement or an animal on the side of the road, decrease your speed.

Safe Driving After Dark

Why is night driving so dangerous? One answer is the darkness itself. According to the National Safety Council, 90 percent of a driver's reaction depends on vision – and vision is limited at night. Depth perception, color recognition and peripheral vision are all compromised after sundown. Older drivers especially have difficulties driving at night.

Another dangerous factor is fatigue. Drowsiness slows reaction times and because the body thinks of night as the time to rest, you may become increasingly groggy while driving at night.

Fortunately, you can take several steps to minimize the risks of driving at night:

- Prepare your vehicle for night driving. Ensure you have clean and functioning headlights, taillights, and signal lights during your pre-trip inspection.
- Be aware of potential miss-aimed headlights. Some vehicle headlights can be adjusted. If you think yours may be "pointing" somewhere other than where they should be, ask maintenance to investigate.
- Reduce your speed and increase your following distance. Judging the

speed and distance of other vehicles is more difficult at night than during the day.

- Don't overdrive your headlights. You should be able to stop and park in the illuminated area.
- When following another vehicle, keep your low beam headlights on so you don't blind drivers ahead of you.
- If an oncoming vehicle doesn't lower its beams from high to low, avoid glare by watching the right edge of the road and using it as your guide.
- Don't ever drink and drive. Alcohol impairs your driving ability and also acts as a depressant that may lead to fatigue.
- Avoid smoking while driving. Smoke's nicotine and carbon monoxide hamper night vision.
- If you're too tired to drive any farther, stop and rest awhile.
- Observe nighttime driving rules as soon as the sun goes down. Early evening can be one of the most difficult times to drive.



Safety Tips

Workplace Safety

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HazCom 2012: Making the Transition to GHS

In 2012, OSHA revised the Hazard Communication Standard and aligned it with the Global Harmonization System (GHS), the model hazard communication system developed by the United Nations. The new standard – called “HazCom 2012” – has updated the standard and made big changes to required labels and safety data sheets.

Under HazCom 1994, most companies used the NFPA and HMIS labeling systems to meet the requirements of the standard. The NFPA and HMIS labels may be familiar to you and may even be used at your facility. They are the red, white, blue and yellow: bar or diamond labeling systems in the diagrams below.

container labeling practices already in place at your facility, then the only major label changes will be on the chemical containers that are shipped to your facility.

Chemical suppliers and manufacturers are now required to adopt the GHS labeling system and their six standard labeling elements. This means by June 1, 2015, all chemical manufacturers and suppliers are required to have labels with the following information:

Inside this issue:

HazCom 2012: Making the Transition to GHS **1**

In the sections below, we will discuss the changes in the new HazCom 2012 standard and how they will affect your interaction with chemicals in the workplace.



HEALTH	<input type="checkbox"/>
FLAMMABILITY	<input type="checkbox"/>
REACTIVITY	<input type="checkbox"/>
PERSONAL PROTECTION	<input type="checkbox"/>

HazCom 2012 Labels and NFPA/HMIS Labels

The biggest changes to the revised HazCom 2012 standard are to the labels required on shipped containers. Under the old standard – HazCom 1994 – labels on shipped containers and workplace labels were performance based, which meant that the standard didn’t say exactly what needed to be on labels, as long as the labels were effective and could successfully transmit hazard information to users.

As part of HazCom 2012, companies may continue to use the NFPA, HMIS or other company specific labeling systems on secondary containers. Many companies may not make any changes to their current secondary container labeling practices.

If your company does continue to use the same secondary

- 1. Product Identifier**
matching the product identifier on the safety data sheet
- 2. Supplier Information**
including name, address and phone number of the responsible party
- 3. Signal Word**, either “Danger” or “Warning” depending on the severity
- 4. Pictogram(s)**, black hazard symbols on white background with red diamond borders

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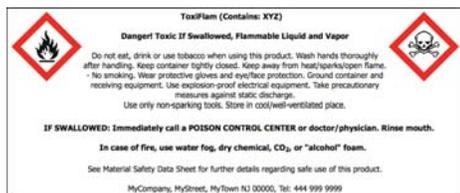
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HazCom (Continued from Page 1)

that provide a quick visual reference of hazard information

- Hazard Statement(s)** that describe that nature of the hazard and/or its severity
- Precautionary Statement(s)** that provide important information on the safe handling, storage and disposal of the chemical

Below is an example of what the new GHS labels should look like:



As part of the new GHS labeling system, there are also nine standard pictograms:



You should become familiar with all nine of these pictograms, because they will now be the standard pictograms used on all chemical containers that are shipped to your facility.

The new GHS labeling system will communicate a lot more information about the chemical directly on the containers and provide more hazard information that will help you handle chemicals safely at your facility. As an employee and a user of these chemicals, it is in your best interest to familiarize yourself with the new GHS labeling system, so that you can help reduce or prevent injuries to yourself and others while using potentially hazardous chemicals in the workplace.

HazCom 2012 Safety Data Sheets

Safety Data Sheets are getting a refresh in the new HazCom 2012 standard. Under HazCom 1994, there were a myriad of formats and no specific details on mandatory sections. This caused a lot of difficulties when working with Safety Data Sheets because there were so many different form variations and required information was not consistent with all Safety Data Sheets.

The new standard however, requires all Safety Data Sheets to be organized into 16 mandatory sections with strict ordering. This will solve a lot of headaches by having uniform Safety Data Sheets. The sixteen sections, in order, include:

Section 1: Identification includes product identifier; manufacturer name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2: Hazard Identification includes all hazards regarding the chemical; required label elements.

Section 3: Composition/Information on Ingredients includes information on chemical ingredients.

Section 4: First-Aid Measures includes important symptoms/effects, acute, delayed; treatment.

Section 5: Fire-Fighting Measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6: Accidental Release Measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7: Handling and Storage lists precautions for safe handling and storage, including incompatibilities.

Section 8: Exposure Controls/Personal Protection lists appropriate engineering controls; personal protective equipment (PPE).

Section 9: Physical and Chemical Properties lists the chemical's characteristics.

Section 10: Stability and Reactivity lists chemical stability and possibility of hazardous reactions.

Section 11: Toxicological Information includes routes of exposure; related symptoms; numerical measures of toxicity.

Section 12: Ecological Information includes information on the environmental impact of a released chemical.

Section 13: Disposal Considerations includes guidance on proper disposal practices.

Section 14: Transport Information includes guidance on classification for shipping and transportation by road, air, rail and sea.

Section 15: Regulatory Information includes regulations that may be applicable to the product.

Section 16: Other Information includes the date of preparation or last revision.

GLOBAL HAZMONIZATION SYSTEM PICTOGRAMS

Flame Over Circle



- Oxidizing Gases
- Oxidizing Liquids
- Oxidizing Solids

Flame



- Flammables
- Self-Reactives
- Pyrophorics
- Self-Heating
- Emits Flammable Gas
- Organic Peroxides

Exploding Bomb



- Explosives
- Self-Reactives
- Organic Peroxides

Skull & Crossbones



- Acute Toxicity (Fatal or Toxic)

Corrosion



- Skin Corrosion/Burns
- Eye Damage
- Corrosive to Metals

Gas Cylinder



- Gases Under Pressure

Health Hazard



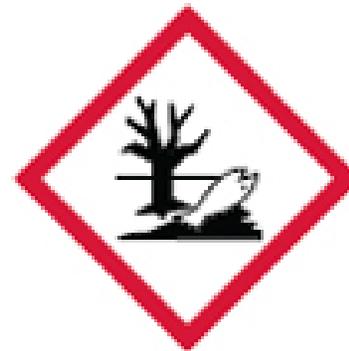
- Carcinogen
- Respiratory Sensitizer
- Reproductive Toxicity
- Target Organ Toxicity
- Mutagenicity
- Aspiration Toxicity

Exclamation Mark



- Irritant
- Dermal Sensitizer
- Acute Toxicity
- Narcotic Effects
- Respiratory Tract Irritant

Environmental



- Acute Aquatic Toxicity
- Chronic Aquatic Toxicity



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