

## OSHA Safety Data Sheet (SDS) Implementation Summary

In an effort to increase workplace safety, the United States Department of Labor Occupational Safety and Health Administration (US/OSHA) has adopted a new format for Material Safety Data Sheets (MSDS). Beginning in December of 2013, The Hazard Communication Standard (HCS) set forth by OSHA was aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This update to the Hazard Communication Standard (HCS) will provide a common and coherent approach to classifying chemicals and communicating hazard information on labels and safety data sheets. Businesses have until June 1, 2015 to fully implement these changes in order to be compliant.

The new regulations require that the following changes be made to replace Material Safety Data Sheets with new, standardized Safety Data Sheets:

- **Hazard classification:** The definitions of hazard have been changed to provide specific criteria for classification of health and physical hazards, as well as classification of mixtures. These specific criteria will help to ensure that evaluations of hazardous effects are consistent across manufacturers, and that and safety data sheets are more accurate as a result. For employers, the new classification criteria may result in safety data sheets for new or different substances to be added to the collection.
- **Safety Data Sheets:** Will now have a specified 16-section format. Past OSHA regulations required that MSDS sheets be kept for all potentially hazardous substances in the workplace and be easily accessible to employees. The information required on the safety data sheet (SDS) will remain essentially the same as that in the current standard (HazCom 1994). However, the revised Hazard Communication Standard (HazCom 2012) requires that the information on the SDS be presented using specific headings in a specified sequence. The format of the 16-section SDS should include the following sections:
  - Section 1. Identification
  - Section 2. Hazard(s) identification
  - Section 3. Composition/information on ingredients
  - Section 4. First-Aid measures
  - Section 5. Fire-fighting measures
  - Section 6. Accidental release measures
  - Section 7. Handling and storage
  - Section 8. Exposure controls/personal protection
  - Section 9. Physical and chemical properties
  - Section 10. Stability and reactivity
  - Section 11. Toxicological information
  - Section 12. Ecological information
  - Section 13. Disposal considerations
  - Section 14. Transport information
  - Section 15. Regulatory information
  - Section 16. Other information, including date of preparation or last revision

### What this means to Practices










Although the onus to comply with the new rules falls on product manufacturers and label printers for this phase of OSHA safety reform, employers also must initiate certain actions in accordance with the new rules. All staff must be trained on the new format changes in SDSs.

Safety Data Sheets can be found online by typing in "Safety Data Sheet" followed by the product name in a search engine (such as Google.) The CVMA recommends that practices save the old Material Safety Data Sheet Binders in a file and start an entirely new binder for SDS sheets.

Staff should be aware of the standardized SDS format and should understand where and how to find information on the sheets.

Staff should also be trained on reading SDSs in accordance with the new GHS method. It may be helpful to include a pictogram chart such as the one below.

**HCS Pictograms and Hazards**

<p><b>Health Hazard</b></p>  <ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Mutagenicity</li> <li>▪ Reproductive Toxicity</li> <li>▪ Respiratory Sensitizer</li> <li>▪ Target Organ Toxicity</li> <li>▪ Aspiration Toxicity</li> </ul>	<p><b>Flame</b></p>  <ul style="list-style-type: none"> <li>▪ Flammables</li> <li>▪ Pyrophorics</li> <li>▪ Self-Heating</li> <li>▪ Emits Flammable Gas</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>	<p><b>Exclamation Mark</b></p>  <ul style="list-style-type: none"> <li>▪ Irritant (skin and eye)</li> <li>▪ Skin Sensitizer</li> <li>▪ Acute Toxicity</li> <li>▪ Narcotic Effects</li> <li>▪ Respiratory Tract Irritant</li> <li>▪ Hazardous to Ozone Layer (Non-Mandatory)</li> </ul>
<p><b>Gas Cylinder</b></p>  <ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>	<p><b>Corrosion</b></p>  <ul style="list-style-type: none"> <li>▪ Skin Corrosion/Burns</li> <li>▪ Eye Damage</li> <li>▪ Corrosive to Metals</li> </ul>	<p><b>Exploding Bomb</b></p>  <ul style="list-style-type: none"> <li>▪ Explosives</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>
<p><b>Flame Over Circle</b></p>  <ul style="list-style-type: none"> <li>▪ Oxidizers</li> </ul>	<p><b>Environment (Non-Mandatory)</b></p>  <ul style="list-style-type: none"> <li>▪ Aquatic Toxicity</li> </ul>	<p><b>Skull and Crossbones</b></p>  <ul style="list-style-type: none"> <li>▪ Acute Toxicity (fatal or toxic)</li> </ul>

Employers are directed to begin training of staff immediately and are required to be fully compliant with an ongoing staff training program by June 1, 2015. Also by this date, all SDS sheets must be available to

staff in the new format and all labels must follow the new GHS system.

Many practices may be wondering about “secondary labels” (also called “Workplace Labels” by OSHA.) Secondary labels are ones which are placed on secondary containers such as spray bottles used in-house or rubbing alcohol dispensers. In regard to workplace labels, OSHA released the following statement in the OSHA brief titled, “Hazard Communication Standard: Labels and Pictograms,” dated 2/2013:

#### Workplace Labels

*OSHA has not changed the general requirements for workplace labeling. Employers have the option to create their own workplace labels. They 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.*

*If an employer has an in-plant or workplace system of labeling that meets the requirements of HazCom 1994, the employer may continue to use this system in the workplace as long as this system, in conjunction with other information immediately available to the employees, provides the employees with the information on all of the health and physical hazards of the hazardous chemical. This workplace labeling system may include signs, placards, process sheets, batch tickets, operating procedures, or other such written materials to identify hazardous chemicals. Any of these labeling methods or a combination thereof may be used instead of a label from the manufacturer, importer or distributor as long as the employees have immediate access to all of the information about the hazards of the chemical. Workplace labels must be in English. Other languages may be added to the label if applicable.*

These brief, as well as training guidelines and more resources on OSHA’s Hazard Communication Standards can be accessed at: <https://www.osha.gov/dsg/hazcom/index.html>