

Haz Com Update

New Info?



Haz Com – Now What?

- June 1st – New labels & SDS in place by manufacturers
- December 1st – No old labels in circulation
- June 1st, 2016 – all elements are implemented

Problems

- OSHA acknowledges lack of manufacturer compliance
 - If your request for an SDS or for a corrected SDS does not produce the information needed, you should contact your local OSHA area office for assistance in obtaining the SDS.
 - It is a good idea to document these requests, either by keeping a copy of a letter or e-mail, or a note regarding telephone conversations. If you cannot show a good faith effort to receive the SDS, you can be cited for not having the SDS for a hazardous chemical.

More Problems

- Ever changing GHS (5th Edition)
 - OSHA sits on current review board
- Canada adopts Biohazard Symbol
- Ongoing Issues
 - Combustible Dust
 - Crude oil
 - Nanoparticles
 - HNOC



Labels

- No new guidance
- NFPA 704 vs. Haz Com 2012
 - Do NOT use the hazard category numbers given in section 2 of HazCom 2012 compliant SDS on 704 label
- DOT shipping labels vs. Haz Com 2012

Good & Bad News

- Good
 - CPL is finished, release date TBA

- Bad
 - CSHO's asking for GHS training documentation (Dec 2014)
 - SDS's aren't really SDS's (name change only, missing pictograms, etc.)



Cleaning Chemicals

No Sniffing Please!

Who's At Risk?

- Janitors
- Custodians
- Office Staff
- Teachers
- Medical Offices
- HOUSEHOLD
- In short – Who isn't at risk

What & Why

- What – More than 14,000 consumer brands of cleaners (Household Product Database, DHHS)
 - Industrial brands tend to be less diluted, more corrosive
- Why – Adverse health effects including burns, allergic reactions, cancer, reproductive toxins, asthma

What can possibly go wrong?



Release of Toxic Gas

- Produced from
 - Mixing of chemicals
 - Avoid Bleach & Ammonia
 - Avoid Bleach and Acidic cleaners (rust removers, toilet bowl cleaners)
- Avoidance
 - Don't do it
 - Adequate ventilation
 - Don't use in confined areas



Chemical Burns

- Results from
 - Extremely acidic or alkaline
 - Corrosives

- Avoidance
 - Minimize handling & dilution to minimize splash
 - Wear PPE (long gloves, long sleeves, pants)
 - Ensure labels notify user of hazard

Dermatitis

- Where
 - Atopic and Contact Dermatitis
 - Affects skin, mucus membranes (nose, throat, eye), respiratory system
- Avoidance
 - Avoid handling, splash, aerosols
 - PPE

Headaches

- Can be caused by
 - Air can be contaminated with cleaners for as long as 20 minutes after use (Bello 2010)
 - Fragrances common cause

- Avoidance
 - Reduce aerosol use
 - Avoid air fresheners

Cancer

- Found where
 - May contain
 - Formaldehyde (Formalin)
 - 1,4 – Dioxane
 - Preservatives which release Formaldehyde such as Bronopol (2 – Bromo – 2 – Nitropropane – 1, 3 – Diol)
- Avoidance
 - Don't use



Reproductive Toxins

- Contained in these
 - Borox & Boric Acid
 - Diethylene Glycol Monomethyl Ether
- Pregnant women & women of child bearing age

Asthma

- Results from
 - Single exposure or multiple, frequent exposures
 - Avoid citrus & pine oil
 - Common asthmagens:
 - Floor wax strippers
 - Bleach
 - Toilet cleaner

- Avoidance
 - Adequate ventilation
 - Substitution

Who Regulates

- Products
 - U.S. Consumer Product Safety Commission
- Employees
 - OSHA
- Disposal
 - EPA



UNITED STATES OF AMERICA
CONSUMER PRODUCT
SAFETY COMMISSION

Applicable Standards

- Haz Com
- PPE
- Emergency Equipment
- Flammable Liquid Storage
- BBP



Haz Com

- List on Chemical Inventory
- Maintain SDS
- Training

- If used more frequently or in greater quantity than a household consumer

PPE

- Hazard assessment documented
- Training
- Select correct PPE
- Available at point of use to encourage wearing

Emergency Equipment

- Eyewash within 55 ft or 10 sec
 - Test frequently, unobstructed & identified
- First Aid supplies
 - Adequate for type of injuries
- 1st responder training for chemical burns/splash injuries

Flammable Liquids

- Storage per NFPA (Cat 1, 2, 3)
- Aerosol cans
- Heat & open flames
- Original containers
- Training on handling & storage

Bloodborne Pathogens

- Per Letter of Interp June 3, 1992
- Employer must determine if employees can come into contact with blood from initial pick-up through disposal in the outgoing trash.
- If OSHA determines, that sufficient evidence exists of reasonably anticipated exposure, the employer will be held responsible for providing the protections of 29 CFR 1910.1030

What About Green Products?

- AKA: Natural, Safe, Biodegradable, Green, CFC Free
- Marketing Tool
- Little/No regulation

- Consult SDS

Need More?

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