

# Pinnacol Pointers for Safety Group Programs

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ASSURANCE

*Editor's Note: Safety Group Program Monthly Newsletter Article – March 2016*  
*Contact: Mindy Carrothers (303.361.4790, [mindy.carrothers@pinnacol.com](mailto:mindy.carrothers@pinnacol.com))*

## **Bringing Your Hazard Communication Program Into Compliance**

Chemicals pose a wide range of health hazards (such as irritation, sensitization and carcinogenicity) and physical hazards (such as flammability, corrosion and reactivity). OSHA's Hazard Communication Standard (HCS) helps ensure that information about these hazards and about protective measures is disseminated throughout your organization.

Chemical manufacturers and importers are required to evaluate the hazards of the chemicals they produce or import, and to provide information about them through labels on shipped containers and safety data sheets (SDSs). Further, all employers with hazardous chemicals in their workplaces must prepare and implement a written hazard communication program. They also must label containers, provide employees with access to SDSs and conduct training for all potentially exposed employees.

On March 26, 2012, OSHA adopted portions of the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS) into the HCS. OSHA provided for a four-year transition period for organizations, as well. This means that your organization must come into full compliance with the revised HCS by June 1, 2016.

Here's a look at major changes to the HCS, as well as the effective dates for compliance. While three of the compliance dates have passed, it's important to review them all closely to help ensure your organization is fully compliant with all requirements by the final, June 1 effective date:

### **Major Changes to the Hazard Communication Standard**

- **Hazard classification:** Provides specific criteria for classification of health and physical hazards, as well as classification of mixtures.
- **Labels:** Chemical manufacturers and importers are required to provide a label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided.
- **Safety Data Sheets:** Now has a specified 16-section format.
- **Information and training:** Employers must have trained workers by December 1, 2013, on the new labels elements and safety data sheets format to facilitate recognition and understanding.

## Effective Dates for Compliance

*The table below summarizes the phase-in dates required under the revised Hazard Communication Standard (HCS):*

Effective Completion Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and SDS format.	Employers
June 1, 2015	Compliance with all modified provisions of this final rule, except:	Chemical manufacturers, importers, distributors and employers
December 1, 2015	The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is an HCS Compliant label	
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both	Chemical manufacturers, importers, distributors, and employers

## Pinnacol Resources

For a quick look at the changes to the revised HCS, check out the short video on the [Resources](#) web page at Pinnacol.com. For a deeper dive into the requirements to comply fully with the revised HCS, visit [OSHA's site](#). Or call Pinnacol's Safety On Call hotline at 303-361-4700 or 888-501-4752. Our safety services team stands ready to answer questions and help bring your organization into full compliance.

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