2018 NEWEA

How to Read (and Understand) Safety Data Sheets!

January 23, 2018
Boston, MA

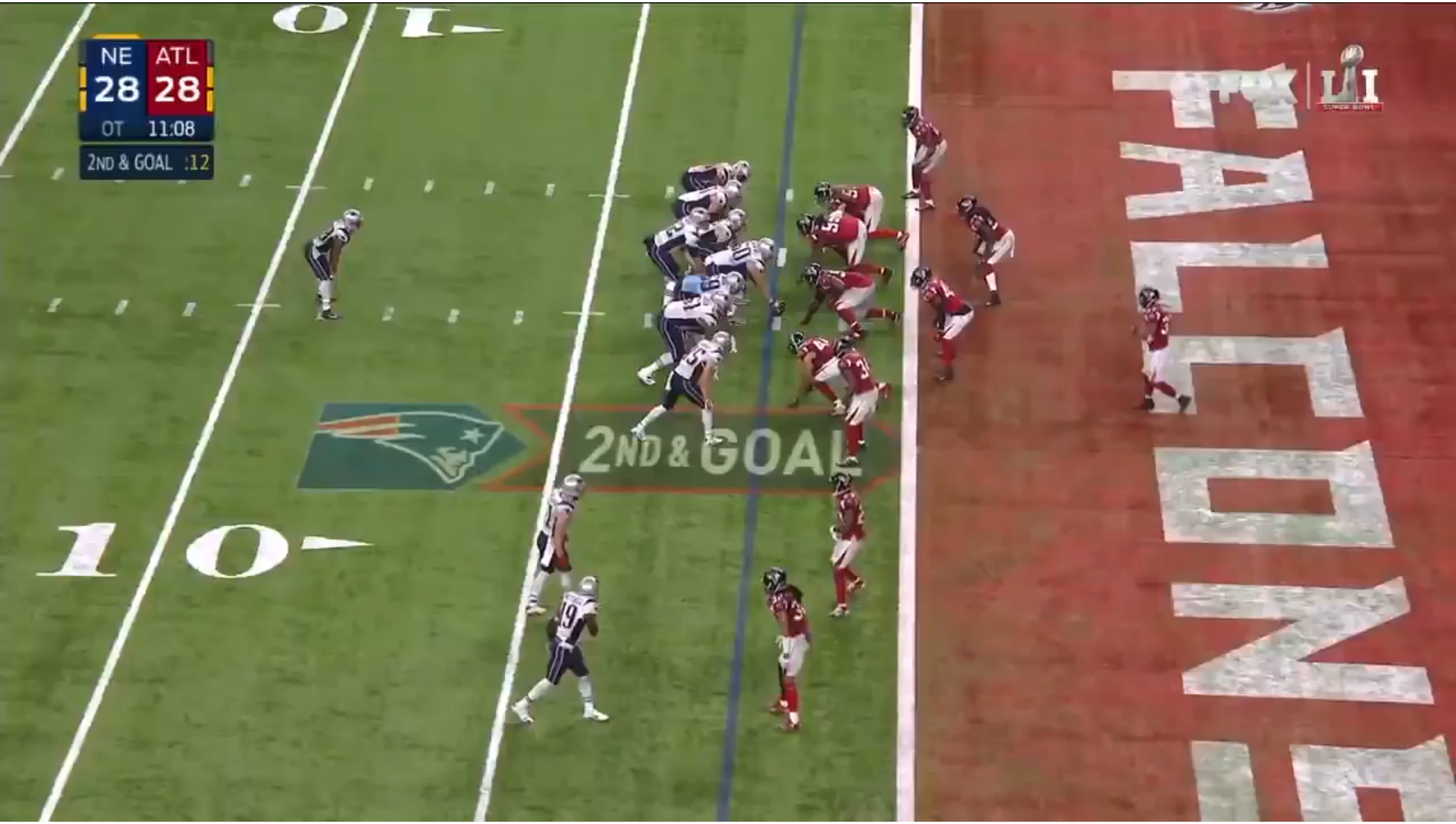
David P. Horowitz, P.E., CSP, Project Manager

Slideshare @dphorowitz

Tighe&Bond

Agenda

- SDS – why do we care?
- GHS
- Common concerns
- Takeaways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Why do we care?
#2 Hazard Communication

Why do we care?
EPA Changes – Tier II's

Physical and Health Hazards (to be effective January 1st, 2018)

Physical Hazard	Health Hazard
Flammable (gases, aerosols, liquids, or solids)	Carcinogenicity
Gas under pressure	Acute toxicity (any route of exposure)
Explosive	Reproductive toxicity
Self-heating	Skin Corrosion or Irritation
Pyrophoric (liquid or solid)	Respiratory or Skin Sensitization
Pyrophoric Gas	Serious eye damage or eye irritation
Oxidizer (liquid, solid or gas)	Specific target organ toxicity (single or repeated exposure)
Organic peroxide	Aspiration Hazard
Self-reactive	Germ cell mutagenicity
In contact with water emits flammable gas	Simple Asphyxiant
Combustible Dust	Hazard Not Otherwise Classified (HNOC)
Hazard Not Otherwise Classified (HNOC)	
Corrosive to metal	

What is the Effective Date of this Final Rule?

Many states have developed their own software for hazardous chemical inventory reporting. Other states use Tier2 Submit, electronic software developed by EPA. To provide enough time for states (as well as EPA) to modify the software to incorporate the new hazard classes, this final rule will be effective on January 1st, 2018. This means that, by March 1st, 2018, facilities are required to report the revised physical and health hazards for their hazardous chemicals present during 2017 calendar year.

Why do we care?
EPA Changes – Tier II's

Significant Changes in Tier2 Submit 2017

- Modified behavior of Hazard Not Otherwise Classified checkbox so it can now be checked together with other physical and health hazard categories, if appropriate (changed in "rev 2")
- Added new physical and health hazard categories (to match the revised safety data sheet options)
- Adjusted validation requirement so that "county" is now required for all facilities
- Adjusted validation requirements so that "type", "pressure", and "temperature" are now required for all storage locations (even those marked confidential)
- Added import check for older MER files to warn users if there are record ID issues that must be resolved this year
- Added export check to warn uses if the file contains invalid characters that would prevent an XML export file from being generated
- Incorporated 2017 North American Industry Classification System (NAICS) codes
- Added "Outside Storage Pile" to the list of storage types
- Updated state-specific fields
- Revised helps
- Made additional minor changes and bug fixes

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Hazard Communication Revisions

Compliance Schedule

Completion Date	Requirement(s)	Who
December 1, 2013	Training •New Label Elements •Safety Data Sheets	Employers
June 1, 2015	Manufacturer full compliance HAZCOM plans updated	Chemical Manufacturers Employers
December 1, 2015	Distribution Prohibitions for non GHS labels	Chemical Manufacturers, Importers and Distributors
June 1, 2016	Updates to program and training based on new hazard classifications	Employers

Training Requirements

- **Labels**
- **Safety Data Sheets**

- **Mawasiliano njia**
  - Utendaji ya msingi
  - Biashara forodha
  - Tu swahili

Training Requirements

- **Labels**
- **Safety Data Sheets**

- **Methods of communication**
  - Performance based
  - Customary business methods
  - English

Figure C.1 – Hazard Symbols and Classes

Flame

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

Flame Over Circle

Oxidizers

Exclamation Mark

Irritant
Dermal Sensitizer
Acute Toxicity (harmful)
Narcotic Effects
Respiratory Tract Irritation

Exploding Bomb

Explosives
Self Reactives
Organic Peroxides

Corrosion

Corrosives

Gas Cylinder

Gases Under Pressure

Health Hazard

Carcinogen
Respiratory Sensitizer
Reproductive Toxicity
Target Organ Toxicity
Mutagenicity
Aspiration Toxicity

Skull and Crossbones

Acute Toxicity (severe)

Figure C.1 – Hazard Symbols and Classes

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Respiratory Sensitizer
Reproductive Toxicity
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Mutagenicity
Aspiration Toxicity

Skull and Crossbones

Acute Toxicity (severe)

Hazard Classifications

Physical Hazards

Figure C.1 – Hazard Symbols and Classes

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Carcinogen
Respiratory Sensitizer
Reproductive Toxicity
Target Organ Toxicity
Mutagenicity
Aspiration Toxicity

Skull and Crossbones

Acute Toxicity (severe)

Hazard Classifications

Health Hazards

Quick Quiz

- What's the most common chemical used at treatment plants??

LAVO Inc.
11900 Boul. Saint-Jean Baptiste
Montréal, QC, H1C 2J3
CANADA
1-800-361-6898

PRODUCT: OD-12%, PCP29852, DIN02245211, CFIA **CODE: OD 12**

SECTION 01: CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: OD-12%, PCP29852, DIN02245211, CFIA
PRODUCT CODE(S): OD 12
CHEMICAL FAMILY: Sodium Hypochlorite Solution 10%-15%. Commercial Garde.
RECOMMENDED USE: NSF mul 97mg/L. Alkaline Hypochlorite Solution is used as an oxidizing and bleaching agent. For industrial, institutional, swimming pool users. Food plant use. For use in industrial recirculating cooling water systems. For municipal water treatment of sewage and industrial effluent and for sanitization. Use for sanitization and disinfection. Brewery pasteurizers.
MANUFACTURING NAME AND ADDRESS: LAVO Inc.
11900 Boul. Saint-Jean-Baptiste
Montréal, QC, H1C 2J3
CANADA
1-800-361-6898
24 HOUR EMERGENCY NUMBER: CANUTEC 24-Hour Number: 613-996-6666.

SECTION 02: HAZARD IDENTIFICATION

SIGNAL WORD: DANGER.
GHS CLASSIFICATION: Serious Eye Damage/ Eye Irritation Category 1. Skin corrosion Category 1. Specific Target Organ Toxicity Single Category 3. Respiratory tract irritation Category 1. Acute aquatic toxicity Category 1. Chronic aquatic toxicity Category 1.
HAZARD STATEMENTS: H290 May be corrosive to metals. H314 Causes severe skin burns and eye damage. H335 May cause respiratory irritation. H400 Very toxic to aquatic life. H410 Very toxic to aquatic life with long lasting effects.
PRECAUTIONARY STATEMENTS: P260 Do not breathe dust/fume/gas/mist/vapours/spray. P264 Wash thoroughly after handling. P270 Do not eat, drink or smoke when using this product. P271 Use only outdoors or in a well-ventilated area. P273 Avoid release to the environment. P280 Wear protective gloves/protective clothing/eye protection/face protection. P304+P340 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. P310 Immediately call a POISON CENTER or doctor/physician. P305+P351+P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. P501 Dispose of contents/container to an approved waste disposal plant.

SECTION 03: COMPOSITION/INFORMATION ON INGREDIENTS

HAZARDOUS INGREDIENTS	CAS #	WT. %
Sodium Hypochlorite	7681-52-9	10-15
Sodium Hydroxide	1310-73-2	0.5-1.5

SECTION 04: FIRST AID MEASURES

ROUTES OF EXPOSURE: Eye, Skin, Ingestion and Inhalation.
INHALATION: Remove victim to fresh air. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. Get immediate medical attention. Call a poison center or physician.
EYE CONTACT: Immediately hold eyelids open and flush with water for at least 15 minutes. Check for and remove any contact lenses if easy to do. Consult a physician.
SKIN CONTACT: Immediately flush skin with plenty of water for 15 minutes. Remove contaminated clothing and wash before reuse. Consult a physician.
INGESTION: Call immediately a poison centre or a doctor. Do not induce vomiting or give anything by mouth to an unconscious person. Rinse out mouth with water.
ACUTE SYMPTOMS/EFFECTS Eyes: Causes eye burns. Causes eye irritation.

Safety Data Sheet
Sodium Hypochlorite, 12.5%

SDS Revision Date: 05/06/2015

1. Identification

1.1. Product identifier
Product Identity Sodium Hypochlorite, 12.5%
Alternate Names Sodium Hypochlorite, 12.5%
1.2. Relevant identified uses of the substance or mixture and uses advised against
Intended use Laundry Bleach
Application Method See Technical Data Sheet.
1.3. Details of the supplier of the safety data sheet
Company Name Gurtler Industries, Inc.
15475 South LaSalle St.
South Holland, IL 60473 US
Emergency
24 hour Emergency Telephone No. (708) 331-2550
Customer Service: Gurtler Industries, Inc. INFOTRAC - (800) 535-5053

2. Hazard(s) identification

2.1. Classification of the substance or mixture
Skin Corr/Irr. 1C, H314 Causes severe skin burns and eye damage

2.2. Label elements
Using the Toxicity Data listed in section 11 and 12 the product is labeled as follows.

Danger

H314: Causes severe skin burns and eye damage

[Prevention]:
P260: Avoid breathing gas/mist/vapours/spray
P264 Wash thoroughly after handling.
P273: Avoid release to the environment.

Safety Data Sheet
according to 29CFR1910/1200 and GHS Rev. 3

Effective date : 12.14.2014 Page 1 of 7

Sodium Hypochlorite,13%

SECTION 1 : Identification of the substance/mixture and of the supplier

Product name : **Sodium Hypochlorite,13%**
Manufacturer/Supplier Trade name:
Manufacturer/Supplier Article number: **S25552**
Recommended uses of the product and uses restrictions on use:
Manufacturer Details:
AquaPhoenix Scientific
9 Barnhart Drive, Hanover, PA 17331

Supplier Details:
Fisher Science Education
15 Jet View Drive, Rochester, NY 14624

Emergency telephone number:
Fisher Science Education Emergency Telephone No.: 800-535-5053

SECTION 2 : Hazards identification

Classification of the substance or mixture:

Corrosive
Corrosive to metals, category 1
Serious eye damage, category 1

Irritant
Skin irritation, category 2

Eye corr. 1
Skin Irrit. 2
Aquatic Acute 2
Aquatic Chronic 3
Metal Corr. 1

Signal word :Danger

Hazard statements:
May be corrosive to metals
Causes serious eye damage
Causes skin irritation
Toxic to aquatic life with long lasting effects
Precautionary statements:
If medical advice is needed, have product container or label at hand
Keep out of reach of children
Read label before use
Wear protective gloves/protective clothing/eye protection/face protection
Wash skin thoroughly after handling
Wear protective gloves/protective clothing/eye protection/face protection
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do. Continue rinsing

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Safety Data Sheet
Sodium Hypochlorite, 12.5%

SDS Revision Date: 05/06/2015

1. Identification

1.1. Product identifier

Product Identity	Sodium Hypochlorite, 12.5%
Alternate Names	Sodium Hypochlorite, 12.5%

1.2. Relevant identified uses of the substance or mixture and uses advised against

Intended use	Laundry Bleach
Application Method	See Technical Data Sheet.

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Danger

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Skin Irrit. 2
Aquatic Acute 2
Aquatic Chronic 3
Metal Corr. 1

Signal word :Danger

Hazard statements:
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Causes skin irritation
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Wash skin thoroughly after handling
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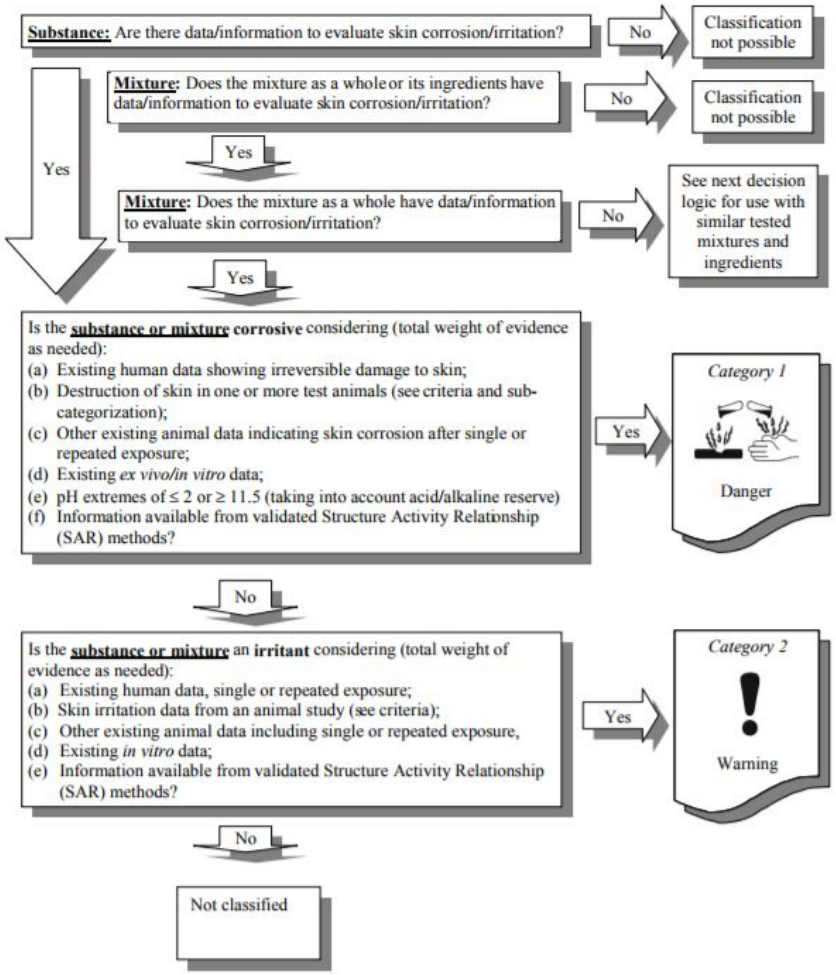
Continue rinsing

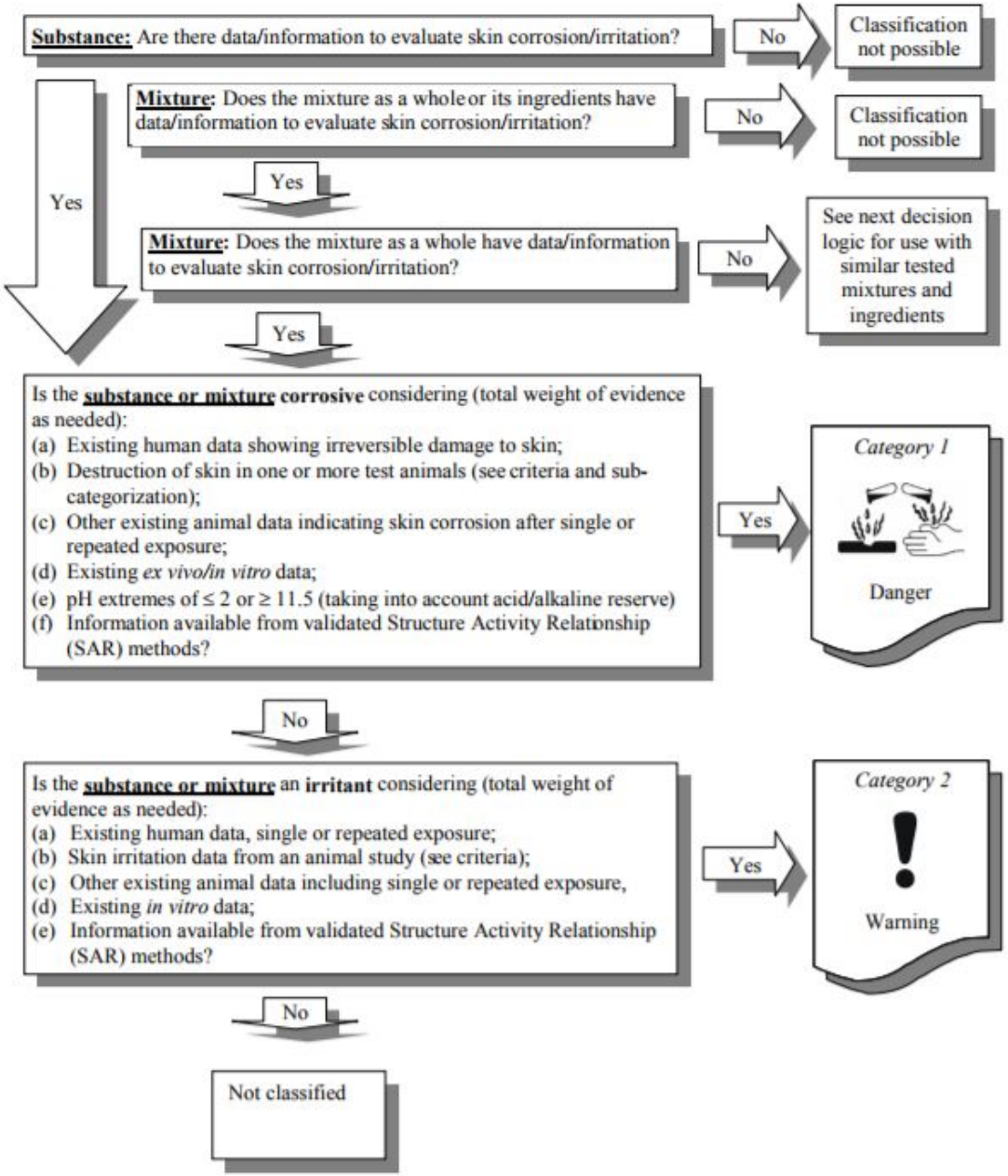
3 SDS for Sodium Hypochlorite

Decision Logic for Corrosives

Decision logic for skin corrosion/irritation



Decision logic for skin corrosion/irritation



SDS Sections

- Section 1, Identification
- Section 2, Hazard(s)
- Section 3, Composition/information
- 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

SDS Sections

- 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, includes the date of preparation or last revision.

SDS – Section Elements

Section 9: Physical and Chemical Properties

This section identifies physical and chemical properties associated with the substance or mixture. The minimum required information consists of:

- Appearance (physical state, color, etc.);
- Odor;
- Odor threshold;
- pH;
- Melting point/freezing point;
- Initial boiling point and boiling range;
- Flash point;
- Evaporation rate;
- Flammability (solid, gas);
- Upper/lower flammability or explosive limits;
- Vapor pressure;
- Vapor density;
- Relative density;
- Solubility(ies);
- Partition coefficient: n-octanol/water;
- Auto-ignition temperature;
- Decomposition temperature; and
- Viscosity.

The SDS may not contain every item on the above list because information may not be relevant or is not available. When this occurs, a notation to that effect must be made for that chemical property. Manufacturers may also add other relevant properties, such as the dust deflagration index (Kst) for combustible dust, used to evaluate a dust's explosive potential.

Classification Changes

	Flashpoint 0 10 20 30 40 50 60 70 80 90 100 110 120 130 140 150 160 170 180 190 200			
Old definition	Flammable		Combustible	
NFPA 704 Diamond	4	3	2	
EPA / DOT	Flammable		Combustible	
NFPA 30 class	Class IA/IB	IC	II	IIIA
GHS category	1 or 2	3		4
Signal Word	Danger	Danger		Warning
Hazard Statement	Extremely flammable liquid and vapor Highly flammable liquid and vapor	Flammable liquid and vapor		Combustible liquid
Pictogram				Nothing

Take Away Points

- **Chemicals haven't changed**
- **Standardized SDS**
  - Not so standardized
- **Employee focused sections**
- **Changes not immediate**

What hasn't changed

- Applicable chemicals
- Exclusions and exemptions
- Elements of the HAZCOM
- Training requirements
- Secondary container labeling
- Temporary container exclusion
- Special labeling systems
  - NFPA 704
  - HMIS

Compliance Schedule

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Closing

- **GHS implementation deadlines have passed**
- **Updated SDS should be provided**
- **Other programs now reference GHS**
  - EPCRA (Tier II Reporting) deadline coming soon
- **OSHA has tools**
  - Quickcard example

OSHA® QUICK CARD™

Hazard Communication Safety Data Sheets

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. The HCS requires new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

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

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required 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.

(Continued on other side)

OSHA 3493-01R 2016

For more information:

U.S. Department of Labor

OSHA® Occupational Safety and Health Administration

www.osha.gov (800) 321-OSHA (6742)

OSHA® QUICK CARD™

Hazard Communication Safety Data Sheets

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); ACGIH Threshold Limit Values (TLVs); and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the SDS where available as well as 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, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*
Section 13, Disposal considerations*
Section 14, Transport information*
Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 (29 CFR 1910.1200(g)(2)).

Employers must ensure that SDSs are readily accessible to employees.
See Appendix D of 29 CFR 1910.1200 for a detailed description of SDS contents.

For more information:

U.S. Department of Labor

OSHA® Occupational Safety and Health Administration

www.osha.gov (800) 321-OSHA (6742)

Thanks

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www.tighebond.com

Questions