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The New Globally Harmonized System: The Right to Know

Are you or your employees at risk?

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New rules, new regulations! It seems that we are faced with these on an almost daily basis. If you are not up to date, you and your employees could be at risk, and your company could be facing penalties. The United States, in conjunction with other nations, has agreed to new rules regarding employee rights and need to know concerning hazardous materials (previously covered in Material Safety Data Sheets, or MSDSs). The new reference will be called Safety Data Sheets (SDSs).

We use many materials in the precast industry, and many of them have given us better castings – but always at a price. That price often comes in the form of special care and handling of materials that are classified as hazardous, including those that are considered flammable or combustible, or cause irritation, sensitivity, corrosion, and are proven or suspected carcinogens. Part of our responsibility is to help reduce the threat, whether

minor or serious, to our workers and the environment. OSHA commonly refers to it as “the right to know.”

You are probably already aware of the new rules and regulations regarding SDSs and the training necessary to comply with the new Globally Harmonized System (GHS). This applies not just to precast suppliers, but the precast producer is also responsible for complying with certain regulations including training.

In making a brief survey of precast and pipe producers, I found that while they are generally somewhat aware, most do not realize the full scope of the new regulations. Here is a quick overview of the GHS.

First, the MSDS is a thing of the past. It is now being replaced by the SDS, and while the format is very similar, there are some significant changes. You will need to have SDSs from all of your suppliers. Some states will have additional requirements, although they are not necessarily addressed here.

GHS LABEL ELEMENTS	
Product Name or Identifier <i>(Identify Hazardous Ingredients, where appropriate)</i>	See 1.4.10.5.2 (d)
	See 1.4.10.5.2 (c) and Annexes 1, 2
Signal Word	See 1.4.10.5.2 (a)
Physical, Health, Environmental Hazard Statements	See 1.4.10.5.2 (b) and Annexes 1, 2
Supplementation Information	See 1.4.10.5.4.2
Precautionary Measures & Pictograms	
	See 1.4.10.5.2 (c) and Annex 3
First Aid Statements	See 1.4.10.5.2 (c) and Annex 3
Name and Address of Company	See 1.4.10.5.4.2 (e)
Telephone Number	See 1.4.10.5.4.2 (e)
<i>The Section numbers refer to the sections in the GHS Document or “Purple Book.”</i>	

GHS PICTOGRAMS & HAZARD CLASSES			
	Explosives		Acute toxicity
	Self-reactives		Skin irritation
	Organic peroxides		Eye irritation
			Skin sensitizers
	Flammables		Carcinogens
	Self-reactives		Respiratory sensitizers
	Pyrophorics		Reproductive toxicity
	Self-heating		Target organ toxicity
	Emits flammable gas		Germ cell mutagens
	Oxidizers		Eye corrosion
	Organic peroxides		Skin corrosion
			Corrosive to metal
	Gases under pressure		Aquatic toxicity
	Acute toxicity		

June 1, 2015, is the time for everything to be in place. An additional review of the policies will occur June 1, 2016, after which there may be additional changes. However, some of the laws are already in effect. If you are not in compliance with them yet, you will need to move quickly.

The employer is responsible for:

- Identifying and maintaining a list of hazardous chemicals known to be present at the plant
- Obtaining, keeping up to date and providing employee access to SDSs
- Being sure that all hazardous materials are properly labeled
- Presenting a training program for all employees who will be exposed to these hazardous materials
- Having a written hazardous communication program in place
- Having SDS information available to employees and ensuring they have access to the company training program.
- Ensuring that employees read and understand the SDSs and the labels on the containers of all hazardous materials

Perhaps the first area of concern to producers is the fact that employee training of the new GHS was to be completed by Dec. 1, 2013. If you haven't already done so, now is the time to do it.

Your training program must include:

- The requirements of the standard
- Places where hazardous chemicals are present in your work area
- The location and availability of the written program, the chemical inventory and the SDSs
- How to access the SDSs in your work area
- How to read the SDSs
- How to read the GHS-style container labels
- Any specific labeling used in-house if different from the standards
- Specific hazardous chemicals in the employees' immediate work areas
- How to detect the presence of a release of a hazardous chemical
- The physical and health hazards of those chemicals
- Measures you can use to protect yourself against these hazards
- Required personal protective equipment (PPE) available and how to use it

Next, you must have a written program and a list of all SDSs spelled out in the program. All SDSs must be in English (worldwide), and additional languages also must be available to convey to employees in their native language or a language they understand. The manufacturer of the hazardous material is responsible only for supplying the SDS in English, so you are responsible for any additional languages.

Materials that fall under the GHS include:

- Health hazards
- Physical hazards
- Environmental hazards
- Other hazardous chemical
- Hazards not otherwise classified

HAZARD WARNING LABELS

Any material falling under the "hazardous" classification must have the following information on the label:

- Product identification
- Pictogram
- Signal word
- Hazard statement(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

While there is no specific format for the label, all of the above must be clearly shown. Pictograms are also required for quick identification of the hazard.

On the SDS itself, there will now be a total of 16 sections – all of which must be completed for any material that falls under the hazardous classification:

1. Identification
2. Hazard(s) identification
3. Composition/information on ingredients
4. First-aid measures
5. Firefighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information (including date of preparation or last revision)

As a final note, all hazardous materials in your workplace must be cross-referenced by supplier and/or manufacturer.

These new OSHA regulations place an additional burden not only on the manufacturer/distributor, but also on the end user – you! Owners and operators are now responsible for keeping employees aware of any hazardous material on the premises, and all new employees must go through this training before being allowed in the workplace. OSHA will likely ask about the GHS in your workplace and assess stiff fines for not being in compliance.

The National Precast Concrete Association offers its members a free webinar titled "Webinar: Guide to Globally Harmonized System Documentation" by logging on to precast.org/education. ■

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