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Subject: General questions on the new OSHA GHS Label & MSDS program

1. How does the OSHA requirement for GHS impact distributors? OSHA's new standard will classify chemicals according to their health and physical hazards, and establish consistent labels and safety data sheets for all chemicals made in the United States and imported from abroad. Pictograms will allow immediate comprehension of characteristic hazards. ***The regulation will hold manufacturers and distributors responsible if labels and SDS are not updated by the deadlines listed.***
2. What is PPG doing at this time? We have begun to develop revised labels for products that we expect to be in our customer's possession when regulatory deadlines approach. There will be thousands of codes, including different pack sizes that must be transitioned to insure compliance. ***An early start on the project benefits all.***
3. What should distributors do at this time? ***Employers must train workers on the new label elements and SDS format by December 1, 2013.*** Chemical manufacturers, importers, distributors, and employers must comply with all modified provisions of the final rule by June 1, 2015. However, distributors may ship products labeled by manufacturers under the old system until December 1, 2015. It is possible that OSHA might inspect a facility in the coming months to insure facilities are adapting to the regulations. A prepared customer will be able to transition more easily to these new regulatory requirements. PPG will continue to supply bulletins to prepare our customers until the transition is complete.
4. Where can a distributor obtain required training? Many online training resources are available (such as www.ghssuperstore.com, www.blr.com, www.thecompliancecenter.com, www.ghskit.com, etc.). ***Required GHS training can be a modification of employee training programs already in place.*** As part of a "Right to know" program, understanding new GHS labels and MSDS formats should be a primary focus. (See # 9 for added detail.)
5. Has OSHA outlined training requirements, supplied the curriculum? OSHA has prepared a number of materials to assist employers in complying with the new updates. The [Hazard Communication Web page](#) explains the changes and contains a number of materials including: a new [fact sheet](#) (PDF*) that reviews the new training requirements, new Quick Cards that review the new pictogram label requirements and a [brief](#) (PDF*) on labels and pictograms.

6. How do we identify a new label? ***The easiest way to identify a GHS label will be by the new hazard pictograms bordered in a red diamond;*** however a few products may not require any hazard pictograms. For those PPG products (only) where no pictogram is required, it may be difficult to quickly see any differences.
7. How would we identify a new carton? ***New GHS compliant cartons can be identified by black diamonds overlapping each corner*** (at the fold) of each carton.
8. What is the importance of stock management and rotation of inventory? The December 2015 deadline calls for all distributors to have only correctly GHS compliant labeled product available for sale. If a distributor sells GHS labeled stock immediately when received, keeping older non GHS labeled stock at the back of the shelf, they will have to manually relabel that stock by December 2015. ***If a distributor only has fresh GHS compliant labeled stock as of December 2015 there will be nothing to manually relabel.***
9. What about stock held by the end user, not intended for sale? ***Relabeling is not a requirement at an application facility*** - even after the deadline, where stock is not intended for resale. New format SDS will be available at standard points of access (distributor & public website www.ppgrefinish.com).
10. GHS is only one part of Hazard Communication has anything else changed? Yes, ***this would be a good time to update your entire Hazard Communication program.*** In addition to labels, there's a need for a written program, training, updated MSDSs (now called Safety Data Sheets SDSs), and other elements. You can find all the requirements in 29 CFR 1910.1200. Or, you can go to www.osha.gov/dsg/hazcom/ for a side-by-side comparison of the old and new Hazard Communication 2012 requirements.
11. Any other high priority topics that OSHA may be addressing in the coming months? Yes. On June 27th the U.S. Occupational Safety and Health Administration (OSHA) announced a new National Emphasis Program (NEP) to protect workers from "...the serious health effects from occupational exposure to isocyanates." OSHA develops NEPs to focus outreach efforts and inspections on specific hazards in an industry for a three-year period. The expectation would be that workers are properly trained on correct PPE, handling and disposal of isocyanate containing products. ***All uses of isocyanates (including coating manufacture and application), and all sizes of facility, are in scope of the inspection program – including Auto body repair facilities.*** PPG will be sending out added information on this topic in the coming weeks

In conclusion...with the imminent deadline for worker training on new GHS label and SDS formats, also with expected added attention toward facilities that use isocyanate containing products with the recent introduction of the National Emphasis Program and the always present "Right to Know" hazard communication requirements, there should be an opportunity to combine these programs and efficiently prepare your workforce.