CHANGES TO HAZARDOUS MATERIALS MSDSs AND LABELING

I. MSDS to SDS – what is changing?

A Safety Data Sheet (SDS) is basically an updated format for a material safety data sheet (MSDS). Manufacturers are transitioning from MSDS to SDS. There are currently a number of different MSDS styles and formats in use in the United States. New rules require a standardized format which features 16 sections in a strict ordering.

WHEN IS THE CHANGE HAPPENING?

Some manufacturers, particularly from Europe, may already be sending the new SDS format. All manufacturers must complete the transition by December 2015.

HOW TO READ A SAFETY DATA SHEET (SDS)

A safety data sheet (SDS) is very similar to a Material Safety Data Sheet and will include the following information, in sections labeled 1-11 and 16. If no relevant information is found for any given subheading within a section, the SDS shall clearly indicate that no applicable information is available. Sections 12-15 may be included in the SDS, but are not mandatory.

1. Identification
   (a) Product identifier used on the label;
   (b) Other means of identification;
   (c) Recommended use of the chemical and restrictions on use;
   (d) Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party;
   (e) Emergency phone number.

2. Hazard(s) identification
   (a) Classification of the chemical in accordance with paragraph (d) of §1910.1200;
   (b) Signal word, hazard statement(s), symbol(s) and precautionary statement(s) in accordance with paragraph (f) of §1910.1200. (Hazard symbols may be provided as graphical reproductions in black and white or the name of the symbol, e.g., flame, skull and crossbones);
   (c) Describe any hazards not otherwise classified that have been identified during the classification process;
   (d) Where an ingredient with unknown acute toxicity is used in a mixture at a concentration = 1% and the mixture is not classified based on testing of the mixture as a whole, a statement that X% of the mixture consists of ingredient(s) of unknown acute toxicity is required.

3. Composition/ information on ingredients

   FOR SUBSTANCES
   (a) Chemical name;
(b) Common name and synonyms;
(c) CAS number and other unique identifiers;
(d) Impurities and stabilizing additives which are themselves classified and which contribute to the classification of the substance.

FOR MIXTURES
In addition to the information required for substances:

(a) The chemical name and concentration (exact percentage) or concentration ranges of all ingredients which are classified as health hazards in accordance with paragraph (d) of §1910.1200 and
   (1) are present above their cut-off/concentration limits; or
   (2) present a health risk below the cut-off/concentration limits.
(b) The concentration (exact percentage) shall be specified unless a trade secret claim is made in accordance with paragraph (i) of §1910.1200, when there is batch-to-batch variability in the production of a mixture, or for a group of substantially similar mixtures (See A.0.5.1.2) with similar chemical composition. In these cases, concentration ranges may be used.

FOR ALL CHEMICALS WHERE A TRADE SECRET IS CLAIMED
Where a trade secret is claimed in accordance with paragraph (i) of §1910.1200, a statement that the specific chemical identity and/or exact percentage (concentration) of composition has been withheld as a trade secret is required.

4. First-aid measures
   (a) Description of necessary measures, subdivided according to the different routes of exposure, i.e., inhalation, skin and eye contact, and ingestion;
   (b) Most important symptoms/effects, acute and delayed.
   (c) Indication of immediate medical attention and special treatment needed, if necessary.

5. Fire-fighting measures
   (a) Suitable (and unsuitable) extinguishing media.
   (b) Specific hazards arising from the chemical (e.g., nature of any hazardous combustion products).
   (c) Special protective equipment and precautions for fire-fighters.

6. Accidental release measures
   (a) Personal precautions, protective equipment, and emergency procedures.
   (b) Methods and materials for containment and cleaning up.

7. Handling and storage
   (a) Precautions for safe handling.
   (b) Conditions for safe storage, including any incompatibilities.

8. Exposure controls/personal protection
(a) OSHA permissible exposure limit (PEL), American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV), and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the safety data sheet, where available.
(b) Appropriate engineering controls.
(c) Individual protection measures, such as personal protective equipment.

9. Physical and chemical properties
(a) Appearance (physical state, color, etc.);
(b) Odor;
(c) Odor threshold;
(d) pH;
(e) Melting point/freezing point;
(f) Initial boiling point and boiling range;
(g) Flash point;
(h) Evaporation rate;
(i) Flammability (solid, gas);
(j) Upper/lower flammability or explosive limits;
(k) Vapor pressure;
(l) Vapor density;
(m) Relative density;
(n) Solubility(ies);
(o) Partition coefficient: n-octanol/water;
(p) Auto-ignition temperature;
(q) Decomposition temperature;
(r) Viscosity.

10. Stability and reactivity
(a) Reactivity;
(b) Chemical stability;
(c) Possibility of hazardous reactions;
(d) Conditions to avoid (e.g., static discharge, shock, or vibration);
(e) Incompatible materials;
(f) Hazardous decomposition products.

11. Toxicological information
Description of the various toxicological (health) effects and the available data used to identify those effects, including:
(a) Information on the likely routes of exposure (inhalation, ingestion, skin and eye contact);
(b) Symptoms related to the physical, chemical and toxicological characteristics;
(c) Delayed and immediate effects and also chronic effects from short- and long-term exposure;
(d) Numerical measures of toxicity (such as acute toxicity estimates).
(e) Whether the hazardous chemical is listed in the National Toxicology Program (NTP) Report on Carcinogens (latest edition) or has been found to be a potential carcinogen in
the International Agency for Research on Cancer (IARC) Monographs (latest edition), or by OSHA.

12. Ecological information (Non-mandatory)
   (a) Ecotoxicity (aquatic and terrestrial, where available);
   (b) Persistence and degradability;
   (c) Bioaccumulative potential;
   (d) Mobility in soil;
   (e) Other adverse effects (such as hazardous to the ozone layer).

13. Disposal considerations (Non-mandatory)
    Description of waste residues and information on their safe handling and methods of disposal, including the disposal of any contaminated packaging.

14. Transport information (Non-mandatory)
    (a) UN number;
    (b) UN proper shipping name;
    (c) Transport hazard class(es);
    (d) Packing group, if applicable;
    (e) Environmental hazards (e.g., Marine pollutant (Yes/No));
    (f) Transport in bulk (according to Annex II of MARPOL 73/78 and the IBC Code);
    (g) Special precautions which a user needs to be aware of, or needs to comply with, in connection with transport or conveyance either within or outside their premises.

15. Regulatory information (Non-mandatory)
    Safety, health and environmental regulations specific for the product in question.

16. Other information, including date of preparation or last revision
    The date of preparation of the SDS or the last change to it.
II. New Hazardous Material Label Pictograms and Hazard Classes

In addition to the transition from MSDS to SDS, the label pictograms on hazardous material containers are being standardized. As with the SDS transition, new labels may be appearing already. All materials must use the new labels by December 2015.

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<tr>
<th>Oxidizers</th>
<th>Flammables</th>
<th>Explosives</th>
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<td>Self Reactives</td>
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<td>Pyrophorics</td>
<td>Organic Peroxides</td>
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<td></td>
<td>Self-Heating</td>
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<td>Emits Flammable Gas</td>
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<td></td>
<td>Organic Peroxides</td>
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<tr>
<th>Acute toxicity (severe)</th>
<th>Corrosives</th>
<th>Gases Under Pressure</th>
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<tr>
<th>Carcinogen</th>
<th>Environmental Toxicity</th>
<th>Irritant</th>
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<td>Dermal Sensitizer</td>
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<tr>
<td>Reproductive Toxicity</td>
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<td>Acute toxicity (harmful)</td>
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<td>Target Organ Toxicity</td>
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<td>Narcotic Effects</td>
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<td>Mutagenicity</td>
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<td>Respiratory Tract Irritation</td>
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<td>Aspiration Toxicity</td>
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