



Hazard Communication: Successful Strategies to Avoid One of the Most Commonly Cited OSHA Violations

A Webinar Presented on February 5, 2019 By:

Kathryn M. McMahon, Esq.

Partner

Conn Maciel LLP

Presented By



Kathryn M. McMahon, Esq.

Partner

Conn Maciel LLP

Kathryn M. McMahon is a partner in Conn Maciel Carey's Washington, DC office. She focuses her practice in the areas of occupational safety and health (OSHA) law and environmental law. Ms. McMahon helps clients manage incident and fatality inspections and a wide array of enforcement-related matters, represents industry stakeholders in all aspects of OSHA rulemaking, having served as industry counsel on all recent OSHA rulemakings, including silica, injury and illness recordkeeping, hexavalent chromium, and beryllium, among others. She also counsels manufacturers on a broad range of OSHA regulatory compliance issues, including GHS Hazard Communication, ergonomics, Hazardous Waste Operations and Emergency Response (HAZWOPER), process safety management, lock-out/tag-out, machine guarding, personal protective equipment, hearing conservation, and injury and illness recordkeeping issues. And, she assists clients in developing risk management and hazard assessment tools to identify and address workplace risks. In addition, she defends her clients in state and federal administrative litigation related to alleged violations.

In addition to her OSHA practice, Ms. McMahon is also an experienced environmental attorney, both in the regulatory and enforcement contexts. For more than two decades, she has provided compliance counseling under all major environmental statutes as well as representing clients in numerous Superfund contribution actions and PRP allocations, Department of Justice enforcement matters, and myriad other federal and state administrative actions.

Kathryn M. McMahon

kcmahon@connmaciel.com / 202.909.2733

KATE MCMAHON is a Partner in the OSHA • Workplace Safety Practice Group at **Conn Maciel Carey PLLC**, where she focuses her practice in the areas of OSHA and environmental law:

- Represents industry stakeholders in all aspects of OSHA chemical and other rulemakings – pre-rule RFIs; OIRA; notice & comment; hearings; post-rule litigation
- Defends her clients in state and federal administrative and federal court litigation related to OSHA citations and EPA NOVs alleging violations of the Occupational Safety and Health Act and/or environmental statutes
- Provides regulatory compliance counselling as well as assists her clients in the development of best practices and health and safety management tools to protect her clients' workforces

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Beeta B. Lashkari

blashkari@connmaciel.com / 202.895.2784

Beeta B. Lashkari is an Associate in the OSHA • Workplace Safety Practice Group at **Conn Maciel Carey LLP**, where she focuses her practice on occupational safety & health law:

- Former Attorney-Investigator at the U.S. Chemical Safety and Hazard Investigation Board (CSB)
- Represents employers in the full range of matters regarding the OSH Act
- Handles the full range of litigation related to contesting citations issued by OSHA
- Manages inspections and investigations by OSHA, the CSB, the EPA, MSHA, DOJ, & state and local regulators

Agenda

- Background of the HazCom Standard
- Overview of the HazCom Standard
- Implementation Issues
- Proposed Rule and Future of the HazCom Standard



Background HazCom Standard

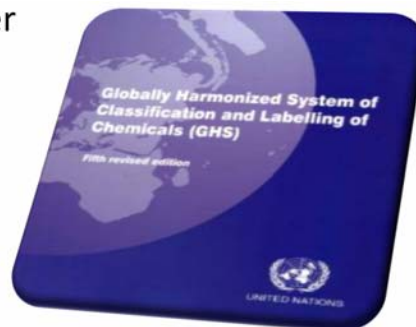
Original HazCom Standard

Five Element Program

1. Determination of chemical hazards in workplace
 2. Development of written hazard communication program
 3. Labeling of hazardous chemicals
 4. Development of Material Safety Data Sheets (MSDSs)
 5. Training of workers on hazards and precautions
- Performance standard that left broad discretion to chemical manufacturers to assess, evaluate and describe hazards

U.N. Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

- Developed a systematic approach for employers to evaluate workplace hazards and provide employees consistent information regarding the chemical hazards they may encounter
- Adopted by U.N. in 2002
- Not a “model” standard
- Set of “building blocks” for countries to adopt into their own regulations



OSHA Adopts GHS

- ANPR – September 2006
- NPRM – September 2009
- Final Rule – March 2012
- Based on UN GHS Revision 3

Stakeholder comments
(both Industry Groups and
Labor) overwhelmingly
supported revision

DEPARTMENT OF LABOR
Occupational Safety and Health
Administration
29 CFR Parts 1910, 1915, and 1926
[Docket No. OSHA-H022K-2006-0062
(formerly Docket No. H022K)]
RIN 1218-AC20
Hazard Communication
AGENCY: Occupational Safety and Health
Administration (OSHA), DOL.
ACTION: Final rule.
SUMMARY: In this final rule, OSHA is
modifying its Hazard Communication
Standard (HCS) to conform to the
United Nations' Globally Harmonized
System of Classification and Labelling
of Chemicals (GHS). OSHA has
determined that the modifications will
significantly reduce costs and burdens
while also improving the quality and
consistency of information provided to
employers and employees regarding
chemical hazards and associated
protective measures. Consistent with the
requirements of Executive Order 13563,
which calls for assessment and, where
appropriate, modification and
improvement of existing rules, the
Agency has concluded this improved
information will enhance the
effectiveness of the HCS in ensuring that
employees are apprised of the chemical
hazards to which they may be exposed,
and in reducing the incidence of
chemical-related occupational illnesses
and injuries.

Revised GHS HazCom

- Same 5 Element Program as original standard
- Shift from performance to specification approach
(defines how to classify hazards of a chemical)
- Set of harmonized criteria for classifying chemicals
- Mandates specific format for Safety Data Sheets (SDS)s and labels
- Mandates content / language for SDSs and labels





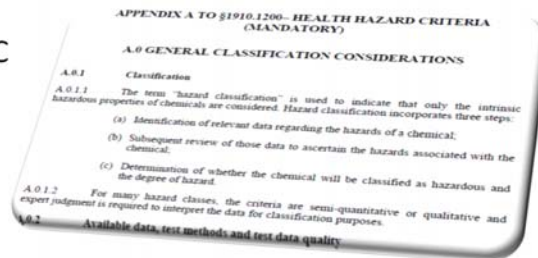
Overview of HazCom Standard



Organization of New Standard

Follows same general regulatory structure as the old rule, but now adds mandatory appendices:

- Health Hazard Criteria - Appendix A
- Physical Hazard Criteria - Appendix B
- Allocation of Label Elements - Appendix C
- Safety Data Sheets Appendix D
- Definition of Trade Secrets - Appendix E
- Guidance for Carcinogenicity Classifications - Appendix F



Purpose, Scope & Definitions

- Hazard “Evaluation” revised to Hazard “Classification” (classifying and categorizing severity of hazard)
- Retains concept of identifying *inherent hazards* as opposed to risk to employees
- Removes definitions of physical hazards and other terms in Definitions section (Physical hazards now addressed in Appendix B)

Hazard Classification

- Specific criteria for classifying health and physical hazards into a hazard class & category
- Hazard Class = Nature of hazard
 - Ex: Flammability
- Hazard Category = Degree of severity within each hazard class
 - Ex: Four levels of flammability
- Based on “weight of evidence” evaluated using “expert judgment”
- Eliminates “one study” rule

Health Hazards - Classes and Categories

- Acute Toxicity • 1-4
- Skin Corrosion/Irritation • 1A, 1B, 1C, 2
- Eye Damage/Irritation • 1, 2A, 2B
- Respiratory or Skin Sensitization • 1
- Germ Cell Mutagenicity • 1A, 1B,2
- Carcinogenicity • 1A,1B,2
- Reproductive Toxicity • 1A,1B,2
- Specific Target Organ Toxicity • 1-3
- Aspiration • 1-2
- Simple Asphyxiants • 1

Physical Hazards

- Explosives
- Flammable Gases, Aerosols
- Oxidizing Gases
- Gases under Pressure
- Flammable Liquids, Solids
- Self-Reactive Chemicals
- Pyrophoric Liquids, Solids, Gases
- Self-heating Chemicals
- Chemicals (water contact) emit flammable gases
- Oxidizing Liquids, Solids
- Organic Peroxides
- Corrosive to Metals
- Combustible Dusts

Mixtures Classifications

- Most chemicals in workplace are mixtures
- Standard includes rules to determine hazard of the mixture for each hazard class (rather than generic mixture cut-off rule)
- Includes a Tiered Approach:
 - Use mixture test data if available
 - Use bridging principles to estimate hazards based on information regarding its ingredients
 - Use “cut-off” values based on composition of the mixture



Safety Data Sheets

- Big Change is **Mandatory Format**; not Content (old standard required specific information)
- Consult Mandatory Appendix D
- ACGIH **Threshold Limit Values (TLVs)** and IARC and NTP carcinogenicity information is required
- New format is consistent with ANSI Z40.1 Standard so already widely used
- As new info developed, manufacturer/importer has **3 months from date of new information** to revise SDS

Safety Data Sheets



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. As of June 1, 2015, the HCS will require 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)



Hazard Communication Safety Data Sheets

- Section 8, Exposure controls/personal protection** lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); 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.

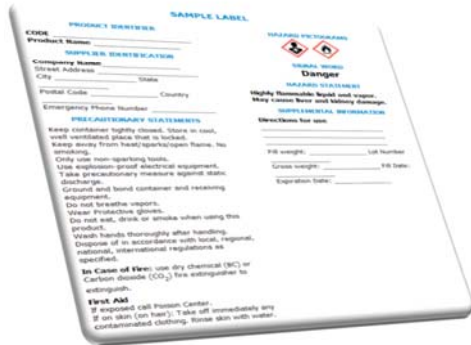
Safety Data Sheets The New 16 Part Mandatory Format

- Section 1. Identification
- Section 2. Hazard(s) identification
- Section 3. Composition/information on ingredients
- 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
- Section 9. Physical and chemical properties
- Section 10. Stability and reactivity
- Section 11. Toxicological information
- Section 12. Ecological information – OSHA does not enforce content
- Section 13. Disposal considerations – OSHA does not enforce content
- Section 14. Transport information – OSHA does not enforce content
- Section 15. Regulatory information – OSHA does not enforce content
- Section 16. Other information, including date of preparation or last revision



New Labels

- Common Signal Word
- Pictogram (red diamond)
- Hazard Statement

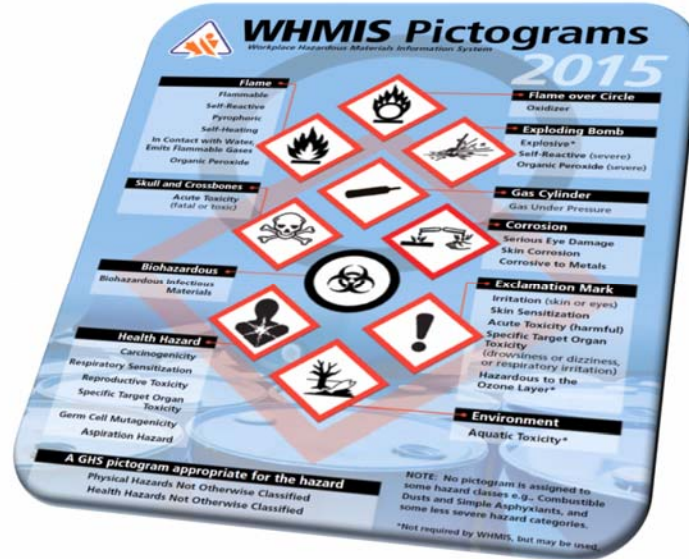


- Precautionary statements
- Product identifier
- Supplier identifier

New Labelling Requirements

- Look to Appendix C to determine required labelling elements
- As new hazard information is identified, manufacturer/importer has **six months from date of learning new information** to change label
- Alternative Workplace Labels - lesser standard - maintain some of discretion from Original HazCom Standard to generate workplace labels

Label Pictograms



Hazards Not Otherwise Classified

- Hazards Not Otherwise Classified
 - Hazards covered under Original HAZCOM Standard but not addressed by GHS
- Simple Asphyxiants and Pyrophoric Gas
 - Both explicitly defined in Revised Standard
 - Requires identification; SDS; Labelling
- Combustible Dust
 - No definition but guidance referenced
 - Require identification; SDS; Labelling

Training

- HazCom training must be provided at **no cost to employees**, and employees **must be paid for time spent training**
- Provide training in a **language employees understand**
- Training is **NOT satisfied solely by giving SDSs** to employees
- Explain hazards of chemicals, and how to access and use information from SDSs and labels
- **Chemical-specific training NOT required** (hazard-based; e.g., flammables, corrosives, etc.)
- May be classroom, video or CBT, **BUT** there must be a forum for employees to **ask questions**



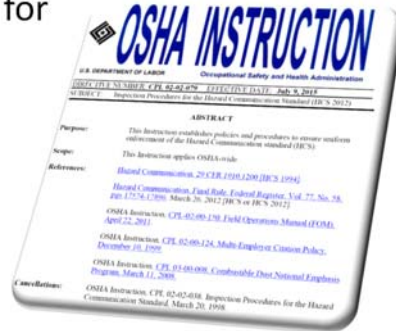
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Implementation Issues

OSHA HazCom 2012 Implementation Guidance

- OSHA Instruction, CPL 02-02-079, “Inspection Procedures for the Hazard Communication Standard”
- Hazard Classification Guidance for Manufacturers, Importers & Employers
- Small Entity Compliance Guide for Employers that Use Hazardous Chemicals
- Steps to an Effective Hazard Communication Program for Employers that Use Hazardous Chemicals Fact Sheet
- Numerous Letters of Interpretation



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Implementation Issues

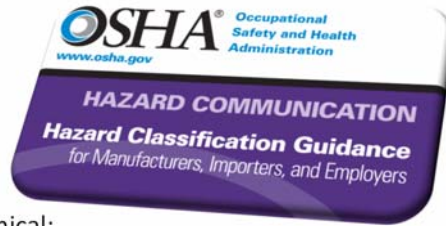
Manufacturers

- Means an employer that manufactures, processes or formulates a hazardous chemical
- A company that repackages, blends, mixes, or otherwise changes the composition of a chemical is considered to be a manufacturer
- The 1st employer that meets the definition of manufacturer is the one responsible for performing the hazard classification, developing the SDS and labeling containers



Hazard Classification

- Hazard classification is the process of evaluating the range of available scientific evidence to determine if a chemical is hazardous, and identifying the level of severity
- Hazard classification guidance and appendices provide extensive explanation to help manufacturers, importers and employers w/ the classification process
- Process:
 - Identify the chemical;
 - Identify the relevant data on the hazards of the chemical;
 - Review relevant data to ascertain the hazards associated w/ the chemical;
 - Determine if the chemical will be classified hazardous (as defined); and
 - Determine the degree of the hazard by comparing the data w/ health and physical hazard criteria



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Hazard Classification

Weight of Evidence Analysis

- Means that “all available information bearing on the classification of a hazard is considered together . . .”
- The quality and consistency of the data must be considered
- Positive effects which are consistent with the criteria for classification, whether seen in humans or animals, must normally justify classification
- Route of exposure, mechanistic information, and metabolism studies are pertinent
- Both positive and negative results are considered together; however, a single positive study meeting certain requirements may justify classification

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Hazard Classification

By-Products

- Manufacturers or importers must provide information regarding hazards of chemicals presented either through normal conditions of use or foreseeable emergencies
- That includes hazardous “by-products”
- Hazard classification must anticipate full range of downstream uses and account for hazardous byproducts
 - Ex: Manufacturer of gasoline must inform downstream users of hazards of carbon monoxide (known to be present as byproduct from use of gasoline)
- But, there are limits on this scope (e.g., incidental exposures, diesel exhaust emissions)

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Labels

- Label = appropriate group of written, printed or graphic info regarding a hazardous chemical affixed to, printed on, or attached to the “**immediate container**”
- Label required on each container, so it is **not compliant to label only an outer package** including other containers
- Labels may NOT have:
 - Blank diamonds
 - Same pictogram more than once (even if hazard classification includes multiple hazards that use same pictogram)
- If deficiencies are noted on SDSs or labels during inspection of a downstream user, CSHO “should” make a **referral** to the Area Office w/ jurisdiction over manufacturer’s location



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Destination Labelling for Exports

- OSHA is developing policy for products manufactured in U.S. *for export only*
- Agency appears to agree that HazCom 2012 does not require U.S. HazCom compliant labels on containers of product made for export to foreign countries, regardless of HazCom law applicable in the destination country
- Requirements will vary depending on whether and how U.S. downstream workers may come in contact with container

OSHA's Predicted Position		
Domestically produced and immediately shipped overseas	Immediate container does not need US HazCom label; label pursuant to destination country requirements	Shipping label must be compliant with any applicable DOT regulations
Domestically produced and immediately packaged, <i>but</i> stored at manufacturing site in U.S. for some period before export	Immediate container does not need US HazCom label; label pursuant to destination country requirements	In storage, must affix workplace label to outside shipping container Shipping label must be compliant with all applicable DOT regulations
Domestically produced and immediately packaged <i>but</i> stored at off-site warehouse (3 rd party or manufacturers' remote location)	Immediate container does not need US HazCom label; label pursuant to destination country requirements	Shipping label must be compliant w/ all applicable DOT regulations Manufacturer must provide HazCom 2012 compliant SDSs to 3 rd parties

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Labels

• Containers

- Means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank or the like that contains a hazardous chemical. That does include:
 - Gas cylinders (e.g., oxygen, nitrogen, acetylene)
 - Somehow, OSHA interprets this to also include bricks palletized & bound
- NOT include pipes, pipe systems, fuel tanks or other operating systems
- Where tank truck, railcar or vehicle is a container for hazardous chemicals, the label may either be posted on outside of vehicle or attached to shipping papers or bill-of-lading



Labels

Containers:

- **Small packages accommodation**
 - Where the manufacturer can show that it is not feasible to use pull-out labels, fold back labels, or tags, containing the full HazCom information, the shipped small container (i.e., the actual container holding the hazardous chemical), at a minimum, must contain the following:
 - Product identifier
 - Appropriate pictograms
 - Manufacturer's name and phone number
 - Signal word
 - A statement indicating the full label information for the chemical is provided on the outside package
- **Patch test kits partial exemption**

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Labels

Other Agency Labeling Criteria

- Manufacturers, importers, and distributors can incorporate supplemental information on HazCom labels but it *cannot contradict or cast doubt* on the validity of the standardized hazard information, and cannot impede the identification of the required HazCom information

Use of Other Country Hazard Classification

- If the other country's hazard classification information does not *contradict or cast doubt* on the HazCom 2012 information, that information may be placed on the hazardous chemical label

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Safety Data Sheets

- Chemical manufacturers and importers must develop or obtain an SDS for **each hazardous chemical** they produce or import
- SDS must transmit w/ 1st shipment of chemical to **each downstream location** of customer that receives the chemical (sending 1 SDS to 1 facility or the customer's HQ is NOT compliant)
- SDS must also transmit with the 1st shipment after a **SDS is updated**

Hazard Communication

The standard that gave workers the right to know, now gives them the right to understand.



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Safety Data Sheets

- If chemical manufacturer or importer has gone **out of business**, an employer has no obligation to create an SDS, but if it chooses to generate an SDS, the employer becomes responsible for its content
- Any party who **changes the SDS** becomes responsible for the SDS under 1910.1200(g) regardless of whether it is a chemical manufacturer, importer, distributor, or employer
 - Employers beware!

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:

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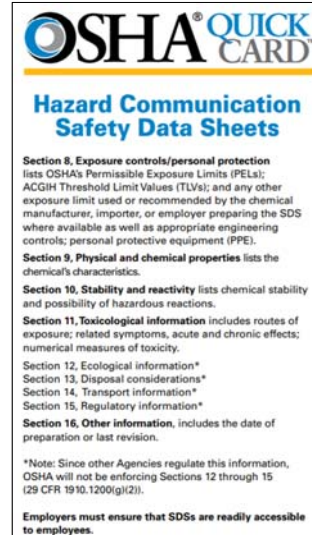
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Safety Data Sheets

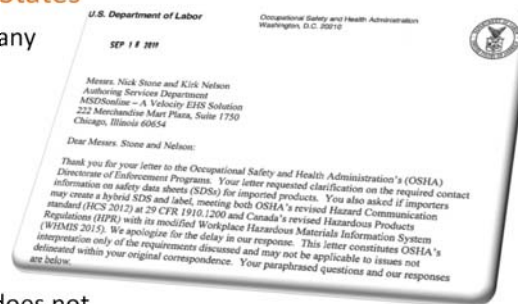
- Individual SDSs required for any **final chemical product** (multiple SDSs for individual components of mixture may NOT be substituted)
- When a single SDS is used for similar mixtures or in cases of batch-to-batch variability, **concentration ranges** of ingredients may be used
 - BUT, if a concentration range is used, it must be limited in terms of percentage concentration variation (i.e., the narrowest range possible), and the variation must have no effect on the hazard of the mixture



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Safety Data Sheets

- The HazCom Standard defines an **"importer"** as **"the first business with employees with the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers in the United States"**
 - BUT, OSHA considers a company that imports chemicals from overseas an **"importer"** under the standard, **even though the importer will not be supplying the chemicals to downstream employers**
 - This is likely b/c, the agency does not have jurisdiction over the foreign entity to enforce under the standard



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Safety Data Sheets

- OSHA does not require SDSs be provided to purchasers of household consumer products when the products are used in the workplace in the same manner that a consumer would use them (i.e., where the **duration and frequency of use (and therefore exposure) is not greater than what the typical consumer would experience**)
 - BUT, this exemption is based not on the chemical manufacturer's intended use of his product, but on how it is **actually used**
- So, employees who are required to work with hazardous chemicals in a manner that results in a duration and frequency of exposure greater than what a normal consumer would experience have a right to know about the properties of those hazardous chemicals

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Safety Data Sheets

- The standard does NOT specify how employers must maintain SDSs at the workplace (e.g., paper, electronic, vendor)
- Requires only that employees have **immediate access** to SDSs
 - May NOT require employees to ask employer for a copy
 - May NOT require an Internet search to view obtain SDS
 - May make SDSs available on intranet or web-based SDS service
 - Must have adequate computer/fax terminals
 - Must have back-up procedure if computer/fax is not working
 - Must train employees how to access the SDSs



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Implementation Issues

Combustible Dust

- o Not defined in HCS 2012, so OSHA relies on definition in the Combustible Dust NEP Compliance Directive:
 - *“Combustible particulate solid that presents fire or deflagration hazard when suspended in air/other oxidizing medium over range of concentrations, regardless of particle size”*
- o Manufacturers/importers must provide information on hazards created by **any foreseeable use**, so if a chemical can form combustible dust when ground into a powder, they must warn of the combustible dust hazard (even if the product was not intended by the manufacturer to be ground)



Implementation Issues

Combustible Dust

- o Even where chemicals are not shipped in a dust form, but may be used by a downstream user in a way that may create a combustible dust hazard, the importer/manufacturer must provide labels
- o Recall that manufacturer means an employer that manufacturers, processes or formulates a hazardous chemical:
 - Sawmills are considered chemical manufacturers as the 1st employer that processes the product (i.e., timber into lumber, thereby creating wood dust)
 - Grain elevator operators also meet definition of manufacturer



Implementation Issues

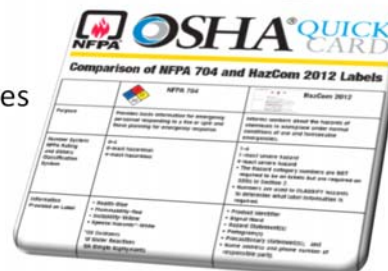
- **Temporary Workers**

“Host employers need to treat temporary workers as they treat existing employees. Temporary staffing agencies and host employers share control over the employee, and are therefore jointly responsible for temp employee’s safety and health. It is essential that *both* employers comply with all relevant OSHA requirements.”



Host vs. Staffing Agency

- **Staffing Agency**
 - Responsible for generic training
 - Duty to verify that host provided adequate site-specific training
- **Host Employer**
 - Identify and communicate site-specific hazards and provide PPE
 - Training for temps should be equivalent to permanent employees
- **Host primarily responsible b/c:**
 - Uses or produces chemicals
 - Creates and controls the hazards



Implementation Issues

- **Multi-Employer Worksites**

- Employers on a multi-employer worksite must include in their HazCom Program the **methods they will use to provide other employers with on-site access to SDSs** for any chemical to which other employers' employees may be exposed
- Employer is responsible for providing **updated training** when their own employees are exposed to new hazards, even if those new hazards are created/introduced by another employer



HazCom Enforcement Issues

- **General Duty Clause (GDC):**

- Preamble to HazCom 2012: "enable employers/ees to increase their recognition and knowledge of chemical hazards and take measures [to] reduce ... chemical-related injuries & illnesses"
- OSHA will use SDSs to support GDC violations for exposures to chemicals that **do not have an OSHA PEL** (at least):
 1. *Hazard exists in the workplace* (hazard information is communicated throughout the SDS and on the label)
 2. *Employer or its industry "recognizes" the hazard* (standard requires employers to maintain SDSs and use them to train)
 3. *Hazard is like to cause death or serious injury* (SDS will describe nature and seriousness of hazard)
 4. *Feasible means exist to eliminate/reduce the hazard* (SDSs list measures to protect against overexposures (e.g., engineering controls and PPE))

GDC and Sub-PEL Chemical Exposures

OSHA relies on *General Dynamics* case - DC Cir. held:

- Employer can rely on PEL in specific chemical standard UNLESS employer knows standard is inadequate to protect employees

Nov. 18, 2018 Memo from OSHA's Front Office on use of GDC for health hazards for exposures below PELs:

- If evidence collected by OSHA meets elements of GDC violation, cite employer for exposure to air contaminant not covered by PEL
- If only some of the elements are met by evidence collected in inspection, OSHA should issue Hazard Alert Letter ("HAL")

2018 Top 10 Most Cited Standards

1. Fall Protection – General Requirements: 7,270 violations
2. Hazard Communication: 4,552
3. Scaffolding: 3,336
4. Respiratory Protection: 3,118
5. Lockout/Tagout: 2,944
6. Ladders: 2,812
7. Powered Industrial Trucks: 2,294
8. Fall Protection – Training: 1,982
9. Machine Guarding: 1,972
10. Eye and Face Protection: 1,536





Proposed Rule and Future of the HazCom Standard



More Updates to HazCom Coming?

- 2012 HazCom update aligned OSHA's rule w/ GHS Rev. 3 (2009)
- Since HazCom 2012, GHS up to Rev. 7 (2017)
- Where there is conflict, reliance on GHS is a violation
- **OSHA is working on proposed revisions to HazCom again:**
 - Realign HazCom w/ more current version of GHS
 - Address issues identified 2-4 years after HazCom 2012 implemented
 - Not de-regulatory (enhance or maintain current protections)



Principles & Assumptions

- As with HazCom 2012, OSHA is expected to modify only the provisions of the standard that must be changed to align with the GHS
 - Basic framework likely will remain the same
 - Chemical manufacturers and importers must provide information about the identities and hazards of chemicals they produce or import
 - All employers with hazardous chemicals in their workplaces must have a hazard communication program, and provide information to employees about their hazards and associated protective measures
- OSHA will likely maintain or enhance the overall current level of protection of the HazCom Standard

Maintaining Alignment w/ GHS

- Appendix A (health hazards):
 - Mostly editorial
- Appendix B (physical hazards):
 - Flammable gases (align w/ GHS Rev. 6/7)
 - Desensitized explosives
 - Aerosols (align with GHS Rev 6/7, include Category 3)
- Appendix C (label elements):
 - New or updated hazards, updated guidance, and precautionary statements
- Appendix D (SDS)
 - Updates sections 2, 5, 7, and 9

Questions for Industry

- How might changes affect your company/industry?
- What types of additional burdens might changes to HazCom impose?
- Was it difficult to adjust to the 2012 HazCom Standard?
- Do you want to provide comments to OSHA on its proposed changes?

Prenile Stage	Communication Tower Safety
Prenile Stage	Emergency Response and Preparedness
Prenile Stage	Mechanical Power Presses Update
Prenile Stage	Powered Industrial Trucks
Prenile Stage	Lock-Out/Tag-Out Update
Prenile Stage	Tree Care Standard
Prenile Stage	Prevention of Workplace Violence in Health Care and Social Assistance
Prenile Stage	Blood Lead Level for Medical Removal
Prenile Stage	Occupational Exposure to Crystalline Silica, Revisions to Table 1 in the Standard for Construct
Proposed Rule Stage	Amendments to the Cranes and Derricks in Construction Standard
Proposed Rule Stage	Update to the Hazard Communication Standard
Proposed Rule Stage	Cranes and Derricks in Construction: Exemption Expansions for Railroad Roadway Work
Proposed Rule Stage	Puerto Rico State Plan
Proposed Rule Stage	Exposure to Beryllium NFRM to Review General Industry Provisions
Final Rule Stage	Standards Improvement Project IV
Final Rule Stage	Quantitative Fit Testing Protocol: Amendment to the Final Rule on Respiratory Protection
Final Rule Stage	Rules of Agency Practice and Procedure Concerning OSHA Access to Employee Medical Rec
Final Rule Stage	Crane Operator Qualification in Construction
Final Rule Stage	Technical Corrections to 35 OSHA Standards and Regulations
Final Rule Stage	Tracking of Workplace Injuries and Illnesses
Final Rule Stage	Occupational Exposure to Beryllium and Beryllium Compounds in Construction and Shipyar

Fall 2018 Regulatory / Deregulatory Agenda

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the **OSHA DEFENSE** report



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2019 OSHA WEBINAR series

[OSHA Year in Review and 2019 Forecast](#)
Tuesday, January 15th

[Updates on OSHA's E-Recordkeeping and Serious Injury Reporting Rules](#)
Tuesday, February 12th

[OSHA's New Site-Specific Targeting Enforcement Program](#)
Tuesday, March 19th

[Responding to 11\(c\) Retaliation Claims and Notices of Employee Complaints](#)
Tuesday, April 16th

[Key Cal/OSHA Issues California Employers Must Track](#)
Tuesday, May 28th

[The Fate of Numerous Midnight Obama-Era OSHA Rules](#)
Tuesday, June 18th

[Tips to Survive an OSHA Inspection](#)
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[Joint- and Multi-Employers, Contractors and Temps](#)
Tuesday, August 13th

[OSHA's Electrical Safety Standards - Top 5 Risks and Mistakes](#)
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[What You Need to Know About OSHA's Health Exposure Standards](#)
Tuesday, October 22nd

[OSHA PSM and EPA RMP Update](#)
Tuesday, November 19th

[Workplace Violence and Harassment - OSHA and Employment Law Issues](#)
Tuesday, December 17th

QUESTIONS?



Contact Information



KATHRYN M. MCMAHON

Partner, OSHA • Workplace Safety Group
Conn Maciel Carey PLLC
Washington, D.C.
202.909.2733
kcmahon@connmaciel.com



BEETA B. LASHKARI

Associate, OSHA • Workplace Safety Group
Conn Maciel Carey PLLC
Washington, D.C.
202.895.2784
blashkari@connmaciel.com

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Credit Information

Continuing education credits are available for this program.

You must complete the program quiz located at the link below in order to receive your safety credit certificate and to enable us to submit a Wastewater Operator/Apprentice Continuing Education Credit Report Form on your behalf to the Indiana Department of Environmental Management:

<https://app.keysurvey.com/f/1405864/38f1/>



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