

Clearing up the GLOBAL HARMONIZATION LABELING questions

NOT HAZARDOUS?

1. Label it as non-Hazardous



HAZARDOUS MATERIALS

2. NOT LEAVING THE FACILITY





3. Leaving the facility AND Hazardous by OSHA HAZCOM



4. Leaving the facility AND Hazardous by both DOT HAZMAT and OSHA HAZCOM







Q1: What is the deadline for converting labels to the new GHS pictogram labels?

A1: June 1, 2015- All manufacturers, importers and employers must comply with HAZCOM 2012 standards. New chemicals will not be produced or transported without SDS and label compliance.

Q2: What about the extended deadline of December 1, 2015?

A2: That deadline is for switching over existing inventories of materials that were labeled under the old standard. This deadline ends the transition period.

Q3: Are there any exceptions from labeling?

A3: Yes! There are still many labeling exceptions under the OSHA HAZCOM standard (29CFR 1910.1200(a)(5), including but not limited to:

- Pesticides and TSCA substances regulated by the EPA
- Food, additives, drugs, cosmetic, medical, etc., covered by FDCA
- Distilled spirits
- Consumer products, Tobacco products, wood products, articles
- Agricultural or vegetable seed covered by the Dept of Ag
- Hazardous waste (EPA RCRA)

Where are you with HAZMAT and HAZCOM Compliance?

PTP Consulting, Inc. can help with:

- Training OSHA and DOT HAZMAT
- Labeling review
- Safety Data Sheet review and consultation

PTP Consulting, Inc. — serving the regulated community for 25 years

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