



Health, Safety and Environment

OSHA Hazard Communication Standard and Globally Harmonized System for Classification and Labeling (GHS)

May 14, 2015

Dear Customer,

As you may be aware of, OSHA's new Hazard Communication Standard will be in effect as of June 1, 2015. In preparation for that deadline RichardsApex would like to take this opportunity to communicate the changes to our products' Safety Data Sheets and packaging labels.

The updated Hazard Communication Standard (HazCom 2012) is now aligned with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. This International GHS was developed and implemented to standardize hazard communications globally by developing an approach to classifying chemicals and standardize chemical hazard communications on labels and Safety Data Sheets.

Attached please find information about the changes required by HazCom 2012 and RichardsApex's implementation of the GHS requirements. Please review the information enclosed, as it will detail the reasoning behind RichardsApex current GHS plan as well as provide explanations on the changes that have been made to hazard classification.

It is important to understand that the product you buy from RichardsApex has not changed, only the way in which we are required to classify certain product's has. Please be assured that any changes to the product label and/or SDS during this transition period is due to Regulatory requirements, not formulary changes.

If there are any questions, please do not hesitate to ask.

Sincerely,

Danielle Fish
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A Short Introduction to GHS and RichardsApex’s Plan of Implementation

What is GHS?

The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) was developed by the United Nations and internationally agreed upon. It was developed to promote a universal standard for hazard classification and hazard communication around the world.

Although GHS is a step toward global harmonization, it is important to note that it is not mandatory to adopt the guideline nor is it mandatory to adopt all of the parts of the guideline. This has led to some significant differences between countries regarding classification, labels, and Safety Data Sheets (SDS) and requires those manufacturing globally to classify, label, and write multiple SDSs for a single product. This is important to understand if you have facilities that are global; as there may be differences in what you see for a RichardsApex product depending upon the countries you are using our products in.

GHS adoption in North America:

In May 2012, the U.S. Occupational Safety and Health Administration (OSHA) aligned its existing Hazard Communication Standard with GHS by promulgating HazCom 2012. The timeline for implementation was given as follows:

Effective Completion Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and SDS format.	Employers
June 1, 2015*	Comply with all modified provisions of this final rule, except:	Chemical manufacturers, importers, distributors and employers
December 1, 2015	Distributors may ship products labeled by manufacturers under the old system until December 1, 2015.	
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period	Comply with either 29 CFR 1910.1200 (this final standard), or the current standard, or both.	All chemical manufacturers, importers, distributors and employers

Canada adopted GHS in February 2015. Their regulations will follow closely with ours and are accepting of GHS SDSs starting now. Full GHS implementation for manufacturers will begin June 1, 2017.

What is the Impact on RichardsApex?

RichardsApex is required to evaluate the hazards of every product we manufacture according to HazCom 2012 and prepare labels and Safety Data Sheets (SDS) in the new format to convey product hazard information to downstream users. RichardsApex is committed to complying with the requirements of HazCom 2012; however as a manufacturer of mixtures RichardsApex relies on the compliance of their suppliers to complete the classification of our products. As soon as RichardsApex receives compliant SDSs from our suppliers we will be able to complete our GHS compliant SDSs for those mixtures.

OSHA has recently put forth an Enforcement Directive that provides downstream manufacturers (such as RichardsApex) with additional time to write compliant Safety Data Sheets if the



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manufacturer has put forth effort to obtain Safety Data Sheets from their supplier. The timeline for the enforcement guidelines is as follows:

“Time Period to Develop HCS 2012-Compliant SDSs and Labels for Mixtures

*SDSs - A manufacturer or importer must create HCS 2012-compliant SDSs **within six months from the date it receives all of the hazard information for the ingredients in a mixture.** OSHA provides this timeframe as an accommodation to the requirement under 1910.1200(g)(5) to update SDSs within three months after receiving new information. The manufacturer or importer must then provide the HCS 2012-compliant SDS downstream with the next shipment of the mixture and when requested by a distributor or employer. Where a chemical manufacturer or importer has not developed an HCS 2012-compliant SDS within six months of receiving the necessary hazard information, a citation for a violation of 1910.1200(g)(2) shall be considered. Related violations of 1910.1200(d)(1), (d)(2), and (d)(3)(i) may also be considered.*

*Labels - A manufacturer or importer must create container labels to comply with HCS 2012 **within six months from the date that it has developed HCS 2012-compliant SDSs.** This accommodation is provided as a reasonable relief to the requirement under 1910.1200(f)(11) that container labels be revised within six months after learning of new hazard information. Containers shipped after the six months period must be labeled with an HCS 2012-compliant label. Where a manufacturer or importer has not developed an HCS 2012-compliant label within six months of the date it developed its HCS 2012-compliant SDS, a citation for violation of 1910.1200(f)(1), (f)(2), and (f)(3) shall be considered.*

*Use of HCS 1994-compliant MSDSs and labels - Manufacturers and importers that have exercised reasonable diligence and made good faith efforts to obtain and integrate the required information but have not received all the necessary classification and SDS information from upstream suppliers to classify the mixture under HCS 2012 shall continue to use MSDSs and labels that conform to HCS 1994. No citation will be issued where sufficient documentation is provided to address this situation. Once the manufacturer or importer has developed an HCS 2012-compliant SDS, it **must be provided to downstream users with the first shipment after the SDS was created or when requested.**”*

As a customer, what changes can I expect to see?

The new HazCom 2012 standard will lead to significant changes to all RichardsApex SDSs and industrial warning labels. New hazards may also be present as a result in the adoption of lower cut off levels such as 0.1% for certain health effects that were previously only considered hazardous at 1.0% or greater.

There are also new definitions for many health hazards. For example corrosives now have guidelines for mixtures (which go beyond the mixture’s pH) with very restrictive concentration cut-offs that may result in current products now being labeled with a statement such as “Causes serious eye damage.” It is important to understand that the formulas of RichardsApex products have not changed, only the way in which we are required to classify the product’s hazards has. Please be assured that any changes to the product label and/or SDS during this transition period is not due to changes to the products or formulations themselves.

As part of the GHS implementation, RichardsApex has discontinued the use of the Hazardous Materials Information System (HMIS) on both our labels and SDSs. HMIS’ rating system is the opposite of the GHS numerical hazard ratings and could present a great deal of confusion.



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Pictograms are a requirement on both SDSs and labels and the pictograms you will see on our products are depicted below:

Health Hazards



Physical Hazards



It is important to understand what the pictograms signify as many of them, especially the health hazards, represent multiple hazard classifications.

As we go through this transition, if you should have any questions regarding RichardsApex's implementation of GHS, please contact the Compliance Department at 215-487-1100 ex 101 or email us at daniellefish@richardsapex.com.