

All the GHS You Need to Know

As you are all aware, the OSHA *Right-to Know / Hazard Communication* rule changed several years ago. One of the most important changes is the use of a consistent GHS symbol, to identify the hazards(s).

However, the question often remains, *where* and *when* to affix the labels? The following is a condensation of OSHA 1910.1200 as well as OSHA Compliance Directives such as CPL 02-02-079 from July 9, 2015, which should make everything clear.

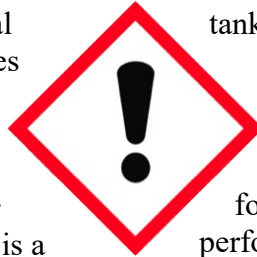
First of all, where don't we need labels? You **do not** need GHS labels on the following:

- Medicines in first aid kits
- Pesticides
- Hazardous waste
- Consumer items like janitorial supplies

There are a lot more, but we'll skipped the obvious like cosmetics and tobacco products. Note for the "Consumer items" this applies when used in consumer quantities. If you buy a 55 gallon drum of a disinfecting chemical, you **do need** a GHS label.

All containers of chemicals from a supplier **do need** a GHS label. As some manufacturers (e.g. spray paint) have no GHS label, you may label individual cans, or you **do need** a GHS label(s) on the storage cabinet.

All drums, gas cylinders, and fixed bulk storage tanks (fuel or compressed gas) **do need** a GHS label.



You **do need** a GHS label on stored propane fuel tanks, but **do not need** a GHS label on in-use tanks.

You **do not need** a GHS label on a container into which chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer and uses it up in one shift.



Process tanks - like plating - **do need** a GHS label. If a mixture, the GHS label may be different than the individual components. You **may need** an Safety Data Sheet (SDS) as a "manufacturer."

You **do not need** a GHS label on a Lead acid or Lithium batteries in equipment. You **do need** to label the batteries in storage (except Lithium "button batteries" used in remote controls or watches). If there are some Lead-Acid batteries set aside for waste or recycling, they **do not need** a GHS label.

Welding rods or reels **do need** a GHS label on the box of rods or on the reel of welding wire.

For brick, metal and or wood that is stockpiled and that will be cut/abraded you **do need** a GHS label.

If there is any hazard - chemical or ignition - for dust in a dust collector, you **do need** a GHS label on the dust collector. In addition, you **may need** an SDS for the dust you have "manufactured."

Lastly, fire extinguishers **do need** GHS labels.

Upcoming Deadlines

- 1/01 - Fire Department permit renewal (e.g. NJ, MA)
- 1/31 - EPA annual MSGP for stormwater discharge report
- 1/31 - EPA Air Permit semi-annual report
- 1/31 - Title V Quarterly Monitoring Report
- 1/31 - Air Permit semi-annual report (e.g. MA, CA)
- 2/01 - OSHA Form 300A post in a public place until April 30
- 2/07 - OSHA Crane Standard evaluate and train operators
- 2/15 - OSHA Voluntary Protection Program annual report

- 3/01 - Tier II EPA Chemical inventory report to Fire Department & LEPC
- 3/01 - some state-specific reports (e.g. groundwater data, MA Recycling)
- 3/01 - Large quantity generators - RCRA Hazardous Waste Report - 2022
- 3/01 - Annual hazardous waste export report to EPA
- 3/01 - EPA Title V annual certification to EPA
- 3/01 - Pesticide manufacture report to EPA
- 3/02 - OSHA 300 log submissions for certain industries
- 3/31 - Quarterly discharge monitoring reports for EPA MSGP facilities
- 3/31 - EPA reporting under 40 CFR 98 Subpart A greenhouse gases