



ANDERSON COUNTY
HAZCOM COMMUNICATION STANDARD:
LABELS AND PICTOGRAMS WHITE PAPER

OSHA has adopted new hazardous chemical labeling requirements as a part of its recent revision of the Hazard Communication Standard, 29 CFR 1910.1200 (HCS), bringing it into alignment with the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS). These changes will help ensure improved quality and consistency in the classification and labeling of all chemicals, and will also enhance worker comprehension. As a result, workers will have better information available on the safe handling and use of hazardous chemicals, thereby allowing them to avoid injuries and illnesses related to exposures to hazardous chemicals.

The revised HCS changes the existing Hazard Communication Standard (HCS/HazCom 1994) from a performance-based standard to one that has more structured requirements for the labeling of chemicals. The revised standard requires that information about chemical hazards be conveyed on labels using quick visual notations to alert the user, providing immediate recognition of the hazards. Labels must also provide instructions on how to handle the chemical so that chemical users are informed about how to protect themselves.

The label provides information to the workers on the specific hazardous chemical. While labels provide important information for anyone who handles, uses, stores, and transports hazardous chemicals, they are limited by design in the amount of information they can provide. Safety Data Sheets (SDSs), which must accompany hazardous chemicals, are the more complete resource for details regarding hazardous chemicals. The revised standard also requires the use of a 16-section safety data sheet format, which provides detailed information regarding the chemical.

All hazardous chemicals shipped after June 1, 2015, must be labeled with specified elements including pictograms, signal words and hazard and precautionary statements. However, manufacturers, importers, and distributors may start using the new labeling system in the revised HCS before the June 1, 2015 effective date if they so choose. Until the June 1, 2015 effective date, manufacturers, importers and distributors may maintain compliance with the requirements of HazCom 1994 or the revised standard. Distributors may continue to ship containers labeled by manufacturers or importers (but not by the distributor themselves) in compliance with the HazCom 1994 until December 1, 2015.

This document is designed to inform chemical receivers, chemical purchasers, and trainers about the label requirements. It explains the new labeling elements, identifies what goes on a label, and describes what pictograms are and how to use them.

Label Requirements:

Labels, as defined in the HCS, are an appropriate group of written, printed or graphic informational elements concerning a hazardous chemical that are affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.

The HCS requires chemical manufacturers, importers, or distributors to ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged or marked with the following information: product identifier; signal word; hazard statement(s); precautionary statement(s); and pictogram(s); and name, address and telephone number of the chemical manufacturer, importer, or other responsible party.

Labels for a hazardous chemical must contain:
<ul style="list-style-type: none">• Name, Address and Telephone Number• Product Identifier• Signal Word• Hazard Statement(s)• Precautionary Statement(s)• Pictogram(s)

To develop labels under the revised HCS, manufacturers, importers and distributors must first identify and classify the chemical hazard(s). Appendices A, B, and C are all mandatory. The classification criteria for health hazards are in Appendix A and the criteria for physical hazards are presented in Appendix B of the revised Hazard Communication Standard. After classifying the hazardous chemicals, the manufacturer, importer or distributor then consults Appendix C to determine the appropriate pictograms, signal words, and hazard and precautionary statement(s), for the chemical label. Once this information has been identified and gathered, then a label may be created.

Label Elements:

The HCS now requires the following elements on labels of hazardous chemicals:

- Name, Address and Telephone Number of the chemical manufacturer, importer or other responsible party.
- Product Identifier is how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in section 1 of the SDS.
- Signal Words are used to indicate the relative level of severity of the hazard and alert the reader to a potential hazard on the label. There are only two words used as signal words, “Danger” and “Warning.” Within a specific hazard class, “Danger” is used for the more severe hazards and “Warning” is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the

hazards warrants a “Danger” signal word and another warrants the signal word “Warning,” then only “Danger” should appear on the label.

- Hazard Statements describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: “Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin.” All of the applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards no matter what the chemical is or who produces it.
- Precautionary Statements describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling. There are four types of precautionary statements: prevention (to minimize exposure); response (in case of accidental spillage or exposure emergency response, and first-aid); storage; and disposal. For example, a chemical presenting a specific target organ toxicity (repeated exposure) hazard would include the following on the label: “Do not breathe dust/fume/gas/mist/ vapors/spray. Get medical advice/attention if you feel unwell. Dispose of contents/ container in accordance with local/regional/ national and international regulations.”

In most cases, the precautionary statements are independent. However, OSHA does allow flexibility for applying precautionary statements to the label, such as combining statements, using an order of precedence or eliminating an inappropriate statement. Precautionary statements may be combined on the label to save on space and improve readability. For example, “Keep away from heat, spark and open flames,” “Store in a well-ventilated place,” and “Keep cool” may be combined to read: “Keep away from heat, sparks and open flames and store in a cool, well-ventilated place.” Where a chemical is classified for a number of hazards and the precautionary statements are similar, the most stringent statements must be included on the label. In this case, the chemical manufacturer, importer, or distributor may impose an order of precedence where phrases concerning response require rapid action to ensure the health and safety of the exposed person.

Supplementary Information:

The label producer may provide additional instructions or information that it deems helpful. It may also list any hazards not otherwise classified under this portion of the label. This section must also identify the percentage of ingredient(s) of unknown acute toxicity when it is present in a concentration of $\geq 1\%$ (and the classification is not based on testing the mixture as a whole). If an employer decides to include additional information regarding the chemical that is above and beyond what the standard requires, it may list this information under what is considered “supplementary information.” There is also no required format for how a workplace label must look and no particular format an employer has to use; however, it cannot contradict or detract from the required information.

An example of an item that may be considered supplementary is the personal protective equipment (PPE) pictogram indicating what workers handling the chemical may need to wear

to protect themselves. For example, the Hazardous Materials Identification System (HMIS) pictogram of a person wearing goggles may be listed. Other supplementary information may include directions of use, expiration date, or fill date, all of which may provide additional information specific to the process in which the chemical is used.

Pictograms and Hazards:

The pictograms OSHA has adopted improve worker safety and health, conform with the GHS, and are used worldwide. 4 While the GHS uses a total of nine pictograms, OSHA will only enforce the use of eight. The environmental pictogram is not mandatory but may be used to provide additional information. Workers may see the ninth symbol on a label because label preparers may choose to add the environment pictogram as supplementary information. Figure 1 shows the symbol for each pictogram, the written name for each pictogram, and the hazards associated with each of the pictograms. Most of the symbols are already used for transportation and many chemical users may be familiar with them.

<p>HEALTH HAZARD</p>  <p>Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Aspiration Toxicity</p>	<p>FLAME</p>  <p>Flammables Pyrophorics Self-Heating Emits Flammable Gas Self-Reactives Organic Peroxides</p>	<p>EXCLAMATION MARK</p>  <p>Irritant (skin and eye) Skin Sensitizer Acute Toxicity Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer (Non-Mandatory)</p>
<p>GAS CYLINDER</p>  <p>Gases Under Pressure</p>	<p>CORROSION</p>  <p>Skin Corrosion/Burns Eye Damage Corrosive to Metals</p>	<p>EXPLODING BOMB</p>  <p>Explosives Self-Reactives Organic Peroxides</p>
<p>FLAME OVER CIRCLE</p>  <p>Oxidizers</p>	<p>ENVIRONMENT NON-MANDATORY</p>  <p>Aquatic Toxicity</p>	<p>SKULL AND CROSSBONES</p>  <p>Acute Toxicity (fatal or toxic)</p>

It is important to note that the OSHA pictograms do not replace the diamondshaped labels that the U.S. Department of Transportation (DOT) requires for the transport of chemicals, including chemical drums, chemical totes, tanks or other containers. Those labels must be on the external part of a shipped container and must meet the DOT requirements set forth in 49 CFR 172, Subpart E. If a label has a DOT transport pictogram, Appendix C.2.3.3 states that the corresponding HCS pictogram shall not appear. However, DOT does not view the HCS pictogram as a conflict and for some international trade both pictograms may need to be present on the label. Therefore, OSHA intends to revise C.2.3.3. In the meantime, the agency will allow both DOT and HCS pictograms for the same hazard on a label. While the DOT diamond label is required for all hazardous chemicals on the outside shipping containers, chemicals in smaller containers inside the larger shipped container do not require the DOT diamond but do require the OSHA pictograms.

Labels must be legible, in English, and prominently displayed. Other languages may be displayed in addition to English. Chemical manufacturers, importers, and distributors who become newly aware of any significant information regarding the hazards of a chemical must revise the label within six months.

Employer Responsibilities:

Employers are responsible for maintaining the labels on the containers, including, but not limited to, tanks, totes, and drums. This means that labels must be maintained on chemicals in a manner which continues to be legible and the pertinent information (such as the hazards and directions for use) does not get defaced (i.e., fade, get washed off) or removed in any way.

The employer is not responsible for updating labels on shipped containers, even if the shipped containers are labeled under HazCom 1994. The employer must relabel items if the labels are removed or defaced. However, if the employer is aware of newly-identified hazards that are not disclosed on the label, the employer must ensure that the workers are aware of the hazards as discussed below under workplace labels.

Workplace Labels:

OSHA has not changed the general requirements for workplace labeling. Employers have the option to create their own workplace labels. They can either provide all of the required information that is on the 5 label from the chemical manufacturer or, the product identifier and words, pictures, symbols or a combination thereof, which in combination with other information immediately available to employees, provide specific information regarding the hazards of the chemicals.

If an employer has an in-plant or workplace system of labeling that meets the requirements of HazCom 1994, the employer may continue to use this system in the workplace as long as this system, in conjunction with other information immediately available to the employees, provides the employees with the information on all of the health and physical hazards of the hazardous chemical. This workplace labeling system may include signs, placards, process

sheets, batch tickets, operating procedures, or other such written materials to identify hazardous chemicals. Any of these labeling methods or a combination thereof may be used instead of a label from the manufacturer, importer or distributor as long as the employees have immediate access to all of the information about the hazards of the chemical. Workplace labels must be in English. Other languages may be added to the label if applicable.

Sample Labels:

The examples below show what a sample label might look like under the revised HCS requirements. The examples break the labeling out into “steps” to show the order of information gathering and how label creation occurs. Step 1 is performing classification; step 2 is gathering full label information; and step 3 is creating the label.

These examples are for informational purposes only and are not meant to represent the only labels manufacturers, importers and distributors may create for these hazards.

Example 1: This example demonstrates a simple label.

The Substance:
HS85
Batch Number: 85L6543

Step 1: Perform Classification
Class: Acute Oral Toxicity; Category 4

Step 2: Gather Labeling Information
Pictograms:



Signal Word:
WARNING

Hazard Statements:
Harmful if Swallowed

Precautionary Statements:

Prevention:

- Wash hands and face thoroughly after handling.
- Do not eat, drink or smoke when using this product.

Response:

- If swallowed: Call a doctor if you feel unwell.²
- Rinse mouth

Storage:
None specified


Disposal:

- Dispose of contents/container in accordance with local/regional/national/international regulations.³

Step 3: Create the Label

Putting together the above information on HS85, a label might list the following information:

Example 1: HS85 Label

<p>HS85 Batch number: 85L6543</p>  <p>Warning Harmful if swallowed</p> <p>Wash hands and face thoroughly after handling. Do not eat, drink or smoke when using this product. Dispose of contents/container in accordance with local, state and federal regulations.</p> <p>First aid: If swallowed: Call a doctor if you feel unwell. Rinse mouth.</p> <p>GHS Example Company, 123 Global Circle, Anyville, NY 130XX</p> <p>Telephone (888) 888-8888</p>
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Example 2: This example demonstrates a more complex label.

Example 2 is for a substance that is a severe physical and health hazard. For shipping packages of chemicals that will be transported in the United States (i.e., drums, totes, tanks, etc.), the U.S. DOT requires a DOT label(s) on the outside container(s) for hazardous chemicals. Two versions of this label are presented below to demonstrate the difference between an OSHA label with pictograms from the HCS and a DOT label required for transport of a shipping container.

The Substance:

OXI252 (disodiumflammy)
CAS number: 111-11-11xx

Step 1: Perform Classification

Class: Oxidizing Solid, Category 1
Class: Skin Corrosive, Category 1A

Step 2: Gather Labeling Information

Pictograms:



Signal Word:

DANGER

Hazard Statements:

- May cause fire or explosion; strong oxidizer
- Causes severe skin burns and eye damage

Precautionary Statements:

Prevention:

- Keep away from heat.
- Keep away from clothing and other combustible materials.
- Take any precaution to avoid mixing with combustibles.
- Wear protective neoprene gloves, safety goggles and face shield with chin guard.
- Wear fire/flame resistant clothing.
- Do not breathe dust or mists.
- Wash arms, hands and face thoroughly after handling.

Response:

- IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water.
- IF ON CLOTHING: Rinse immediately contaminated clothing and skin with plenty of water before removing clothes. Wash contaminated clothing before reuse.
- IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
- IF INHALED: Remove person to fresh air and keep comfortable for breathing.
- IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
- Immediately call poison center.⁴

Specific Treatment:

Treat with doctor-prescribed burn cream.⁵

In case of fire:

Use water spray. In case of major fire and large quantities: Evacuate area. Fight fire remotely due to the risk of explosion.

Storage:

Store locked up.

Disposal:



- Dispose of contents/container in accordance with local/regional/national/international regulations.³

Step 3: Create the Label

Putting together the above information on OXI252, a label might list the following information:

Example 2A: OXI252 Label inner package label with OSHA pictograms

OXI252
(disodiumflammy)
CAS #: 111-11-11xx



Danger
May cause fire or explosion; strong oxidizer
Causes severe skin burns and eye damage

Keep away from heat. Keep away from clothing and other combustible materials. Take any precaution to avoid mixing with combustibles. Wear protective neoprene gloves, safety goggles and face shield with chin guard. Wear fire/flame resistant clothing. Do not breathe dust or mists. Wash arms, hands and face thoroughly after handling. Store locked up. Dispose of contents and container in accordance with local, state and federal regulations.



First aid:
IF ON SKIN (or hair) or clothing⁶: Rinse immediately contaminated clothing and skin with plenty of water before removing clothes. Wash contaminated clothing before reuse.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
IF INHALED: Remove person to fresh air and keep comfortable for breathing.
IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
Immediately call poison center.
Specific Treatment: Treat with doctor-prescribed burn cream.

Fire:
In case of fire: Use water spray. In case of major fire and large quantities: Evacuate area. Fight fire remotely due to the risk of explosion.

Great Chemical Company, 55 Main Street, Anywhere, CT 064XX Telephone (888) 777-8888

Example 2B: OXI252 Label meeting DOT requirements for shipping⁷

OXI252
(disodiumflammy)
CAS #: 111-11-11xx



Danger
May cause fire or explosion; strong oxidizer
Causes severe skin burns and eye damage

Keep away from heat. Keep away from clothing and other combustible materials. Take any precaution to avoid mixing with combustibles. Wear protective neoprene gloves, safety goggles and face shield with chin guard. Wear fire/flame resistant clothing. Do not breathe dust or mists. Wash arms, hands and face thoroughly after handling. Store locked up. Dispose of contents and container in accordance with local, state and federal regulations.

First aid:
IF ON SKIN (or hair) or clothing: Rinse immediately contaminated clothing and skin with plenty of water before removing clothes. Wash contaminated clothing before reuse.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a doctor.
IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
Immediately call poison center.
Specific Treatment: Treat with doctor-prescribed burn cream.

Fire:
In case of fire: Use water spray. In case of major fire and large quantities: Evacuate area. Fight fire remotely due to the risk of explosion.

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For more detailed information about labels and Safety Data Sheets (SDSs) under the revised Hazard Communication Standard, please refer to refer to 29 CFR 1910.1200 - paragraphs (f) and (g), and Appendix C. The revised Hazard Communication Standard and additional guidance materials are available on OSHA's Hazard Communication page, located at: www.osha.gov/dsg/hazcom/index.html.

<https://www.osha.gov/Publications/OSHA3636.pdf>

<https://www.trac360.com/blog/chemicals/the-9-hazard-communication-standard-pictograms/>