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tor, which always presents challenges.

The new OSHA assigned protection factor for constant-flow supplied-air respirators with full facepieces also is different from that of NIOSH. OSHA assigned an APF of 1,000 to this respirator configuration while NIOSH gave it an APF of only 50.

This new OSHA standard on APFs supersedes most of the APFs that have been noted in substance-specific standards previously released by OSHA, making it much easier for employers and employees to follow safe workplace respiratory practices.

John Hierbaum
MSA Co.

OSHA Hazard Communication Standard Globally Harmonized System (GHS)

OSHA's Globally Harmonized System (GHS) is designed to eliminate the inconsistencies posed by regulations in various countries for the classification and labeling of hazardous chemicals, as well as safety data sheet information.

The GHS advance notice of proposed rule-making (ANPRM) was published in the Federal Register on Sept. 12, 2006. Go to <http://www.gpoaccess.gov/fr/index.html> to view the ANPRM. The OSHA Web site also provides a GHS summary at <http://www.osha.gov/dsg/hazcom/ghs.html>.

Commentary

If all goes according to OSHA's plan, one in three Americans will be affected by the most significant change to the Hazard Communication Standard (HCS) since it was first promulgated in 1983. According to OSHA's revised estimates, the current HCS affects more than 100 million Americans, employed at more than 7 million working places and working with nearly a million hazardous products.

So why change, and why change now? To understand this, one has to travel back to 1992, when the United Nations Conference on Environment and Development (UNCED) adopted a mandate for the development of a Globally Harmonized System of Classification and Labeling for Chemicals (GHS). Many observe that our government moves at a glacial pace, but imagine shepherding through a significant global change. This explains why it has taken more than 15 years for this change to finally have the potential to impact U.S. workplaces in 2008.

The intent is for GHS to remove or signifi-

cantly minimize the inconsistencies presented by the varying rules countries have for labeling hazardous chemicals and promote enhanced worker protection and facilitate more efficient trade in this global economy.

OSHA states:

... the United States (U.S.) is both a major importer and exporter of chemicals, the manner in which the U.S. and other countries choose to regulate information dissemination on hazardous chemicals not only has an impact on the protection of employees in the U.S. but also may pose potential barriers to international trade in chemicals. To protect employees and members of the public who are potentially exposed to chemicals during their production, transportation, use, and disposal, a number of countries have developed laws that require information about those chemicals to be prepared and transmitted to affected parties. These laws vary with regard to the scope of chemicals covered, definitions of hazards, the specificity of requirements (e.g., specification of a format for safety data sheets), and the use of symbols and pictograms. The inconsistencies between the various laws are substantial enough that different labels and safety data sheets must often be developed for the same product when it is marketed in different nations.

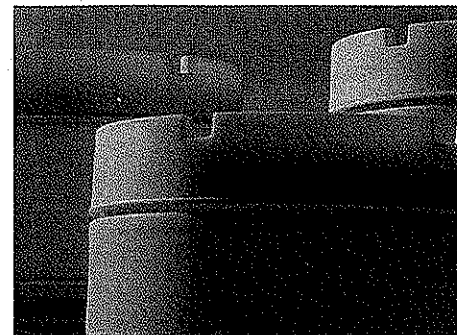
The Bottom Line

As much as GHS is meant to drive global harmonization in classification, safety data sheets and labeling, the GHS requirements typically are adopted by each country or region and may be modified by individual governmental bodies to meet specific in-country or regional compliance requirements and objectives. For all practical purposes, safety managers can anticipate more harmonization, but there will be national differences. How should safety departments prepare for what is coming?

GHS Classification and Regulatory Data

GHS requirements, regulatory data and substance classification data should be maintained in a database, by region, tracking how each country or region adopts the requirements. Online, Web-accessed reference data and integrated corporate enterprise data should include the following:

- Online regulatory data access with an easy-to-use interface and robust search, query,



OSHA's Globally Harmonized System attempts to standardize international classification and labeling of hazardous chemicals.

reporting and analysis.

- A system and process for regulatory updates in which relevant employees receive alerts on changing regulations.
- The integration of chemical regulatory data into diverse, custom, open corporate environmental, health and safety systems, including efficient change management and regular updates as regulations change and new ones are released.

SDS Authoring and Distribution

GHS classification data is necessary for substances and mixtures as part of safety data sheets (SDs) and label authoring. SDSs and labels should be re-authored in compliance with GHS requirements for the country or region that has adopted GHS or is anticipated to adopt GHS. Authoring should support seamless, large-scale updates to SDSs and labels, thus providing a single source for GHS-driven SDS and labeling changes.

SDS Management

Chemical users should be able to search, view, print and e-mail SDSs in a company-specific database via a Web browser interface. GHS requirements are likely to drive significant revisions to SDSs and thereby increase the burden of vendor MSDS management.

Other Regulatory Impact

In addition to OSHA's HCS, GHS classification is also anticipated to affect current Toxic Substances Control Act (TSCA) and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) filings and inventories. Companies with chemicals that are subject to TSCA and FIFRA regulations should also review the impact of the GHS regulations on those chemicals.

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