



# SCHC Monthly Newsletter

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## Multi-Modal Transportation Classification Training

**\$750 Members - Use Discount Code SCHC2016**

**\$840 Nonmembers**

The SCHC Professional Development Committee is announcing the Distance Learning course, Multi-Modal Transportation Classification Training, to be held on July 19, 21, 26 and 28, 2016. The Series will encompass 4 distance learning sessions, 3 hours each that will be held from 1pm to 4 pm ET. A certificate of successful completion will be provided for all who attend all distance learning courses in the series and successfully complete the test. If you are unable to attend one distance learning course, you will need to notify the instructor to make other arrangements.

This distance learning course is intended for SDS authors and covers DOT, IATA/ICAO (air transport) and the IMDG Code (ocean transport). The course combines lectures with problem-solving and practical workshops. The curriculum focuses mainly on the principles and practices of classifying hazardous materials/dangerous goods under the transport regulations, selecting proper shipping names and assigning a shipping description. Packing, marking, labeling and shipping papers will also be covered in brief. The successful completion of this 4-part multi-modal training series will meet the requirements for initial and recurrent training under the DOT, IATA/ICAO and the IMDG Code for individuals involved in the classification of hazardous materials/dangerous goods.

Classification is always the first and most important of the “Shipper’s responsibilities.” It dictates all other elements for compliance with the hazardous materials/dangerous goods regulations from shipping name selection to packaging, marking, labeling, documentation, and placarding. In this course, students will learn, via lectures, problems and examples, a systematic approach to evaluating physical, chemical and toxicological properties of compounds, mixtures and solutions. The resultant hazard determination leads to identification of the primary and subsidiary hazard class/division(s) and packing group. Reliable reference sources of relevant technical data will be identified and discussed.

Emphasis will be placed on hazard class definitions (including the UN/IMDG criteria for Marine Pollutants), tests and criteria, the Hazardous Materials Table and Dangerous Goods Lists, shipping name selection, packing group assignments, hierarchy of hazards and subsidiary hazards. Other topics covered will include: recent changes in the regulations, marine pollutants, hazardous substances, elevated temperature materials and hazardous wastes. A brief overview of packaging, marking, labeling documentation, and placarding will be presented.



## Training & Meetings

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### Multi-Modal Transportation Classification Training (Cont.)

Off-line practice examples will be provided at the end of each session and the answers will be discussed at the beginning of subsequent sessions. Each participant will be required to pass an exam. The exam will be emailed at the end of the last class and all participants are required to return the completed exam via email within 24 hours. All participants will be given an attendance certificate. Successful completion certificates will only be provided to people who pass the exam with a score of 80%.

You will need access to current versions of the following regulations for the final test and for the exercises: 49 CFR Parts 105-180 (US DOT Hazmat Regulations) (available on-line); the published version of the ICAO Technical Instructions (IATA Dangerous Goods Regulations or the Labelmaster Air Shipper) and the International Maritime Dangerous Goods Code. Labelmaster is offering printed copies of 49CFR and their Air Shipper at a discount for course attendees. Details on ordering will be provided when you register for the course. If you do not have access to the IMDG Code, please email the instructor to make arrangements.

[Register Here.](#)

### Instructors

#### **Denese A. Deeds, CIH, FAIHA**

Denese Deeds is co-founder of Industrial Health & Safety Consultants, Inc. and is certified in the Comprehensive Practice of Industrial Hygiene by the American Board of Industrial Hygiene. She has been consulting in the areas of Industrial Hygiene and Chemical Regulatory Affairs since 1981. In her position as Director of Chemical Regulatory Services she prepares MSDS and other hazard communication documents, files international chemical registrations and assists companies with overall chemical regulatory compliance. As part of her practice, Denese has assisted clients in the development of PPE programs, has delivered numerous training classes on respiratory protection, personal protective equipment and Hazwopper operations and has recommended various engineering solutions to industrial hygiene exposure problems in many different manufacturing settings. Prior to consulting, Ms. Deeds held industrial hygiene positions with Westinghouse Electric and General Electric. She is a fellow of the American Industrial Hygiene Association, the Academy of Industrial Hygiene and the Society for Chemical Hazard Communication, where she has served as President.

#### **Gene Sanders, CET, DGSA, CDGP**

With over 20 years of extensive exposure working with Dangerous Goods in pharmaceutical, safety supplies, chemical, educational, waste, and clinical trials environments, Gene is knowledgeable in DOT (49CFR), ICAO (A.I.R. & IATA), IMO (IMDG), TDG, and ADR. Gene is one of the first three people in the world to become a Certified Dangerous Goods Trainer in five different sets of transport regulations. Gene has worked for carriers and for shippers, dealing with proposed products, with new products, and with waste, involving chemicals and involving articles, handling outgoing shipments and dealing with returns, on both sides of the Atlantic Ocean. Gene has been on a Hazardous Materials Emergency Response team, and on a volunteer fire department.



## Training & Meetings

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Multi-Modal Transportation  
Classification Training (Cont.)

Gene has developed and conducted training programs, primarily for shippers, involving some aspect of all hazard classes and divisions, including Class 1, Division 6.2, and Class 7. With degrees in Biochemistry and in Chemistry, and a minor in Microbiology, Gene regularly teaches in depth, detailed courses in Classification, and in Infectious Substances, as well as teaching more comprehensive classes involving all aspects of DG shipping, offering, and accepting. Gene is a current member of the Board of Directors at DGAC (formerly HMAC), served on the initial Board of Directors for DGTA, and is currently also a member of COSTHA, AHMP, and SCHC.

## Training & Meetings

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Fall Meeting Reminder

### Fall Meeting Reminder

The SCHC Fall Meeting will once again be held in Arlington, Virginia on 24-28 September. Make your hotel reservations at the Crystal Gateway Marriott soon – rooms WILL sell out! Hotel reservations can be made [Here](#).

### SCHC TSCA Reform Webinar

**\$75 Members**

**\$125 Nonmembers**

**July 13, 2016 - 1:30-3:00p (ET)**

An Overview and Summary of the New TSCA: Major Changes, What to Expect, and When to Expect It.

[Course Details](#)

[Register Here](#)

## OSHA, GHS & EPA

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Knowing the Differences

### OSHA, GHS & EPA: Dealing with Differences

On March 26, 2012, OSHA adopted elements of the GHS under OSHA HazCom 2012. Under FIFRA, the Environmental Protection Agency (EPA) did not adopt the GHS. Instead of adopting GHS, on April 20, 2012, in response to OSHA HazCom 2012, the EPA published an 11-page document:

*Pesticide Registration (PR) Notice 2012-1 Material Safety Data Sheets as Pesticide Labeling.*

**[www.epa.gov/sites/production/files/2014-04/documents/pr2012-1.pdf](http://www.epa.gov/sites/production/files/2014-04/documents/pr2012-1.pdf)**

On pp. 8-9 of PR Notice 2012-1, the EPA describes two examples of how to display information from an EPA label into Section 15 of an OSHA HazCom 2012 SDS.

Under the guidelines of OSHA HazCom 1994, an MSDS author would put EPA label elements in the Hazards Identification Section of the then-MSDS.

Today, under OSHA HazCom 2012, the EPA label information now appears in Section 15 of the SDS, with an appearance similar to this:



## OSHA, GHS & EPA

### Knowing the Differences (Cont.)

#### Example 1-FIFRA information for SDS Section 15 (Regulatory Information):

This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and for workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label:

#### **WARNING**

May be fatal if swallowed or if absorbed through skin.

Harmful if inhaled.

Causes skin irritation.

Causes substantial but temporary eye injury

There were some publications by the EPA as far back as 2004, as you will see in the References section. Much of the early discussion was to sort-out the conflicts between the EPA Label Review Manual versus the building blocks of the GHS. A primary example of the conflict between the two is that GHS does not have a Signal Word of CAUTION, while the EPA still uses CAUTION as a Signal Word on product labels.

**Figure 1:** Portion of EPA approved label Signal Word and Precautionary Statements:

**CAUTION**

Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment, wash water or rinsate. See Directions for Use for additional precautions and requirements.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Do not apply this product around electrical equipment due to the possibility of shock hazard.

**Figure 2:** Portion of OSHA HazCom 2012 SDS, for the same product:

**2. HAZARDS IDENTIFICATION**

Classification

**OSHA Regulatory Status:**  
This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

Acute toxicity - Inhalation (Dusts/Mists)	Category 4
Flammable aerosol	Category 2
Gases under pressure	Liquefied gas

Label elements Emergency Overview

**WARNING**

**Hazard statements**

- H332 - Harmful if inhaled

However, since PR Notice 2012-1 was published in 2012, there have been no recent publications regarding the EPA adopting GHS or OSHA HazCom 2012.

#### **FAQ's:**

The most frequently asked questions I received when we first started authoring GHS/ OSHA HazCom 2012 SDS's were from my employers' own sales staff. Soon afterwards, similar questions and inquiries trickled-in from our customers and from sub-registrants of our products;



## OSHA, GHS & EPA

Knowing the Differences (Cont.)

1. “Why does our SDS say WARNING ... and our EPA label says CAUTION?”

2. “What are these Precautionary Statements? What are these Hazard Statements?”

3. “What does this exploding-chest-person mean?!”



4. “What does the big exclamation-mark with a red -square mean?”



Note: Technically it is a ‘square-on-point.’

5. “Why does the label say Harmful if absorbed through skin...and the MSDS (SDS) says Harmful if inhaled?”

The burden of explanation of a pesticide/ insecticide manufacturer's SDS information falls on the SDS author(s) themselves. Creating a lengthy self-addressed e-mail in order to answer all of these questions expedited the repetitive process of my need to explain the difference between OSHA SDS's and our EPA labels to both everybody inside of our own company, as well as to everybody outside of our company.

When involved in a lengthy telephone discussion or an exchange of several e-mails, I have kindly offered the caller advice of membership into SCHC.

### References:

White paper: The Globally Harmonized System of Classification and Labelling of Chemicals (GHS): Implementation Planning Issues for the Office of Pesticide Programs:  
[www.epa.gov/sites/production/files/2015-08/documents/globa-whitepaper.pdf](http://www.epa.gov/sites/production/files/2015-08/documents/globa-whitepaper.pdf)

Chemical Hazard Classification and Labeling: Comparison of OPP Requirements and the GHS:

[www.epa.gov/sites/production/files/2015-09/documents/ghscriteria-summary.pdf](http://www.epa.gov/sites/production/files/2015-09/documents/ghscriteria-summary.pdf)

Hazard Communication Standard for Chemical Labels and Safety Data Sheets In GHS Format:

[www.epa.gov/sites/production/files/2016-01/documents/hazard\\_communication\\_standard-safety\\_data\\_sheets\\_epa\\_dec\\_2015.pdf](http://www.epa.gov/sites/production/files/2016-01/documents/hazard_communication_standard-safety_data_sheets_epa_dec_2015.pdf)

EPA Label Review Manual:

[www.epa.gov/pesticide-registration/label-review-manual](http://www.epa.gov/pesticide-registration/label-review-manual)

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## Misc.

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### Congress Passes Largest Chemical Safety Legislation In 40 Years

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On June 8, Congress passed the long-awaited TSCA Reform bill. It has been sent to the President to sign into law (and it will certainly be signed). This bill was many years in the making and it will change how chemicals are regulated in the US and give more power to the EPA. The linked articles below provide an explanation of these important changes:

[NPR](#)

[ACS](#)

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The SCHC Newsletter is a monthly publication of the Society for Chemical Hazard Communication. SCHC Members are encouraged to submit a title or short statement on any topic in the HazCom field along with a link to:

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