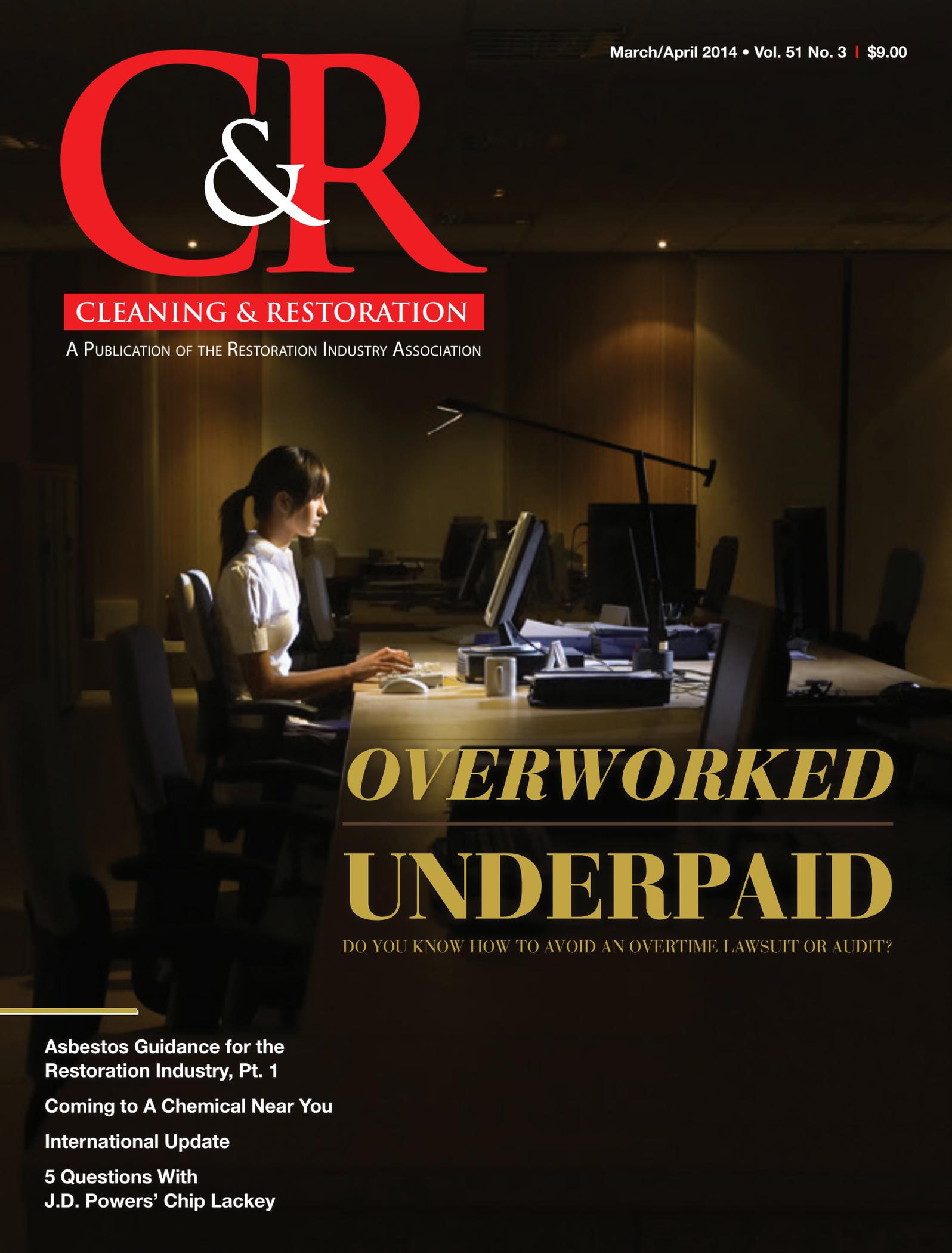


CR &R

CLEANING & RESTORATION

A PUBLICATION OF THE RESTORATION INDUSTRY ASSOCIATION

A woman with dark hair in a ponytail, wearing a white short-sleeved shirt, is sitting at a desk in a dimly lit office. She is looking at a computer monitor and has her hands on the keyboard. The office has several other desks with computers in the background, and the lighting is focused on the woman's desk.

OVERWORKED

UNDERPAID

DO YOU KNOW HOW TO AVOID AN OVERTIME LAWSUIT OR AUDIT?

**Asbestos Guidance for the
Restoration Industry, Pt. 1**

Coming to A Chemical Near You

International Update

**5 Questions With
J.D. Powers' Chip Lackey**



COMING TO A CHEMICAL NEAR YOU

New Labeling Rules Will Impact
Carpet Cleaning Techs and
Restoration Pros

By Michael Wilson

The Occupational Safety and Health Administration (OSHA) has revised its Hazard Communication Standard (HCS) so that it is more in line with standards used in many countries around the world, as well as the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). While the entire program will be implemented in stages, with full implementation by

2016, carpet-cleaning technicians and restoration professionals should become aware of these changes now.

Why should carpet-cleaning and restoration pros care about these changes? Very simply, they rely heavily on cleaning chemicals, spotters, disinfectants, and other chemical detergents and solutions. Many of these products are potentially dangerous, especially if they are used improperly, and the new rules will impact all of these chemicals. Further, the new standard applies not only to

chemicals manufactured in the United States, but to all those imported into the country as well.

In essence, the new HCS is designed to provide hazardous information about a chemical product as well as protective measures to take in case of emergency.

Some of this information is already listed on material data safety sheets (MSDS); however, MSDS are being replaced by safety data sheets (SDS).

The goal is that those working in Hong Kong, for instance, will be able to understand the potential hazards of the chemicals they use even if the substances are made in the U.S. or any other country. As OSHA explains, “The diverse and sometimes conflicting national and international requirements [on chemical labels] can create confusion among those who seek to use hazard information effectively. For example, labels and safety data sheets may include symbols and hazard statements that are unfamiliar to readers or not well understood. Further, containers may be labeled with such a large volume of information that important statements are not easily recognized. Labels may also be incorrect when used in other countries. If countries around the world adopt the GHS, these problems will be minimized, and chemicals crossing borders will have consistent information, thus improving communication globally.”

HCS AT A GLANCE

The labeling changes dictated by the new HCS are significant and expansive. To ensure successful implementation, techs need to be not only aware of these innovations, but also in touch with an astute distributor should questions arise.

Here are some of the changes we can expect with the new HCS:

1. **SDS**—The new SDS has a universal format with 16 specific sections; this is to ensure consistency in presenting important hazard, protection and related information. (See sidebar on p. 22.)
2. **Labels**—Labels on chemical products must include signal words such as “Danger,” “Warning” and “Caution.”
3. **Pictograms***—Along with words, universally understood pictograms will appear on labels. The following pictograms will be used: an image that conveys a health hazard; flame (flammable); exclamation mark (irritant to skin, eyes, respiratory track, etc.); explosive; skull and bones (acutely toxic, potentially fatal). According to the rule, a pictogram must consist of a symbol on a white background framed within a red, square-on-point

border. Images of the new pictograms may be found at www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html.

4. **Statements**—Hazard and precautionary statements about a product identifying its hazard class and category will also appear on the label. The class and category of a product identify the relative severity of the product should it be misused or an accident occurs while the product is in use.
5. **Training**—More than being aware of the new HCS changes will be necessary; employers are required to train workers about the new labels and the SDS format, as well as have ongoing training for current and new workers.

PHASE-IN PERIODS

OSHA realizes these changes will require manufacturers to make adjustments to their product labels and even acknowledges that this could be costly. However, with the goal of protecting the user of the products no matter where the user is located, as well as anyone who comes into direct or indirect contact with the product, its position is that these costs are not only justified, but will also provide a savings.

Who benefits from these changes? OSHA says the new standard will impact more than 40 million workers in more than five million workplaces in the U.S. alone. The administration also expects the changes will help prevent more than 500 chemical-related injuries and more than 40 fatalities each year, plus eventually save American businesses nearly \$500 million annually.

To smooth the way and make the changes more palatable to businesses and their workers, the program will be introduced in stages. However, carpet-cleaning techs and restoration professionals should be aware that the deadline for one of the key requirements has already passed; by Dec. 1, 2013, employers were required to introduce and train employees on the new label elements and SDS format. Aware that this might have caught some employers off guard, OSHA has said that full compliance of the training requirement must begin by 2015.

Other items have staggered completion dates and will be phased in over the coming years. Among these are the following:

- Chemical manufacturers must comply with the new rules by June 1, 2015; this specifically addresses the labeling requirements.
- Distributors may market or ship products that do not comply with the rules by Dec. 1, 2015; this

allows distributors to sell any current inventory they may still have in stock.

- Employers must begin updating workers on the labeling and hazard communication program and provide additional staff training for any newly identified physical and health hazards of an existing or new product. This must be completed by June 1, 2016.

IMPACT ON CLEANING-RELATED INDUSTRIES

Because so many chemicals are used in cleaning, carpet cleaning and restoration work, the new rules, labels, SDS and other changes will undoubtedly affect the professionals working in these fields. As to cost implications, one chemical manufacturer has reported the program will tally approximately \$200,000, if not more, to implement. The actual costs are unknown; however, very often these changes can be worked into other training programs.

While this discussion covers the key provisions of the new standard, there are others and it is expected that actual implementation of the program, including understanding all the changes that will result, will require guidance. Having an astute distributor aware of the new rules and their implications will likely prove invaluable in assuring proper compliance. **RIA**

**The new standard also specifies how pictograms must be presented, again in order to standardize them around the world. According to the rule, a pictogram must consist of a symbol on a white background framed within a red, square-on-point border, designed to communicate a distinct hazard graphically.*

Michael Wilson is the marketing director for AFFLINK, a sales and marketing organization that links manufacturers of janitorial, carpet cleaning, packaging, food service, safety, MRO and supplies together with distributors throughout North America. He can be contacted via <http://afflink.com/Default.aspx>



WHAT YOU'LL SEE ON A SAFETY DATA SHEET

Here are the 16 sections required in the new safety data sheets:

- Section 1. Product identification
- Section 2. Hazard(s) identification
- Section 3. Composition/information on ingredients
- Section 4. First-aid measures
- Section 5. Fire-fighting measures (if applicable)
- Section 6. Accidental release measures
- Section 7. Handling and storage
- Section 8. Exposure controls/personal protection
- Section 9. Physical and chemical properties
- Section 10. Stability and reactivity
- Section 11. Toxicological information
- Section 12. Ecological information
- Section 13. Disposal considerations
- Section 14. Transport information
- Section 15. Regulatory information
- Section 16. Other information, including date of preparation or last revision