

OSHA HAZCOM DEADLINE REMINDER FOR LAB PERSONNEL

UPDATED DECEMBER 2015

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) adopted new global requirements for chemical classification, labelling and safety data sheets in 2012. These labelling and safety data sheet requirements apply to all lab personnel. Changes have been phased-in to ensure employers, manufacturers and distributors have sufficient time to comply with the mandate.

The initial phase required training on the new label and safety data sheet formats. The second phase became effective June 1, 2015, and required that users of hazardous chemicals at Virginia Tech comply with all provisions summarized below:

I. UNDERSTAND the new label elements and safety data sheet format

- All persons who handle hazardous chemicals must receive awareness training on the new label elements and safety data sheets. If you have not completed this training, or are unsure if you have completed it and it is not showing on your training profile, please complete the new EHS online General Lab Safety training module. Please register online at <https://secure.hosting.vt.edu/www.ehss.vt.edu/register.php?id=1540>
- Classroom training is also available upon request for large groups.
- In addition, each workspace is responsible for establishing departmental-specific procedures for workplace container labelling and safety data sheet management, and for training lab personnel on using these procedures.
- See also [OSHA Brief: Training Requirements for the Hazard Communication Standard.](#)

II. MAINTAIN LABELS on all chemical containers

- Chemical labels cannot be defaced or in any way become illegible (until empty). Users (lab personnel) of hazardous chemicals are not responsible for updating labels (conforming to new label format) on primary containers of existing inventory as of June 1, 2015. However, lab personnel must re-label any existing primary containers with the new labels if they have been removed or defaced.
- Manufacturers were required to begin to use, if not already using, the new labelling system on all chemicals by June 1, 2015.
- Distributors were permitted to ship existing inventory that did not have the new labeling format until December 1, 2015.
- Options acceptable for laboratory workplace labels (not primary containers, but secondary labelling for beakers, bottles, etc.) include but are not limited to the following:
 1. Write the full chemical name(s) on the label (preferred when feasible).
 2. Write the standard formula, abbreviation or trade name for the chemical(s)/reagent on the label.
 - NaOH, EDTA, IPA, HCl, EtBr, PBS (and % or concentration)
 - Use a code from a lab notebook or reference sheet.
 - If a container is too small or identity name is too large, a codified name may be used on the container when defined in a lab notebook or reference sheet accessible to all.

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- Include the primary hazard on the container (words or symbol).
- The product or chemical names must be in English.
- See also: [OSHA Brief- Hazard Communication: Standard Labels and Pictograms.](#)

III. MAINTAIN SAFETY DATA SHEETS for each hazardous chemical in the work space.

- Safety data sheets (SDSs) must be readily accessible (no barriers to student or employee access).
- As of June 1, 2015, manufacturers are required to convert to the new SDS format. All existing material safety data sheets (MSDSs) in the workplace must be replaced with updated SDSs.
 1. Each lab must establish a system (if not already in place) to actively acquire new SDSs for chemicals present in the lab from manufacturers and distributors.
 2. Each lab must complete the transition as soon as possible after June 1, 2015, but no later than December 31, 2015.
 3. This will be a focus of upcoming EHS inspections.
- See also: [VT EHS FAQ Verifying SDS Format.](#)
[VT EHS FAQ Obtaining Safety Data Sheets \(formerly MSDS\)](#)
- There must be an adequate back-up system in the event of an emergency (including power outages, equipment failure, on-line access delays, etc.). Providing responders (local hospital and rescue squad) with hard copies of SDS is highly recommended and will greatly assist them in responding quickly and specifically to your emergency.
- Acceptable options for maintaining SDSs include:
 1. Keeping hard copies in a binder in the workspace.
 2. Maintaining an electronic system which includes an adequate backup method (documented in the lab's CHP) for rapid access to hazard information in the event of emergency including power-outages, equipment failures, on-line access delays, etc.
- Employees and/or students in each work space must be trained on the department specific system being used to manage the safety data sheets.
- See also: [OSHA Brief: Hazard Communication Standard: Safety Data Sheets.](#)

Please also note the following regarding importing chemicals:

If your lab imports chemicals from foreign manufacturers who have no US presence, you are considered an importer and the chemical manufacturer requirements transfer to you. Please contact Office of Research Compliance if at any time you plan to import chemicals for use in your research or other work environment.

For more information about these requirements, contact Rachel Layman at ralayman@vt.edu.