

## EMPLOYMENT SERVICES ALERT

11/4/13

### Deadline for Mandatory Employee Training on OSHA's Revised Hazard Communication Standard is Rapidly Approaching

By December 1, 2013, employers that use hazardous chemicals in their workplace must train employees on OSHA's revised hazard communication standard. Generally, this standard is designed to ensure the safe use of hazardous chemicals in the workplace. To that end, it requires chemical manufacturers and importers to prepare labels and safety data sheets (SDSs) that convey information regarding hazardous chemicals. It also requires employers that use hazardous chemicals in their workplace to provide this information to employees and train employees to handle chemicals safely.

In 2012, OSHA revised its hazard communication standard to align it with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As its name suggests, the GHS is the international approach to classifying hazardous chemicals. The revised OSHA standard includes four major changes. First, it creates specific criteria for classification of health and physical hazards, as well as classification of mixtures. Second, it requires chemical manufacturers and importers to provide a label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Third, the revised standard requires SDSs to have a specified 16-section format.

Fourth, the standard requires employers to train their workers on the label elements and the SDS format by **December 1, 2013**. Training on label elements must include information on the type of data the employee would expect to see on the new labels, how an employee might use the labels in the workplace, and how the elements work together on a label. Training on the format of the SDS must include information on the standardized 16-section format and how the information on the label is related to the SDS.

The employee training requirement is the first compliance date under the revised hazard communication standard. The remaining requirements will be gradually phased in through 2016.

Roetzel & Andress attorneys can assist with your employee training and other compliance needs. For additional information, please contact any of the attorneys below:

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