

OSHA GHS Rev 7 NPRM Checklist



Earlier in 2021, OSHA issued a Notice of Proposed Rulemaking (NPRM) to update the HazCom Standard to align with Revision 7 of the UN's Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Since then, we've received a lot of questions from stakeholders throughout the supply chain about how the proposed changes might affect their business.

This checklist is intended to help you understand some of the most important tasks you need to complete in order to prepare for the coming changes. You'll find the responsibilities pertaining to everyone in the supply chain in the first section. After reviewing those, you can review the responsibilities specific to your place in the supply chain, and just check off the items you've addressed. **And don't forget to read the end of the checklist to learn more about the ways VelocityEHS can help!**

Preparation Checklist

Responsibilities for Everyone

- Make sure you have an up-to-date chemical inventory of all chemicals that you use and store that are defined as hazardous under the Hazard Communication Standard.
- Make sure you have an up-to-date library of safety data sheets (SDSs) for all hazardous chemicals in your inventory.
- Assess whether you and your employees have immediate, right-to-know access to your entire SDS library. For example, can you quickly get to an SDS for a hazardous chemical in your inventory — anytime, from anywhere?

Manufacturer Responsibilities

- Identify if you manufacture aerosol products. If you do, prepare for changes in hazard classification. OSHA is proposing to expand the existing Flammable Aerosols hazard class (Appendix B.3) to include non-flammable aerosols under the new Category 3, while flammable aerosols will be under existing Categories 1 and 2.
- Identify if you manufacture products which are desensitized explosives. If so, prepare to classify them according to OSHA's proposed new criteria. These new criteria introduce a new physical hazard class for desensitized explosives with 4 hazard categories (1,2,3 & 4), each with specific hazard and precautionary statements.
- Identify if you manufacture products which are flammable gases, and if so, prepare for OSHA's proposed classification changes. OSHA is preparing to subdivide Category 1 of this hazard class into two subcategories (1A and 1B) and specifies that pyrophoric and chemically unstable gases would be classified in Category 1A.

Manufacturer Responsibilities continued to next page.

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Manufacturer Responsibilities continued from previous page.

- Assess whether you are currently determining hazard classes and where appropriate, the category of each class that applies to your chemical product under “normal conditions of use” and “foreseeable emergencies.” OSHA has stated in letters of interpretation going back to 2004 that they’ve always required manufacturers to consider this, but they’re now proposing to modify paragraph (d)(1) of the HazCom Standard to make this requirement clearer.
- Identify the hazards of your chemical products related to chemical reactions that may occur under normal conditions of use. OSHA is proposing that hazards identified under normal conditions of use resulting from a chemical reaction would need to appear in Section 2 of the SDS, but would not need to be listed on the shipped label.
- For solid materials, collect any applicable information on “particle characteristics” to include in Section 9 of the product SDS. OSHA is proposing to revise Section 9 of SDSs to include the category “particle characteristics,” including information on particle size (median and range), and if available, size distribution range, shape and aspect ratio, and specific surface area.
- Make sure you’re prepared to meet the compliance timeline for all of the above evaluations related to chemical classifications. According to the NPRM, chemical manufacturers, importers and distributors evaluating substances must comply with all modified provisions no later than one year after the effective date of the final rule, which will be 60 days from whatever date it’s published in the Federal Register. Manufacturers, importers and distributors evaluating mixtures must comply within two years of the effective date.
- Prepare to update shipped container labels for products affected by the changes discussed above to include updated HazCom information such as classifications, hazard pictograms, precautionary statements, and hazard statements.
- Make sure you have a system for ensuring that shipped labels for chemical products contain the date that the chemical product is “released for shipment.” OSHA is proposing a new paragraph (f)(1)(vii) stating that the shipped label must contain this date.
- Determine if you ship chemical products in “small containers,” defined by OSHA as being 100 mL capacity or less. If so, and you plan to use an abbreviated form of the shipped container label information (product identifier, pictogram(s), signal word, chemical manufacturer’s name and phone number and a statement that the full label information is provided on the immediate outer package), prepare to provide the full shipped container label information on the outer packaging.
- Determine if you ship chemical products in “very small containers,” defined by OSHA as 3 mL capacity or less. If so, plan to follow paragraph (f)(12)(iii) of the proposed rule to demonstrate that a full label would interfere with the use of the container. You’ll only need to indicate the product identifier on the shipped container, but will need to provide the full shipped container label information on the outer packaging.
- If you plan on following either or both of the allowances for “small” and “very small” containers indicated above, prepare to include a written statement on the outer packaging that the containers originally shipped inside of it must be stored in the immediate outer packaging when not in use. This is a proposed new requirement in paragraph (f)(12)(iv)(B) of the NPRM.
- If you’ll be claiming any chemical concentrations of ingredients in your products as trade secrets/confidential business information, prepare to specify a concentration range from the prescribed list of ranges indicated within the NPRM.
- Make sure you’re currently including a US domestic address and telephone number and a domestic emergency contact number in Section 1 of your product SDSs. Since some classifications and associated hazard information are changing, it’s important to ensure that your downstream users have access to emergency contact information, per HazCom requirements. As an extra layer of protection, consider providing a number accessible 24 hours per day.
- Don’t forget that you have responsibilities toward your own employees for the chemical products they may be exposed to. Jump down to the “Employer Responsibilities” section for an overview of those responsibilities.



Distributor Responsibilities

- Prepare to manage the influx of newly authored SDSs accompanying products you store for distribution, especially chemical products most affected by the proposed rule such as aerosols, desensitized explosives and flammable gases.
- Prepare to ensure that product containers are shipped with the revised SDSs and shipped container labels sent to you by your chemical suppliers/manufacturers.
- Assess whether you handle any chemicals other than those kept in closed containers from your supplier and awaiting shipment to end users. If you do any repackaging of chemicals or otherwise handle any open containers of hazardous chemicals, you need a Written Hazard Communication Plan, which you'll need to update if you have aerosols, desensitized explosives or flammable gases in your inventory due to changes in classification for those chemicals.
- Don't forget that you have responsibilities toward your own employees for the chemical products they may be exposed to. Jump down to the "Employer Responsibilities" section for an overview of those responsibilities.

Employer Responsibilities

- Prepare to manage the influx of newly authored SDSs for products you store and use in the workplace, particularly chemical products most affected by the proposed rule such as aerosols, desensitized explosives and flammable gases.
- If your chemical inventory contains chemicals most affected by the NPRM like aerosols, desensitized explosives, and flammable gases, prepare to update your Written Hazard Communication Plan to include changes in classifications of those chemicals.
- If your chemical inventory contains chemicals most affected by the NPRM like aerosols, desensitized explosives, and flammable gases, prepare to train your employees on the changes to classifications, any potential changes to hazard and precautionary statements, and on corresponding changes to your Written Hazard Communication Plan.
- If you have chemicals in your inventory affected by the proposed changes, such as aerosols, desensitized explosives, and flammable gases, plan to update your workplace labeling system so that all "workplace" or "secondary" containers of these products have labels containing any updated HazCom information such as classifications, hazard pictograms, hazard statements and precautionary statements.
- As an extra precaution, ensure that your entire workforce can get rapid access to emergency response information for chemical products in the event of a spill or exposure.



Check All the Boxes with VelocityEHS!

The VelocityEHS Accelerate® Platform gives you the support you need when it comes to workplace chemical management and HazCom compliance. Our [Safety Management Solution](#) includes chemical management capabilities like online or offline mobile SDS access, SDS auto-updates, GHS-aligned workplace labeling, HazCom-compliant SDS library backup options, container-level inventory management, and much more — all through an intuitive, centralized system.

In addition to industry-leading chemical management capabilities, our [Safety Management Solution](#) gives you easy-to-use tools to manage and share responsibility for a wide range of safety and compliance tasks like incident investigations, inspections, task risk assessments (TRAs), meetings and corrective actions. Versatile dashboards and reporting features let you view important safety data at-a-glance and more easily communicate actionable safety insights with key stakeholders to drive better safety management decisions.

If you're a chemical manufacturer or importer, our in-house team of [SDS Authoring and chemical safety experts](#) can help ensure your SDSs are in-compliance with evolving HazCom requirements. And, no matter where you are in the chemical supply chain, our globally recognized [Emergency Response Services](#) can help you. Our 24/7 toll-free emergency number can be used for Section 1 of your product SDSs and hazardous materials shipping papers, for providing employees with rapid back-up access to your library of SDSs, for offering live chemical exposure support in 200+ languages, for generating incident reports for chemical spills and releases, and more.

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