



OSHA HazCom Panel: Navigating the 2024 Amendments to the Hazard Communication Standard

Panel

SCHC Members: Denese Deeds, John Howell, Jon Hellerstein
OSHA: Trapper Braegger, Joanna Mitchell

Panel Abstract

OSHA's recent amendments to the Hazard Communication Standard (HCS) increases the attention that manufacturers or suppliers will need to focus on the hazards from downstream uses of their products along the supply chain. SDS authors will need to more thoroughly consider and classify hazards that may result from "known or reasonably anticipated" downstream uses of their products including any changes in the physical form, chemical reactions and resulting chemicals generated.

OSHA's intent was to ensure classification only for those downstream uses where the manufacturer "knows or could reasonably anticipate" how the chemical will be used and where that use creates a hazard that needs to be communicated in the workplace.

The panel will discuss principles of Product Stewardship, product lifecycles and the emerging circular economy in context of what and how hazard communication professionals and SDS authors should know or learn about downstream uses of products in classifying hazards. The panel will discuss questions such as the following:

- Does OSHA HCS require hazards of "articles" that undergo recycling or destruction be considered by SDS authors?
- How HazCom professionals can determine if a shipped solid product (not yet in the form of a "combustible dust") presents a combustible dust hazard "under normal conditions of use?"
- Is there an obligation to label a solid product ("not yet in the form of a combustible dust") and how to convey the warning label downstream to customers?
- What options are allowed for labeling "bulk shipments" of hazardous chemicals? How do these differ from requirements to label chemicals in "bulk containers"?
- Assigning and describing the source of unique identifiers where a CAS Number is not available or a manufacturer claims specific chemical name (and/or CAS Reg No) as a trade secret in Section 3 of their SDSs? How can companies effectively communicate the identity of a CBI substances to a Physician or other licensed healthcare professional in case of an emergency?

The panel plans to discuss a several scenarios to provide their insights and prompt audience participation:

- Bulk Rubber processing into tires before "rubber meets the road"
- Producing Paperboard and Plastic Packaging
- Multipart Systems Kits – (Base, Curative and/or Catalyst)
- Recycling end of life products into raw materials or feedstock



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Panel Presenters

Jon Hellerstein CIH, CSP, Product Stewardship Manager Carpenter Co

Jon Hellerstein, M.S., CSP, CIH is Manager of Product Stewardship for a large privately held manufacturer of polyol chemistry and polyurethane foam products. Jon has served as adjunct professor of the Product Stewardship Graduate Program, IU Fairbanks School of Public Health and on the Product Stewardship Society Board of Directors and Educational Committee. Jon co-authored chapters in the “Professional Practices of Product Stewardship.”

Jon continues serving on the SCHC Program committee.

During his diverse 40-year environmental health professional career, Jon has advised private industry or governmental agencies. He performed exposure and health risk assessments of chemical, physical and biological agents in manufacturing and during product use scenarios. These assessments generated objective data to help inform compliance decisions regarding OSHA and other global regulations.



Denese A. Deeds, CIH, FAIHA, SDSRP IHSC, LLC

Denese Deeds is co-founder of IHSC, LLC, where she is the Director of Chemical Regulatory Services. In that function she prepares SDS, labels and other hazard communication documents and assists companies with overall chemical regulatory compliance. Prior to founding IHSC she worked as an industrial hygienist for General Electric and Westinghouse. Denese is a certified Industrial Hygienist. Denese is active on the AIHA Stewardship and Sustainability Committee and served on the team that

developed the SDS and Label Author Registry. She is an AIHA Fellow, a past president of the Society for Chemical Hazard Communication (SCHC), a Registered Specialist SDS and Label Authoring, the 2014 recipient of the AIHA Alice Hamilton Award and the Lifetime Achievement Award by SCHC in 2016. She currently serves as a delegate to the GHS Subcommittee of Experts on the GHS for DGAC.



**John K Howell Jr, Ph.D., President
GHS Resources Inc.**

John Howell, of GHS Resources, Inc., has over fifty years of experience in metalworking and metal finishing business areas, in chemical hazard communication and in EPA Premanufacture Notice preparation. John now consults with the Independent Lubricant Manufacturers Association, is a member of the Society for Chemical Hazard Communication, ASTM, Society of Tribologists and Lubrication Engineers and of the American Chemical Society.

John has a Bachelor of Science in Chemistry and a Ph.D in Inorganic Chemistry from Philadelphia's Drexel University as well as a Master of Arts in Organization Development from Loyola University, Chicago.

And, as some of you know, John has extensive business interests in short line railroading as well.



**Joanna G. Mitchell, MSOH, CIH, Industrial Hygienist
Directorate of Enforcement Programs,
Office of Health Enforcement
Occupational Safety and Health Administration**

Joanna Mitchell is an Industrial Hygienist with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA), Directorate of Enforcement Programs. Joanna works to develop policy and procedures related to the enforcement of OSHA's health-related standards. This includes the development of compliance instructions, interpretation letters, and compliance assistance tools.

Joanna primarily focuses on hazard communication, biohazards, and respiratory protection.

Ms. Mitchell is a Certified Industrial Hygienist (CIH). Her experience with federal OSHA includes work as a compliance officer with the Toledo Area Office and an Industrial Hygienist in the Directorate of Standards and Guidance.



**Trapper Braegger CSP, Industrial Hygienist
Directorate of Technical Support and Emergency Management
Occupational Safety and Health Administration**

Trapper works at the OSHA Technical Center on the Health Response Team (HRT). The HRT provides nationwide response to major emergency events and supports OSHA area offices during inspections in the field and remotely. Trapper's specialties include Process Safety Management, Explosives Safety, Hazard Communication and Respiratory Protection.

Mr. Braegger is a Certified Industrial Hygienist (CIH), Certified Safety Professional (CSP) and has worked for OSHA for 3 years. Prior experience includes 8 years in private industry (Aerospace) and 7 years as civilian Bioenvironmental Engineer for the US Air Force.

