Hazard Classification Issues for Mixtures: Reaction Products

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Presenter Biography

John Howell, of GHS Resources, Inc., has over fifty years of experience in the 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 (and former Program Committee co-chair) of the Society for Chemical Hazard Communication, of ASTM, of the 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.

Presentation Abstract

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Authors in the field of lubricant manufacture face significant challenges in preparing SDS and labels for products formulated by their laboratory chemists who typically focus first on product properties and only later focus on the SDS, including the composition as expressed in Section 3 as well as the classified hazards in Section 2. Importantly, the amendments to the Hazard Communication Standard (HCS), frequently referenced as HCS 2024, pose new challenges including understanding and communicating hazards of reaction products produced under known or reasonably foreseeable conditions of use.

In this presentation, Dr. Howell will review data sources, issues related to reaction products of mixtures of acids and bases, including TSCA, Environment Canada and ECHA considerations, HCS Appendix A considerations, how to maintain some semblance of confidentiality and the need to document your hazard classification process under a quality management system. Dr. Howell will suggest that product formulators focus at least as much on how the SDS will read as they do on formulating the product itself.