

The good the bad and the what?!@#\$\$% - SDSs after GHS adoption: samples and thoughts on the what?!@#\$\$%

Katie McGee, Quality Assurance/Regulatory Compliance, Ruth Donlon, Authoring/Compliance Lead,
Jessica Cornett, Senior Project Manager

SDS Example #1

Critical Information:

- Aerosol (non-flammable per flame projection test)
- Revision Date - Early 2014
- Clipping from "Parts" 2 & 4 ("Part" 3 omitted, only contained HMIS/ NFPA ratings)
- Manufacturer located in U.S.

Safety Data Sheet (Parts 2 and 4)

Part 2: Hazardous Ingredients

Signal Word: **WARNING**

H229: Pressurized container: may burst if heated
H351: Suspected of causing cancer

Hazardous Ingredients	CAS No.	SARA III List	PEL PPM	TLV PPM	Carcinogen Refer. Source
Dichloromethane	75-09-2	Yes	25	12.5	IARC NTP

Warning:
Contains gas under pressure. May explode if heated.
May cause allergy or asthma symptoms or breathing difficulties if inhaled.
May cause damage to organs.
May be harmful if swallowed.

Part 4: First Aid Measures

Eye Contact: Flush with water for 15 minutes. If irritation persists call a physician. **GHS: Category 2A**

Skin Contact: Flush with water. Wash with soap and water. Apply a lotion. **GHS: Category 2**

Inhalation: Move to fresh air.

Ingestion: Do not induce vomiting. Give several large glasses of water. Seek medical attention. **GHS: Category 4**

Reproductive Toxicity: **GHS Category 2**

Carcinogenicity: **GHS Category 2**

Should this be Hazard(s) Identification? Why are there ingredients listed in this "part"?

Where are the classifications? Various Hazard statements throughout "Part 2" on the SDS. One of the hazards statements below is for a "gas under pressure," but this material is an aerosol. This in combination with the Part 2 section title of Hazardous Ingredients leads to the question are these statements for the component and NOT the material?

What is the Ingredient percentage?

What is Eye Contact... GHS Category 2A and Skin Contact...GHS Category 2? It might be Eye Irritation Category 2A and Skin Irritation Category 2?

What is GHS Category 4? It might be Acute Toxicity Category 4, Oral? It would accompany the "May be harmful if swallowed" hazard statement that is listed in "Part 2"

No other mention of reproductive hazards in "Part 2" or anywhere else on the SDS

Carcinogenicity is the clearest health hazard communicated on this SDS as it is represented in Part 2

What the ?!@#\$\$%

The purpose of GHS and HazCom 2012 is to move from a "Right to Know" to a "Right to Understand." What will the average end user do with this SDS? An effective SDS communicates the hazards of a material in a clear and consistent manner that allows end users to take preventive measures to protect themselves. If the information on the SDS is presented inconsistently and incorrectly, what good does the SDS do?

Other thoughts in general:

- *Are some of these problems the result of using a basic word processing software to author SDSs? If this is the case, this becomes more difficult the more hazardous a material is as there is a lot of time involved in determining the appropriate labeling elements (Precautionary statements) that belong in section 2. We are all under the gun here and many tools are available and necessary to help ensure that a compliant and consistent SDS can be written in a timely manner. Who has 20+ hours to write an SDS?*
- *Clearly there is a struggle to include the correct prescribed label elements (Hazard Statements, Pictograms, Signal Words and Precautionary Statements) on SDSs. Determining the correct elements should be fairly simple as these are prescribed in the regulatory text. The process for determining material classifications is much more complex. If something simple like label elements are not correct on an SDS, does this bring the reliability of the classifications provided on an SDS into question?*
- *What impact will the recently published OSHA enforcement guidance have on updating SDSs? From what we have seen, very few manufacturers have attempted to update their SDSs to align with OSHA HCS 2012. What the ?!@#\$\$% - Is this alarming considering there are only 3 months left until the deadline?*

SDS Example #2

Critical Information:




- Solid Granules
- Revision Date - Mid 2014
- Clipping from Section 2
- Manufacturer located in the U.S.

Safety Data Sheet (Section 2 only)

2. Hazard(s) Identification

Classification:
Oxidizing Solid, Category 3
Acute Toxicity, Oral, Category 4
Eye Irritant, Category 2
STOT (Single), Category 3
Respiratory Sensitizer, Category 1
Skin Sensitizer, Category 1

Labeling:

Symbol:   

Signal Word: **DANGER**

Hazard Statements:
H272 May intensify fire; oxidizer.
H302 Harmful if swallowed.
H315 Causes skin irritation.
H317 May cause an allergic skin reaction.
H320 Causes eye irritation.
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled.
H335 May cause respiratory irritation (inhalation).
H350 May cause cancer.
H371 May cause damage to organs (respiratory system).
H373 May cause damage to organs through prolonged or repeated exposure (respiratory system).

Precautionary Statements:
P210 Keep away from heat/sparks/open flames/hot surfaces. No smoking.
P220 Keep/store away from combustible materials.
P260 Do not breathe dust.
P262 Do not get in eyes/on skin/on clothing.
P264 Wash hands and clothing thoroughly after handling.
P272 Contaminated work clothing should not be allowed out of the workplace.
P273 Avoid release to the environment.
P280 Wear protective gloves/protective clothing/eye protection/face protection.

Physical/Chemical Hazards: Avoid exposure to moisture.

Is this missing skin irritation, specific STOT SE, STOT RE and Carcinogen classifications (based on Hazard Statements provided below)?

If this is your toll manufacturer or raw material SDS, what do you do with these Hazard Statements that don't have a corresponding classification? Do you go back to your supplier? What if they are not helpful?

What the ?!@#\$\$%

As an SDS author, what do you do with the inconsistencies presented on raw material SDSs for ingredients in a product formulation? This is problematic as raw material hazards need to be considered when determining classifications for any untested mixture. Do you choose to use the information on the raw material SDS provided knowing there are potential issues with it, or do you choose to go back to the supplier for additional information/ clarification with the June 2015 deadline looming?