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

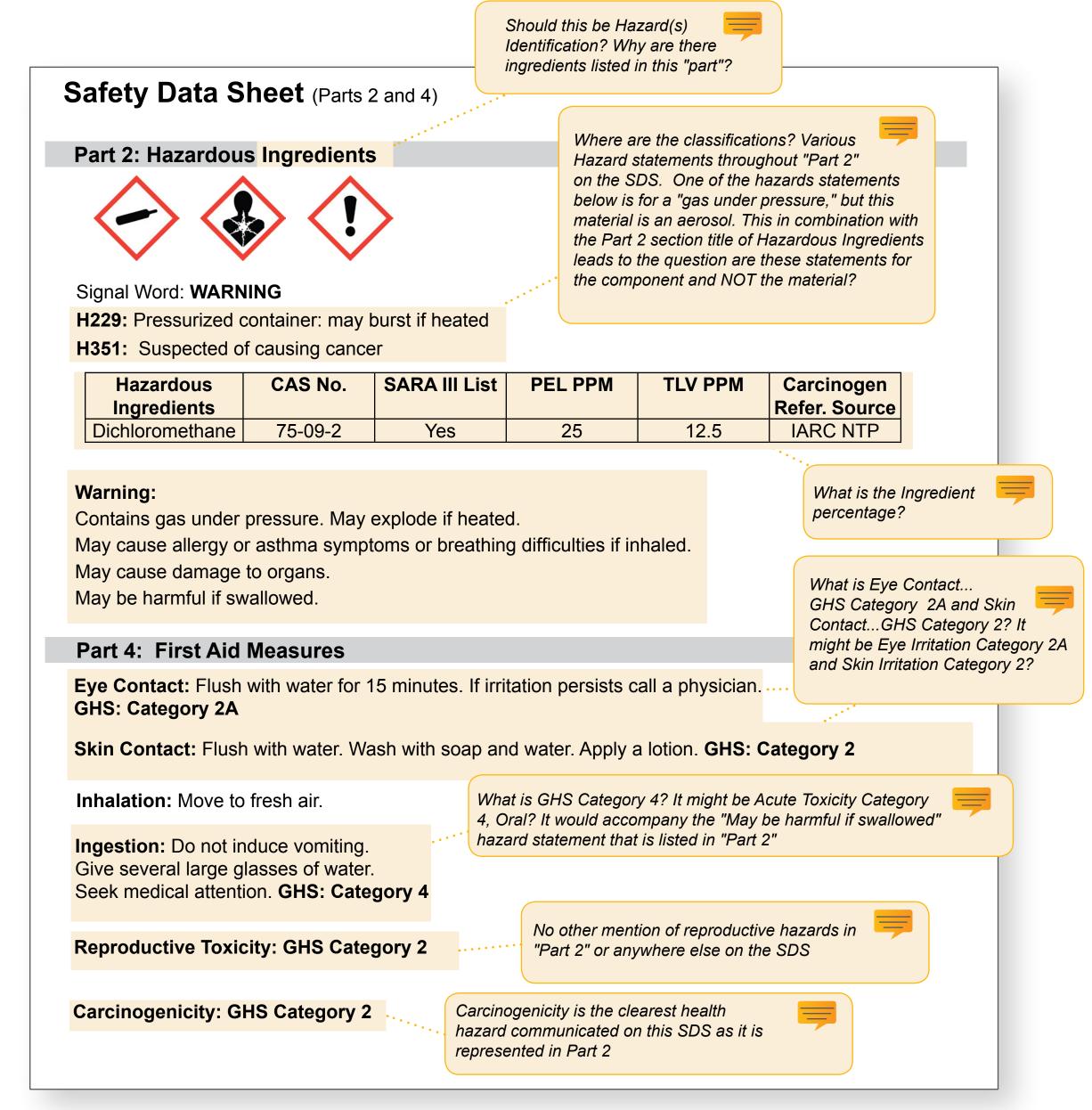
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SDS Example #1

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)





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:

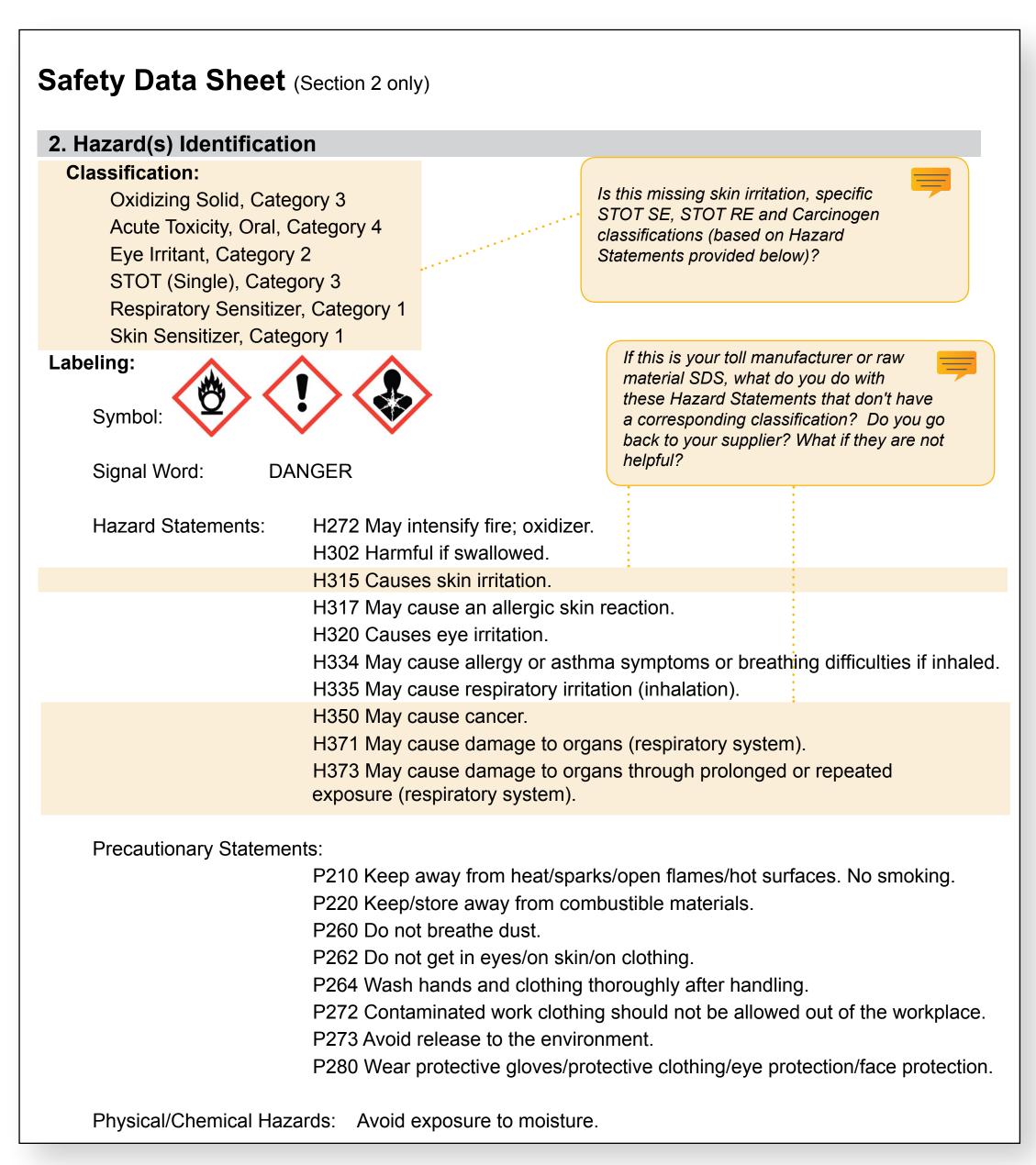
- Are some of these problems the result of using a basic word processing software to author SDSs? If this is the case, this becomes more difficult the more hazardous a material is as there is a lot of time involved in determining the appropriate labeling elements (Precautionary statements) that belong 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.



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?