

Section 14 Challenges for SDS Authors
Gene Sanders, CET, DGSA, CDGP
W.E. Train Consulting



Presenter biography

With over 20 years of extensive exposure working with Dangerous Goods in pharmaceutical, safety supplies, chemical, educational, waste, and clinical trials environments, Gene is knowledgeable in DOT (49CFR), ICAO (A.I.R. & IATA), IMO (IMDG), TDG, and ADR. Gene is one of the first three people in the world to become a Certified Dangerous Goods Trainer in five different sets of transport regulations. Gene has worked for carriers and for shippers, dealing with proposed products, with new products, and with waste, involving chemicals and involving articles, handling outgoing shipments and dealing with returns, on both sides of the Atlantic Ocean. Gene has been on a Hazardous Materials Emergency Response team, and on a volunteer fire department. Gene has developed and conducted training programs, primarily for shippers, involving some aspect of all hazard classes and divisions, including Class 1, Division 6.2, and Class 7. With degrees in Biochemistry and in Chemistry, and a minor in Microbiology, Gene regularly teaches in depth, detailed courses in Classification, and in Infectious Substances, as well as teaching more comprehensive classes involving all aspects of DG shipping, offering, and accepting.

Gene is a current member of the Board of Directors at DGAC (formerly HMAC), served on the initial Board of Directors for DGTA, and is currently also a member of COSTHA, AHMP, and SCHC. Gene now runs his own classification, training, and consulting company, W.E. Train Consulting.

Presentation abstract

Applying mSDS Information to Transport Classifications in the GHS Era

The majority of the time 'read across' from SDS conclusions and pictograms leads to compliant transport classifications. However, the minority of the time, due to inconsistency between GHS and DG hazard definitions and communications, a 'read across' process can lead to non-compliant, and therefore likely unsafe, transport classifications. There are some other issues with using SDSs as the sole source of information for transport classifications. For example, transport classifications can vary by size (quantity) of material shipped, mode of transport used (esp. air vs. surface), and country variations (e.g. US RQ). This presentation explores the differences between workplace HazMat regulations and transport HazMat regulations, and how those differences create challenges for SDS authors.