



SCHC Monthly Newsletter

Issue 15 | April 24, 2017

TABLE OF CONTENTS

ECHA

ECHA Has Announced Proposals for Harmonized Classifications for 3 Substances Including 2-Butoxyethanol.....1

OSHA

OSHA to Delay Enforcing Crystalline Silica Standard in the Construction Industry.....1

OSHA HCS 2012 Docket Number for Submitting Revision Comments*.....1

WEBINARS

GHS Safety Data Sheets - Roadmap to Managing Variances in Key Geographies.....1-3

Multi-Modal Transportation Classification Training.....3-5

SCHOLARSHIP AWARD UPDATE

University Relations Committee–Scholarship Awards Update.....5

MISC.

The California Office of Environmental Health Hazard Assessment (OEHHA) Announced Prop 65 Safe Harbor Warnings in Languages other than English are Now Available.....6

EPA Announces Public Regulatory Reform Meetings on TSCA, TRI and Lead Exposure Reduction.....6-7

Survey on the Cumulative Regulatory Costs for the Chemical Industry.....7-8

ECHA

ECHA Has Announced Proposals for Harmonized Classifications for 3 Substances Including 2-Butoxyethanol.

[Read More Here](#)

OSHA

OSHA to Delay Enforcing Crystalline Silica Standard in the Construction Industry

Originally scheduled to begin June 23, 2017, enforcement will now begin Sept. 23, 2017.

More information and resources are available [Here](#).

You can also register for Silica Rule updates by email [Here](#).

OSHA HCS 2012 Docket Number for submitting revision comments*

During the recent SCHC Spring 2017 Meeting in New Orleans, Maureen Ruskin (OSHA Deputy Director – Directorate of Standards and Guidance) had made mention of a Hazard Communication Docket that was to be used for interested parties whom wished to provide comments to OSHA. OSHA docket OSHA-2016-0005 is now open (through 31 March 2018) for submission of comments on the OSHA GHS efforts.

OSHA-2016-005 can be found [Here](#).

The rulemaking docket is found [Here](#). (already closed)

As such, comments made to OSHA-2016-005 will not officially be in the rule making docket. At this time, it is unclear if comments made to OSHA-2016-005 would/should be resubmitted when a rule making docket opens.

*Special Thanks to the OSHA Alliance Committee for sourcing this information

WEBINARS

GHS Safety Data Sheets - Roadmap to Managing Variances in Key Geographies

SCHC is now accepting registration for its NEW! Webinar: “GHS Safety Data Sheets - Roadmap to managing variances in key geographies.”

Date: Thursday, May 25, 2017

Time: 10:00 a.m. - 11:30 a.m. Eastern Time

Cost: \$125 Nonmembers

\$75 Members (Use Discount Code SCHC2017)





WEBINARS (Cont.)

Register [Here](#).

Webinar Details

Objectives:

- Identify variances between GHS Implementations that drive classification differences
- Identify variances between GHS Implementations that drive Safety Data Sheet differences
- Introduce non-GHS regulations that may impact SDS preparation

Abstract:

This 90 minute webinar will use the US Hazard Communication Standard (29 CFR 1910.1200) as a foundation, and highlight variances between Classification expectations and Safety Data Sheet requirements in the United States alongside requirements of major trading partners who have completed, or are in the process of, implementation of the Globally Harmonized System of Classification and Labelling (GHS).

This Webinar is intended for individuals/companies:

- Preparing SDS for US and non-US geographies
- Reviewing vendor SDS for raw materials procurement
- Exporting materials between the United States, Canada and/or Europe

Agenda:

Introduction

Classification Variances

- US
- Canada
- Europe

Safety Data Sheet Variances

- US
- Canada
- Europe

Presenters:



Paul W. Brigandi has been working in the area of Hazard Communication for the past 38 years at Mobil/ExxonMobil and CGI Technologies and Solutions Inc. Paul spent the first 21 years of his career with Mobil Oil Corporation where he was involved in a wide variety of research assignments including spending 10 years in the Product Safety group. In this group Paul led multi-disciplinary teams on the planning and implementation of global product safety compliance programs and during this time personally authoring thousands of SDS. Paul's team had responsibility for hazard communication compliance in the US, Canada, Europe, Australia, and Japan. While at Mobil, Paul also represented industry during the development of the Globally Harmonized System for the Classification and Labeling of Chemicals (GHS) and chaired the American Chemistry Council's Global Harmonization Task Force, which provided input into the development of the GHS.

The materials in SCHC's web site/newsletter are provided "as is". SCHC makes no warranties, expressed or implied, and hereby disclaims and negates all other warranties, including without limitation, implied warranties or conditions of merchantability, fitness for a particular purpose, or non-infringement of intellectual property or other violation of rights. Further, SCHC does not warrant or make any representations concerning the accuracy, likely results, or reliability of the use of the materials on its Internet web site/newsletter or otherwise relating to such materials or on any sites linked to the site/newsletter.





WEBINARS (Cont.)

He was also a member of the OECD Expert Group on the Classification of Mixtures, which developed the GHS mixtures classification criteria. For the past 17 years, Paul has been the senior Regulatory Compliance subject matter expert for CGI Technologies and Solutions Inc. where he has led the requirements, design, and implementation phases of multiple projects that delivered commercial software supporting global regulatory compliance. Most notably Paul has provided thought leadership in solutions that support GHS Hazard Classification and Communication requirements and the EU REACH regulation. Paul also provided subject matter expertise to EPA in support of the design and development of the new electronic Chemical Data Reporting web tool (eCDR). That successful project lead to further development of a suite of web-based submission modules for electronic reporting under TSCA. Paul also participated in a consortium of industry and software providers supporting the definition and implementation of an electronic data exchange standard for exposure scenario data throughout the supply chain under REACH.



Jennifer L. Mahoney works to provide global regulatory compliance assistance for clients across all chemical industries. Ms. Mahoney has contributed to product safety compliance activities for numerous companies and currently works as a Senior Consultant with CGI Technologies and Solutions, Inc., and leads the Regulatory Advisory Services practice. Throughout her career, she has worked to cultivate and mentor EHS professionals. Ms. Mahoney has instructed a variety of training courses including those on the Globally Harmonized System (GHS), REACH, EU Classification, US and Canadian Hazard Communication Essentials and Transportation, and has presented courses to international audiences in the United States and Europe. Prior to beginning her regulatory consulting career, she worked in Research and Development and then Quality Assurance for a specialty chemicals manufacturer where she was a member of the emergency response team and a certified volunteer firefighter. She is an active member of the Society for Chemical Hazard Communication (SCHC), serving on a number of committees, including chair of the Professional Development Committee from 2009 - 2013, then was elected to the Board of Directors and served as Chair of the Board from 2014 - 2016. Ms. Mahoney is currently SCHC's Vice-President.

[View/Print the Brochure](#)

Register [Here](#).

Multi-Modal Transportation Classification Training

Attendance is mandatory at all distance learning courses in the series, if you are unable to attend one distance learning course session, you will need to notify the instructor to make other arrangements.

Date: June 13, 15, 19 and 20, 2017

Time: 1:00 p.m. - 5:00 p.m. Eastern Time (4 Hours Each Session)

Cost: \$850 Nonmembers (Use Discount Code SCHC2017)
\$940 Members

The materials in SCHC's web site/newsletter are provided "as is". SCHC makes no warranties, expressed or implied, and hereby disclaims and negates all other warranties, including without limitation, implied warranties or conditions of merchantability, fitness for a particular purpose, or non-infringement of intellectual property or other violation of rights. Further, SCHC does not warrant or make any representations concerning the accuracy, likely results, or reliability of the use of the materials on its Internet web site/newsletter or otherwise relating to such materials or on any sites linked to the site/newsletter.





WEBINARS (Cont.)

This distance learning course covers DOT, IATA/ICAO (air transport) and the IMDG Code (ocean transport). The course combines lectures with problem-solving and practical workshops. The curriculum focuses mainly on the principles and practices of classifying, marking and labeling hazardous materials/dangerous goods. The successful completion of this 4-part multi-modal training series will meet the requirements for initial and recurrent training under the DOT, IATA/ICAO and the IMDG Code for individuals involved in the classification of hazardous materials/dangerous goods. While the main emphasis of the course will be classification, additional topics covered will be packaging, marking, labeling and placarding of hazardous materials shipments. This course is specifically designed for the hazard communicator.

Classification is always the first and most important of the “Shipper’s responsibilities.” It dictates all other elements for compliance with the hazardous materials/dangerous goods regulations from shipping name selection to packaging, marking, labeling, documentation, and placarding. In this course, students will learn, via lectures, problems and examples, a systematic approach to evaluating physical, chemical and toxicological properties of compounds, mixtures and solutions. The resultant hazard determination leads to identification of the primary and subsidiary hazard class/ division and packing group. Reliable reference sources of relevant technical data will be identified and discussed.

Emphasis will be placed on hazard class definitions (including the UN/IMDG criteria for Marine Pollutants), tests and criteria, the Hazardous Materials Table and Dangerous Goods Lists, shipping name selection, packing group assignments, hierarchy of hazards and subsidiary hazards. Other topics covered will include: recent changes in the regulations, marine pollutants, hazardous substances, elevated temperature materials and hazardous wastes. A brief overview of packaging, marking, labeling documentation, and placarding will be presented.

Off-line practice examples will be provided at the end of each session and the answers will be discussed at the beginning of subsequent sessions. Each participant will be required to pass an exam. The exam will be emailed at the end of the last class and all participants are required to return the completed exam via email within 24 hours. All participants will be given an attendance certificate. Successful completion certificates will only be provided to people who pass the exam with a score of 80%.

You will need access to current versions of the following regulations for the final test and for the exercises: 49 CFR Parts 105-180 (US DOT Hazmat Regulations) [Available On-Line](#); the published version of the ICAO Technical Instructions (IATA Dangerous Goods Regulations) and the International Maritime Dangerous Goods (IMDG) Code. If you do not have access to the IATA Regulations or the IMDG Code, please email the instructor [Denese Deeds](#) to make arrangements.

Presenters:

Denese A. Deeds, CIH, FAIHA

Denese Deeds is co-founder of Industrial Health & Safety Consultants, Inc. and is certified in the Comprehensive Practice of Industrial Hygiene by the American Board of Industrial Hygiene. She has been consulting in the areas of Industrial Hygiene and Chemical Regulatory Affairs since 1981. In her position as Director of Chemical Regulatory Services she prepares MSDS and other hazard communication documents, files international chemical registrations and assists companies with overall chemical regulatory compliance. As part of her practice, Denese has assisted clients in the development of PPE programs, has delivered numerous training classes on respiratory protection, personal protective equipment and Hazwoper operations and has recommended various engineering solutions to industrial hygiene exposure problems in many different manufacturing settings. Prior to consulting, Ms. Deeds held industrial hygiene positions with Westinghouse Electric and General Electric.

The materials in SCHC's web site/newsletter are provided "as is". SCHC makes no warranties, expressed or implied, and hereby disclaims and negates all other warranties, including without limitation, implied warranties or conditions of merchantability, fitness for a particular purpose, or non-infringement of intellectual property or other violation of rights. Further, SCHC does not warrant or make any representations concerning the accuracy, likely results, or reliability of the use of the materials on its Internet web site/newsletter or otherwise relating to such materials or on any sites linked to the site/newsletter.





WEBINARS (Cont.)

She is a fellow of the American Industrial Hygiene Association, the Academy of Industrial Hygiene and the Society for Chemical Hazard Communication, where she has served as President.

Gene Sanders, CET, DGSA, CDGP

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 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.

Register [Here](#).

SCHOLARSHIP UPDATE

University Relations Committee–Scholarship Awards Update

The goal of this committee is to engage college students in the field of hazard communication by awarding SCHC research grants, to participate in college career days, and to present seminars on hazard communication. Nine student grants were available for the 2016-17 academic year with 6 students receiving a \$3000 grant for scholarly activities with several others under consideration.

At the SCHC 2017 spring meeting held March 21-22 in New Orleans, three SCHC scholarship students were invited to present posters on their research. The students also attended the plenary session experiencing SCHC's HazCom presentations.

Student Poster Presentations:

Brooklyn Scherer: Investigation of the Impact of Learning Community Immersion on Chemical Hazard Communication Awareness, Knowledge and Commitment to Best Practices, Walsh University, Faculty Advisor: Joseph Lupica, Ph.D.

Jeries Smirat: Healthy Environment and Community Assessment Partnership, Indiana University Fairbanks School of Public Health, Faculty Advisor: Yi Wang, Ph.D.

Keerthanaa Jeeva: Characterizing Occupational Exposures in a Hair Salon, University of Minnesota School of Public Health – Exposure Science & Sustainability Institute (ESSI), Faculty Advisor: Susan Arnold, PhD, CIH.

The students' presentations were, highly professional, very informative, and well received by the membership. Brooklyn's poster was voted as number 1 by the Poster Session attendees. The presentations are available on the SCHC website. We hope each student will share the experiences they valued by participating in the grant program.

The society is very proud to award these grants to deserving students, and looks forward to the 2017-18 academic year. Please see the website for a student grant application or contact [Dr. Bob Skoglund](#).



Photo of students: Left to right - **Jeries Smirat, Brooklyn Scherer, Keerthanaa Jeeva**

The materials in SCHC's web site/newsletter are provided "as is". SCHC makes no warranties, expressed or implied, and hereby disclaims and negates all other warranties, including without limitation, implied warranties or conditions of merchantability, fitness for a particular purpose, or non-infringement of intellectual property or other violation of rights. Further, SCHC does not warrant or make any representations concerning the accuracy, likely results, or reliability of the use of the materials on its Internet web site/newsletter or otherwise relating to such materials or on any sites linked to the site/newsletter.





MISC.

The California Office of Environmental Health Hazard Assessment (OEHHA) Announced Prop 65 Safe Harbor Warnings in Languages other than English are Now Available

Proposition 65 safe harbor warnings in languages other than English are now posted [Here](#). Effective August 30, 2018, businesses opting to provide safe harbor warnings pursuant to the Article 6 Clear and Reasonable Warnings regulations may need to provide warnings in a language other than English if consumer information for a consumer product or signage for a facility is provided in a language other than English. Businesses should refer to the safe harbor methods and content corresponding to the type of exposure for which they are providing warnings. The translations are provided for the purpose of assisting businesses and represent OEHHA's best efforts in translating the safe harbor warning content.

EPA Announces Public Regulatory Reform Meetings on TSCA, TRI and Lead Exposure Reduction

Consistent with [Executive Order 13777](#), the U.S. Environmental Protection Agency's Office of Chemical Safety and Pollution Prevention (OCSPP) is hosting two meetings on May 1, 2017, to solicit input on regulations promulgated under the Toxic Substances Control Act (TSCA) and the Emergency Planning and Community Right-to-Know Act (EPCRA) that could be repealed, replaced, or modified to make them less burdensome.

On February 24, 2017, President Donald Trump issued Executive Order 13777 on Enforcing the Regulatory Agenda. The Executive Order (EO) establishes the "policy of the United States to alleviate unnecessary regulatory burdens placed on the American people." Among other things, it requires each agency to create a Regulatory Reform Task Force to evaluate existing regulations and to identify regulations that should be repealed, replaced, or modified.

OCSPP is holding two public meetings (both of which the public is invited to participate in person or via teleconference) on May 1, 2017 so that we can listen and learn from those directly impacted by our regulations.

The first meeting will be held from 9am to 12pm and will address regulations promulgated under TSCA Subchapters I (Control of Toxic Substances), II (Asbestos Hazard Emergency Response), VI (Formaldehyde Standards for Composite Wood Products), as well as EPCRA Subchapter II §11023 (Toxic chemical release forms), commonly referred to as the Toxics Release Inventory (TRI). These are regulations addressing chemical risk review and reduction programs including new and existing chemicals, polychlorinated biphenyls, asbestos, mercury and formaldehyde, as well as regulations implementing the TRI.

The second meeting will be held from 1pm to 2:30pm and will address regulations promulgated under TSCA Subchapter IV (Lead Exposure Reduction). These regulations address implementation of the Lead Renovation, Repair and Painting Program, Lead Abatement Program, Residential Lead-based Paint Disclosure Rule, and Residential Hazard Standards for Lead in Paint, Dust and Soil.

We invite you to provide input on these actions during the public meeting/teleconference or by submitting written comments to the [EPA-wide docket](#) using docket number: EPA-HQ-OA-2017-0190. The docket, which is accessible through www.regulations.gov, will remain open through May 15, 2017. OCSPP will give equal consideration to input provided through either of these methods.

Additional information on joining the meetings (in person and via teleconference) and submitting written comments through the docket is below. For questions about this process, please contact [Darlene Leonard](#). For more information about this effort, please visit [This Website](#).

The materials in SCHC's web site/newsletter are provided "as is". SCHC makes no warranties, expressed or implied, and hereby disclaims and negates all other warranties, including without limitation, implied warranties or conditions of merchantability, fitness for a particular purpose, or non-infringement of intellectual property or other violation of rights. Further, SCHC does not warrant or make any representations concerning the accuracy, likely results, or reliability of the use of the materials on its Internet web site/newsletter or otherwise relating to such materials or on any sites linked to the site/newsletter.





MISC. (Cont.)

Participating in the Meetings:

Persons interested in attending the meeting on TSCA Subchapters I, II and VI, and EPCRA Subchapter II §11023, either in person or remotely, may register [Here](#).

Those interested in participating in the meeting on TSCA Subchapter IV, either in person or remotely, may register [Here](#).

Participants must indicate their interest in speaking when registering. To attend the meeting in person or to receive remote access, please register no later than April 27, 2017. While on-site registration will be available, seating will be on a first-come, first-served basis, with priority given to pre-registrants, until room capacity is reached. The Agency anticipates that approximately 150 people will be able to attend the meeting in person. For registrants not able to attend in person, the meeting will also provide remote access capabilities; registered participants will be provided information on how to connect to the meeting prior to its start.

Providing Input through the Docket:

Comments can be submitted to the public docket, EPA-HQ-OA-2017-0190, which is available at [Here](#). The docket will be open until May 15, 2017.

Detailed instructions on how to submit comments to the docket are available [Here](#). Also, EPA's Tips for Effective Comments can be found [Here](#).

We also recommend that you clearly include the subject area on which you are providing input at the beginning of your comment. The subject area could include, but is not limited to, a reference to any of the following:

- Code of Federal Regulations regulatory cite or Part/Subpart;
- Federal Register citation;
- Regulatory program or rulemaking title;
- Title of guidance document.

Survey on the Cumulative Regulatory Costs for the Chemical Industry

The study in question has been commissioned by the European Commission and is a comparative study on the cumulative regulatory costs for the chemical industry in four main actors on the international scene: China, India, the United States and the European Union. The overall objective is to understand the differences in regulatory frameworks and how these affect competitiveness in the respective regions and countries.

A key part of the study is to gather evidence directly from chemical companies operating across the four regions through structured questionnaires and interviews. They have sought to try and make contact with relevant people (e.g. Regulatory affairs managers) across a range of US chemical firms, but are struggling to gain positive responses.

The participation of firms is critical to the success of the study - the higher the response rate, the more meaningful the results will be. But from our perspective the benefits of participation do not all fall one way.

The materials in SCHC's web site/newsletter are provided "as is". SCHC makes no warranties, expressed or implied, and hereby disclaims and negates all other warranties, including without limitation, implied warranties or conditions of merchantability, fitness for a particular purpose, or non-infringement of intellectual property or other violation of rights. Further, SCHC does not warrant or make any representations concerning the accuracy, likely results, or reliability of the use of the materials on its Internet web site/newsletter or otherwise relating to such materials or on any sites linked to the site/newsletter.





MISC. (Cont.)

We envisage that:

- The results will help US firms understand how the regulatory burden in the US compares to current international competitors and those operating in potential new markets.
- Also firms will be able to consider how their burden compares to the average in their industry in the US.
- The survey offers the opportunity to take part in an innovative study - Very little research has been undertaken in the area of regulatory costs faced by chemical industry so far.

We're looking to receive completed questionnaires from companies producing each of the following products: basic chemicals, pesticides and agrochemicals, soaps and detergents and plastics and rubber. All responses will be confidential and results only presented in aggregated form. If you wish to participate, please [Click Here](#) to complete the survey form no later than Monday, 01 May 2017. Thank you in advance for your participation!

The materials in SCHC's web site/newsletter are provided "as is". SCHC makes no warranties, expressed or implied, and hereby disclaims and negates all other warranties, including without limitation, implied warranties or conditions of merchantability, fitness for a particular purpose, or non-infringement of intellectual property or other violation of rights. Further, SCHC does not warrant or make any representations concerning the accuracy, likely results, or reliability of the use of the materials on its Internet web site/newsletter or otherwise relating to such materials or on any sites linked to the site/newsletter.

The SCHC Newsletter is a monthly publication of the Society for Chemical Hazard Communication. SCHC Members are encouraged to submit a title or short statement on any topic in the HazCom field along with a link to: design@m2columbus.com.

