

# Newsletter

Society for Chemical Hazard Communication

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Vol. 8, No. 2

Fall/Winter 2005/2006

## OSHA and SCHC Renew Alliance

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Acting Assistant Secretary of Labor for Occupational Safety and Health Jonathan L. Snare signed a two-year renewal of the Society for Chemical Hazard Communication Alliance that will continue to focus on providing information and education on hazard communication and chemical safety.



*Michele Sullivan, Ann Brockhaus, Denese Deeds, Jonathan Snare, and Pam Kreis at the signing of the alliance.*

This alliance renewal will continue to help advance a culture of injury and illness prevention, while sharing best practices on improving workplace safety and health. Originally signed on Oct. 22, 2003, one of the Alliance's aims is to distribute information and increase awareness about the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals.

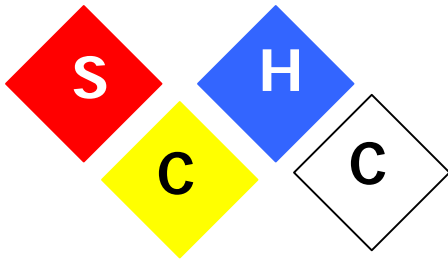
"This Alliance has served as an excellent mechanism for helping enhance the safety and health of workers in the chemical industry," Snare said. "We are excited about continuing our relationship with SCHC to empower employees in reducing and preventing exposure to chemical hazards, and addressing hazard communication and MSDSs in the workplace."

Added Michele Sullivan, chair of SCHC's Board of Directors: "In the past 2 years, SCHC's Alliance with OSHA has provided outreach and partnership opportunities to promote effective hazard communication and awareness of the GHS. SCHC is proud to extend our Alliance with OSHA and hopes by working together we will continue to make progress in improving the effectiveness of hazard communication tools and practices in the United States."

As a direct result of the Alliance, SCHC was included on OSHA's [Hazard Communication](#) Safety and Health Topics page. SCHC also developed an MSDS checklist.

## About Us .....

SCHC is a professional society organized to promote the improvement of hazard communication for chemicals by providing opportunities for the exchange of ideas and opinions and broaden awareness of new developments. Two meetings are held every year where topics of timely and general interest to the members are presented and discussed. SCHC draws upon government, private industry and academia for speakers and panelists to ensure most effective exchange of ideas and information.



### OSHA/SCHC Alliance (cont'd)

In addition, OSHA and SCHC will continue to work together to increase employees' access to safety and health information and outreach programs. Both organizations will also continue to develop and disseminate injury and hazard information at conferences and events, and through print and electronic media.

### Highlights

As part of our split duties, Linda Moquet and I are sharing the duties of co-editor of the newsletter. I got to attend the Fall Meeting in Arlington, which by any measure was a success.

In addition to hearing a wonderful group of presentations, and meeting many fine folks, two gentlemen volunteered to submit material for the newsletter, and you will see their work in this issue.

Atanu Das of MSDSWriter and Skip Preston from 3M both contributed.

As always, we are always seeking appropriate materials, stories, photos, and ideas for inclusion in future issues.

Robert A. Ernst

### Newsletter Update

By going to a .PDF format, we can produce a newsletter without worrying about the costs for printing and mailing. The newsletter to date has provided coverage of the meetings with a focus on activities and members. Now that Bob is co-editor, we can expand the scope of content. Some of the content can come from you, the members. We can accept the following content for consideration:

\* Internet sites of interest

\* MSDS tips and techniques

\* Hazcom/SCHC in the news

\* Hazcom/SCHC trivia, crossword puzzles, etc.

### Enzi Legislation Urges Adoption of GHS

U.S. Senator Mike Enzi, R-WY, Chairman of the Senate Health, Education, Labor and Pensions Committee (HELP Committee) recently introduced a legislative package addressing occupational safety and health.

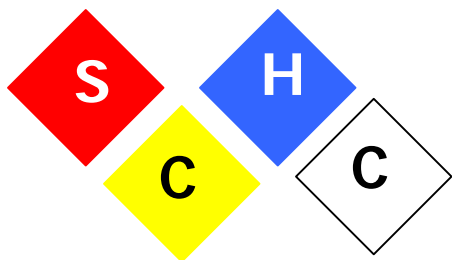
One of the bills, the [HazCom Simplification and Modernization Act – S.2067](#), would direct OSHA to develop model MSDSs for Highly Hazardous Chemicals on the list in Appendix A of the standard for Process Safety Management. The bill would create a commission designed to review and make recommendations regarding the implementation of the United Nation's Globally Harmonized System of Classification and Labeling of Chemicals, hazard communications, and a variety of related issues.

### Hexavalent Chromium Rule Reaches OMB

The Office of Management and Budget (OMB) has received OSHA's final rule on [Occupational Exposure to Hexavalent Chromium \(Preventing Occupational Illness: Chromium\)](#).

OMB's Office of Information and Regulatory Affairs (OIRA) reviews draft regulations under Executive Order 12866.

Chromium hexavalent (CrVI) compounds, often called hexavalent chromium, exist in several forms.



Chromates are often used as pigments for photography, and in pyrotechnics, dyes, paints, inks, and plastics. They can also be used for stainless steel production, textile dyes, wood preservation, leather tanning, and as anti-corrosion coatings.

Approximately 380,000 workers are exposed to CrVI in general industry, maritime, construction, and agriculture, according to OSHA.

Exposure to CrVI has been shown to produce lung cancer, an often fatal disease, among workers exposed to CrVI compounds.

OSHA's current standards for CrVI compounds, adopted in 1971, were established to protect against nasal irritation. Therefore, there is a need to revise the current standard to protect workers from lung cancer, OSHA says.

### **The Chemical Facility Anti-terrorism Act of 2005**

Comprehensive legislation was introduced in the Senate to address security vulnerabilities that exist at our nation's chemical plants. [The Chemical Facility Anti-terrorism Act of 2005](#) would provide broad new authority to the Department of Homeland Security to ensure that America's chemical facilities are better protected from terrorists.

The bill directs the Department of Homeland Security to establish risk-based criteria to determine which chemical facilities are vulnerable to terrorist attack and establish security standards for those facilities. Chemical plants would be required to conduct vulnerability assessments and create site security and

emergency response plans based on their specific vulnerabilities.

### **Fall Meeting Recap**

The Fall Meeting proved to be another exciting and well-attended event. We had 215 meeting attendees, of which 31 were new members in 2005.

The SCHC Program Committee put together another winning program. Presentations centered on the Globally Harmonized System, HazCom training, and HazCom Enforcement. A synopsis of each presentation is given here, along with a link to the PowerPoint presentations, which are posted on the SCHC web site.

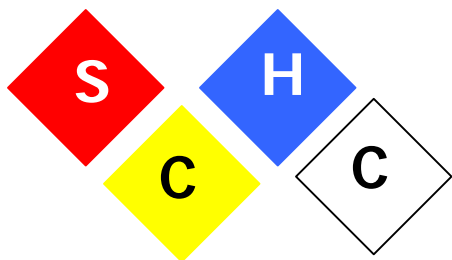
### **U.S. Move Towards GHS Implementation**

"The fun is just now beginning" with regard to OSHA adoption of the GHS, said Jennifer Silk, U.S. DOL/OSHA and head of the US Subcommittee to the GHS Development Committee.

According to Ms. Silk, the Agency is undergoing a review of an advance notice to modify the Hazard Communication Standard to bring the standard more in line with the GHS.

Changes are not expected to affect portions of the regulation outside of the scope of GHS, such as training and trade secrets, Ms. Silk said.

Click [here to view her PowerPoint presentation](#).



## **The GHS Update Panel**

Mary Francis Lowe, U.S. EPA, as part of a panel of presenters, said that the EPA's work with pesticides is the lion's share of activities. "It goes without saying that the benefit of GHS don't happen unless everyone adopts them," Lowe said. You can see her presentation by [clicking here](#).

Shane Kelley, International Transportation Specialist, U.S. DOT, discussed how that department is going about implementing GHS. Kelly said that transportation regulations should be aligned by 2007, allowing a one year transition period prior to the international goal of implementation by 2008. You can find the complete presentation [here](#).

Robert Rafferty, U.S. Consumer Product Safety Commission, briefed the assembly on what was happening from the CPSC point of view. Rafferty stated that there is a GHS review team at CPSC, but that eventually it will take rulemaking or Congressional action for change. See his [presentation here](#).

Finally, Kim Headrick, Health Canada, stated that Canada can already accommodate the ILO format. Headrick said there is a pending guidance document. Headrick stated that there is great interest in harmonizing with the U.S. as much as possible. View the [presentation here](#).

## **European Union Move Toward GHS Implementation**

Robert Donkers, Environmental Counselor, Delegation of the European Commission to the U.S., discussed EU implementation. Donkers said that Europe was busy with implementing [REACH](#), an EU regulatory framework for chemicals.

Donkers said that the EU intends to implement the GHS, but that if [REACH](#) is delayed, then GHS will be delayed as well. You can see his [presentation here](#).

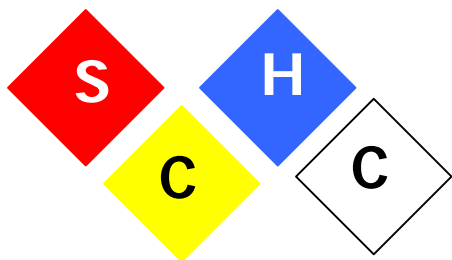
## **Asia-Pacific GHS Implementation Update**

Karon Armstrong, 3M, provided an interesting presentation on the state of GHS implementation in the Asian sphere, including Australia, New Zealand, China, Thailand, Malaysia, and Taiwan. Armstrong said that the [NIST website](#) has updates of foreign standards for those who need to know. See the complete [presentation here](#).

## **Hazard Communication Training Challenges**

Skip Preston

Dr. Deborah Kearney discussed the training component of Hazard Communication, identifying human factors critical to creating a successful HazCom program--including getting enough sleep. She recommends pre-testing the workforce, allowing a trainer to uncover the level of understanding and physical limitations of the group: the worker who fails an Ishihara test for color blindness, misinterprets "auto ignition" on an MSDS as pertaining to a vehicle, or responds



inappropriately to a simulated emergency spill. After identifying baseline knowledge and learning styles, the trainer can tailor the hazard communication program to ensure competency.

You can find her [presentation here](#).

## **Hazard Communication Enforcement**

Atanu Das

Jackie Annis, Industrial Hygienist with OSHA's Office of Health Enforcement presented on the topic of OSHA's standards enforcement objectives. After a brief review of the Hazard Communication Standard, Annis stated that about 70% of SCHC members were in SIC 2800 (Chemical and Allied Products). Because these companies must evaluate the chemicals being produced and communicate the hazard to their employees, they have dual responsibilities under the HCS as both manufacturer and employer.

While the number of Hazcom inspections within SIC 2800 has gone down since 2003, Annis reiterated that this standard is still at the top of the list of OSHA's frequently cited violations. Specifically, the most commonly cited paragraphs within this standard include (e)(1) Written Program, (f)(5) Container Labeling, (g)(2) MSDS, and (h) Employee information and training.

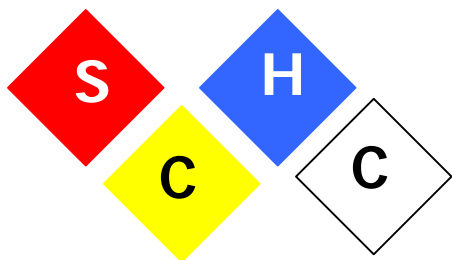
Annis also discussed the three phases of an OSHA inspection. Starting with an opening conference, OSHA uses this to explain the inspection's purpose, nature, and scope. In addition, any documentation requests are made at this time. The next step is the physical

inspection which involves a walkthrough of the facility and may include air monitoring, data gathering, and employee interviews. The inspection will usually end with a closing conference where OSHA will review the inspection results and any observed violations. This conference can also include a discussion with the facility about abatement and corrective action steps.

Inspections are typically triggered by employee complaints, accidents, and referrals by other agencies or other groups, and even when inspectors happen to just drive by a facility, Annis said. She next explained the role of her office in OSHA directives including the issuing of Hazcom enforcement procedures used by OSHA inspectors found in CPL 02-02-038. In addition, her office is responsible for writing letters of interpretation on the Hazcom standard.

Annis also discussed the future of OSHA's role in impacting Occupational Health outcomes through the alliance with SCHC, MSDS initiatives, GHS and the issuance of guidance documents on hazard determination, model Hazcom training programs, and MSDSs.

You can see the PowerPoint presentation by clicking on the link to the [SCHC website](#).



## **HazCom Resources Document: New Information for MSDS**

### **Authors**

Skip Preston

Dr. Charles Sokol, well known to the SCHC, presented the HazCom Resources Committee's "Hazardous Communication References Document." The committee has assembled a comprehensive collection of information for MSDS authors—including hyperlinks—and placed it on the SCHC website.

Dr. Sokol discussed some useful new internet search sites and search strategies to make internet searches more productive.

Dr. Sokol said that the document guides authors to MSDSs on the Internet, resources pertaining to each MSDS section, Hazard Communication Topics and References, links to EU regulations, and many, many other valuable resources. Nearly all searches are free. To take advantage of this collection, go to [SCHC.org](http://SCHC.org), and click on [the HazCom Resources Web Page](#).

## **Thank You to our Fall Meeting Exhibitors!**

A special thank you to the [24 exhibitors](#) who attended the Fall Meeting. We appreciate your support.

## **SCHC Members in the News:**

### **Hazard Communication References**

As many of you are aware, just prior to the Fall Meeting the HazCom Resources Committee completed a major update of the [Hazard](#)

[Communication References](#) document. The purpose of the reference was to create a list of references that will aid in the creation of hazard communication documents.

Major contributors to the document include Nora Barr (original document), Anita Boldt, Amy Breedlove, Sharen Breyer, Denese Deeds, Jon Gerber, Len Hong & co-workers, Anita Knight, Jeanette McCauley, Charles Sokol, and Richard Willinger.

The compilers note that specific sources listed are based on personal knowledge of committee members or other SCHC members, or upon information obtained by reviewing available resources.

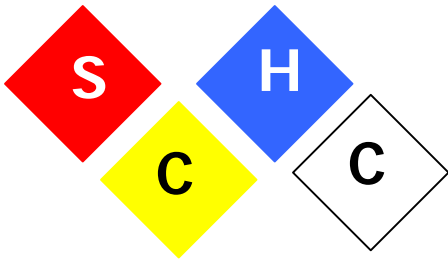
"With a major undertaking like this, there are likely to be some errors and omissions," said committee chair Charles Sokol. "All of you can help us make this an even better, more comprehensive document."

If you are interested in submitting a resource for future updates, send the information to:  
Hazard Communication Resource Committee  
SCHC  
P.O. Box 1392  
Annandale, VA 22003-9392

## **A Message From the Membership Committee Chair**

Angela Rath sends the following:

For the past few years, the membership committee has been organizing evening dinners to give SCHC members an opportunity to meet and network in a casual atmosphere away from the professional development courses and conference. We are excited to see our attendance is growing and the comments have



been overwhelmingly positive. Thank you to all of you for your comments.

To encourage members to come and to keep this casual atmosphere, we have allowed people to sign up or show up at the last minute. With the numbers rising, that practice is getting harder to accommodate. We are asking (and begging) that you make a reservation prior to the meeting. Drop the contact person a quick e-mail that tells how many will be coming and a contact phone number so we can reach you in case plans change. This would help make our job easier.

The host hotel for the spring meeting is the Doubletree Universal Hotel which is at the entrance to Universal Studio. In addition to being a beautiful hotel it also offers complimentary transportation to Universal Orlando, SeaWorld, Discovery Cove, Wet 'n Wild, and Universal CityWalk®'s. If you plan to visit Disney World, the hotel is not far away either.

Please look for our announcement that will be coming to you via e-mail. We hope to have some exciting events planned and we would like you to join us. If you would like to make a suggestion for dinner or outing or would like to host a dinner, please e-mail me at [a.rath@ih-sc.com](mailto:a.rath@ih-sc.com).

### **Did you ever wonder?**

Did you ever wonder how the agenda gets set or who decides the speakers or topics? Not the Program Committee - it's YOU!

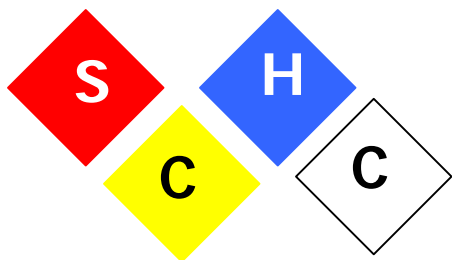
The Program Committee meets by phone once per month for about 45 minutes to talk about the next meetings' agenda, provide updates on speaker contact made, and to suggest ideas the committee members have heard of or are

experiencing. For example, one of our members was complaining there was a potential take-over slated for their company and they didn't even understand the new product lines – VOILA! "Corporate EHS Merger Topic" was born.

Another way the committee creates the agenda (the most common way of getting topics) is by listening to the membership via the yellow sheets or the online suggestion form (see [www.schc.org](http://www.schc.org) then go to [Program Committee page](#)). We review each and every one to see what you want to hear about. What's important to our members is what drives our agenda.

The way it works is this... we start with a blank template of the final agenda you see on the web and meeting packets. Blank spaces and all. Then we look over the yellow sheets and review what you've asked for. Suddenly, someone on the phone will oohh and ahh and put in 2 cents of wonderment. Then the next person and the next... the excitement over the topic and its impact build until the Chairperson (that's me) says "OK... so who am I assigning this to?" Their name is written in stone, a variety of contact information is exchanged, and then we move on. You don't have to know someone with a particular expertise to be assigned a contact name – but you will know that person after you complete your assignment!

Sometimes we end up with a theme – sometimes not. It depends on the topic and how much time we can devote to it. Over the past, we have focused on specific sections of the MSDS. We did Section 14: Transportation, Section 8: PPE, and Section 3: CBI issues. We will continue on this path – unless we see something on the yellow sheets!



Coming in Spring 2006 is more information for specific MSDS Sections....stay tuned!

We always assign time for a relevant update in the world, too – lately, it's been pretty easy for us to decide that it's GHS. We're also covering updates to the New Substance Notification process in Canada, an update of Mexican HazCom, and an overview of the US HazCom legislation process.

One area where we really need your input is our "how to" talks. We need to know what you want to learn to do. For example, we recently had a great "how to" on internet resources. What else do you need to know to do your job? Let us know... we'll figure it out and find you an expert to guide you! And if you join the Program Committee, you might even get to know that expert too!

Join us... we don't bite and we have a lot of fun!

## Next Meeting

**March 28-29, 2006**

[Doubletree Universal Hotel](#)

Orlando, Florida

Room Rate \$139.00 per night

Room Cut-Off: March 5, 2006

Visit [www.schc.org](http://www.schc.org) for more information and [program agenda](#)

**SPECIAL ATTRACTION:  
Poster Session**

[Spring Meeting Registration Form \(Word .doc\)](#)

[Second Call for Technical Posters and Abstracts](#)

[Spring Meeting and Event Schedules](#)