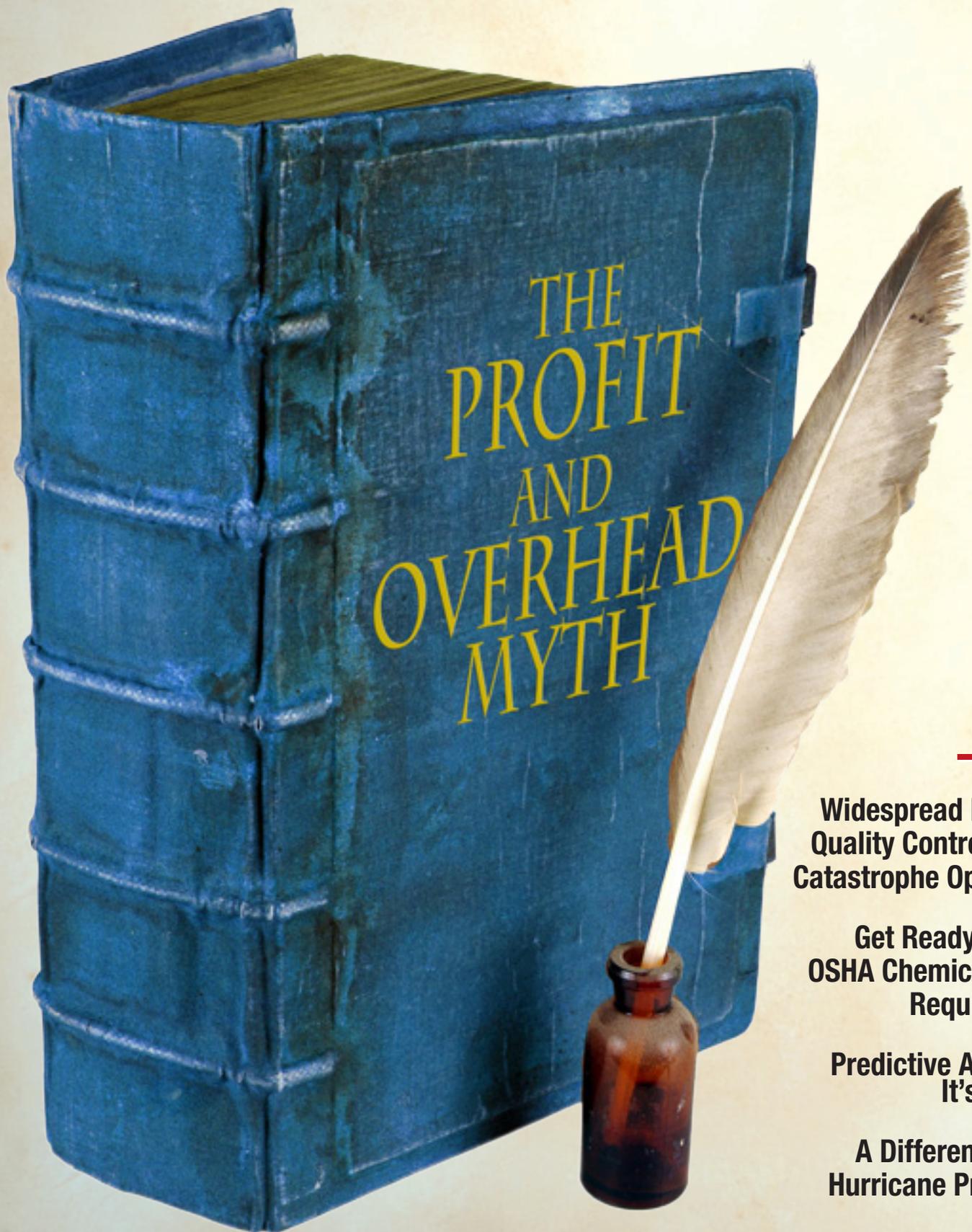


\$9.00

Cleaning & Restoration

August 2012 • Vol. 49 No. 7

Published by the Restoration Industry Association



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Get Ready for New OSHA Training, Labeling Requirements

By Michael A. Pinto, CSP, CMP

If you are not already familiar with the acronyms GHS and ICRA, it's time to learn about them. The terms Globally Harmonized System (GHS) and Infection Control Risk Assessment (ICRA) will be getting much attention from regulators, business owners and property managers over the next two years as sweeping changes and recommendations come into play.

Whether you are a restoration contractor, property manager, educational institution or service provider, it is likely that you have team members who deal with chemicals of some sort on the job. Many of you know that work activities with powders, liquids or compressed gases fall under an OSHA-mandated Hazard Communication Program. Some of you even have the required written program and have conducted training for your team members, which covers proper storage of chemicals, labeling of containers, safety precautions and how to understand a material safety data sheet (MSDS).

Now is the time to drag out that binder with your written program and your extensive collection of material safety data sheets. OSHA has recently passed regulations that mandate significant changes to the written program and retraining of all impacted employees by Dec. 1, 2013. Even if you reside in a state that operates its own version of OSHA (such as Michigan with its MIOSHA program), these requirements still impact you. Since this is a federal rule change, all state programs are required to adopt it so that their individualized approach to safety is "at least as effective as" the federal rules.

The changes mandated by OSHA are known as the Globally Harmonized System of Classification and Labeling of Chemicals because the rule adjustments incorporate information and procedures that have been in use in Europe and many other countries across the world. It is believed that OSHA's acceptance of these guidelines will truly force a single worldwide approach to identifying and informing people of chemical hazards.

Labels, Language to be Standardized

While the changes to the hazard communication rules will require some effort to comply, the good news is that the changes will actually make it easier for individuals to understand the risks associated with chemicals and more quickly review an MSDS for critical information.

One of the key components of the rules change relates to labels that must be on chemical containers. By the end of 2015, chemical labeling will be standardized; the same information will be shown in the same place on every label, large or small. In conjunction with this uniform layout is a requirement that every label include a pictogram, signal word, hazard statement, precautionary statement(s), product identifier and supplier identification.

OSHA is adopting eight of the nine international pictograms so that individuals can understand at a glance what type of hazards a particular chemical poses to the user. (See the pictograms and hazard explanations on p. 22.) OSHA is not adopting the pictogram currently used in many industrialized countries to indicate that a chemical is an environmental hazard because OSHA's jurisdiction is limited to occupational safety and health, not environmental concerns. Nevertheless, employers are wise to train their team members in regards to that graphic as well, since it is likely that at some point, the Environmental Protection Agency will require its use.

Another benefit of the revised hazard communication standard is that the language related to the dangers of any particular chemical will be more uniform. For example, under the current OSHA standard, chemical manufacturers and distributors can rely on a variety of sources to determine the risk and warning language for a particular chemical. This has led to considerable confusion by users since the same chemical might have different wording for hazards based solely on the manufacturer's preference.

With the adoption of the GHS, chemicals will now be classified consistently, which will prevent one chemical from



being labeled “flammable,” “very flammable” and “highly flammable” by three different manufacturers or distributors.

Goodbye, MSDS

Probably the most important change is that all safety data sheets will have a uniform format. Start getting used to it now: What Americans have referred to as material safety data sheets [MSDS] will now be called safety data sheets [SDS] under the new system. Each sheet will have 16 sections in a consistent order.

One of the more controversial aspects of the adjusted rules is that the safety data sheets will have to include recommended *threshold limit values* (TLVs) for chemical exposure as well as the OSHA *permissible exposure limits* (PELs). Since TLVs are updated on an annual basis, expect a steady stream of revised data sheets once the new system is in place.

Expanded Infection Control Training

As if planning to comply with new OSHA regulations was not enough, contractors who work (or want to work) in health care facilities are also faced with the prospect of having to train all their workers in basic infection control procedures. Although this is not a result of a regulatory change from a government agency, the impact is very similar.

To a large extent, accreditation and licensing of health care facilities is based on their compliance with the recommendations for best practices developed by a group known as the Joint Commission (previously known as the Joint Commission for the Accreditation of Healthcare

Operations, or JCAHO). In its rule EC.02.06.05, the Joint Commission instructs health care facilities to ensure that contractors working on their properties be familiar with the Infection Control Risk Assessment (ICRA) process that the Joint Commission promotes.

Facility managers, who will be graded on whether on-site contractors are familiar with infection control practices, have started to interpret the Joint Commission rules to mean that all contractor personnel need to be trained. As such, they are adding requirements for ICRA training to their bid documents and requesting proof of training for all personnel.

But beyond the requirement for infection control training, much is left open to interpretation. What level of training is required? How many hours should the training take? Who should provide the training? Can it be done by in-house personnel or must it be facilitated by a third party? Are hands-on exercises necessary as part of the training?

Many organizations in infection control, health care, consulting and educational fields have started to meet this training demand. Typically, classes run from four hours to three days in length. The shorter ones introduce the topic of infection control and explain the system for classification of work and functional areas within the health care facility, which allows a person to select the level of engineering controls and work practices from the matrix endorsed by the Joint Commission. The longer courses teach the specific skills necessary to implement the protections selected for a particular project, such as construction of isolation barriers, installation of HEPA-filtered negative pressure, dust-minimizing demolition techniques, etc.

Plan Ahead Now

There is much more that employers need to know about GHS and ICRA. OSHA also adjusted a number of specific standards to line up with the new GHS version of hazard communication. For example, the new GHS adjustments to the asbestos standard require building owners to label previously identified asbestos. The lead standard has similar changes as well.

This is exactly why training is mandated by OSHA and encouraged by the Joint Commission. Conscientious contractors and facility managers will plan now to identify and schedule appropriate training.

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GHS Pictograms and Hazard Classes		
		
<ul style="list-style-type: none"> • Oxidizers 	<ul style="list-style-type: none"> • Flammables • Self Reactives • Pyrophorics • Self-Heating • Emits Flammable Gas • Organic Peroxides 	<ul style="list-style-type: none"> • Explosives • Self Reactives • Organic Peroxides
		
<ul style="list-style-type: none"> • Acute toxicity (severe) 	<ul style="list-style-type: none"> • Corrosives 	<ul style="list-style-type: none"> • Gases Under Pressure
		
<ul style="list-style-type: none"> • Carcinogen • Respiratory Sensitizer • Reproductive Toxicity • Target Organ Toxicity • Mutagenicity • Aspiration Toxicity 	<ul style="list-style-type: none"> • Environmental Toxicity 	<ul style="list-style-type: none"> • Irritant • Dermal Sensitizer • Acute toxicity (harmful) • Narcotic Effects • Respiratory Tract • Irritation