The transition from MSDS to SDS

The transition from MSDS to SDS requires employers to train their workers on the new label elements and the SDS format. This training is needed early in the transition process, because workers are already beginning to see the new labels and SDSs on the chemicals in their workplace. To ensure employees have the information they need to better protect themselves from chemical hazards in the workplace during the transition period, it is critical that employees understand the new label and SDS formats.

The following list contains the minimum required topics for the training that must be completed by December 1, 2013.

Label element training must include information on:

- The type of information the employee would expect to see on the new labels, including:
  - **The product identifier:** how the hazardous chemical is identified. This can be, but is not limited to, the chemical name, code number, or batch number. The manufacturer, importer, or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in Section 1 of the SDS (Identification).
  - **The signal word:** used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only two signal words, “Danger” and “Warning.” Within a specific hazard class, “Danger” is used for the more severe hazards and “Warning” is used for the less severe hazards. There will only be one signal word on the label, no matter how many hazards a chemical may have. If one of the hazards warrants a “Danger” signal word and another warrants the signal word “Warning,” then only “Danger” should appear on the label.
  - **The pictogram:** OSHA’s required pictograms must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame sufficiently wide enough to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label. OSHA has designated eight

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Training on the format of the SDS must include information on:

- The standardized 16-section format, including the types of information found in the various sections.
  - For example, the employee should be informed that with the new format, Section 8 (Exposure Controls/Personal Protection) will always contain information about exposure limits, engineering controls, and ways to protect yourself, including personal protective equipment.
- How the information on the label is related to the SDS.
  - For example, explain that the precautionary statements would be the same on the label and on the SDS.

As referenced in Dr. Michaels’ OSHA Training Standards Policy Statement (April 28, 2010), with all training, OSHA requires employers to present information in a manner and language that their employees can understand. If employers customarily need to communicate work instructions or other workplace information to employees in a language other than English, they will also need to provide safety and health training to employees in the same manner. Similarly, if the employee’s vocabulary is limited, the training must account for that limitation. By the same token, if employees are not literate, telling them to read training materials will not satisfy the employer’s training obligation.

Resources

OSHA’s Hazard Communication website, http://www.osha.gov/dsg/hazcom/index.html, has the following QuickCards and OSHA Briefs to assist employers with the required training.

- Label QuickCard (English/Spanish)
- Pictogram QuickCard (English/Spanish)
- Safety Data Sheet QuickCard (English) (Spanish)
- Safety Data Sheet OSHA Brief
- Label/Pictogram OSHA Brief (to come)

For more information, contact Helen Richards at 800-528-7730 | helen.richards@wellsfargo.com.