Occupational Health & Safety Administration (OSHA) Adopts New Safety Labeling System

The Hazard Communication Standard (HCS) is now aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This update to the Hazard Communication Standard (HCS) is intended to simplify and standardize labeling practices to improve communication regarding hazard information on labels and safety data sheets.

How this Impacts You.

Johns Manville and all of its customer channel partners will need to take action as indicated in the chart below.

Effective Completion Date | Requirement(s)                                                                 | Who                                                                 |
---------------------------|-------------------------------------------------------------------------------|----------------------------------------------------------------------|
December 1, 2013           | Train employees on the new label elements and safety data sheet (SDS) format. | Employers                                                             |
June 1, 2015 - December 1, 2015 | Compliance with all modified provisions of this final rule, except: The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label | Chemical manufacturers, importers, distributors and employers          |
June 1, 2016               | Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards. | Employers                                                             |

As a roofing professional, contractor or distributor, you are required to ensure that containers in the workplace are labeled. You may use the same label that Johns Manville provides or you may label workplace containers with alternative labeling systems. Any container of hazardous chemicals in the workplace must, at a minimum, include the product identifier, general information concerning the chemical hazards, and appropriate precautionary measures. All workers need to have access to the complete hazard information.

What is Changing?

By no later than June 1, 2015, all labels are required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown on the right. Supplemental information can also be provided on the label as needed.

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a
Please note that manufacturers are not required to have an SDS sheet for items deemed “articles.” An “article” under the HCS means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees. (29 CFR 1910.1200(c)).

Example: Membrane products, such as JM TPO, are manufactured with substances that are mixed at a JM location to form the final product that ultimately ends up on a roof. Since these chemicals are bonded in manufacturing into a solid sheet of a specific shape and thickness that is not a fluid or a particle, these membranes are not required to have an SDS. Fluids, such as JM Low VOC Adhesive, will require SDS sheets.

Boards and Insulations: JM’s boards and Insulation (Polyiso, Invinsa, & Fesco) products are also considered articles under the new standard and are not required to have an SDS. However, we recognize that many of our customers do require documentation of the products they specify or purchase. For this reason, JM has developed a “safe use instruction” (SUI) for its boards and insulations products. The SUI is very similar to an SDS with less health, safety, and regulatory content due to the absence of hazardous ingredients in these products. JM is in the process of transitioning the SDS’s and product labels to the new system with completion on or before June 2015.

Implications to You as a Roofing Professional?

Often, submittal packages requested by an owner, GC or specifier, will require MSDS information as part of the bidding process. MSDSs and SDSs will no longer be available for items deemed “articles.” JM has included a letter of explanation on its Submittal Wizard application to begin the education process. This letter can be inserted into your submittal package to help communicate this change. JM is committed to ensuring compliance and a smooth transition.

Please let us know if you have any questions regarding this transition.

Jennifer Ford-Smith
Director of Single Ply