

Complying with GHS / OSHA HCS 2012 Hazard Communication Standard

QEC custom
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What is GHS?

"GHS" is the Globally Harmonized System of Classification and Labeling of Chemicals that was established by the United Nations as a means to standardize the labeling of hazardous chemicals across regulatory jurisdictions and international boundaries.

What is OSHA's HCS?

The United States Occupational Health and Safety Administration (OSHA) incorporated the GHS classification system into OSHA's regulatory requirements under 29 CFR 1910-1200, also referred to as OSHA's Hazard Communication Standard 2012 (HCS or HCS 2012). These regulations apply to all manufacturers, distributors, and shippers of hazardous chemicals.

Does it apply to our lab?

YES. According to regulatory language, if your lab dilutes or mixes classified chemical compounds (for example, preparing an HCl solution for sample preservation), you are a "chemical manufacturer". If you carry preserved containers out to use in the field, you are "shipping" a classified hazardous chemical. In either or both cases, you must be in compliance with OSHA's HCS 2012 standards, which became effective in 2015.

What is required for compliance?

You must be able to supply a Safety Data Sheet for every classified hazardous chemical compound that you have.

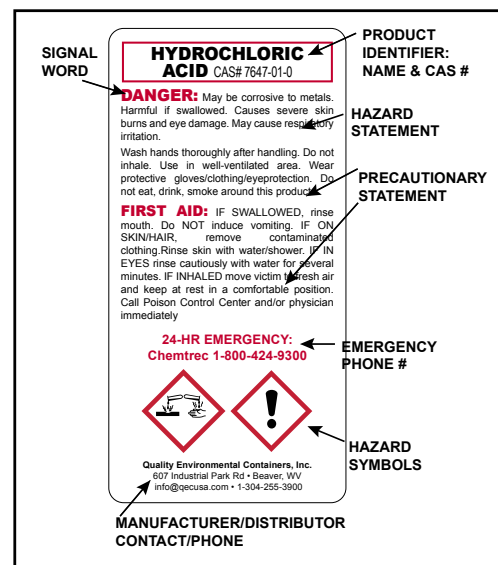
You must have HCS-compliant labels (see illustration) on every container, regardless of container size, and regardless of the amount of chemical in the container.

In some cases you may also need to have HCS-compliant labeling on the outside packaging (box or carton).

All label content must be completely consistent with the content of the corresponding Safety Data Sheet.

What are penalties for non-compliance?

For most OSHA violations, penalties are decided on a case-by-case basis, depending on the circumstances and egregiousness of the violation. Fines could, however, run to many thousands of dollars. Additionally, non-compliance or poor compliance could also contribute to the potential for personal injury liability exposure.



Could our lab handle this on our own?

If your lab wants to in effect become its own "chemical manufacturer", you will have to:

- Generate your own Safety Data Sheet for each hazardous chemical you will be handling.
- Provide a 24-hour toll-free emergency contact number
- Create and print HCS-compliant labels for every hazardous chemical and for every size container you will be using.

Could QEC provide labels for our lab's in-house preservative production?

QEC provides labels only for our own Custom-Preserved™ products. We cannot take the responsibility for labeling preservatives and/or preserved containers that we did not produce.

Are QEC's Custom-Preserved™ products compliant with OSHA HCS 2012?

YES. We have spent the last several months developing a "total compliance" labeling protocol that addresses OSHA's HCS 2012 as well as all relevant US Dept. of Transportation hazmat labeling requirements. We have all the necessary labels either in stock or available for every classified hazardous chemical we use.

How can QEC help if we preserve our sample containers in the field?

QEC provides preservatives in 15ml droppers and in 4ml & 7ml vials with pre-measured preservative solutions, that are all appropriately labeled to be HCS 2012 compliant.

For more information on complying with OSHA HCS 2012, contact your QEC rep or Michael McCune at 80-255-3950 (mmccune@qecusa.com).