Advanced Lubrication Specialties GHS Compliance

**May 5, 2015 Status of GHS Compliance with Advanced Lubrication Specialties**

Advanced Lubrication Specialties has begun creating GHS compliant SDS’s and plan on being fully compliant by the June 1, 2015 deadline. Several raw material suppliers are still in the process of converting their MSDS to the new SDS format. Like ALS they have until June 1, 2015 to be compliant with the new standard which creates a delay on our ability to create finished product SDS’s. ILMA (Independent Lubricant Manufacturers Association) has been working with OSHA to identifying the potential delay manufacturers will face from their suppliers. Current customers of ALS have until December 1, 2015 to have compliant labels and SDS’s

**What is GHS Compliance?**

OSHA has decided to align its Hazardous Communication to the GHS (Global Harmonized System) standard. The GHS standard requires all manufacturers to re-classify each product to the new 16 classifications of physical hazards criteria.

**What is the timeline for OSHA compliance to the GHS standard**

December 2012: Employers must train all employees on GHS formatted labels and SDS’s

June 1, 2015: Manufacturers must ship all products with GHS compliant labels and SDS.

December 1, 2015: Distributors must ship all products with GHS compliant labels and SDS.

**What is the difference between MSDS and the new SDS (Safety Data Sheet)?**

The SDS is very similar to our current MSDS (formatted to ANSI Z400.1-1993) but further defines the order and content of the now required 16 sections which addresses the following:

* + Regulatory Information
  + Transportation Information
  + Ecological Impact
  + Disposal Considerations.

As part of the GHS standardization, the SDS will include pictograms when required in section 2. There are 9 standard pictograms which have a red diamond shaped border with a black image on the inside indicating a potential hazards. Due to the red border all labels and SDS must be printed on a color printer.

**What are the specific requirements for GHS labels**

Under the GHS requirements there are 6 basic elements which must appear on the label for the product.

* *Product Identifier:* Name of the Product (must be the same as the SDS)
* *GHS pictogram:* When required, one or more of the 9 diamond shaped symbols conveying the risks or hazards for the product. Please refer to the following link for a list of these symbols.
  + <https://www.osha.gov/dsg/hazcom/pictograms/index.html>
* *Signal Words:* “WARNING” and “DANGER” are the only authorized signal words.
* *Hazard Statements:* These statements describe the type and degree of the hazard.
* *Precautionary Statements:* These describe the measures that should be taken to minimize or prevent risks associated with the pictogram hazard.
* *Supplier Information:* Lists the name, address and telephone of the manufacturer of the product.