



## DID YOU KNOW?

In March 2012, the Occupational Safety and Health Administration (OSHA) officially adopted the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) as part of its Hazard Communication Standard (HCS) to provide a common and coherent approach to classifying chemicals and communicating hazard information on labels and Safety Data Sheets (SDS). These changes affect hazard classifications, labels, information and training, and SDS. SDS, which differ from the former Material Safety Data Sheets (MSDS), will now have a uniform 16-section format.

In June 2016, the Environmental Protection Agency (EPA) revised 40 CFR Part 370: Hazardous Chemical Reporting - Community Right-to-Know standards to better align the Emergency Planning and Community Right-to-Know Act (EPCRA) with the revised OSHA HCS. This includes changes to the annual Tier II reporting requirements, which will now require additional information regarding the hazard categorization of the chemical. Rather than the previous five hazard categories on the Tier II form, there will now be more than 20 hazard categories.

## HOW DOES THIS AFFECT ME?

The revisions to 40 CFR Part 370 will affect reporting under Sections 311 and 312 of EPCRA (i.e. SDS and Tier II reporting) for the 2017 calendar year. Therefore, when facilities submit their Tier II reports by March 1, 2018 for the 2017 calendar year, they will need to use the new EPCRA hazard categories on their report forms. Between now and the beginning of 2018, all facilities will need to make sure they have copies of the current, GHS-compliant SDS on hand for its chemicals.

Beginning June 1, 2015, distributors were required to provide updated SDS for products shipped after that date. However, companies were not required to send the new SDS to existing or previous customers who may still have the product in inventory. Providence strongly recommends requesting updated SDS from manufacturers for all products stored on site for the 2017 calendar year as soon as possible. This will ensure a quick, smooth transition from the 2016 Tier II report form to the 2017 Tier II report form.

The revised reporting format should be available via the Louisiana State Police's Tier II reporting website by January 1, 2018. For more information on the new HCS, [click here](#). For more information on amendments to Sections 311 and 312, [click here](#).