

Amy Lopes – Corporate EHS & Risk Director Chemco Products Company



Amy is currently the EHS & Risk Director for Chemco Products Company. Amy has spent the last 26 years of her professional career solely focusing on Safety & Risk Management functions within the Central Valley. Amy has experience in retail safety and food safety, dairy production and food manufacturing safety. Most recently adding Chemical blending, manufacturing, and transportation to her resume. Amy has been on the Northern - Chemical Safety Day Committee since its inception 14 years ago. This is the second year with Amy at the helm of the Committee. In addition to being on the Committee, Amy is a member of the San Joaquin Valley Air Pollution Control Districts Citizens Advisory Committee for Merced County Industry & Agriculture.



Hazard Communication Standard (HCS) Update



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Hazard Communication Standard (HCS) Update

- OSHA's Hazard Communication Standard (HCS) was implemented in 2012 and updated in 2024 to align with the 7th revision of the GHS (Globally Harmonized System of Classification and Labeling of Chemicals (GHS)). It includes changes to hazard classification, labeling, and Safety Data Sheets (SDS).
 - All employers who use hazardous chemicals in their workplaces must train employees on the updated changes. Therefore, today you will learn the **key changes** to the updates and why they made these changes.



Important Dates to Remember

Timeline:

July 19, 2024 – Final Rule

- **Substances:**

- **Manufacturers**, importers, and distributors must comply with modified provisions by **May 19, 2026**.
- **Employers** must update workplace labeling, hazard communication programs, and employee training by **November 20, 2026**.

- **Mixtures:**

- **Manufacturers**, importers, and distributors must comply with modified provisions by **November 19, 2027**.
- **Employers** must update workplace labeling, hazard communication programs, and employee training by **May 19, 2028**.



Hazard Classification

- The Standard includes revised criteria for classifying certain **health** and **physical** hazards, ensuring more accurate and consistent hazard information.

Health Hazards

- Updated Respiratory Tract Corrosion based on acute inhalation toxicity data.
- Updated skin corrosion/irritation and serious eye damage/eye irritations.
 - Non-animal test methods were added to skin corrosion/irritation to promote use of alternative methods.
- Scope of Classifications: Must now include “reasonably anticipated uses”, chemical reactions under normal use.
- Mixture Considerations: Potential synergistic effects of chemical ingredients.



What's the number ONE rule of Safe Chemical Handling?



Hazard Classification

Example: Cleaners that may be used intentionally or unintentionally to boost the cleaning efficacy of the product, may cause a reaction. Therefore, the hazards associated with the “gas” the chemical reaction makes, the Hazardous Classification must now include the health hazard that may occur when mixed.

Example: Sodium Hypochlorite Solution (Bleach) with a toilet bowl cleaner (Hydrochloric Acid) will create a chlorine gas.

Therefore, the Hazard Classification must now include the inhalation toxicity of chlorine gas, and the SDS must warn about chlorine gas release when it contacts acids.



Hazard Classification

Physical Hazards

- Flammable Gasses- Revised and expanded to 3 categories.
- Aerosols- From “Flammable Aerosols” to simply “Aerosols”.
- Chemicals under Pressure-A new hazard class has been added for solids and liquids that are pressurized with a gas but are not classified as aerosols. This new class is for chemicals in refillable containers, distinguishing them from aerosols.
- Desensitized Explosives- explosive materials treated with a wetting or stabilizing agent to suppress their explosive properties.



Labeling

- There are revised provisions for updating labels, including new labeling for small containers.
 - Small and “very small” containers no longer require complete hazard information **IF** the immediate outer package contains it.

- Small-100mL or less
- Very Small-3mL or less



- Manufacturers must put only the product identifier on the immediate container if a label would interfere with use of the container. In both cases the outer packaging must have full shipped container label information, and the label must tell users to keep the small or very small containers in the outer packaging when not in use.



Safety Data Sheets

- **Safety Data Sheets-** Several changes to information required on SDSs, including:
 - addition of “particle characteristics” to Section 9,
 - clarification of the need for Section 1 to contain domestic contact information, and
 - updated instructions on information for chemical manufacturers to include in Section 2.



New Hazard Category

- **New Hazard Category's-** OSHA has adopted a new hazard category "Chemicals Under Pressure", within the aerosols class.
 - **Reclassification of Aerosols**
 - **Desensitized Explosives**
 - **Flammable Gasses**
- Manufacturers and importers will need to reclassify and make corresponding revisions to SDSs and labels.



Why These Changes?

- **Improve Worker Safety** by ensuring hazard information is more complete, accurate, and easily understandable.
- **Enhance Communication** by promoting better communication of chemical hazards through the supply chain, from manufactures to end-users.
- **International Consistency by aligning with GHS Revision 7 promotes international consistency in hazard communication, making it easier for businesses to operate globally.**
 - Addresses issues from 2012 update.





Switching Geers

SADT

Self-Accelerating Decomposition Temperature



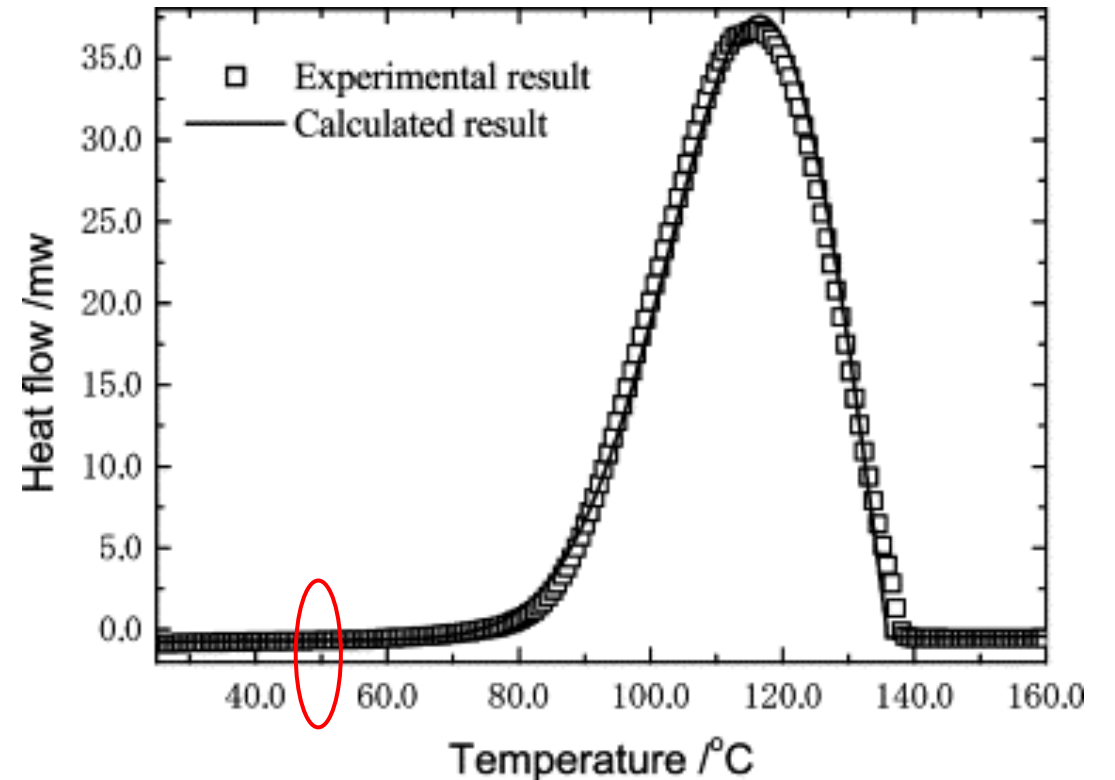
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What is an SADT?

- Self-Accelerating Decomposition Temperature
 - The lowest temperature at which a self-reactive substance in its commercial package will undergo violent, self-accelerating thermal decomposition.

Ex: Organic Peroxide/Nitric Blend

- SADT 120 degrees (F) 48.9 (C)



Examples of Materials that have an SADT

- Various organic peroxides, as well as mixtures. These substances can undergo thermal decomposition that generates heat faster than it can be dissipated, leading to a runaway reaction, fire, explosion, or toxic fumes if the temperature exceeds the SADT.

Just a reminder that high temperatures can have varying effects on certain chemistries, some common issues, not just SADTs:

- **Peracetic acid products** – Degradation of products at higher temperatures, containers are vented but gases can form faster than the bungs can vent, causing swelling of the containers.
- **Chlorine and products containing chlorine** - Degradation of products at higher temperatures, often may see containers swelling, but also chlorine percentage goes down, and chlorate percentages goes up.
- **Ammonia products** - Gassing at higher temperatures, containers are not vented, and swelling can be common as gases form.

Why is this important?

- Using greater quantities of Organic Peroxides for sanitizing.
 - Great Sanitizing Properties
- Experiencing High Heat / Longer Duration of the Calendar year.



Where can I find information on an SADTs?

The Products Safety Data Sheet (SDS)-

- SDS Section 7- Handling and Storage
- SDS Section 9 – Physical and Chemical Properties.
- SDS Section 10 – Stability and Reactivity
- **Every Section is Important**

Storage

It is recommended to store this product at temperatures where the bulk liquid will not exceed 86°F / 30°C. Keep cool.

What to do in the event of an SADT Incident?

- Employee Safety #1
- Refer to products SDS
- Cool Down the internal Temperature to get the product to stop reacting
- Wait for it to stop reacting before clean-up mitigations
- Call 911 if you cannot get it to stop reacting
- Follow SDS for proper cleaning measures and disposal considerations
- Keep the product away from metals or minerals



Borden Incident



SADT Incident Example





Tote Explosion



Chemical Handling Reminders:



- Strive to keep them out of the sun and out of enclosed spaces that can absorb heat (tin sheds or uninsulated trailers.)
- Recommend that anything with a known SADT be stored in a cooled area, especially in High Heat Situations.
- Continuous and copious amounts of cool water are the best way to treat most SADT reactions (a reaction that is self-generated and won't stop.)
- **ONLY IF YOU ARE TRAINED TO DO SO:**
 - Always wear full PPE's if venting a container and never have your body or face over the vent port as it will release pressure, know your exit and safety shower locations. Be cautious about venting a container indoors as it can release gases and be overwhelming in an enclosed space (even if well vented, fumes can be strong for a short period).

A close-up, monochromatic blue-toned photograph of several interlocking metal gears. The gears are in various stages of focus, with the central gear being the most prominent and sharp. The lighting creates highlights on the teeth and shadows in the mesh, giving a sense of depth and mechanical complexity.

Switching Geers

California Senate Bill 153 (SB 153)



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SB-513 Update

**Personnel File
Access to
Include
Training
Records**



Effective January 1, 2026, expands the scope of personnel documents employers must allow employees to inspect and copy.

It amends Labor Code section 1198.5 to include education and training records, requiring them to contain the employee's name, trainer's name, training date/duration, core competencies, and any certifications.

Key Details

- **Expanded Access:** The law broadens the definition of "personnel records" to include, if maintained, any records related to employee education and training.
- **Required Documentation:** If an employer keeps training records, they must specifically include:
 - Employee's name.
 - Training provider's name.
 - Date and duration of the training.
 - Core competencies covered (including skills in equipment or software).
 - Resulting certification or qualification.



Additional Key Details

Compliance Actions for Employers:

- **Standardize Sign-in Sheets:** Ensure that group sign-off sheets for safety meetings or training sessions include all five data points listed previously.
- **Update Record Retention:** Training records must be maintained and accessible for current and former employees.
- **Revise Policies:** Update handbook policies to include these new categories of records in employee file inspections.





How to handle group rosters:

- **Group Rosters:** If you use a single sign-in sheet for a training session, you can maintain that roster. However, when an employee requests their personnel file, you must be able to produce that record, and it must contain the employee's name, the trainer's name, the date/duration, the core competencies, and any certifications.
- **Compliance Options:** For group training, employers may:
 - File a copy of the entire group roster in each employee's file.
 - Create a one-page, individualized, or system-generated acknowledgment for each employee summarizing their participation in that group session.
- **LMS/Electronic Records:** If training is tracked through a Learning Management System (LMS), digital records (e.g., electronic certificates, completion logs) that contain all required data points are acceptable, provided they are accessible and part of the employee's personnel record.



Thank you!

Questions?

Chemco Products company is providing this training as a supplement only and not a replacement for training provided by your company.

