



# OSHA and DOT Clarify Hazardous Chemical Labeling Requirements

OSHA and the Department of Transportation (DOT) have separate requirements for labeling hazardous chemicals, which can make it difficult to know how containers should be labeled. However, the two agencies recently released a memorandum to clarify when and where both sets of labeling requirements apply.

The DOT's hazardous chemical labeling requirements can be found in the U.S. Hazardous Materials Regulations (HMR) and apply to the transportation of hazardous materials in commerce, such as when chemicals are sold and transported to a buyer. OSHA's labeling requirements, found in the Hazard Communication Standard (HCS), are specific to the workplace. However, the DOT's HMR requirements specify that its label must be separate, since an accompanying label could be confused for or conflict with the DOT's label.

The recent memorandum states that a label can accompany another label meeting the DOT's requirements if it conforms to an international standard—the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, businesses can use two hazardous chemical labels to meet the requirements of both the DOT and OSHA, as long as the label that meets OSHA's requirements also falls under the standards of the GHS. To view the full memorandum, visit [OSHA's website](#).



## OSHA CORNERSTONES

Marshall & Sterling, Inc.  
(845) 454-0800  
[www.marshallsterling.com](http://www.marshallsterling.com)

## ! NEWS & NOTES

### Ammonia Leak Led to a Worker's Death at Seafood Wholesaler

A worker at Stavis Seafoods Inc. died after a burst pipe led to an ammonia leak. A subsequent OSHA inspection found that a deficient design and a lack of proper maintenance for the company's ammonia refrigeration system exposed employees to ammonia hazards. Additionally, Stavis Seafoods failed to label ammonia piping, provide a ventilation system in the event of a leak and maintain an alarm system to warn employees of a dangerous amount of ammonia.

For these and other safety violations, OSHA cited Stavis Seafoods for 20 "serious" violations with proposed fines of over \$170,000. For information on keeping your employees safe from hazardous chemicals, contact Marshall & Sterling, Inc. today.

### OSHA Proposes Numerous Revisions to Streamline and Improve Standards

As part of an ongoing campaign to revise standards that it considers confusing or outdated, OSHA has proposed 18 changes to recordkeeping, general industry, maritime and construction standards.

According to the agency, the proposed revisions are based on responses to a public request for information and recommendations from OSHA staff members. Additionally, it's estimated that the revisions would save employers approximately \$3.2 million each year.

The revisions include changes to rules on lockout/tagout, permissible exposure limits (PELs), personal protective equipment (PPE) and more. For the full list of proposed changes, visit [OSHA's summary of the revisions](#).

© 2016 Zywave, Inc. This publication is for informational purposes only. It is not intended to be exhaustive nor should any discussion or opinions be construed as compliance or legal advice.