

What's the Difference?

Understanding the relationship between GHS Pictograms and USDOT transport classification labels

Although similar in some aspects, USDOT transport classification labelling and OSHA GHS pictogram labelling address two very different needs. The USDOT transport classifications focus on the short-term and immediate hazards of a chemical in case of spill during transport. The GHS workplace regulations address the acute and chronic health hazards of the same chemical given that a worker may be exposed to that chemical every day over many years.

GHS Pictograms



USDOT Labels (Example)



The Hazard Communication Standard (HCS) requires pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

Enacted in 1975, the Hazardous Materials Transportation Act (HMTA) is the principal federal law in the United States regulating the transportation of hazardous materials. The United States Department of Transportation (USDOT) groups chemicals into 9 classes, depending on specific properties. Some classes are also broken up into divisions to further clarify groups within each class.

THE ECO TOX ISSUE

Same picture different audience

Except for the size requirement, the label selected by GHS for Environmentally Hazardous substances is IDENTICAL to the mark currently used by USDOT for Marine Pollutants.



- For the USDOT this mark is reserved for application on a list of chemicals that could possibly kill fish in a medium-sized river if spilled in truckload quantities.

- This pictogram when used in GHS labeling identifies chemicals that are environmentally hazardous.

The GHS EcoTox Classification will not impact USDOT; these are separate regulations. Keep in mind when the GHS Environmentally Hazardous pictogram is present on the label it may OR may not be a USDOT marine pollutant. Check the bill of lading for clarification.

GHS USDOT FAQ

Will USDOT labels still be used for transport?

YES. USDOT rules still apply for chemicals being transported. Outside shipping containers will still be labeled with a USDOT label or placard.

Will one chemical container have both a GHS pictogram and a USDOT transport label?

Yes it can! When a USDOT label is on the outside of a container, a GHS pictogram can also appear on the same container.

Will NFPA labels still be used?

YES. NFPA labels will still be used. BASF includes the NFPA symbol on all GHS labels as well, even though this is not required by OSHA.

Will HMIS labels still be used?

NO. BASF has made a decision to discontinue the use of HMIS labels.

What is the deadline for new GHS labels to appear on chemical containers?

The deadline is June 1, 2015. BASF started transitioning to the GHS label in July 2014.

MORE INFORMATION

Helpful links for GHS information:

OSHA:

<https://www.osha.gov/dsg/hazcom/index.html>

NFPA Quick Card:

http://www.nfpa.org/Assets/files/AboutTheCodes/704/NFPA704_HC2012_QCard.pdf

Canadian GHS Adoption Information:

<http://www.hc-sc.gc.ca/ewh-semt/occup-travail/whmis-simdut/ghs-sgh/index-eng.php>

Mexico GHS Adoption Information:

http://msds.3ecompany.com/files/mexico_ghs_071911.pdf