

CBS Corporate Safety and Environmental Affairs

CBS Corporation, 20 Stanwix
Street, Pittsburgh, PA 15222

October 2013

OSHA Hazard Communications Standard Summary

Globally Harmonized System

On March 20, 2012, the Occupational Safety and Health Administration (OSHA) issued its final rule regarding the Hazard Communication Standard (HCS). In revising the HCS, OSHA has aligned the HCS with the United Nations Globally Harmonized System (GHS) of Classification and Labeling of Chemicals, which is a set of international classification criteria. This rule is OSHA's most comprehensive rulemaking in a decade.

The HCS requires chemical manufacturers and importers to evaluate the hazards of the chemicals they produce or import, and to communicate that information to their downstream consumers. Chemical labels for containers and Safety Data Sheets (SDSs) (formerly known as MSDSs) are the primary means of communicating the hazards associated with chemicals in the workplace to affected employees.

The major changes to the HCS include:

- 1) Hazard classification criteria for health hazards and physical hazards
- 2) Standardization of chemical labels
- 3) A new specific format for SDSs
- 4) New training requirements for workers

Who: CBS employees who use or are potentially exposed to chemicals in the workplace

What: Must be trained on new labels and Safety Data Sheets

When: By December 1, 2013

Where: SkillSoft Training website

The following table details the required compliance dates:

| Effective Dates | Requirement(s) | Who |
|-------------------|--|--|
| December 1, 2013 | Train employees on the new label elements (including pictograms) and the new SDS format. | CBS Employees |
| June 1, 2015 | Comply with all modified provisions of this final rule, except the Distributors: | Chemical Manufacturers, Importers, Distributors and Employers |
| December 1, 2015 | Distributors may ship products labeled by manufacturers under the old system until December 1, 2015. | |
| June 1, 2016 | Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards. | CBS Management |
| Transition Period | Comply with either the updated 29 CFR 1910.1200, or the current standard, or both. | All chemical manufacturers, importers, distributors, and employers |

All CBS locations, with hazardous chemicals in their workplaces, must have the appropriate new labels and SDSs as they become available from the manufacturer. **CBS employees who use or are potentially exposed to chemicals in the workplace must be trained on these new labels and SDSs by December 1, 2013.**

To assist in meeting the December 1, 2013 training requirement, an online Skillsoft training course entitled *Hazard Communication* is available at no charge. To assign training to an employee, a Training Request Form must be completed. To access this form, please log-on to the Corporate Safety and Environmental Affairs intranet webpage at: <http://ehs.cbs.com>. You will be required to register and create a User Name and Password the first time you log-in. Click on the Training tab; then SkillSoft Training Info; and then the SkillSoft Training Request Form. If you are registering ten or more employees, please contact Dorothy Pastelak at Dorothy.Pastelak@cbs.com

A PowerPoint presentation on the new Hazard Communication Standard will be available on the CBS Environmental, Health and Safety website listed above or through the CBS&You portal at <http://cbsandyou.com>

In addition, each CBS location should complete an updated chemical inventory of all chemicals used and stored at the location. With the new standard, SDSs are to be specific to the manufacturer/supplier. In other words, generic SDSs will no longer be allowed.

Please contact Mark Perriello, CBS Corporate Director of Safety and Health (mark.perriello@cbs.com or 412-642-5055) or Mary Ellen Holvey of Leader Professional (MEHolvey@leaderlink.com or 585-248-2413) if you have any questions concerning the new Hazard Communication Standard or if you require assistance in meeting the new requirements. You may contact Dorothy Pastelak with respect to the online Skillsoft training course that is available to you at no cost.