

Technical Brief

CRC and HazCom 2012 Compliance

As of June 1, 2015, all products shipped by CRC Industries, Inc. that are for workplace use must be in compliance with OSHA's 2012 Hazard Communication Standard (HazCom 2012). This standard incorporated the global chemical classification system known as GHS. And don't worry – CRC is ready!

It is important to understand that there are a number of ways to be compliant with the 2012 HazCom Standard. This technical brief explains CRC's approach to HazCom 2012 and advises what, if any, actions should be taken by distributors or customers.

Automotive / Marine Products

management will be required.

CRC's automotive and marine products are labeled in accordance with the Consumer Product Safety Commission regulations. Since these products are sold in retail locations, the label must continue to comply with the CPSC regulations. Therefore, these labels will not be changed. At the same time, since these products may also be used in workplaces, CRC is creating HazCom 2012 compliant Safety Data Sheets (SDSs) for all of these products. Please note that under 29 CFR 1910.1200(b)(5)(v), products labeled in compliance with CPSC regulations are not required to have HazCom 2012 labeling in a workplace as long as a HazCom 2012 SDS is available.

**Distributors and retailers should visit our website for updated SDSs. No other inventory management will be required.

Industrial / Electrical Products (< 5 gallon sizes)

Formerly, CRC's industrial and electrical products were labeled in accordance with the consumer (CPSC) <u>AND</u> workplace (OSHA) labeling regulations. These products are used largely in workplaces, but may be sold in some retail channels. Due to this varied customer base, CRC will continue to label these products in compliance with both regulations by adding HazCom 2012 GHS requirements to the label. These updates have been occurring over the past two years. Remember that since these products were already compliant with the CPSC regulations, they will be HazCom 2012 compliant even without the updated label.

**Distributors and customers should visit CRC's website to obtain the updated SDS. All old inventory will be HazCom 2012 compliant as long as you have the updated SDS. No other inventory

Industrial / Electrical Products (5 gallon and larger sizes)

CRC's larger industrial and electrical products (5 gallons+) will be updated to HazCom 2012 compliant labels and SDSs. This has been in process for over 2 years and most of the conversions are complete. As of June 1, all of these products will be shipping from CRC with HazCom 2012 labeling. Distributors have until December 1, 2015 to deplete non-HazCom 2012 labeled inventory.

**Distributors and customers should visit CRC's website for the updated SDSs. If you still have 5 gallon or larger products with old labels after the deadline, contact CRC to obtain a HazCom 2012 compliant label.

CRC has your Solution

CRC has devoted significant time and effort to understanding this new regulation and providing the smoothest transition for our distributors and customers. Our approach requires minimal oversight on the part of our distributors, retailers and customers. Visit our website at www.crcindustries.com for updated SDSs and other information.