SKILLSIGNAL™
Construction Safety & Compliance

TOOLBOX TALK

What GHS Actually Is: One Label System for Every Can, Drum, and Bag on the Site

TOPIC NO.	DURATION	AUDIENCE
HC-01	**10 to 15 min**	**All Crew**

OSHA REFERENCE 29 CFR 1910.1200 · 29 CFR 1926.59 · HazCom 2024 Final Rule (GHS Rev. 7)

PROJECT / JOBSITE	DATE	PRESENTED BY

01 THE HOOK

START HERE

Walk the gang box. Concrete cure, PVC primer, form release, WD-40, a five-gallon pail of adhesive, a bottle of muriatic acid somebody brought from home. Every one of those can hurt you a different way, and ten years ago every one of them had a label that looked different, said different things, and used whatever words the manufacturer felt like using. "Caution." "Beware." "Harmful if misused." GHS fixed that. Now every hazardous product on this site has to speak the same language: the same two signal words, the same nine symbols, the same sixteen-section data sheet. This talk is the first of twelve. Today is the system. The rest are the symbols, one at a time.

02 WHY THE RULE EXISTS

OSHA's Hazard Communication Standard, **29 CFR 1910.1200** (applied to construction through **29 CFR 1926.59**), is built on one idea: **you have the right to know what you are working with.** The manufacturer has to classify the hazard, put it on the label, and write the Safety Data Sheet. Your employer has to keep a written program, a chemical inventory, SDSs you can reach, and train you. That chain is the law.

It is also the **second most cited OSHA standard in the country**. In fiscal year 2025, HazCom drew **3,010 citations**, behind only fall protection. The violations are almost always boring: no written program, SDSs nobody can find, workers never trained on the labels. Boring violations are still the ones that get people hurt, because a crew that cannot read the label does not know the pail of adhesive is a reproductive hazard.

03 WHAT GHS CHANGED

THE OLD WAY (BEFORE 2012)	GHS (2012, UPDATED 2024)
HAZARD RATING Each manufacturer decided for itself what counted as hazardous and how to say it	HAZARD RATING **Standard hazard classes and categories, so the same chemical is classified the same way by everyone**
LABELS Any format. Any wording. “Caution,” “Beware,” “Use with care”	LABELS Six required elements, two signal words only: **DANGER** or **WARNING**
SYMBOLS Optional, inconsistent, company-specific	SYMBOLS Nine standard pictograms in a red diamond. Eight are mandatory under OSHA
DATA SHEETS MSDS: any length, any order, hard to compare	DATA SHEETS SDS: 16 sections, always in the same order, every product
STATEMENTS Free-text warnings	STATEMENTS Standard hazard statements (“Causes severe skin burns”) and precautionary statements (“Wear protective gloves”)

04 THE NINE PICTOGRAMS

Each red diamond means one family of hazards. One label can carry several. Over the next ten talks we take each one apart. For today, learn to recognize them.

FLAME
Flammables, pyrophorics, self-heating, self-reactives, organic peroxides

FLAME OVER CIRCLE
Oxidizers

EXPLODING BOMB
Explosives, self-reactives, organic peroxides

GAS CYLINDER Gases under pressure	**CORROSION** Skin burns, eye damage, corrosive to metals	**SKULL AND CROSSBONES** Acute toxicity: fatal or toxic
HEALTH HAZARD Carcinogen, mutagen, reproductive, organ toxicity, sensitizer, aspiration	**EXCLAMATION MARK** Irritant, sensitizer, acute toxicity (harmful), narcotic effects	**ENVIRONMENT** Aquatic toxicity (not mandatory under OSHA)

05 THE 2024 UPDATE YOU WILL START SEEING

OSHA revised the standard again in a final rule published **May 20, 2024** (effective July 19, 2024) to align with the UN's GHS Revision 7. The big ideas did not change. The details did:

CHANGE 1

NEW DEADLINES ON THE LABELS YOU RECEIVE

Manufacturers must ship updated labels and SDSs for **single substances by May 19, 2026** and for **mixtures by November 19, 2027**. Employers then have six months after each date to update workplace labels, the written program, and training: **November 20, 2026** for substances and **May 19, 2028** for mixtures. (OSHA pushed each date back four months in January 2026.)

CHANGE 2

SMALL CONTAINERS GET SHORT LABELS

Containers of **100 mL or less** can carry an abbreviated label if the full label is on the outer package. **3 mL or less**: product identifier only. The outer box has to say to put the small container back in it. That means the full warning is on the carton, not the vial. Keep the carton.

CHANGE 3

NEW HAZARD CLASSES

Desensitized explosives (explosives wetted or stabilized so they can be handled), **chemicals under pressure**, non-flammable **aerosols**, and a split of flammable gases into **1A and 1B**, with pyrophoric and chemically unstable gases in 1A. New words on labels, same pictograms.

CHANGE 4

A “RELEASED FOR SHIPMENT” DATE

Labels now carry the date the product was released for shipment. If the manufacturer learns something new after that date, they do not have to relabel what already left, but they must send the updated label with the shipment. **Check the date, and check whether a newer label came in the box.**

06 WHY IT MATTERS

[JOBSITE]

FOR THE CREW

A crew that can read a GHS label stops asking “is this stuff bad for you?” and starts reading the answer off the can. That is faster, and it is exactly what OSHA’s 1910.1200(h) training requirement means. The written program, the chemical list, and the SDS binder (or app) are what the inspector asks for first.

[INDIVIDUAL]

FOR YOU

Nobody memorizes every chemical. You do not have to. You have to recognize nine symbols and two words and know where the SDS is. That is the whole skill, and it covers every product you will touch for the rest of your career.

[HOME]

FOR LIFE OFF-SITE

The same diamonds are on the bottle of drain cleaner under your sink, the pool chemicals in the garage, and the two-part epoxy in the shop. Learn them once, read them everywhere.

07 TODAY’S DRILL

TODAY’S DRILL **FIND THREE DIAMONDS**

Go to the gang box or the chemical storage area. Pick up three different products. For each one, find the signal word and count the pictograms. Name each pictogram out loud. Then find where the SDS for that product lives on this site: binder, trailer, or app. If you cannot find one of the three SDSs in five minutes, tell the foreman. That is a gap OSHA writes up.

08 CREW DISCUSSION

Take 2 minutes. Pick one.

1. What is the product on this site you use the most and know the least about? What is on its label?
2. Where is the SDS for it right now, and could you put your hands on it in under five minutes?
3. Which of the nine pictograms have you never seen on this site? Which one do you see every day?

09 ATTENDANCE & SIGN-OFF

All attendees confirm they participated in this Toolbox Talk and understand the content covered.

NAME (PRINT)	SIGNATURE

SUPERVISOR SIGNATURE

_____ Date: _____

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