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#### Contact information

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### HAZCOM 2012

# More than "read the new label and know that MSDS's are now SDS's"



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### Agenda

- What were you supposed to know?
- Brief GHS History & Overview
- **▶** Timeline
- Are Other Standards Affected?
- My Pet Peeve
  - What do you need to be doing?



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### What were you supposed to know?

- The following slides are from HAZCOM and HAZCOM 2012.
- This is not a test, but a self evaluation.
- Do you or did you know what you were supposed to know under the old HAZCOM?
- Do you understand the new HAZCOM?

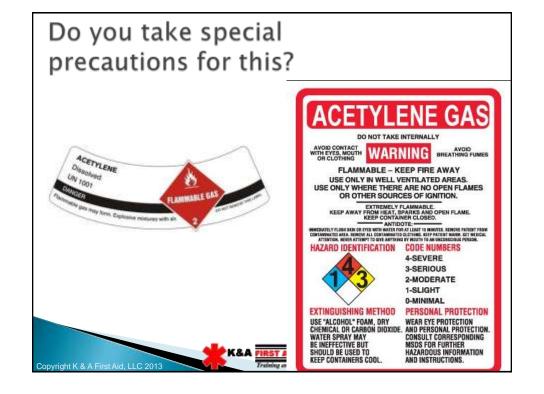


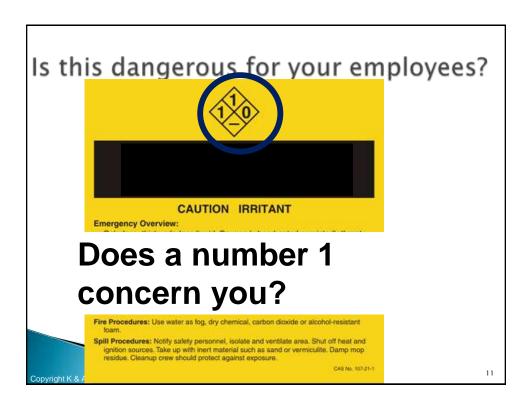
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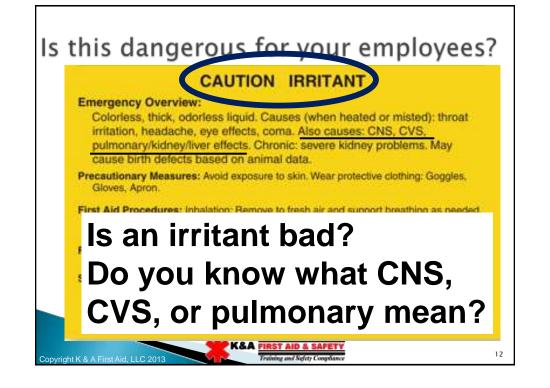


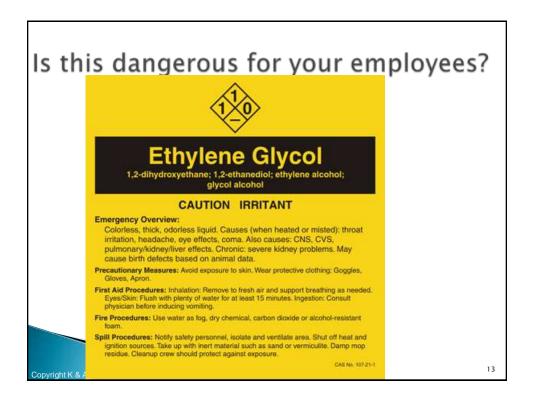




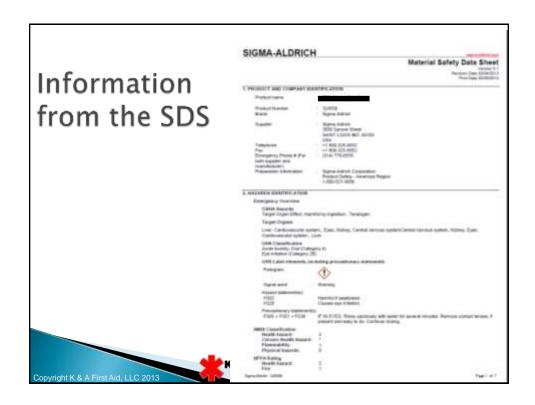


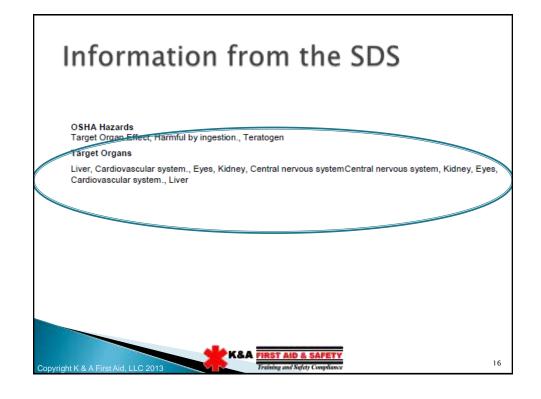


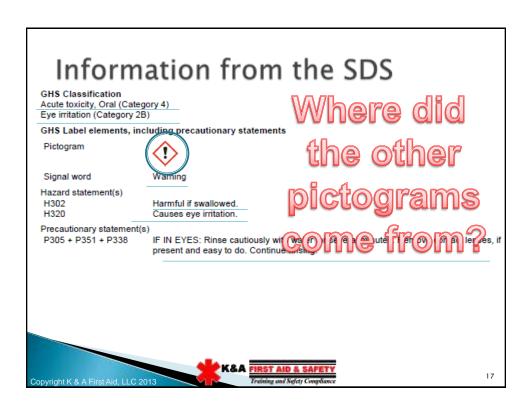


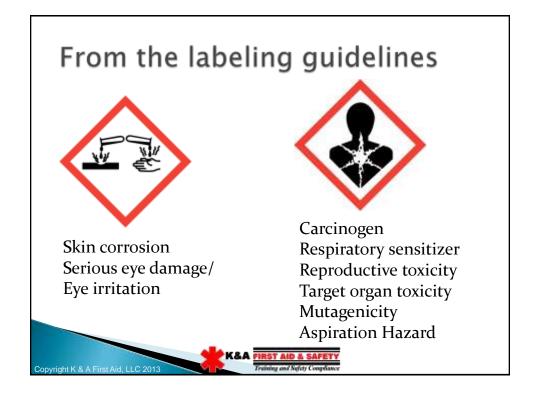




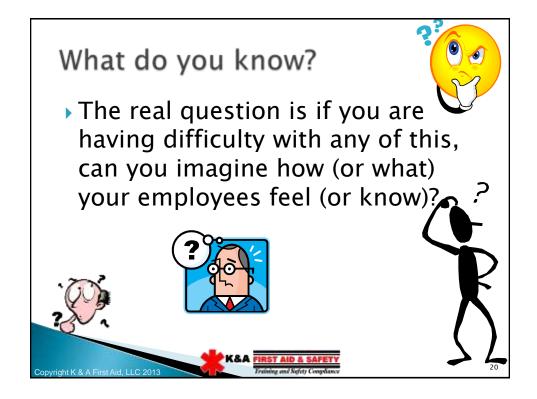












### What does this mean?

- Example was meant to:
  - Show that current knowledge may not be enough.
  - Remember "Prop 65"?
  - Not as straight forward as you think.



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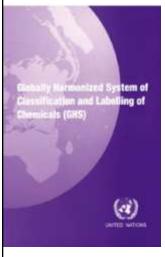
## **Brief History & Overview of GHS**

The following are excerpts from "standard" GHS overview slides.



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The GHS is an acronym for *The Globally Harmonized* System of Classification and Labeling of Chemicals.

The GHS is a system for standardizing and harmonizing the classification and labeling of chemicals. It is a logical and comprehensive approach to:

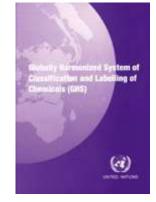
- •Defining health, physical and environmental hazards of chemicals;
- •Creating classification processes that use available data on chemicals for comparison with the defined hazard criteria; and
- •Communicating hazard information, as well as protective measures, on labels and Safety Data Sheets (SDS).





## Why the Change to Haz Com?

- To align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) adopted by 67 nations
- To provide a common and coherent approach to classifying chemicals
- Reduce confusion and increase understanding of the hazards
- Facilitate training
- Help address literacy problems





#### Who is Affected?

- Manufacturers, Distributors, Importers
  - Change SDS information and format
  - · Change container labeling
- Employers

Training employees on changes to:

- SDS (change from MSDS to SDS and 16-section format)
- Container Labels (including secondary containers)
- Employees

Recognize and understand hazards based on:

- Information in new SDS format
- Pictograms on container labels
- Precautionary and hazard statements





# Other Standards Affected - Health (signage requirements)

- Asbestos
- Carcinogens
- Vinyl Chloride
- Inorganic Arsenic
- Lead
- Cadmium
- Benzene

- Coke Oven Emissions
- Acrylonitrile
- Ethylene Oxide
- Formaldehyde
- Methylenedianiline



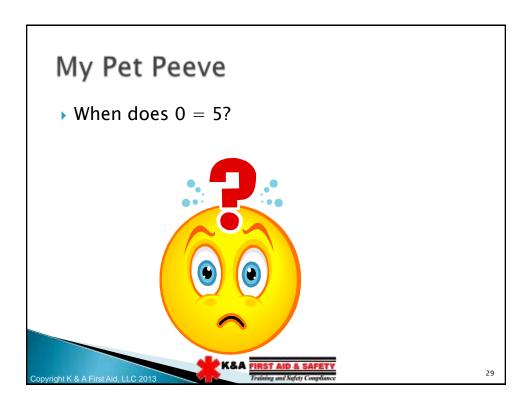
LEAD
MAY DAMAGE FERTILITY
OR THE UNBORN CHILD
CAUSES DAMAGE TO THE
CENTRAL NERVOUS
SYSTEM
DO NOT EAT, DRINK OR
SMOKE IN THIS AREA

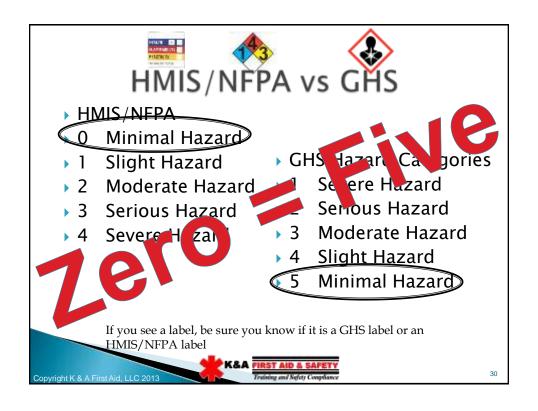
#### Other Standards Affected

- Flammable and Combustible Liquids
- Spray Finishing using Flammable and Combustible Materials
- Process Safety Management of Highly Hazardous Chemicals (PSM)
- Hazardous Waste and Emergency Response (HAZWOPER)
- Hazardous Work In Laboratories
- Dipping and Coating Operations
- Welding, Cutting and Brazing
- Employee Medical Records and TradeSecrets



Effective Dates and Requirements					
Effective Completion Sate	Requirement(s)	Responsible Party			
December 1, 2013	Train employees on the new label elements and SDS format	Employers			
June 1, 2015	Compliance with all modified provisions of the final rule except:	Chemical manufacturers, importers, distributors, and employers			
December 1, 2015	The distributor shall not ship containers labeled by the chemical manufacturer of importer unless it is a GHS label	Distributor			
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified hazards [and affected vertical standard specific signage]	Employer			
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# What do you need to be doing? - Contractors.....

- 1. Recognize that HAZCOM 2012 AKA GHS is Oh Sh!t if you haven't started getting ready.
- 2. Assuming you have not started:
  - Figure out who needs to be trained?
  - Determine the effort required to train affected employees.
- 3. Define the training curriculum appropriate to your employees' needs.



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## What do you need to be doing?

- Suppliers/Distributors.....
  - Determine if you need to create the new SDS or can get it from your supplier.
    - If you need to create SDS's determine how you are going to do this (e.g. software package, contract it out, etc.)
  - 2. Determine which labels need to be updated and how to do this.



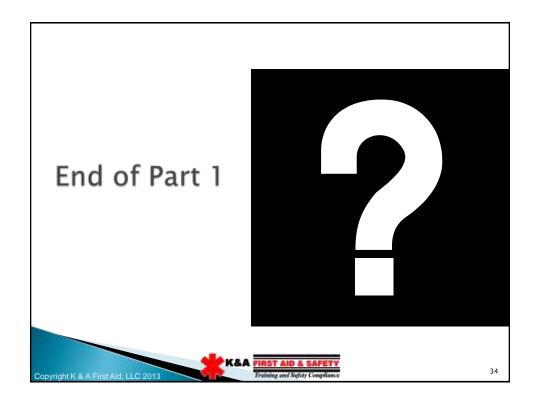
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## What do you need to be doing?

- Suppliers/Distributors.....
  - 3. Determine how you will control your inventory to meet the deadlines.
  - 4. Plan on logistics and expenses to send out new SDS's to <u>all</u> your customers.



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### Agenda

- Organization of the Standard
- Training Requirements
- Hazard Classes
- Mixtures
- Hazard Classes Not Otherwise Classified
- Sample "Acute Toxicity"
- The New Label
- SDS Format
- Reference Slides (FYI)



## Organization of the Final Rule

- a) Purpose
- b) Scope and **Application**
- Definitions
- d) Hazard Classification i) Trade Secrets
- Written Hazard Communication **Program**
- n Labels and Other **Forms** of Warning

- g) Safety Data Sheets
- h) Employee Information and **Training**
- i) Effective Dates Appendices A-F



### Appendices

- Appendix A, Health Hazard Criteria (Mandatory)
- Appendix B, Physical Hazard Criteria (Mandatory) (NEW)
- Appendix C, Allocation of Label Elements (Mandatory) (NEW)
- Appendix D, Safety Data Sheets (Mandatory) (NEW)
- Appendix E, Definition of "Trade Secret" (Mandatory)
- Appendix F, Guidance for Hazard Classifications re: Carcinogenicity (Non-Mandatory) (NEW)



## HAZCOM 2012 12/1/13 Deadline

Understand the new labelUnderstand SDS's



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Training Requirements More than a sign in sheet.



### **Training Requirements**

Understand the Following on Labels:

- Product Identifier
- Signal Word
- Pictogram
- Hazard Statements
- Precautionary Statements
- Contact Information (manufacturer etc.)





**Safety** Data

### **Training Requirements**



- How the labels are used in a workplace.
- How the parts of the label work together.

SDS Training to Include:

- Understanding the 16 Part Format
- Relationship of SDS to Label





# OSHA Statement (key points)



#### All Training Must:

- Be presented in a manner that employees can understand.
- Be presented in a language that is understood.
- Training must take into account literacy level of employees.



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### Hazard Classification

(health, physical, environmental)

- Manufacturers are still responsible for determining the hazards of the chemicals they produce or import.
- Classification (similar to hazard determination) is based on the full range of available information. The procedures for determining if the manufacturer has properly performed the hazard classification are provided in Appendix A (health) and Appendix B (physical).



#### HazCom 2012: Mixtures

- The GHS has a tiered approach to mixtures, with each health hazard class having a specific approach.
  - » Step 1: Use available test data on the mixture as a whole to classify the mixture based on the substance criteria.
  - » Step 2: Use bridging principles to extrapolate from other data (e.g., dilution principle).
  - » Step 3: Estimate hazards based on known information regarding the ingredients of the mixture (cut-offs may be applied).
  - » Except for chronic health hazards.



EXPLOSIVES	FLAMMABLE GASES
FLAMMABLE AEROSOLS	OXIDIZING GASES
GASES UNDER PRESSURE	FLAMMABLE LIQUIDS
FLAMMABLE SOLIDS	SELF-REACTIVE SUBSTANCES
PYROPHORIC LIQUIDS	PYROPHORIC SOLIDS
SELF-HEATING SUBSTANCES	SUBSTANCES which, in contact with water, emit flammable gases
OXIDIZING LIQUIDS	OXIDIZING SOLIDS
ORGANIC PEROXIDES	CORROSIVE TO METALS

Physical	IIIaza	ai u	3				
Hazard Class			Hazard	l Catego	ory		
Explosives	Unstable Explosives	Div 1.1	Div 1.2	Div 1.3	Div 1.4	Div 1.5	Div 1.6
Flammable Gases	1	2					
Flammable Aerosols	1	2					
Oxidizing Gases	1						
Gases under Pressure Compressed Gases Liquefied Gases Refrigerated Liquefied Gases Dissolved Gases	1						
Flammable Liquids	1	2	3	4			
Flammable Solids	1	2					
Self-Reactive Chemicals	Type A	Type B	Type C	Type D	Type E	Type F	Type G
Pyrophoric Liquids	1						
Pyrophoric Solid	1						
Pyrophoric Gases	Single category						
Self-heating Chemicals	1	2					
Chemicals, which in contact with water, emit flammable gases	1	2	3				
Oxidizing Liquids	1	2	3				
Oxidizing Solids	1	2	3				
Organic Peroxides	Type A	Type B	Type C	Type D	Type E	Type F	Type G
Corrosive to Metals	1						
Combustible Dusts	Single category						

#### Health Hazard Classification

- The list of chemicals presenting a 'Health' hazard was deleted from the current HCS and the proposed HCS has identified a new listing
- A 'Health Hazard' means a chemical which is classified as posing one of the following hazardous effects:



#### GHS Hazard Classification

- Acute Toxicity (any route of exposure)
- Skin Corrosion or Irritation
- Serious Eye Damage or Eye Irritation
- Respiratory or Skin Sensitization
- Germ Cell Mutagenicity
- Carcinogenicity
- Reproductive Toxicity
- Specific Target Organ Toxicity (single or repeated exposure)
- Aspiration Hazard



Hazard Class	Hazard Category			
Acute Toxicity	1	2	3	4
Skin Corrosion/ Irritation	1A	1 B	1C	2
Serious Eye Damage/ Eye Irritation	1	2A	2B	
Respiratory or Skin Sensitization	1			
Germ Cell Mutagenicity	1A	1B	2	
Carcinogenicity	1A	1B	2	
Reproductive Toxicity	1A	1B	2	Lactation
STOT - Single Exposure	1	2	3	
STOT - Repeated Exposure	1	2		
Aspiration	1			
Simple Asphyxiants	Single C	Category		

#### Hazards not Otherwise Classified

Simple Asphyxiant and Pyrophoric Gas Combustible Dust

- "Simple asphyxiant" means a substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.
- "Pyrophoric gas" means a chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.
- "Combustible dust" is covered separately





# Standard Label Elements: Acute Toxicity

Hazard	Symbol	Signal	Hazard
category		Word	statement
1	Skull	Danger	Fatal if swallowed (oral)
	and cross- bones		Fatal in contact with skin (dermal)
			Fatal if inhaled (gas, vapor, dust, mist)



# Standard Label Elements: Acute Toxicity

Hazard	Symbol	Signal	Hazard
category		Word	statement
2	Skull and cross- bones	Danger	Fatal if swallowed (oral)  Fatal in contact with skin (dermal)
			Fatal if inhaled (gas, vapor, dust, mist)



# Standard Label Elements: Acute Toxicity

Hazard	Symbol	Signal	Hazard
category		Word	statement
3	Skull and	Danger	Toxic if swallowed (oral)
	cross- bones		Toxic in contact with skin (dermal)
			Toxic if inhaled (gas, vapor, dust, mist)



## Acute Toxicity 1 vs. 2 vs. 3

What was the difference between the 3 categories?



Classifi	cati	on c	rite	ria j	for acute toxicity
Acute	Cat.	Cat.	Cat.	Cat.	Cat.
toxicity Oral (mg/kg)	5	50	300	2000	Criteria: - Anticipated oral LD50 between
Dermal (mg/kg)	50	200	1000	2000	2000 and 5000 mg/kg - Indication of
Gases (ppm)	100	500	2500	5000	significant effect in human - Any mortality at
Vapours (mg/l)	0,5	2,0	10	20	class 4 - Significant clinical signs at class 4
Dust and mists (mg/l)	0,05	0,5	1,0	5	- Indications from other studies

# Standard Label Elements: Acute Toxicity

Hazard	Symbol	Signal	Hazard
category		Word	statement
4	Exclamation point	Warning	Harmful if swallowed (oral)  Harmful in contact with skin(dermal)  Harmful if inhaled (gas, vapor, dust, mist)



# Standard Label Elements: Acute Toxicity

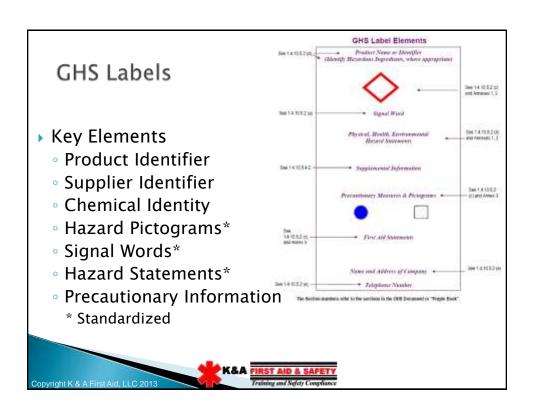
Hazard	Symbol	Signal	Hazard
category		Word	statement
5	No symbol	Warning	May be harmful if swallowed (oral)
			May be harmful in contact with skin (dermal)
			May be harmful if inhaled (gas, vapor, dust, mist)

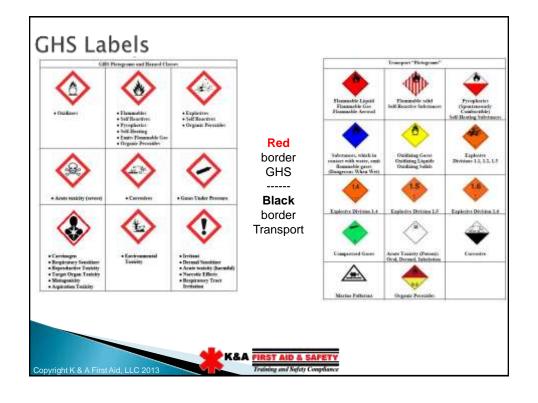


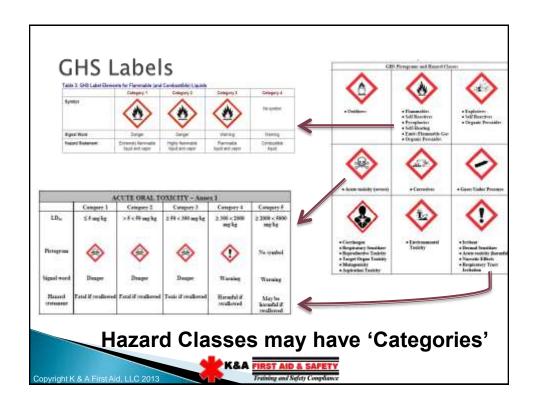
#### **GHS Labels**

- Three standardized GHS label elements:
  - Symbols (Hazard Pictograms) that convey health, physical, and environmental hazard information assigned to a GHS hazard class and category
  - <u>Signal Words</u> "Danger" or "Warning" used to emphasize hazards and relative level of severity of the hazard and assigned to a GHS hazard class and category
  - Hazard Statements which are standard phrases assigned to a hazard class and category that describe the nature of the hazard



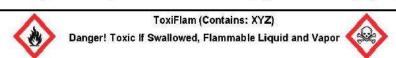






#### **GHS Labels**

Figure 4.12 Example GHS Inner Container Label (e.g., bottle inside a shipping box)



Do not eat, drink or use tobacco when using this product. Wash hands thoroughly after handling. Keep container tightly closed. Keep away from heat/sparks/open flame. – No smoking. Wear protective gloves and eye/face protection. Ground container and receiving equipment. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Use only non-sparking tools. Store in cool/well-ventilated place.

IF SWALLOWED: Immediately call a POISON CONTROL CENTER or doctor/physician. Rinse mouth. In case of fire, use water fog, dry chemical, CO<sub>2</sub>, or "alcohol" foam.

See Material Safety Data Sheet for further details regarding safe use of this product MyCompany, MyStreet, MyTown, NJ 00000, Tel: 444 999 9999



#### **GHS Labels**

Figure 4.15 Example GHS Outer Container Label (55 gallon/200 liter drum)

#### ToxiFlam

Danger! Toxic If Swallowed Flammable Liquid and Vapor Flammable liquids, toxic, n.o.s. (contains XYZ)

UN 1992

Do not eat, drink or use tobacco when using this product. Wash hands thoroughly after handling. Keep container tightly closed. Keep away from hear/sparks/open flame. – No smoking. Wear protective gloves and eye/face protection. Ground container and receiving equipment. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Use only non-sparking tools. Store in cool/well-ventilated place.

IF SWALLOWED: Immediately call a POISON CONTROL CENTER or doctor/physician. Rinse mouth.

In case of fire, use water fog, dry chemical, CO2, or "alcohol" foam.

See Material Safety Data Sheet for further details regarding safe use of this product MyCompany, MyStreet, MyTown NJ 00000, Tel: 444 999 9999



#### **Example of a Transportation and GHS label combined**



# Pictograms on Shipped Containers

Flame over circle	Exploding bomb
*	1
Gas cylinder	Skull and crossbones
	<b>A</b>
Environment	Health Hazard
*	
-/2	<b>6</b> 3
	Gas cylinder

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### SDS Format

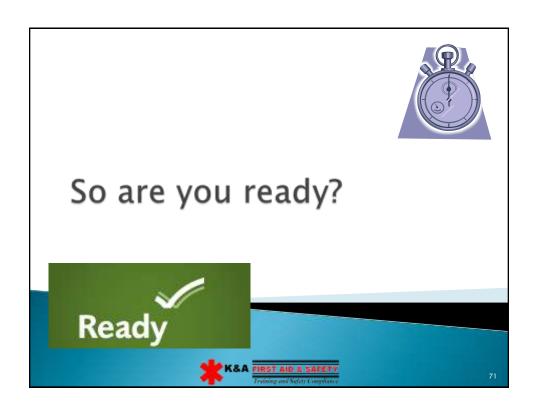
#### Section

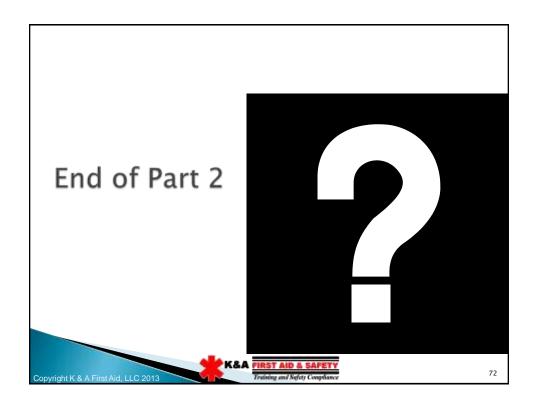
- 1: Product Identifier
- 2: Hazard Identification
- 3: Components
- 4: First Aid
- 5: Firefighting
- 6: Accidental Release Measures
- 7: Handling and Storage
- 8: Personal Protective Equipment

#### Section

- 9: Physical and Chemical Properties
- 10: Stability and Reactivity
- 11: Toxicological Information
- 12: Ecological Information
- 13: Disposal Considerations
- 14: Transportation Information
- 15: Regulatory Information
- 16 Other information







### Contact information

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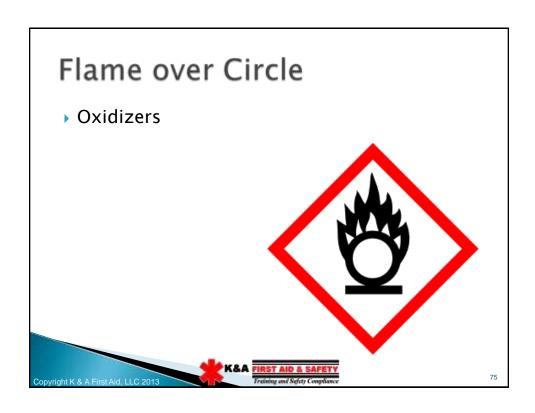
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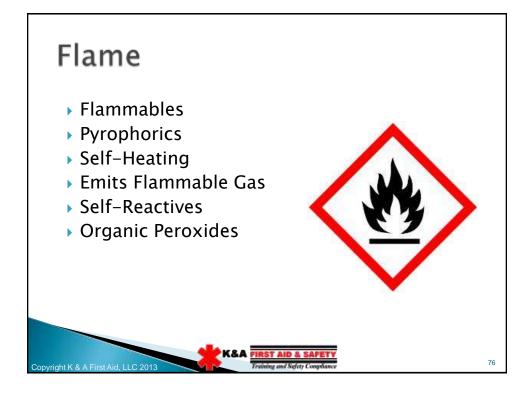
### Reference Slides

The following slides are additional information to supplement this talk.



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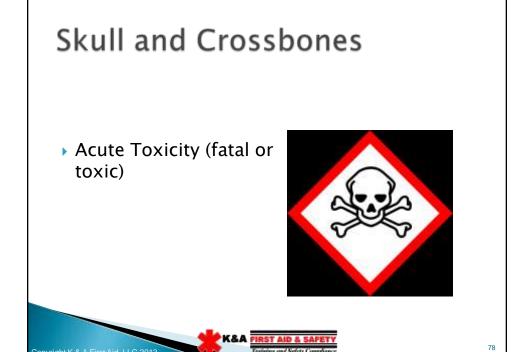


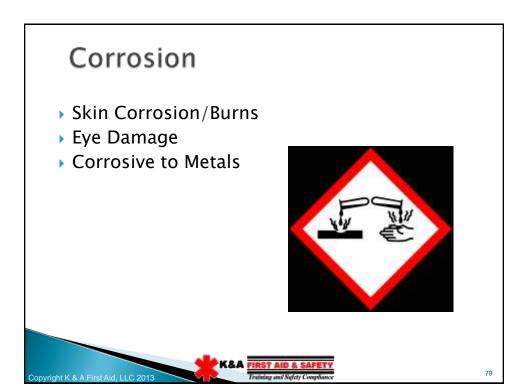


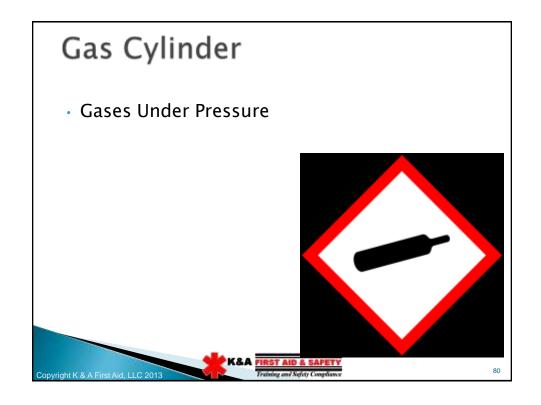


- Explosives
- Self–Reactives
- Organic Peroxides











- Carcinogen
- Mutagenicity
- Reproductive Toxicity
- Respiratory Sensitizer
- Target Organ Toxicity
- Aspiration Toxicity







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### Environment

- Aquatic Toxicity
  - (Non-Mandatory)





### **Exclamation Mark**

- Irritant (skin and eye)
- Skin Sensitizer
- Acute Toxicity
- Narcotic Effects
- Respiratory Tract Irritant
- Hazardous to Ozone Layer (Non-Mandatory)







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#### "MATERIAL" SAFETY DATA SHEET

Material Safety Data Sheets (MSDSs) provide detailed health and safety information and precautions for handling hazardous substances, including emergency and first aid procedures.



### "MATERIAL" SAFETY DATA SHEETS

- Identity of the chemical or product
- Hazardous ingredients
- Physical/chemical characteristics
- Fire and explosion hazards
- Reactivity data
- Health hazards
- > Precautions for safe handling and use
- Control measures



### Change of Name to "Safety Data Sheets"

- Should provide a clear description of the data used to identify the hazards
- If info is not applicable or not available, it should be stated
  - Minimum Information for an SDS
  - From GHS R3 Table 1.5.2



### Section 1: Product Identifier

- To include
  - GHS product identifier
    - · Other means of identification
  - Recommendations for use
  - Restrictions on use
  - Manufacturer or distributor
  - Address and phone
  - Emergency telephone



Section 2: Hazard Identification

- Hazard Identification
  - GHS classification of the substance
  - Labeling elements
  - Signal words and precautionary measures
  - May have pictograms
  - Other hazards which do not result in classification
    - (dust explosion hazards)



### Section 3: Components

- Chemical Ingredients
  - · Common name, synonyms, CAS Registry Number
  - Have to list hazardous chemicals if in concentrations above 1%
  - Have to list carcinogens if in concentrations above 0.1%
  - Trade secrets are allowed



Section 4: First Aid

- Description of necessary measures, subdivided according to the different routes of exposure
- Most important symptoms, and effects
- Type of treatment
  - Indication of immediate medical attention and special treatment needed



### Section 5: Firefighting

- > Suitable and unsuitable extinguishing media
- Specific hazards arising from the chemical
- Protective equipment and precautions for firefighters



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### Section 6: Accidental Release Measures

- Personal precautions, protective equipment and emergency procedures
- Environmental precautions
- Proper methods of containment and cleanup



# Section 7: Handling and Storage

- Precautions for safe handling and storage
- Incompatibilities



### Section 8: Personal Protective Equipment

- **PELs**
- TLVs
- Engineering Controls
- Individual protection measures, such as PPE



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### Sections 9: Physical and Chemical Properties

- Appearance
- Odor
- Odor threshold
- ▶ pH
- Melting point/freeing point
- Initial boiling point and boiling range
- Flash point

- Evaporation rate
- Flammability
- Upper and lower flammability or explosive limits
- Vapor pressure
- Vapor density
- Solubility
- Auto ignition temp



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# Section 10: Stability and Reactivity

- Chemical stability
- Possibility of hazardous reactions
- Conditions to avoid
- Incompatible materials
- Hazardous decomposition products



## Section 11: Toxicological Information

- Information on the likely routes of exposure
- Symptoms related to the physical, chemical and toxicological characteristics
- Delayed and immediate effects and chronic effects from short and long tem exposure
- Estimates of toxicity
  - LD<sub>50</sub>
  - LC<sub>50</sub>



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## Section 12: Ecological Information

- Not mandatory
- Ecotoxicity
- Persistence and degradability
- Bioaccumulative potential
- Mobility in soil



## Section 13: Disposal Considerations

- Section 13: disposal considerations
  - Description of waste residues
  - Methods of disposal
  - Safe handling



Section 14: Transportation Information

- Section 14: Transport Information
  - UN Number and proper shipping name
  - Transport Hazard Classes
  - Packing Group
  - Special precautions
- ▶ Sections 1–11 are mandatory, 12–16 not



0

### Sections 15 and 16

- Section 15: Regulatory Information
  - Safety, health and environmental regulations specific for the product
- Section 16 Other information
  - Revision date



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### Approach to Other Standards

- Many other OSHA standards contain criteria related to defining hazards, as well as other provisions that rely on those criteria.
- OSHA undertook a comprehensive review of its rules to identify what needed to be changed.
- OSHA has proposed modifications to all of those standards that it determined needed to be consistent with the GHS.



### Health Standards

- The substance-specific standards generally pre-date the HCS, and do not have a comprehensive approach to hazard communication.
- The final rule references HazCom 2012 in each of these standards to ensure they have all the protections of the rule.



### Health Standards cont.

- In addition, OSHA updated the provisions regarding what is to be communicated to workers to ensure the health effects are consistent with the GHS criteria.
- Regulated area signs will need to be updated to reflect the new language.
- Employers have until June 1, 2016 to update the signs.



#### Health Standards

- Asbestos (1910.1001; 1926.1101; 1915.1001)
- 13 Carcinogens (1910.1003)
- Vinyl Chloride (1910.1017)
- Inorganic Arsenic (1910.1018)
- Lead (1910.1025; 1926.62)
- Chromium (VI) (1910.1026; 1926.1126; 1915.1026)
- Cadmium (1910.1027; 1926.1127)
- Benzene (1910.1028)
- Coke Oven Emissions (1910.1029)
- Cotton Dust (1910.1043)

- · 1,2-dibromo-3-chloropropane (1910.1044)
- Acrylonitrile (1910.1045)
- Ethylene Oxide (1910.1047)
- Formaldehyde (1910.1048)
- Methylenedianiline (1910.1050; 1926.60)
- 1,3-Butadiene (1910.1051)
- Methylene Chloride (1910.1052)
- Occupational exposure to hazardous chemicals in laboratories (1910.1450)



### Safety Standards

- OSHA updated a number of safety standards to be consistent with the criteria in the HazCom 2012.
- The manner in which this was done depended on the provisions of the standard being considered, and approaches varied.



### Safety Standards cont.

- In some cases, it was decided that changes could not be made at this time given the source of the standard or other constraints.
- OSHA sought to minimize the impact on the scope or substantive provisions of the standards that were updated.



### Safety Standards PSM 1910.119(a)(1)(ii)

#### HazCom 1994

A process which involves a flammable liquid or gas (as defined in 1910.1200(c) of this part) on site in one location, in a quantity of 10,000 pounds (4535.9 kg) or more except for:

#### HazCom 2012

A process which involves a *Category 1* flammable gas (as defined in 1910.1200 (c)) or a flammable liquid *with a flashpoint below 100 °F (37.8 °C)* on site in one location, in a quantity of 10,000 pounds (4535.9 kg) or more except for:

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### Safety Standards

- Flammable Liquids (1910.106; 1926.52)
- Spray finishing using flammable and combustible materials (1910.107)
- Process safety management of highly hazardous chemicals (1910.119; 1926.64)
- Hazardous waste operations and emergency response (1910.120; 1926.65)
- Dipping and coating operations: Coverage and definitions (1910.123)
- General requirements for dipping and coating operations (1910.124)
- Additional requirements for dipping and coating operations that use flammable liquids or liquids with flashpoints greater than 199.4 °F (93 °C) (1910.125)
- Welding, Cutting, and Brazing (1910.252)

