

As OSHA's Hazcom Standard Evolves Agency plans to align with the UN's GHS Revision 7

Back in 2012, OSHA aligned its Hazard Communication Standard (HazCom or HCS) with Revision 3 of the United Nation's Globally Harmonized System of Classification and Labeling (GHS), which resulted in the current HazCom 2012 Standard.

Since then, the UN has continued to publish updated versions of the GHS every two years. Its most recent edition—GHS Revision 7—is of particular significance as OSHA has expressed its intention to update HazCom 2012 to align with this latest version of the system.

The UN allows nations and agencies the flexibility to pick and choose which elements of the GHS to adopt. This is a primary tenet of the GHS that aims to facilitate greater global adoption of the system, and is an approach OSHA took with its first adoption of GHS in 2012. We can expect that OSHA's alignment with Revision 7 of the UN's GHS will happen in a way that continues to address OSHA's specific needs and interests, and works within the scope of its regulatory oversight for hazardous chemicals in the U.S.

While specific changes to HazCom 2012 will not be known until OSHA releases its notice of proposed rulemaking (NPRM), currently planned for February 2019, a number of noteworthy modifications appear in Revision 7 compared to its preceding edition—Revision 6—that you should be aware of. OSHA may choose to adopt some or all of these changes when it aligns the HazCom Standard with the newest version of the GHS. Below is a list of what's new.

What's New?

- **Updated definitions for some health hazard classes.** The definition of skin corrosion, skin irritation, serious eye damage, eye irritation, dermal corrosion, dermal irritation, respiratory sensitizer, specific target organ toxicity, reproductive toxicity, and carcinogenicity are all slightly update for additional clarity.
- **Modified criteria for how flammable gases are categorized.** Prior to Revision 7, there was ambiguity regarding how to apply categories provided in the flammable gas chapter. Now, to eradicate some of the confusion, both pyrophoric gases and chemically unstable gases meet the classification criteria of flammable gases category 1A. Also, two hazard statements are now assigned to pyrophoric gases and chemically unstable gases category 1A/1B.
- **Revised and further rationalized precautionary statements in Annex 3.** A new precautionary statement P503 now exists for some explosives, instructing users to refer to the chemical manufacturer/supplier for information on its disposal, recovery, or recycling. Also, Section 3.2 now reads, "Flexibility in the use of precautionary statements with the first heading under that being Omission of precautionary statements where the advises is not relevant."

Other GHS Changes

As part of the GHS evolution, the three UN editions of GHS published between GHS Revision 3, the version HazCom is currently aligned to, and the latest version of GHS Revision 7, which OSHA is aiming to align to next, each had their own notable modifications.

Below is a sampling of updates from Revision 4 through 6, which help provide perspective on the types of changes the UN makes on its two-year update intervals, as well as insight into the cumulative updates incorporated into the latest edition—GHS Revision 7. You should be familiar with these changes, since they are parts of the evolving standard that OSHA may consider incorporating when they revise the HazCom Standard next.

- New hazard categories for chemically unstable gases and non-flammable aerosols (Rev. 4)
- Further clarification of criteria to avoid differences in the interpretation of precautionary statements (Rev. 4)
- Addition of a new test method for oxidizing solids (Rev. 5)
- Clarification of hazard classification criteria for skin corrosion/irritation, severe eye damage/irritation, and aerosols (Rev. 5)
- Revised/simplified classification & labelling summary tables (Rev. 5)

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- New codification system for hazard pictograms (Rev. 5)
- New hazard class for desensitized explosives (Rev. 6)
- New hazard category for pyrophoric gases (Rev. 6)
- Additional information to be included in Section 9 of safety data sheets (SDSs) (Rev. 6)

How to Prepare

So what does all this mean for businesses that must comply with HazCom? While it's important that you're aware of OSHA's Revision 7 alignment plans, all regulated businesses must continue to adhere to the current HazCom 2012, GHS Revision 3 aligned requirements. HazCom 2012 remains the law of the land until OSHA communicates differently.

Instead, you should simply take note of what could change based on the evolution of GHS and use this time to refocus your understanding of current obligations under the GHS-aligned HazCom 2012 Standard.

Chemical manufacturers, importers, distributors and employers of facilities where hazardous materials are used and stored should review their SDS libraries now to ensure they have the most updated information available for employees to access, verify shipped labels and workplace container labels comply with GHS, update written HazCom plans, and make sure all employees have been trained to comprehend the current GHS changes.

Employers, in particular, should be prepared to manage against another phased-in deadline and the consequential SDS library churn resulting from updated documents arriving with any initial shipments from the suppliers or with first shipments following significant changes made to the documents.

A well-organized, up-to-date chemical inventory will also help ease the transition to GHS Revision 7 and provide you with valuable insight as to what chemicals you currently have so you can understand how any hazard reclassifications will affect your business.

By taking a few measured steps, safety professionals can begin to lay the groundwork for any future changes to come while improving their hazard communication management right now.

By Mark Saner
ISHN September 2018 Issue

MICHIGAN & DESIGN CONSTRUCTION TRADESHOW 2019

This one-day tradeshow will be held on **February 5th, 2019** and will be attended by construction owners, contractors, suppliers, architects and engineers.

Show hours are 9:00 am to 4:30 pm.
Held at the Motor City Casino Hotel.

SAVE THE DATE!



2019 International Roofing Expo
February 11-13, 2019
Nashville, Tennessee

Join the industry at the International Roofing Expo as we take over Music City for three days of education, exhibits, and unlimited networking opportunities.

Mark your calendars!

Registration is now open.
www.theroofingexpo.com

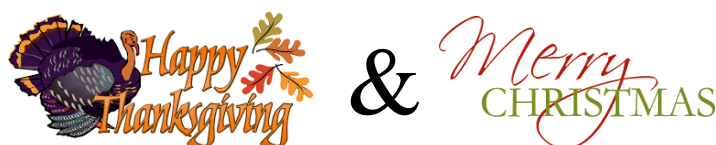
NRCA ROOFING DAY IN D.C.

Hyatt Regency Washington on Capitol Hill
April 3-4, 2019

Join fellow roofing industry professionals in Washington, D.C., as we take our message to Capitol Hill. It is important members of Congress see you and hear from you about critical issues facing your company. To be seen and heard, we need the industry speaking with one voice in Washington, D.C.! Don't miss this opportunity to make a difference for your business and our industry!

www.nrca.net/roofingday

Register today! <http://www.nrca.net/Register-Roofing-Day-2019>



CAM's Michigan Construction Payment Act

Fellow members, within the next few months, representatives of CAM will have the opportunity to make the case in support of CAM's Michigan Construction Payment Act (MCPA) before a State Senate subcommittee. CAM's proposed legislation is intended to become the first prompt pay law for private sector commercial projects in the State of Michigan. Also, if the MCPA becomes law as proposed, it will eliminate the unfair industry practice known as retention or retainage.

Currently, Michigan is one of only a handful of states that does not have a prompt payment act of the private sector construction industry. Additionally, every state in the country, including Michigan, has prompt pay legislation on the books for public sector work. Who has not traveled to major metropolitan cities like Chicago, New York, Dallas, Atlanta or Seattle and marveled at all of the cranes at work and thought, "What If?" All of these great cities are located in states with legislation on the books guaranteeing prompt payment on both public and private projects.

Our country's free market system compels Michigan to compete against other states for business. In order to successfully convince employers to establish and grow their businesses in the Great Lakes State, we need to be either a low-cost producer or provide added value. In truth, on many occasions, a state needs to do both to lure employers. Whether it's the cost of money associated with a line of credit or the lost opportunity cost of not deploying money efficiently, the cost of money is a real cost. The leaders of states that have enacted private sector prompt pay legislation recognize the importance of a healthy construction industry and what it can do for their individual state's overall economy today and into the future.

For a state to have a healthy construction industry, they money must flow in a timely and efficient manner. Unfortunately, in today's private sector construction industry, intentional and unreasonable delays in paying for work, materials and services that have been accepted as being completed satisfactorily are becoming more prevalent. In fact, delays in excess of 120 days are not uncommon. The Michigan Construction Payment Act will put an end to unscrupulous practice. Key provisions of the MCPS include:

- Owners must prove their ability to pay;
- Owners are required to pay for acceptable work within 30 days;
- Contractors and subcontractors must pay their tiers within 7 days of receiving payment;
- An interest penalty clause is included for wrongfully withholding payment;
- Contractual retainage/retention provisions are prohibited;
- Withholding of payment without penalty for work unsatisfactorily completed is permitted;
- Contract provisions requiring the contractor to assume the risk of non-payment are void and unenforceable.

Consequently, we are asking everyone for their support in addressing and rectifying this very critical problem plaguing our industry. For starters, we need you to write to and/or call your local legislators. Timing is of the essence! Therefore, we have included on our website, www.buildwithcam.com, downloadable form letters that you can send to your local State Senators and Representatives. For a list of who they are, head here: buildwithcam.com/government-contacts. Tell them today that you support CAM's Michigan Construction Payment Act! Thank you for your support of this paramount issue.

By: Joseph Fontanesi, 2018 CAM Chairman of the Board
CAM Magazine September 2018

2018 Just Build It! Construction Career Expo

On October 17th the Washtenaw Contractors Association hosted the Just Build It! Construction Career Expo.

The event provided students grades 8-12 along with their counselors and teachers the opportunity explore skilled trade apprenticeship programs with information and hands on activities.

Thank you to everyone who helped at the booth—Roofers Union #149 and the Detroit Training Center. It takes a team to Work Together!



NRCA ProCertification

The first phase of NRCA ProCertification has launched! NRCA ProCertification is the first industry-wide effort to certify installers' skills and knowledge in specific roof systems. Installers will have to sit for two exams to test their knowledge and skills. The first is a computer-based exam that will cover what an experienced installer should know. The second test is a field exam during which an installer performs installation tasks for an on-site Qualified Assessor to evaluate. The field exam will certify whether the installer can perform the tasks well.

NRCA is accepting applications for those interested in becoming Qualified Assessors. You can learn more and start the application process at www.nrca.net/NRCA-ProCertification.

The benefits of being a Qualified Assessor include:

- Expanding your current business offerings by assessing NRCA ProCertification candidates
- Generating additional revenue by charging NRCA ProCertification candidates an appropriate fee for conducting their performance exams
- Gaining access to NRCA ProCertification materials for specific roof system disciplines
- Earning a digital badge and professional recognition as being one of the leaders in the industry.

For more information:

<https://www.nrca.net/store/category/nrca-qualified-trainer-course/65>

JATC Training Center

Journeyworkers Skill Advancement Training Classes are available at no cost to all Detroit 149 members. Dues must be current in order to enter the Training Center.

If you have any questions, contact the Training Center at 248-543-3847.

Education Resources



CAM Online
www.cam-online.com



NRCA
www.nrca.net



MIOSHA
www.michigan.gov/miosha

Upcoming Industry Trade Shows 2018/2019

Nov. 14-16	Greenbuild Chicago, Illinois www.Greenbuildexpo.com
Nov. 16-17	RCI Building Envelope Symposium Nashville, TN www.rci-online.org
Jan. 17-18, 2019	CRCA Trade Show and Seminar Oakbrook Terrace, IL www.crca.org
Feb. 5, 2019	Michigan Construction & Design Tradeshow Detroit, MI www.buildwithcam.com



Birthday Wishes

George Schena
Schena Roofing & Sheet Metal Co., Inc.

November 13

Jim Coppens
Mid Michigan Roofing

November 15

Brian Moore
Schreiber Corporation

November 29

Roger LaDuke
LaDuke Roofing & Sheet Metal

December 13

Kathy LaDuke
LaDuke Roofing & Sheet Metal

December 21

Happy Anniversary



Tara and Jay Kakias
T.F. Beck Company

December 31



Deepest Sympathy

Our deepest sympathy's are extended to the family and friends of:

Robert "Bob" Coppens
Brother of Jim Coppens, Mid Michigan Roofing

Proposal 1 Passes in Michigan

On Tuesday, November 6th, Michigan residents voted yes on Proposal 1 which made marijuana legal for recreational use.

As the passing of this law may encourage employees to use marijuana, employers should review their policies concerning drugs and alcohol. Hiring and retaining top talent may be difficult if stellar candidates and employees use marijuana recreationally and therefore, cannot pass a pre-employment or random drug test. Given this, employers should reconsider the necessity of pre-employment and random drug testing. Employers should also review their policies concerning the use of drugs and alcohol at company-related events to assess whether they cover the use of marijuana.

Kerr, Russell and Weber, PLC

SMRCA & MIRCA Websites

The SMRCA and MiRCA have updated websites. Check them out.

If you have any changes to your listing on the websites, contact the association office.

www.smcra.org
www.mirca.org



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ROOFING CONTRACTORS ASSOCIATION



Crane Rule Takes Effect

OSHA's crane safety rule requirements that operators be certified officially goes into effect on November 10. Crane operators must be: certified by an independent testing organization accredited by a nationally recognized accrediting organization; or qualified by an employer's independently audited program or the U.S. military; or comply with qualifying State or local licensing requirements (mandatory when applicable). Option 1 is the only "portable" certification, meaning any employer hiring a certified operator can be sure of their certified competency. The Census of Fatal Occupational Injuries reported 220 total crane-related deaths from 2011 to 2015.

Roofers & Waterproofers National Instructor Training Program

Ambitious New Training Program to Roll Out in 2020 At Washtenaw Community College

The Roofers & Waterproofers Research and Education Trust Fund is proud to announce that it is in negotiations to launch its National Instructor Training Program (NITP) at Washtenaw Community College in Ann Arbor, MI, during the summer of 2020. The NITP will allow for centralized training, which will offer a wide range of classes that are required and needed for all apprenticeship instructors throughout the union roofing and waterproofing industry. This program will allow instructors to take classes that will improve their instructional skills and knowledge based by attending professional instructor course, safety and technical train the trainer courses, and JATC administrative support courses, while also possibly receiving college credits with Washtenaw Community College.

Once the National Instructor Training Program is launched in 2020, it will be a recurring event every year during the same week, allowing JATCs, local unions and employers to plan for the absence of instructors who are attending the NITP. The NITP will allow for instructors to attend two courses per year, with each one consisting of 22.5 hours, totaling 45 class hours per year. Some courses may consist of up to 45 hours limiting instructors to attend only one course per year one prerequisites are met.

Our contractors and members have hailed safety, productivity and skills training as the most important factors that are needed. The fundamentals go hand-in-hand with the excellent training that we provide, and we believe that begins by providing and maintaining the highest level of training for our instructors.

Purpose of the NITP

The National Instructor Training Program for instructors of journeypersons and apprentices is designed to:

- Increase instructors' proficiency of instructional techniques, material, and equipment.
- Acquaint instructors with the philosophy and principles of education, especially within our trade, industrial, and technical education and training.
- Provide learning experiences in the principles and the fundamentals of the applied knowledge subjects.
- Expand the understanding of our instructors in the technical aspects of the craft and convey information to the instructors about the last developments in education and our trade.

Instructor Certificate Program

To receive a Certificate of Completion, Roofing & Waterproofing, instructors most successfully complete ten courses. Once an instructor graduates from the Certificate Program, we encourage ongoing participation in the event for the purpose of continuing education and the pursuit of an Associate's degree.

Courses

Currently we have a list of professional courses, proposed safety and technical courses, and proposed JATC administrative support courses that will be offered, with the ability to add additional courses each year as our industry continuously advances and changes.

Professional Instructor Courses

- Planning, Teaching, and Assessing Effective Lesson Plans: Beginner
- Planning, Teaching, and Assessing Effective Lesson Plans: Intermediate (prerequisite: Beginner Course)
- Planning, Teaching, and Assessing Effective Lesson Plans: Advanced (prerequisite: Intermediate Course)
- Courses Planning and Problem Solving (prerequisite: Advanced Course)
- Public Speaking (recommended to be taken in conjunction with Intermediate Course)

Safety and Technical Courses (TTT = Train The Trainer)

- Competent Person Fall Protection TTT
- Qualified Rigging Person TTT
- Signal Person TTT
- GHS Haz-Com & RF Radiation TTT
- Aerial Lift & Power Industrial Truck TTT
- Asbestos Class TTT
- IRCA TTT
- Confined Space TTT
- Competent Person Scaffold TTT
- OSHA 510
- OSHA 500
- OSHA 502
- Safety Culture for Frontline Leaders TTT
- Financial Literacy TTT
- Single-Ply TTT
- Green Technologies TTT
- Waterproofing & Building Envelope TTT
- Steep Slope TTT
- Built-Up Roofing TTT
- Math, Blueprints, and Specifications TTT
- Utilizing Job-Site Technology TTT
- Foreman Training TTT

JATC Administrative & Support Courses

- Computer Skills Training: Beginners
- Computer Skills Training: Intermediate
- Computer Skills Training: Advanced
- Microsoft PowerPoint for Instructors
- TRC & Online Training Resources Class
- Anti-Harassment & Diversity Training
- Adapting Apprenticeship in the 21st Century
- Understanding Legal Issues and Fiduciary Responsibilities
- Managing Financial Operations of a Training Program

As the National Instructor Training Program progresses and is being developed, we will be providing more information and will be looking forward to announcing our Inaugural Training Session for the summer of 2020. If anyone is to have any questions, please do not hesitate to contact Executive Director Keith J. Vitkovich at (202) 463-7663 or keithv@unionroofers.com

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- S**AFETY A safe jobsite is assured because SMRCA crews complete the M.U.S.T. Safety Training and Drug Testing.
- M**ULTIPLE SERVICES A SMRCA Roofing Contractor has the ability to provide the roof you need because of our expertise in a variety of roofing applications and techniques.
- R**ELIABLE SMRCA Contractors are Union trained professionals bringing an Industry leading standard of service, quality and knowledge to every project.
- C**ONFIDENCE Projects completed by SMRCA Contractors provide a Michigan roofing contractor 2 year standard workmanship warranty.
- A**CCOUNTABILITY SMRCA Contractors are established companies with years of experience in providing responsive service, superior workmanship and exceptional value.

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Southeastern Michigan Roofing Contractors Association Members

T. F. BECK COMPANY

Rochester Hills, MI
(248) 852-9255
www.tfbeck.com

LUTZ ROOFING COMPANY, INC.

Shelby Twp., MI
(586) 739-1148
www.lutzroofing.com

ROYAL ROOFING COMPANY

Orion, MI
(248) 276-ROOF (7663)
www.royal-roofing.com

J. D. CANDLER ROOFING CO., INC.

Livonia, MI
(734) 762-0100
www.jdcandler.com

M.W. MORSS ROOFING, INC.

Romulus, MI
(734) 942-0840
www.morssroofing.com

SCHEMA ROOFING & SHEET METAL CO., INC.

Chesterfield, MI
(586) 949-4777
www.schenarroofing.com

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Detroit, MI
(313) 837-1420
www.cdetroit.com

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Pontiac, MI
(248) 332-3021
www.newtoncraneroofing.com

SCHREIBER CORPORATION

Wixom, MI
(248) 926-1500
www.schreiberroofing.com

DETROIT CORNICE & SLATE COMPANY

Ferndale, MI
(248) 398-7690
www.detroitcornice.com

NORTH ROOFING COMPANY

Auburn Hills, MI
(248) 373-1500
www.northroofing.com

LADUKE ROOFING & SHEET METAL

Oak Park, MI
(248) 414-6600
www.ladukeroofing.com

DAVE POMAVILLE & SONS, INC.

Warren, MI
(586) 755-6030
www.PomavilleRoofing.com



www.smrca.org