



Zep Distribution Branded products CPSC vs OSHA GHS Labeling

Frequently Asked Questions:

Which Zep Distribution brands will have CPSC labeling?

- Zep Professional, Misty, TimeMist, iChem
- Excluding exempt products that include: EPA, FDA products

What regulation is Zep Distribution referencing to justify utilizing the CPSC labels on their branded product?

- We are using the OSHA guidelines. You may reference OSHA regulation: 29CFR1910.1200 (b). Because our products are sold on-line, and in distributors' stores, we are providing the label format that is required for consumer products.
[Click to go to OSHA Regulation 29CFR1910.1200 \(b\) \)](#)
- Products that are packaged in greater than 5 gallon pack sizes will be labeled GHS.

What would happen if you sold your product to a household consumer?

- If the CPSC, the agency that governs consumer labeling, finds a product that is mislabeled with a household consumer. The seller of the product is subject to large fines, penalties and potential product recalls.

Which Zep Distribution brands will have GHS labeling?

- Zep Aviation will have GHS labeling after June 1, 2015. All Zep Aviation products will ship with the new GHS label on or before June 1, 2015. Pack sizes greater than 5 gallon will also transition to the GHS label.
- All GHS product will carry a "Green" sticker on the case.
- As a Distributor, you have until December 1, 2015 to sell through our Zep Aviation and 55 gallon or larger products. Exempt products that include: EPA, FDA, and Household consumer products are not included.

Will my SKU numbers change?

- No, your SKU numbers will not change for our GHS or CPSC labeled products. We will be implementing the labels as a running change.

When will my GHS compliant SDSs be available?

- The new GHS compliant SDS will be available on June 1, 2015. Please visit www.zepdistribution.com for the latest Safety Data Sheets (SDS).
- You will need to advise all of your customers that will be utilizing the CPSC label to ensure that the SDSs are kept on file and available for employees to use in the event of an emergency. We recommend that they indicate this in their OSHA training material.

How can we continue to get information on your GHS/CPSC change?

- Zep Distribution will continue to provide you with updates. We will also keep you updated on the regulations on our website, www.zepdistribution.com



Frequently Asked Questions - CPSC vs OSHA GHS Labeling

What is the GHS? (Global Harmonization Systems)	The GHS is the United Nations System for the Classification and labeling of chemicals. It is intended to be used around the world as the universal way to classify chemicals for their hazards and communicate that hazard information to chemical users.
Do all chemicals sold in the US require the new GHS labels?	No – only hazardous chemicals used in the workplace require labeling under the new OSHA Hazard Communication Standard. Certain hazardous chemicals used in the workplace are also exempt from the labeling requirements.
Which workplace chemicals are exempt?	Pesticides, food, food additives, color additive, drug, cosmetic, or medical or veterinary device or product, including materials intended for use as ingredients in such products (e.g. flavors and fragrances), Distilled spirits and other alcoholic beverages, consumer products, agricultural or vegetable seeds treated with pesticides.
What is a consumer product?	The Consumer Product Safety Commission (CPSC) defines a consumer product as any product brought into or around a dwelling and related buildings (garages, sheds, etc.). Includes products designed primarily for professional use but available to consumers in retail stores for non-professional use.
What regulations govern consumer chemical labeling?	Unless the product is a cosmetic, food, drug or pesticide, the CPSC regulates the labeling and packaging of hazardous household chemicals.
What is a pesticide?	The US Environmental Protection Agency (EPA) defines a pesticide as A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. This includes anti-microbials.
What regulations govern pesticide labeling?	The EPA regulates the labeling and registration of all pesticides. The EPA has not adopted the GHS for pesticide labeling.
If a product is also used in the workplace, does it need OSHA labeling also?	No, OSHA exempts consumer products, pesticides and certain other chemicals that are used in the workplace from OSHA labeling (See 29CFR1910.1200 (b)).
Where do workers get the hazard information they need for consumer products and pesticides used in the workplace?	Safety Data Sheets that comply with OSHA must be available (unless the product is exempt from the Hazard Communication Program) and workers are trained on the hazards of the chemicals they work with.
When is a consumer product exempt from OSHA Hazard Communication?	When it is used in the workplace in the same way and the same frequency of use as a consumer would use the product.
What about cosmetics?	Cosmetics are labeled under the regulations of the Food and Drug Administration (FDA). The FDA has not adopted the GHS for labeling.
Why not add OSHA GHS labeling to consumer product labeling?	There are several good reasons not to have dual labeling on consumer products. <ol style="list-style-type: none"> 1. Consumers are not trained on the meaning of the GHS pictograms and other label elements and may find those confusing. 2. The hazard definitions are different under the 2 standards so the hazard information may be conflicting. 3. CPSC labels for some chemicals mandate specific label statements and those are very different from the GHS hazard statements for the same hazards. 4. OSHA and CPSC use different test methods that result in different classifications and hazard statements. 5. Many containers are too small to accommodate dual labeling.