

From: Kenneth Smith
Sent: Wednesday, April 10, 2013 9:57 PM
To: Smith, Steve C.@DIR
Cc: Gold, Deborah@DIR
Subject: Possible incorrect reference/change in the GHS Horcher adoption.

Hi Mike and Steve

Thank you for arranging the advisory group meeting this week and your valiant efforts to compile information on the comparative differences between the various standards.

In reviewing the changes of the GHS 5194 (Horcher) adoption I believe there was an error made in the reference cited in 8 CCR 5194(b)(3) that reads:

Such excepted laboratories must also ensure that labels of incoming containers of hazardous chemicals substances are not removed or defaced pursuant to section **5194(f)(1)(4)**, and must maintain any material safety data sheets that are received with incoming shipments of hazardous chemicals substances and ensure that they are readily available to laboratory employees pursuant to section 5194(g).

I believe that subsection (f) added two entries (f)(2) and (f)(4). Thus the old section (f)(4) now becomes (f)(6). I believe the reference highlighted above in yellow should have been correctly listed as section 5194(f)(6)(4). This would make sense as subsection (f)(6) is the requirement for employers to label containers and would be consistent with the previous version of the HCS.

Can you please let me know if this is correct. If so is it possible to get this error fixed in the printing?

Thanks
Ken

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