When OSHA announced that it was updating its Hazard Communication Standard last year to include the adoption of the Globally Harmonized System of Classification and Labeling of Chemicals, many companies and emergency responders asked “How will this impact NFPA 704”? NFPA 704, Identification of the Hazards of Materials for Emergency Response, which uses a combination of color coding and numbers to describe a hazard’s severity, provides a simple, readily recognized, and easily understood label designed to assist those who are responding to an emergency such as a fire or spill. OSHA’s revised Standard, known as Hazard Communication 2012 or HC2012, is a workplace chemical information system established primarily to provide information and safe work practices for those working with chemicals on a routine basis.

The concern is that the HC2012 standard incorporates a numerical rating system that appears to be similar to NFPA 704 rating system, however the severity rating on the two standards are inverted. NFPA 704 uses a numerical of 0-4 with 4 indicating the most severe hazard. Hazard Communication 2012 uses a numerical system of 1-4 with 4 indicating the least hazard. The inverse numerical rating between the two systems is primarily what creates the concern.

To address this concern, NFPA has been working with OSHA over the past year to promote awareness of the differences between the two systems. It should be noted that OSHA does not necessarily see a conflict between HCS and NFPA 704. OSHA has indicated that the GHS numbers are not relative ratings of hazards but are used for the purpose of classifying hazards into categories for proper labeling and training information.

Recently OSHA and NFPA worked together to develop a “Quick Card” showing the differences between the two systems. The Quick card can be found on the NFPA website at www.nfpa.org/704 at the bottom of the page under “Additional Information”. Or you may go directly to the card at http://www.nfpa.org/Assets/files/AboutTheCodes/704/NFPA704_HC2012_QCard.pdf. The card can be downloaded and laminated as a two sided document that can be laminated and used for easy field reference.

The NFPA Technical Committee on Classification will continue to assess the impact of GHS incorporation into OSHA’s HC2012 standard. In the meantime, there is no immediate plan to change the existing NFPA 704 system. The Committee recognizes that the NFPA 704 consensus standard has been protecting emergency responders, employees, and the public for over 50 years and any changes would need to be carefully considered. For updates on NFPA 704 it is recommended that you sign up for email alerts on the top of the document information page for 704 www.nfpa.org/704.