



## PURITAN PRODUCTS

CHEMICAL BLENDING EXPERTISE

Quality • Consistency • Confidence

### Management of Change Notification

March 3, 2015

**RE: MOC# 150201:**

**Globally Harmonized System (GHS) of Classification and Labeling of Chemicals**

Dear Valued Customer:

In May 2012, the US Occupational Health and Safety Administration (OSHA) updated its Hazard Communication Standard (HCS) to align with the United Nation's Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. This resulted in Hazard Communication Standard 2012 (HCS 2012, aka GHS) which mandates an update to Safety Data Sheets (SDS) and labels by **June 1, 2015**.

Per HCS 2012, two important deadlines are to be observed for compliance with this regulation:

1. June 1, 2015 -Chemical manufacturers, importers, distributors, and employers shall be in compliance with all modified provisions of the standard no later than June 1, 2015.
2. December 1, 2015 -A distributor shall not ship containers labeled by the chemical manufacturer or importer unless the label has been modified to comply with paragraph (f)(1) of the standard.

**Please be advised of the following:**

- **Updated, HCS 2012 compliant SDS are already available for all products supplied by Puritan Products.**
- **SDSs and labels for all products shipping from Puritan Products on or after June 1, 2015 must be compliant with HCS 2012. Below you will find a summary of all revisions that will occur with the new label.**
  - The GHS required icons will be utilized for classifying the products on the label.
  - The NFPA Fire Diamond is no longer on the label.



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- The current four digit product number on the label will have an additional alpha-numeric code. The complete product number will maintain the original four digit code plus an alpha-numeric code to indicate the product package size and material of construction.
- Product specifications will be removed from the label. Product specifications and actual analysis will remain part of the Certificate of Analysis (C of A).
- A product expiration date will be included on all labels based on the manufacture date.
- The EHS Cautionary Information will be reduced to focus on primary hazardous concern.
- Product labels for GMP-Manufactured products will contain an intended use statement to meet regulatory requirements.
- A country of origin statement will be included for GMP-Manufactured products.
- The UN Number required by the U.S. DOT will be a minimum of ½” in size to meet the new standard.
- The new Puritan Products logo will be part of the new label design.
- A brand name will be added to the current product name to better describe the chemical product. The brand name will be based on the following definitions:
  - **PharmaPUR™**—used for all cGMP manufactured chemicals, single compendial chemicals, and cGMP manufactured solutions and blends.
  - **BioPUR™**—used for non-GMP manufactured chemicals, non-GMP manufactured solutions and blends that are typically sold and used in the bio/pharma industry.
  - **ChemPUR™**—used for any products which are reagent grade. To be used for chemicals with ACS Reagent monographs or other reagents in which there is no monograph. ChemPUR™ A.C.S. Reagent will be the designation for a reagent that has an ACS compendial monograph. ChemPUR™ Reagent will be used for reagents that have no ACS compendial monograph. This designation will also be used if a product is to be sold to multiple industry end-users.
  - **ElectroPUR™**—to be used as our SEMI grade equivalent. The general term “Electronic” will be used if a product has no SEMI standard or does not meet SEMI standard.



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- **MultiPUR™**—used on regulated compendial chemicals that are GMP-manufactured with more than one compendia such as any product that is USP/NF and meets EP, JP, BP, or FCC compendial monographs.

Please forward this notification to the appropriate personnel in your organization. We request your support in meeting this federal regulatory obligation and thank you in advance for your attention and cooperation. Any products received from the date of this letter forward, may be labeled utilizing the improved product label.

Sincerely,

Brian P Meckes  
Director of Quality  
bmeckes@puritanproducts.com

# Globally Harmonized System (GHS) of Labeling

## Current Label

**DANGER!**  
CORROSIVE LIQUID  
LIQUID, MIST, AND VAPOR CAUSE SEVERE BURNS TO ALL BODY TISSUE. MAY BE HARMFUL OR FATAL IF SWALLOWED OR INHALED. VAPOR EXTREMELY IRRITATING. INHALATION MAY CAUSE LUNG DAMAGE. CORROSIVE TO METALS.

**PRECAUTIONARY MEASURES:** Do not get into eyes, on skin or clothing. Avoid prolonged or repeated skin exposures. Avoid breathing vapors, spray or mist. Do not take internally. Keep container closed when not in use. Wash thoroughly after handling. Consult Material Safety Data Sheet for additional information on safe use, handling, clean-up and disposal.

**FIRST-AID:** Seek medical attention immediately after any overexposure. Skin or Eye Contact - In case of contact, immediately flush area for 15 minutes while removing contaminated clothing and shoes. Inhalation - If inhaled, move victim to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Ingestion - If ingested, do not induce vomiting. If victim is fully conscious, give a cupful of water. Never give anything by mouth to an unconscious person.

**TARGET ORGANS:** Skin, eyes, respiratory system, teeth.

**IN CASE OF FIRE:** Use water fog, "alkohol" foam, CO2 or dry chemical.

**IN CASE OF SPILL:** Releases should be cleaned-up by trained personnel in appropriate personal protective equipment. Use neutralizer for acids (e.g., soda ash). Place residue in suitable container. Clean-up spills promptly.

**HANDLING INSTRUCTIONS:** When handling, wear chemical splash goggles, face shield, gloves (neoprene or Buna-N) and protective clothing. Provide local or general exhaust systems. Use NIOSH/MSHA approved respiratory protection if exposed to mist or sprays above OSHA-recommended exposure limits (refer to Material Safety Data Sheet). Avoid splattering by adding this solution to water slowly. Do not transfer to unlabeled containers.

**STORAGE INSTRUCTIONS:** Store away from strong bases and metals. Keep container out of sun and away from heat.

**ADDITIONAL INFORMATION:** Dispose of product in accordance with Federal, State and local requirements.

Hazardous Materials Information System Rating: 3 (health) - 0 (fire) - 0 (reactivity) - C, D, H (eye, hand, body, respiratory protection, as needed for specific operations)

**PURITAN PRODUCTS**  
Custom Formulated and Specialty Chemicals

**HYDROCHLORIC ACID**  
36.5-38.0%  
A.C.S. Reagent  
UN 1789  
HCl CAS 7647-01-0 F.W. 36.46

FACE SHIELD, SPLASH GOGGLES, PROPER GLOVES, LAB COAT & APRON, EXHAUST VENTILATION

**STORAGE INFORMATION:**  
Corrosive Liquids Area  
Storage Code Color: White

**KEEP OUT OF REACH OF CHILDREN!**  
INDUSTRIAL USE ONLY!

**DOT Basic Description:**  
UN 1789, Hydrochloric Acid, 8, PG II

**A.C.S. Specifications** 2612

Assay (HCl).....36.5-38.0%  
Color (A.P.H.A.).....10 max  
Appearance.....Free from suspended matter or sediment.

**MAXIMUM LIMITS OF IMPURITIES**

Residue after Ignition.....5 ppm  
Bromide (Br).....0.005%  
Sulfate (SO4).....1 ppm  
Sulfide (S2).....1 ppm  
Extractable Organic Substances.....5 ppm  
Free Chlorine (Cl).....1 ppm  
Ammonium (NH4).....5 ppm  
Arsenic (As).....0.01 ppm  
Heavy Metals (as Pb).....1 ppm  
Iron (Fe).....0.2 ppm

LOT NO.: 26120491501  
NET CONTENTS: 4 x 10 lbs

**PURITAN PRODUCTS**  
Custom Formulated and Specialty Chemicals  
2290 AVENUE A BETHLEHEM, PA 18017  
610-866-4225

FOR TRANSPORTATION EMERGENCY ASSISTANCE  
CALL CHEMTREC 800-424-9300

FOR HEALTH EMERGENCIES  
CALL LOS ANGELES POISON INFORMATION CENTER  
800-366-3129

FOR HAZARDOUS MATERIALS EMERGENCY CALL  
800-438-6917

## New GHS Label

**DANGER!**  
CAUSES SEVERE SKIN BURNS AND EYE DAMAGE. MAY CAUSE RESPIRATORY IRRITATION. MAY CAUSE DROWSINESS OR DIZZINESS.

Avoid breathing dust/fume/gas/mist/vapors/spray.  
Wear protective gloves/ protective clothing eye protection/ face protection. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/physician.

Refer to SDS for additional information.

**PURITAN PRODUCTS**

**HYDROCHLORIC ACID**  
36.5-38.0%  
ChemPUR™ ACS Reagent  
HCl CAS 7647-01-0 F.W. 36.46

**UN 1789**

**KEEP OUT OF REACH OF CHILDREN!**  
FOR INDUSTRIAL USE ONLY!

**DOT Basic Description:**  
UN 1789, Hydrochloric Acid, 8, PG II

LOT 26120411501  
Net Contents 4 x 10 Lbs  
Exp. Date 02/28/2017

**PURITAN PRODUCTS**  
2290 AVENUE A BETHLEHEM, PA 18017  
610-866-4225  
www.puritanproducts.com

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800-438-6917

Product of U.S.A.

Rev. 1

- ① Hazard & Precautionary Statements
- ② GHS Hazard Pictograms
- ③ Brand / Purity Designation
- ④ UN Number ≥1/2 inch
- ⑤ Product Code
- ⑥ Expiration Date
- ⑦ Country of Origin