GUIDANCE NOTE No. 61

SUMMARY DOCUMENT - HANDLING OF SOLVENTS IN SMALL PACKAGES

Introduction

The supply, handling and storage of small quantities of solvents require very similar control measures to those that apply to supply of larger quantities of product with associated hazards. This SIA guidance note acts as a signpost document to be used as a reference to direct users to more detailed existing information and guidance available via alternative documentation and web pages.

Chemical Classification, CLP / GHS

The CLP Regulation adopts the United Nations' Globally Harmonised System (GHS) on the classification and labelling of chemicals across all European Union countries, including the UK.
European Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures came into force on 20 January 2009 in all EU Member States, including the UK.

http://www.hse.gov.uk/chemical-classification/legal/clp-regulation.htm

If the product being supplied contains a chemical mixture or substance, there is a legal obligation to assess the physical, health and environmental hazards associated with its use. Chemical classification, also known as hazard classification is the process used to calculate product hazards and is the foundation of chemical regulatory compliance.
The Globally Harmonised System of classification and labelling of chemicals (GHS) covers a comprehensive harmonised classification of chemicals to define physical, health and environmental hazards.
Countries and regions across the world have incorporated the GHS standards into their respective chemicals legislation to promote the safe use of chemicals and facilitate international trade.

http://www.hse.gov.uk/chemical-classification/legal/background-directives-ghs.htm

COSHH: Control of Substances that are Hazardous to Health

This is the law that requires employers to prevent or reduce workers' exposure to hazardous substances.
COSHH is task based, so control measures may be different for handling smaller quantities (i.e. fume cupboard) than larger quantities of the same material.
This is completed by defining health hazards and deciding how to prevent harm to health via a risk assessment, providing control measures to reduce harm to health, and keeping all control measures in good working order.

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There is also a requirement to provide information, instruct and train employees and others and provide monitoring and health surveillance in appropriate cases and also to plan for emergencies.

http://www.hse.gov.uk/coshh/basics.htm

The Provision of Safety Data Sheets (SDSs)

If the product has a hazardous chemical classification, there is a legal obligation to communicate the associated hazards along the supply chain. REACH Regulation dictates that Safety Data Sheets (SDSs) are required. SDS are key documents in the safe supply, handling and use of chemicals. They help to ensure that those who use chemicals in the workplace do so safely without risk of harm to users or the environment and enable the recipient to make a risk assessment.

The information detailed in the safety data sheet (SDS) relates to occupational health and safety, transport safety and environmental protection.

http://www.hse.gov.uk/chemical-classification/labelling-packaging/safety-data-sheets.htm

Exposure scenarios provide information on how the exposure of workers, consumers and the environment to hazardous substances can be controlled during use. Relevant exposure scenarios should be included as an annex to the safety data sheet of a substance when a company in the supply chain has carried out a chemical safety assessment under REACH. A common layout format for the exposure scenarios is agreed.

This allows an automated exchange of harmonised information on the safe use of chemicals between various sectors in the supply chain and their own systems. When downstream users receive exposure scenarios, they must check that they cover their own use of the substance and their conditions of use or take alternative action.

https://echa.europa.eu/view-article/-/journal_content/title/new-eguide-on-safety-data-sheets-and-exposure-scenarios-available-on-echas-website

Chemical Transportation

If goods are consigned that are classified as potentially dangerous when transported, their packing and transportation by air, sea, road, rail or inland waterway must be carried out according to international regulations.
The UN Model Regulations harmonise the rules on the various methods of transportation into a classification system in which each dangerous substance or article is assigned to a class defining the type of danger which that substance presents. The packing group (PG) then further classifies the level of danger according to PG I, PG II or PG III.
Together class and PG dictate how package must be, labelled and carried as dangerous goods, including inner and outer packaging, the suitability of packaging materials, and the marks and label they must bear.

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For smaller quantities there is a limited Quantities derogation;

https://www.gov.uk/shipping-dangerous-goods/transporting-limited-quantities

As well as the requirements specific to their transportation, suppliers of dangerous goods are required by law to label their hazardous products and packaged chemicals with hazard symbols, warnings and safety advice. A range of internationally recognised symbols has been developed so that personnel handling the goods know the nature of the hazard they present. For more information, see the following guides;

https://www.gov.uk/guidance/moving-dangerous-goods

http://www.hse.gov.uk/chemical-classification/labelling-packaging/index.htm

The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG Regs) and the European agreement ("Accord européen relatif au transport international des marchandises dangereuses par route", known as ADR) together regulate the carriage of dangerous goods by road.

http://www.hse.gov.uk/cdg/manual/index.htm

Further Health and Safety information covering aspects such as storage, disposal and filling procedures etc. relating to smaller fills may also be useful for reference;

HSG51 – Storage of flammable liquids in containers;
http://www.hse.gov.uk/pUbns/priced/hsg51.pdf

HSG140 – Safe use and handling of flammable liquids;
http://www.hse.gov.uk/pUbns/priced/hsg140.pdf

Control of ignition sources, e.g. Hazardous area classification in laboratories;
http://www.hse.gov.uk/electricity/atex/classification.htm

Environmental issues – Waste disposal, spillage etc. UK Environment Agency;
https://www.gov.uk/topic/environmental-management/waste

SIA Guidance Note 47 – Solvents and the Hazard of Static Electricity
http://www.solvents.org.uk/sia-guidance-notes/

SIA Guidance Note 56 – Percentage Fill of Packages
http://www.solvents.org.uk/sia-guidance-notes/

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