Aligning The Hazardous Materials Identification System (HMIS®) with the Updated OSHA Hazard Communication Standard (HCS 2012)

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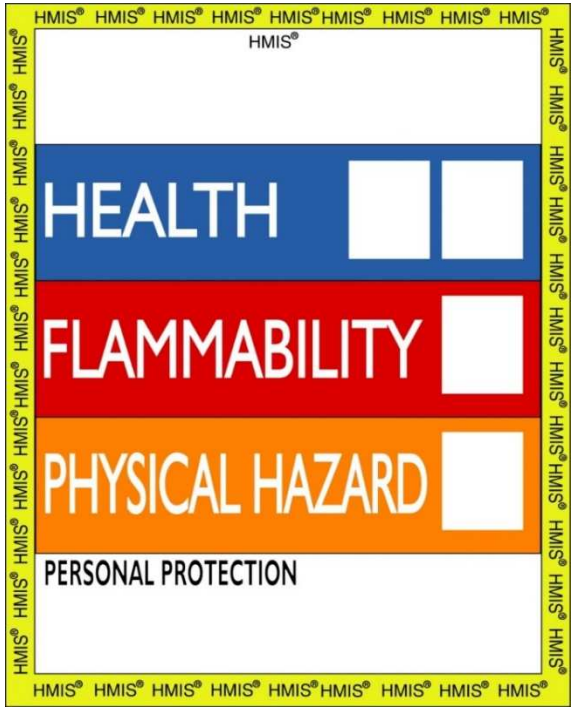
Outline

- What is the HMIS®
  - How does it support work place labeling under the OSHA Hazard Communication Standard (HCS)?
- Brief History
- Recent HMIS® revisions
- Future of HMIS®



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What is HMIS®and How Does it Support Work Place Labeling?

- Work Place Labels - inform workers of the dangers posed by exposures to hazardous materials they encounter with under "normal" conditions in the workplace.
  - OSHA has continually supported the use of such labels in the workplace AND STILL DOES!
- HMIS® provides a "Comprehensive Hazard Communication Compliance Resource for Employers" including:
  - Written Program Content
  - A Hazard Rating Scheme
  - Employee Training Elements
  - A Common Work Place Label Format – designed to provide for:

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History

- First edition published in 1981 as an industry resource to develop work place labels
  - Designed to help workers understand the hazards of (literally) 1000's of raw materials
- Developed and endorsed by ACA's PSC and OHSC
  - Based on the Safety and Health Index System (SHIS) created by PPG Industries and Advanced by DuPont
  - Adopted by many members of the National Paint and Coatings Association (NPCA, now American Coatings Association, or ACA)
- Early Modifications to Address Initial OSHA Hazard Communication Standard (1983)
  - Raw Materials Ratings Manual
    - ***Updated*** the ratings system
  - Tailored to meet needs of raw materials suppliers and manufacturers

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History

- 1986 Second Edition Released
  - Added chronic asterisk box to Health bar
  - Added individual Personal Protective Equipment (PPE) Codes
  - Added new acute toxicity criteria
  - Advanced new emphasis on target Organs
- 1996 NFPA changed reactivity to instability
  - Requiring some more fundamental conforming changes to HMIS®

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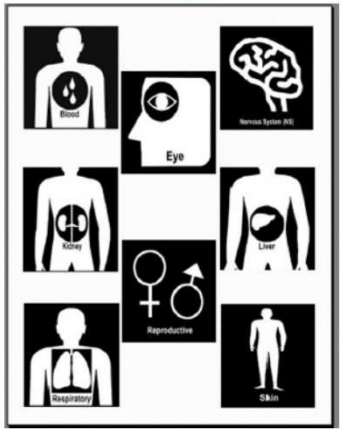
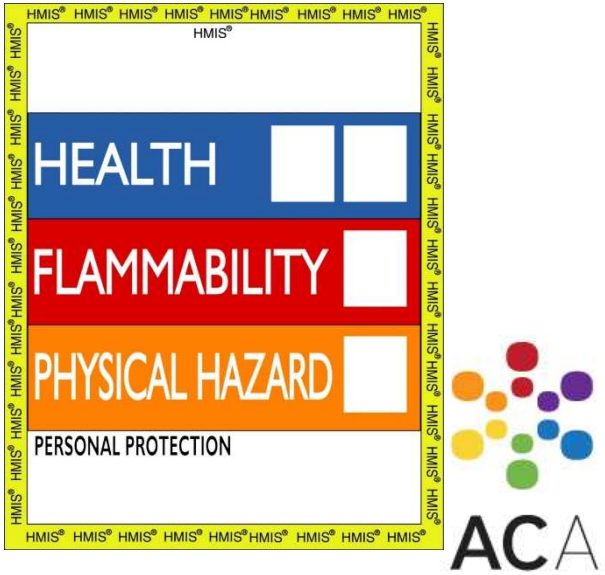
History

- HMIS® III published in 1996
  - MAJOR change to the system
- Changes included:
  - Revised label
  - Reactivity criteria changed to reflect all physical hazards as defined in the 1994 HCS
  - Icons provided for physical hazards and target organs
  - Restructured integrated worker training resources to reflect new emphasis





OSHA HCS 2012

- HMIS® has served as a work place labeling and HCS resource for 30+ years
- HCS 2012 presents challenges for HMIS®
  - HCS 2012 adopts GHS
    - Category 1 is most hazardous; Category 5 is least hazardous
    - Seemingly opposes the HMIS® rating system
  - Requires training of employees
    - New SDS requirements
    - New container labels, which include pictograms
- HMIS® must be updated to remain viable

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Updating HMIS®

- Developed a Revised Version (Fourth Edition) of the HMIS® manual conforming to the HCS 2012
- Manual provides instructions for integration into the written hazard communication program:
  - Part I: Reinforcing the “Basics” of Hazard Communication and the Role of HMIS®
  - Part II: Helping Employers and Employees Understand the HCS 2012
  - Part III: Developing HMIS® Ratings in a “GHS World”
    - Helpful Conversion “Table”
  - Part IV: Reinforcing the Role of the Safety Data Sheet (SDS)
  - Part V: Employee Training Resources
  - Part VI: Updated Appendices (detailing HCS 2012 requirements)

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Updating HMIS®

- Part I: HMIS® Basics
  - Revised all references to the OSHA Hazard Communication Standard to follow HCS 2012
  - Removed outdated references to health and physical hazards and associated icons
  - Developed and refined a COMPARISON TABLE for GHS Hazard ***Classifications*** → HMIS® Hazard **RATINGS**
- Part II: Understanding the Revised OSHA HCS 2012
  - Eliminated of out-of-date content
  - Added an overview of OSHA HCS 2012
  - Reinforced the written hazard communication program

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Skin Sensitizers (Chapter 3.4)

Hazard Category	Criteria	Hazard Communication Elements		DOT Placard	HMIS®
1	1. *For substances and tested mixtures* (a) If there is evidence in humans that the individual substance can lead to sensitization by skin contact in a substantial number of persons, or (b) If there are positive results from an appropriate animal test 2. *If data for the complete mixture are not available,* apply bridging principles (see 3.4.3.2) 3. *If bridging principles do not apply,* classify the mixture as skin sensitizer if it contains at least one ingredient classified as skin sensitizer at a concentration: (a) ≥ 0.1% (solid/liquid/gas) see note to Table 3.4.5; or (b) ≥ 1.0% (solid/liquid/gas)	Symbol		No DOT Pictogram	H: 2
		Signal Word	Warning		
		Hazard Statement	May cause an allergic skin reaction		

Updating HMIS®

- Part III: Resources for Developing HMIS® Hazard Ratings
  - Details GHS Hazard Classification conversion to HMIS® Hazard Rating process
  - No change to the HMIS® rating system
  - No change to the HMIS® rating criteria
- Part IV: Developing a SDS
  - Revised to reflect what employers need to know about the SDS and the requirements to convey to workers – including training

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Updating HMIS®

- Part V: Employee Training
  - Emphasizes required training for Revised HCS 2012
  - Provides TRAINING MODULE on HMIS® and overview of the Revised HCS 2012
- Part VI: Appendices
  - Provides detailed information in CONVERSION TABLE
  - Clarifies classification instructions
  - Revised “Frequently Asked Questions”
  - Updated “Glossary of Terms” and other retained aspects
  - Includes old HMIS® Hazard Rating sheet

The Future of HMIS®

- Revised HMIS® Implementation Manual (Fourth Edition) available at: http://www.paint.org/programs/hmis.html
- ACA is working with OSHA on the development of an OSHA "Quick Card" to further document best practice for work place labeling and HMIS®
- Future web seminars and additional training tools contemplated

Conclusion

June 1, 2016: Compliance date for IN-PLANT labeling and hazard communication programs… employer responsibilities:

- If you have an in-plant labeling system, you need to:
  - Determine the criteria used to develop the hazard warnings
  - Update the label to be consistent with the updated OSHA standard

    OR
  - Provide a conversion table that helps the user understand the hazard
  - Train employees on GHS and the in plant labeling system
  - Reinforce the role of the SDS in the hazard communication program

- **The updated HMIS® system has all of these elements and can be used by employers to meet their workplace labeling requirements and provide for:**

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Questions

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