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

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September 29, 2015
Crystal City, Virginia
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®
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:

  “Recognition at a glance!”
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
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®
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
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)
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
## Skin Sensitizers (Chapter 3.4)

<table>
<thead>
<tr>
<th>Hazard Category</th>
<th>Criteria</th>
<th>Hazard Communication Elements</th>
<th>DOT Placard</th>
<th>HMIS®</th>
</tr>
</thead>
</table>
| 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) \( \geq 0.1\% \) (solid/liquid/gas) see note to Table 3.4.5;  
   or  
   (b) \( \geq 1.0\% \) (solid/liquid/gas)                                                                 | Symbol (Exclamation Mark) | Warning | No DOT Pictogram | H: 2 |
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
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®


• 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
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:**

  “Recognition at a glance!”
Questions

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