

Hazardous Materials Identification System *(Third Edition)* Transition Guide



Transition Guide to the HMIS^o III

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Transition Guide to the HMIS[®] III

1.0 Introduction

This document is intended to assist industry representatives who are currently using an older version of the HMIS[®] (First or Second Edition) in implementing the new HMIS[®] Third Edition (HMIS[®] III), or are interested in converting from their existing system to the HMIS[®] III. Though there are numerous different ways to accomplish this transition, this procedure was developed by industry participants who have actually made the transition and learned from it. Hopefully, your transition will be error and confusion free.

2.0 Why Use HMIS[®]?

Every employer is responsible for providing their employees with a safe and healthy workplace. Hazard communication is an important part of this responsibility. Employers must be trained to recognize the potential hazards of diverse chemicals and properly deal with these hazards through work practice procedures and the use of personal protective equipment (PPE). Additionally, hazard communication is the law. The Occupational Safety and Health Administration's (OSHA) standard titled "Hazard Communication" found in Title 29 (Labor) of the Code of Federal Regulations (CFR) part 1910, section 1200, requires chemical manufacturers, importers, distributors, and employers to provide hazard information to employees and customers.

HMIS[®] serves as a primary means of complying with the OSHA Hazard Communication Standard (hereafter referred to as "the standard" or "HCS"). The HMIS[®] Implementation Manual, Third Edition, may be used as the basis of a written hazard communication plan. The rating, labeling, and training portions of the implementation process satisfy many of OSHA's requirements for hazard evaluations, workplace labeling of hazardous materials, and employee instruction, respectively.

OSHA stated in the Preamble to the 1983 HCS that "Labels prepared in accordance with NPCA's Hazardous Materials Identification System would generally be in compliance with this standard." OSHA recently re-confirmed the acceptability of HMIS[®] as an in-plant hazard communication tool by stating in the Preamble to the 1994 Revised Final Hazard Communication Standard, that this type of system continues to be an acceptable means of complying with the standard, providing adequate attention is given to target organ hazards during employee training.

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3.0 In What Way Has HMIS[®] Changed?

The HMIS[®] Implementation Manual, Third Edition, is designed to be a BETTER and more COMPREHENSIVE compliance tool for employers' use in meeting requirements of the Occupational Safety and Health Administration (OSHA) HCS. Significant changes in the third edition include the following:

- A.** Changes in definitions provide better alignment with language found in the HCS. The third edition HMIS[®] adopts OSHA's criteria for "Flammability" rating, and adds a "Physical Hazards" category with seven subcategories:
- Water Reactive
 - Organic Peroxides
 - Explosives
 - Compressed Gasses
 - Pyrophorics
 - Oxidizers
 - Unstable Reactives
- B.** Consistent with adding these discrete physical hazard criteria, the HMIS[®] label has been revised. The new label features a field entitled "Physical Hazard," which replaces "Reactivity." In light of this change, the label also has a new look. The new Physical Hazard field is orange, to distinguish it from the yellow Reactivity field. A border makes the label more visually distinctive, and the colors used on the label comply with the most recent American National Standard Safety Color Code (ANSI Z535.1-1998).
- C.** New ICONS are available to identify specific health and physical hazards. The ICONS support "at-a-glance" hazard recognition and aid employers with internal product labeling, informing employees of the specific nature of the chemical hazard as emphasized by OSHA. ICON stickers are now available for Target Organs, Physical Hazards, and Personal Protective Equipment (PPE).
- D.** Chapter 12 (Hazard Communication Training) of the Manual has been expanded to include the most current information and guidance that OSHA offers on the topic, with increased training emphasis on understanding Target Organ hazards. This chapter also explains how to effectively incorporate HMIS[®] into your site-specific Hazard Communication Training Program using new training aids covered in Chapter 13, Employee Training Materials. Training aids also reflect the changes in label and ICON options.

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4.0 Do I Need to Replace All the Existing HMIS[®] Labels With HMIS[®] III Labels?

Yes, as is discussed elsewhere in this document, replacing HMIS[®] labels is part of the transition. However, this can be accomplished in a measured, controlled way. In general, the labels that may have been placed on hazardous chemicals in your workplace continue to have utility, so long as your employees have been trained to understand them and continue to be able to use the appropriate precautions as a result. However, HMIS[®] III was designed to improve the in-plant hazard communication process and make your compliance with the OSHA Hazard Communication Standard even more assured. We have no doubt that the new rating system, along with its training components, is greatly superior to the existing HMIS[®] product. OSHA, in enforcing the Hazard Communication System, does not require that you use HMIS[®]. It does, however, require that if you employ a system such as HMIS[®] in your workplace, you use it correctly and fully train your workers on its use. Should you rely on HMIS[®] to support your Hazcom compliance program, you are well advised to use the most comprehensive and up-to-date system on the market, HMIS[®] III. As you implement HMIS[®] III, new workers you may hire will not have received training on prior versions of HMIS[®] and may not understand older versions of the label. Consider training new hires with both systems until the transition to HMIS III has been completed. This simple fact dictates that you should make your transition to the new system in a deliberate way. This document provides you with the tools and structure to manage this transition and most completely ensure your ultimate compliance with the OSHA Hazcom.

5.0 How do I Manage the Transition from the Current Version of HMIS[®] to the HMIS[®] III?

The most important modifications of the HMIS[®] are the new Physical Hazard rating criteria and the introduction of icons to convey the specific physical hazards and the Target Organ hazards posed by the chemical or chemical mixture. These changes will most significantly affect training and labeling of materials within the facility.

In light of these important and necessary changes, HMIS[®] users will need to consider changing MSDSs, HMIS[®] Labels, and any other HMIS[®] information placed upon products that leave the facility. Additionally, you should evaluate the support documentation (HMIS[®] Brochures, etc.) your company uses to support your HMIS[®] activities.

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5.1 What Are the Steps in an In-Plant Program Transition?

5.1(A). Step 1

The HMIS[®] implementation manager (IM) should obtain the HMIS[®] III Implementation Manual and familiarize him/her self with all of the new aspects of the system. Attention should be given to the Physical Hazard rating criteria, the Icons and the new Posters and Labels addressed throughout the Manual.

5.1(B). Step 2

The IM should establish the length of the transition period, i.e., the time frame during which the company will convert from the prior edition of HMIS[®] to the HMIS[®] III. We recommend a full year for this purpose.

5.1(C). Step 3

The IM should incorporate all the new HMIS[®] III and support/communications materials into the company's existing Hazard Communication Training Program. Since there will be a period of time when both the old and the new HMIS[®] III information and ratings will be used throughout the facility, employees must be aware of the transition and knowledgeable on both systems.

When developing the new training program the IM should use all of the HMIS[®] III training aids available. This includes:

- The HMIS[®] Label
- The HMIS[®] Wall Poster
- The HMIS[®] Wallet Card
- The Employee Guide to HMIS[®]
- The Employee Quiz
- The HMIS[®] Wall Poster Rating Chart Set
- The HMIS[®] PPE Index
- Physical Hazard Icons
- Target Organ Icons
- HMIS[®] Right-To-Know Poster
- HMIS[®] Haz Com Target Organ Poster
- HMIS[®] Target Organ Labels

The transition should not be initiated until ALL employees have received this training.

If MSDSs for the materials used reflect HMIS[®] ratings developed under an earlier version, we suggest making the changes to the MSDS over the transition period

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rather than republishing them all at one time. We also suggest first changing any MSDSs of products which are scheduled for revision, leaving the established ones for later.

5.1(D). Step 4

The IM should begin using the various HMIS[®] III communication tools throughout the facility as soon as possible after the initial training is completed.

5.1(D)(i) Classic HMIS[®] III Labels – New Material Containers

The first objects to receive the new HMIS[®] III labels should be those containers which are short-lived in the facility. Begin placing the new HMIS[®] III labels on raw materials and products which arrive at the loading docks as soon as the transition training has been completed.

5.1(D)(ii) Classic HMIS[®] III Labels – Static Containers

Once you have established a process to label containers and material packaging for products with short shelf lives, you can begin to re-label static containers, tanks, totes, etc. You can accomplish this gradually, replacing old labels over a predetermined time frame.

The IM should plan to have ALL of the old labels replaced with the new labels in the early stages of transitioning. We recommend, depending on the number of labels involved, this be accomplished in the first quarter of the transition period.

5.1(D)(iii) HMIS[®] III Wall Posters

The original HMIS[®] Wall poster should be posted next to the old version during the first part of the transition period. This helps serve as reinforcement to the transition and lessens the possibility of errors in interpreting the new system information. The new HMIS[®] III posters should be posted at other locations to reinforce the new system and the new information.

5.1(D)(iv) HMIS[®] Wallet Cards

The wallet cards have not changed in the new HMIS[®] III. They are still excellent information prompters for the ratings and codes listed on the HMIS[®] Labels. They contain much the same information as the original HMIS[®] Wall Poster, e.g. explanation of the HMIS[®] ratings and the PPE code equipment and combinations.

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5.1(D)(v) HMIS[®] PPE Index

The PPE Index has also not changed in the new HMIS[®] III. However, it is still a good idea to reinforce the PPE information during the training session and provide the Index in either label or Poster format throughout the facility.

5.1(D)(vi) Other Forms of HMIS[®] III Communications Tools

All of the other HMIS[®] III support/communications materials should also be used at the early stages of transition. This will ensure the employees become familiar with them and have time to ask questions and resolve conflicts, should they arise, early in the transition.

5.1(E) Step 5

Refresher or Reinforcement Training should be scheduled periodically during the transition period or as often as needed. The objective of these training sessions is to address any potential employee questions about HMIS[®] III and the transition process, and ensure employees clearly understand the key aspects of the new HMIS[®] III. We recommend emphasizing and using only HMIS[®] III materials during the training sessions. This will aid in an orderly and complete transition. We also recommend using the HMIS[®] III Posters as the major instructional props for the training sessions and to augment the training with actual HMIS[®] III labels for materials commonly used in the work place. It may be helpful to use several example labels to demonstrate all of the different Icons for Physical Hazards and Target Organs.

5.2 How do I Manage this Transition for Out-Of-Plant (Downstream) Uses of the HMIS[®]?

Chemical manufacturers, suppliers, or distributors who choose to provide HMIS[®] III ratings and/or labels on MSDSs or who place HMIS[®] III Labels on products which leave their facility must be prepared to ensure that their customers and their customers' employees fully understand the transition to the third edition and what that means in terms of their own hazard communication programs.

5.2(A) MSDSs

As with the In-Plant transition recommendations, the new HMIS[®] III ratings and labels may be placed on MSDSs that are due for revision first. The other MSDSs may be scheduled over a predetermined period of time, dictated by the number of MSDSs involved.

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We recommend that explanatory text be placed in close proximity to the New HMIS[®] III ratings or labels indicating that they reflect new ratings criteria and directing the reader to a part of the MSDS with a more detailed explanation. As an example, the following may be considered for use:

MSDS for Tetra-Ethyl Chicken Fat

NFPA	HMIS [®]
H=1	H=1
F=2	F=2
I=1	PH=2

Note* See Section III
For more Information

And, Section III may contain the following “explanation”

HMIS[®] III: The HMIS[®] III ratings displayed on the front of this MSDS are from the HMIS[®] Third Edition. There have been significant changes made to the system. “PH” stands for “Physical Hazard” as defined in the OSHA Haz Com Standard and replaces the former code “R” for “Reactivity.” For a more detailed explanation of the system and the ratings, please contact our Health, Safety, and Environmental Staff at [your phone number or address]

As before, preparers of MSDSs should not place HMIS[®] personal protection equipment (PPE) designation codes on the MSDSs or labels that leave the facility, as they do not know the conditions under which their customers use those products.

5.2(B) Product Labels

Container label stock often represents a significant monetary investment for many companies. If HMIS[®] labels are to be placed on product containers leaving the facility, either as part of the label or as an independent stick-on, we recommend the following:

For new container label stock, containing the new HMIS[®] III labels, replace the old ones initially on products which are due for label revisions and then on the products whose labels are relatively static or established. This may be accomplished as resources permit in a predetermined, metered fashion. We also recommend that either a statement be added to the label immediately below the HMIS[®] III label identifying it as “new” and providing a short explanation, or a brochure explaining the details of the new HMIS[®] III program be provided with the product.

Another recommendation for those company’s that are undecided whether to

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convert to the new HMIS III would be to remove the HMIS from the product labels as revisions occur now and reinstate at a later date.

In all cases, please remember that including HMIS on your product labels is voluntary. There are no Federal/State/Local regulations mandating HMIS inclusion on product labeling.

6.0 HMIS[®] Chemical Ratings Guide

New for the Third Edition of the HMIS[®] is the publication of a companion document entitled “HMIS[®] Chemical Ratings Guide.” One feature lacking in older versions was a reference containing HMIS[®] ratings for commonly used chemicals. Employers were expected to develop their own ratings or obtain recommended ratings from suppliers. As a result, ratings of common chemicals often varied from user to user depending on how the person developing the rating interpreted the HMIS[®] ratings guidance. To address this problem and make the system more comprehensive, HMIS[®] now features an “HMIS[®] Chemical Ratings Guide”. While users will have to develop ratings for chemicals or chemical mixtures that are not addressed in the new Guide, HMIS[®] users will now be able to rely on the guide for well-documented ratings for a large number of commodity chemicals.

The guide contains an explanation of how to develop HMIS[®] ratings, a table of chemicals with their HMIS[®] ratings, and finally an Appendix with an HMIS[®] Rating Classification Data Sheet for each chemical listed in the table.

7.0 Where can I get the HMIS[®] III Implementation Manual and all of the Support Materials?

The exclusive licensee for **ALL** HMIS[®] materials is J. J. Keller and Associates, Inc. They may be reached at:

JJ Keller & Associates, Inc.
3003 W. Breezewood Lane
P. O. Box 368
Neenah, WI 54957-0368
Toll Free: 800-327-6868
FAX: 800-727-7516
www.jjkeller.com