Why We Decided to Retain and Combine the Z400.1 and Z129.1 Standards … and to Begin Now

ACC-ANSI Work Group
Open Meeting

October 15, 2008
Arlington, VA

Agenda

• Introductions	Dave Peters
• The ANSI process	Susan Blanco
• The standards	Anne Stieffenhofer
• Why combine them	Ed Bisinger
• Proposed structure	Catherine Croke
• Timeline	Dave Peters
• Question/Answers	All

The ANSI process

- American National Standards Institute (ANSI)
  - Does not develop standards
  - Provides framework for development and approval of voluntary consensus standards
- The American Chemistry Council (ACC) is the ANSI accredited standards developer (sponsor) for the Z400.1 and Z129.1 standards

The ANSI process

- ACC is responsible for maintaining the standards by updating them as necessary on a 5-year cycle
- We achieve consensus by using ANSI's Accredited Canvass Method
- Final approval by ANSI Board of Standards Review

ANSI's Canvass method

- ACC develops list of potential canvassees by identifying organizations having an interest in the standard
- These organizations are contacted and invited to participate in the canvass in one of three categories:

  "Producer" "User" "General interest"
- The canvass list includes all who agree to participate

ANSI's Canvass method

- The revised standard is sent to the canvass list for ballot and comment
- All written comments are considered
- Standard is submitted to ANSI for approval
- To be approved by ANSI, the revised standard must receive positive votes from a majority of the canvass list and at least 2/3 of those voting on the revision, excluding abstentions

The ANSI Z400.1 Standard

- Provides guidance to MSDS Preparers:
  - To develop consistent, understandable MSDSs, providing useful information to a variety of audiences
  - Companion to ANSI Z129.1 Labeling Standard
- Originally developed as a CMA Guideline in early 1990's
  - Approved as a consensus standard by ANSI in 1993
  - Revised in 1998 and 2004
  - Due for revision in 2009

The ANSI Z129.1 Standard

- Provides guidance to Label Preparers:
  - Establishes sound principles and guidelines for the preparation of precautionary labeling for hazardous industrial chemicals
  - Companion to ANSI Z400.1 MSDS Standard
- Originally developed from "A Guide for the Preparation of Warning Labels for Hazardous Chemicals" or Manual L-1; 1945
  - 6 revisions
  - Converted to an ANSI Standard; 1976
    - 5 revisions - 1982, 1988, 1994, 2000 and 2006
  - Due for revision in 2011

Timeline

- September, 2007 - First meeting
  - An exploratory group met to decide our path forward
    - Do we combine the standards?
    - Do we incorporate GHS?
    - Do we wait to see what OSHA does?
- November, 2007
  - Decided to combine standards
  - Model GHS without including classification

Who we were

The exploratory team

Co-Chairs

David Peters, Monsanto

Anne Stieffenhofer, 3M

Edwin Bisinger, AkzoNobel

Jayne Clifton, Huntsman

Catherine Croke, RohMax

Suzanne Hignet, PPG

Mike Hulse, Shell

Larry Klein, DuPont

Donna Newhouse, Huntsman

Debra Randall, Arkema

Frank Rudy, Air Products

Brian Zoretich, Lubrizol

Susan Blanco, ACC Staff

Why combine the standards

- Will provide SDS and label preparers with a unified, systematic approach similar to that of the HazCom Standard
- It will be a more robust standard that is consistent because there is only one document versus two
- Updates to one combined standard will be more easily managed and can follow GHS updates more uniformly as they occur

Why combine the standards

- Consistent examples (such as an SDS and labels for the same product using the same data)
- Most users of the standards use both standards together
- The difference in content between the two standards is somewhat contrived
  - Has been a source of confusion for users
- Easier to use and cheaper for the user

Why now

- If we did nothing now, we would have significantly more work when GHS is eventually in place in the United States
- We would likely have to revise both ANSI standards to incorporate GHS at the same time
- If we begin work on further incorporating the GHS into the new combined ANSI Standard, we will support GHS implementation in the United States
- We have a strong group available in 2008
  - If we wait 1-2 years , prospect of losing some key members

Who we are

- The ACC ANSI Work Group is an ad hoc committee under the American Chemistry Council's (ACC) Health, Product & Science Policy Team
- The work group is composed of representatives of 16 member companies of the ACC
- The group includes toxicologists, product stewardship managers, and hazard communication experts

Who we are

Co-Chairs

David Peters, Monsanto

Anne Stieffenhofer, 3M

Edwin Bisinger, AkzoNobel
Karen Brooks, Dow
Jayne Clifton, Huntsman
Jennifer Ungvarsky, LANXESS
Suzanne Hignet, PPG
Debra Randall, Arkema
Sandra Schmidt, Sartomer
Sheryl Small, Sasol

C. Bringer-Guerin, Sartomer
Trish Bruen, Air Products
Catherine Croke, RohMax
Janice Gadiare, Evonik
Donna Newhouse, Huntsman
Robin Ruppel-Kerr, Bayer
Matt Sczepanski, Dow
David Gasper, DuPont
Brian Zoretich, Lubrizol

Susan Blanco, ACC Staff

Z400.1 + Z129.1 =

- Working title

"American National Standard for Hazardous Industrial Chemicals - Hazard Evaluation and Communication"

Z400.1 + Z129.1 =

- More than just reformatting
- Modeled on the GHS by incorporating classification, SDS preparation and labeling
- Does not adopt GHS classification and pictograms until regulatory action by OSHA

Proposed structure

- Structure based on how we work
  - Gather information
  - Perform the assessment
  - Write /review the safety data sheet
  - Write /review the labeling/label
  - Check for consistency

Proposed structure

- Introduction and Scope of the Standard
  - Introduction of the previous standards
  - Scope
- Purpose
- Application
- Audience
- Content and organization

Proposed structure

- Hazard evaluation
  - Definition of a hazard
  - Collecting the information
  - Determining hazards

Proposed structure

- Hazard evaluation
  - Physical hazards
- Definition of a physical hazard
- Physical hazard criteria
- Physical hazard evaluation
- Sources of information
- Statements of physical hazards

Proposed structure

- Hazard evaluation
  - Health hazards
- Definition of a health hazard
- Health hazard criteria
- Health hazard evaluation
- Sources of information
- Statements of health hazards

Proposed structure

- Hazard evaluation
  - Environmental hazards
- Definition of an environmental hazard
- Environmental hazard criteria
- Environmental hazard evaluation
- Sources of information
- Statements of environmental hazards

Proposed structure

- Tables of precautionary statements
  - Physical hazards
  - Health hazards:
- Skin corrosion/irritation
- Eye corrosion/irritation
- Respiratory irritation
- Sensitization
- Inhalation toxicity
- Dermal toxicity
- Oral toxicity
  - Additional statements
  - Additional environmental hazard statements

Proposed structure

- Effective communication principles
- Safety data sheets
  - SDS principles
  - SDS organization
  - SDS section by section
- Precautionary labeling
  - Labeling principles
  - Elements of a label
  - Preparing precautionary labeling
- Evaluation of documents

Proposed structure

- References
- Annexes
  - Annex A: Examples of labels and SDSs
  - Annex B: Glossary
  - Annex C: Background: The GHS
  - Annex D: Preparation resources document

Timeline

- 2008
  - Broke into sub-groups to combine sections of the documents that are redundant and to work on inconsistencies
  - Met with CSB and OSHA regarding combustible dusts
  - Met with CSB regarding static accumulators
  - Open meeting
- ??? – What is OSHA going to do with GHS? What is OSHA's timeline?

Timeline

- 2009
  - March - April
    - Submit draft to canvass
  - May - June
    - Canvass response and vote
  - July - September
    - Reply to written responses
  - November - December
    - Submit for approval and publication

Questions

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