

MSDS Hazardous Material Information Management Solutions - Choosing the Right Program!

Kami Blake

3E Company

March 26, 2009

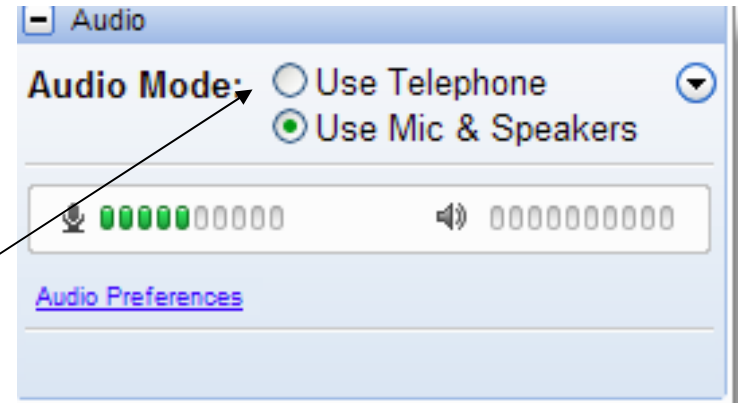
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Web Seminar Instructions



- Click Q&A button to submit your questions. Questions will be answered at the end of the presentation.
- The web seminar will be recorded. The audio and visual presentation link will be sent to you after the web seminar.

Guest Speaker



Kami Blake:

- As a Solutions Engineer with 3E Company, Kami is responsible for analyzing a client's current state of compliance with applicable regulatory requirements, industry-specific best practices and engineering a transition path to meet corporate hazardous materials information compliance goals and objectives.
- She has held a variety of management positions since joining the 3E Team in 2002, including Quality Assurance, Workload Management and Manufacturer Services.
- Prior to joining 3E, Kami directed the Materials Management, QA and Compliance operations for organizations in the medical device manufacturing and bio-technology industries.
- She is a Certified Hazardous Materials Specialist, Six Sigma Greenbelt and has 25 years combined experience in FDA, OSHA, EPA, and DOT compliance of regulated materials and processes.

Who is 3E Company?



- Leading provider of EH&S compliance and risk information management solutions
- Most comprehensive global EH&S domain knowledgebase
 - Professional EH&S expertise
 - Rich content across multiple databases
 - Unique EH&S business rules and best practices
- Provider of Choice offering:
 - Broadest range of services
 - Delivered in multiple formats and platforms
 - That meet the unique needs of our diverse customer base
 - 24 - 7 - 365
 - Global capabilities and presence


Agenda

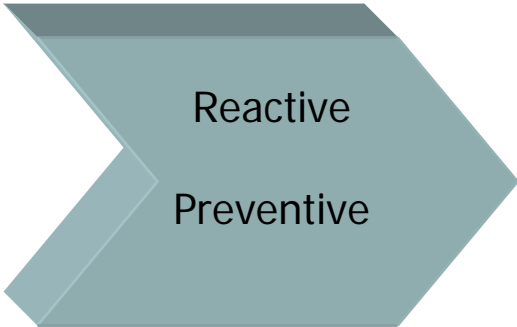


- Compliance Today
- Environmental Information Management Systems (EMIS)
- Data Requirements
- Program Performance
- 3E Online Demo
- Conclusion & Questions

The Evolution of EH&S Compliance

← - - - 1900-1969 - - - 1970-1995 - - - Late 90's to Present - - - →

- 
1. Do the Right Thing
 2. What Could Go Wrong?



Reactive
Preventive



Progressive

Compliance Today



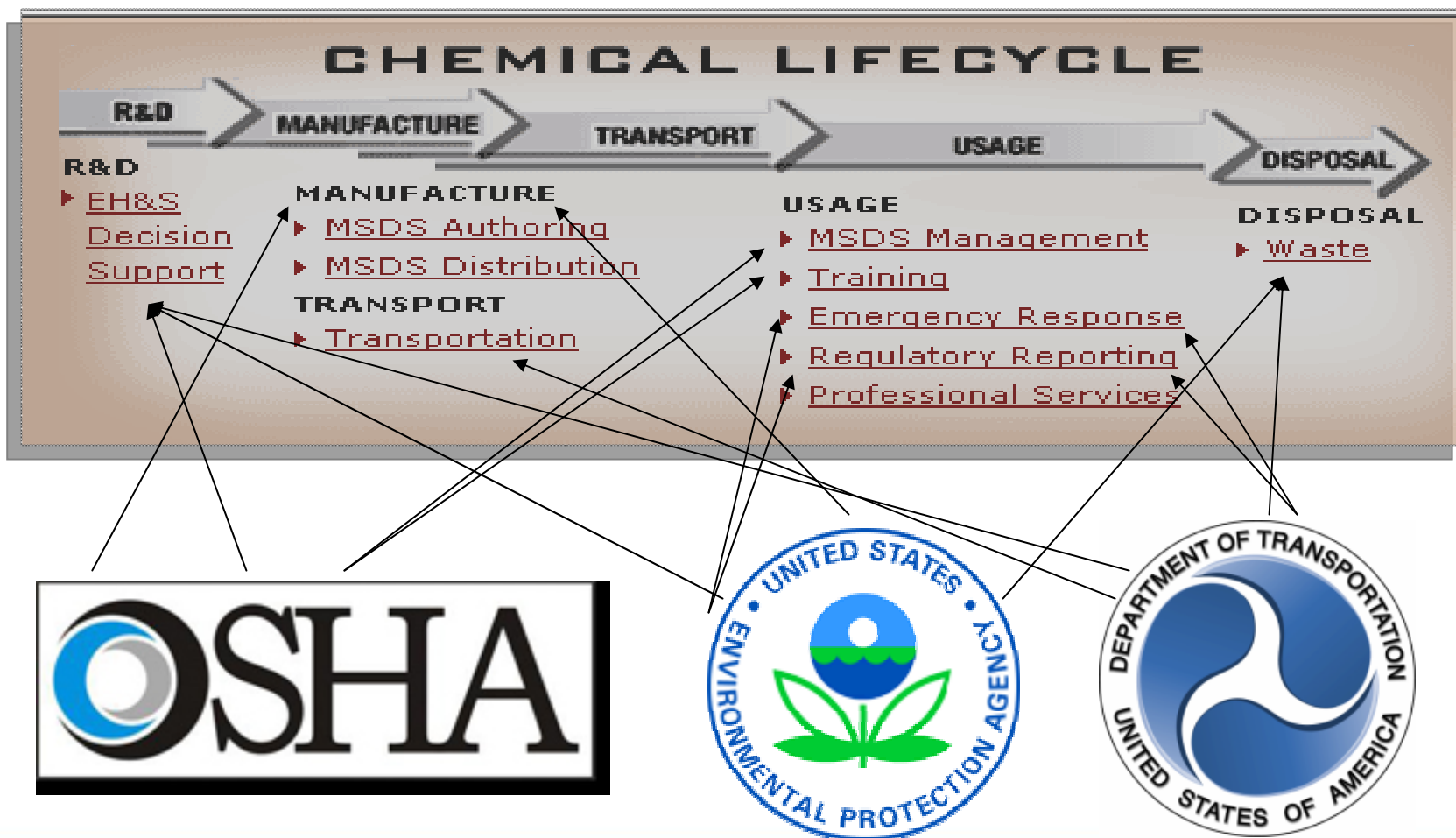
In addition to adhering to International, Federal, State and Local regulations, compliance today includes two progressive approaches that are being broadly accepted and implemented.

Corporate Social Responsibility: Assumption of responsibility for the impact of all corporate activities upon its employees, customers, community and the environment. Often carried out in the context of voluntary improvement commitments and performance reporting.

Industry Best Practices: Technique or methodology that, through experience and research, has proven to reliably lead to a desired result. A commitment to using the best practices is a commitment to using all the knowledge and technology at one's disposal to ensure safety and compliance.

Compliance Today

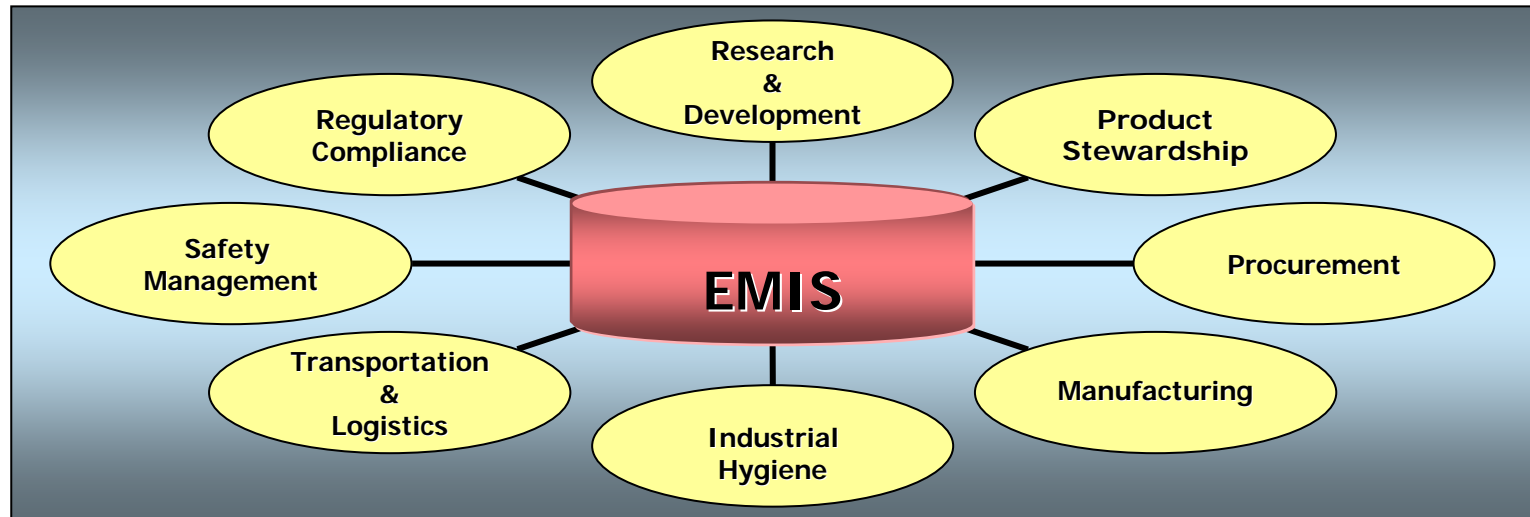
Hazardous chemical regulations cover the entire **product life cycle**.



Compliance Today

Organizational Participation

- Stakeholders – VP of Risk Management, Compliance & Ethics Officer, VP of Sales
- Power Users

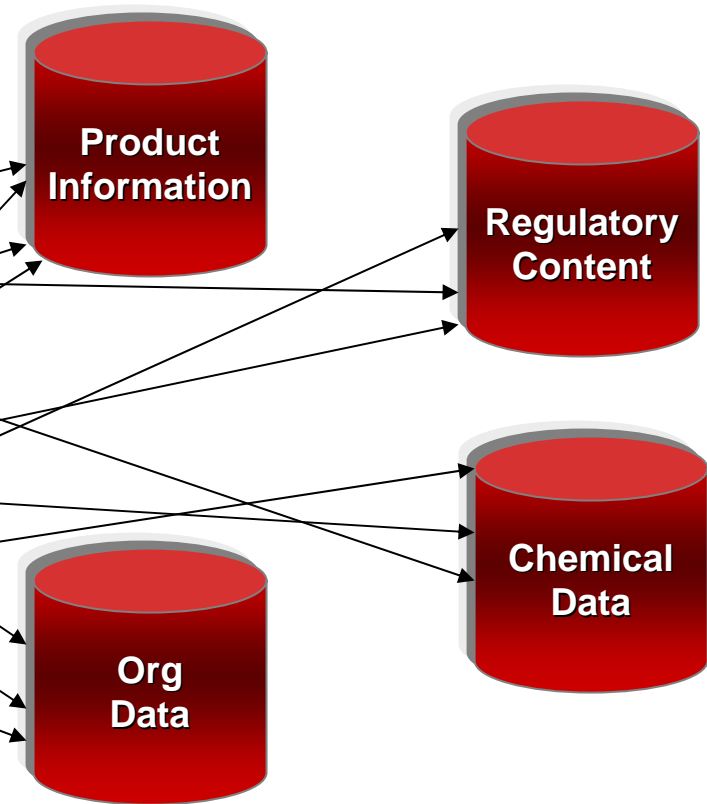


- Beneficiaries – Employees, Downstream Users

Access to Information

Platforms

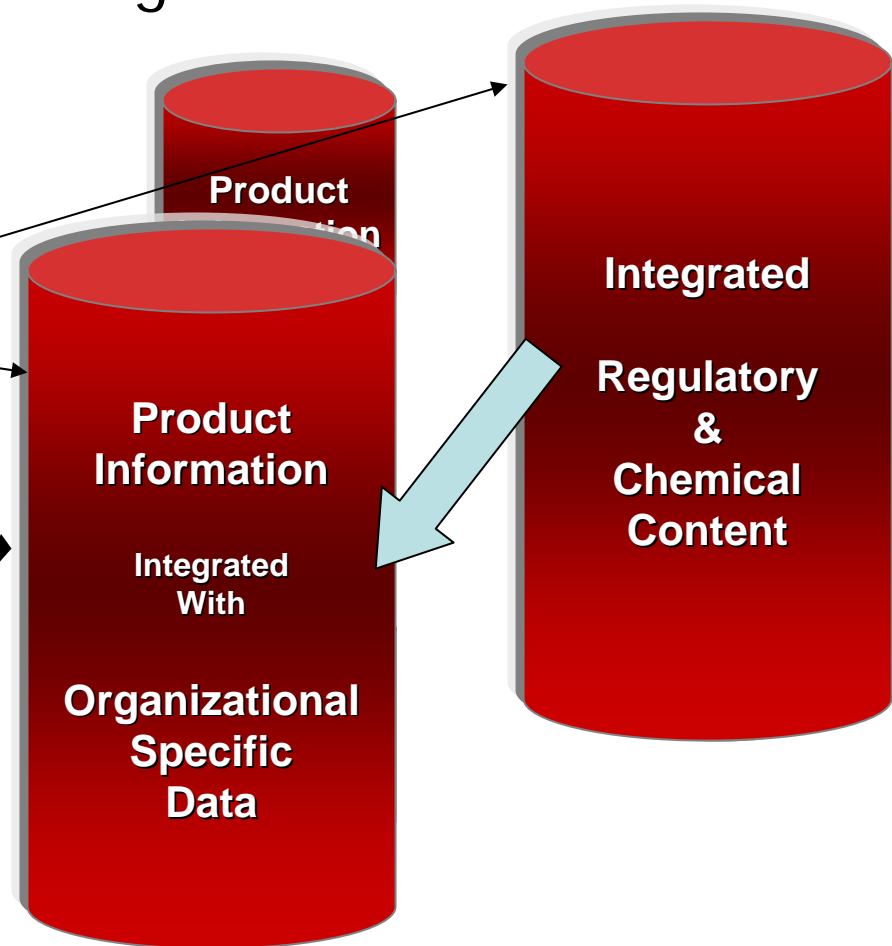
- MSDS Authoring
- MSDS Distribution
- Chemical Inventory & MSDS Management
- Enterprise Systems



Data Integration

Platforms

- MSDS Authoring
- MSDS Distribution
- Chemical Inventory & MSDS Management
- Enterprise Systems



Checkpoint #1



- Should your MSDS management system be a part of a broader EMIS?

Data Requirements



Material Safety Data Sheets (MSDS) - History

- 1940s - The Manufacturing Chemists' Association, produced "Chemical Safety Data Sheets" containing "Properties and Essential Information for Safe Handling and Use" Ultimately 100+ Data Sheets were produced that provided detailed coverage of each chemical, to the point of being a stand alone reference book on the product.
- November 25, 1983 - OSHA published the Hazard Communication Standard as 29 CFR Part 1910, adding 1910.1200. This initial standard applied only to SIC Codes 20 through 39.
- November 25, 1985 - Manufacturers and distributors required to provide MSDS to their customers. Though the standard does not require a particular format for the MSDS, it does specify what information must be included.
- September 23, 1987 - the requirements of the standard were extended to include "... all employers with employees exposed to hazardous chemicals in their workplaces."
- July 22, 2004 – OSHA publishes a recommended format for MSDS.

Data Requirements



Evolution of MSDS Content

Basic Requirements

- Product Name/Identity
- Chemical Names (haz ingredients)
- Physical & Chemical Characteristics
 - Physical & Health Hazards
 - Primary Routes of Entry
 - OSHA PELs & ACGIH TLVs
 - Applicable Carcinogen Listings
 - Appropriate Control Measures
- Emergency & First Aid Procedures
- Complete Supplier Contact Info
 - Emergency Contact Info
- Date of Issue/Revision Date

ANSI 16-Section Format

- Basic Requirements, AND
- Fire-fighting measures
- Accidental release measures
- Handling and storage
- Exposure controls/personal protection
- Stability and reactivity
- Toxicological information
- Ecological information
- Disposal considerations
- Transport information
- Regulatory information
- Other information

Data Requirements



Additional Data Requirements

- Product Information
 - Composition data (index from MSDS)
 - Physical characteristics and properties (index from MSDS)
 - Quantities (data entry at the site-level)
 - Other custom searchable fields
- Product Classifications (interpreted data)
 - NFPA
 - HMIS
- Regulatory Reporting
- Regulatory Content
 - CAS driven lists
 - Searchable full text
- Storage of other required documentation
- Integration with enterprise systems

Checkpoint #2

Does your online MSDS management system need to provide access to

- ☑ Information indexed directly from MSDS
- ☑ Interpretive chemical classifications
- ☑ Additional searchable fields
- ☑ SARA reporting capabilities
- ☑ Regulatory content
- ☑ Other additional documents
- ☑ Data from your internal systems

Program Performance



Full-Service Program vs. Low Cost Provider

There are many vendors out there offering what appears on the surface to be less expensive alternatives. Reducing expenses is extremely attractive, especially in this economy.

Low Cost Providers (LCP) can offer substantially lower per MSDS pricing to clients who require little more than a user-interface to a disorganized collection of out-dated MSDS. Consequently, LCPs do not staff to provide back office and day-to-day support that is a standard provision of 3E Online.

Though not advertised, LCPs offer a business model that is long on do-it-yourself options and monthly transaction fees (usually not included with the published per MSDS costs) but short on providing current documents, indexed and searchable data, access to critical chemical and regulatory content, 24-7-365 customer support and quality assurance.

Program Performance



Full-Service Program vs. Low Cost Provider

Shrouded in an attractively priced package, LCP programs can

Cost More – Incremental service charges apply after a client agrees to significantly reduced per MSDS fee (invoiced annually). Transaction-based billing accrues each month for operational support that is standard with full-service programs.

Do Less – A few transaction-based invoices, will likely provide incentive allocate additional internal resources to hold down costs or let important work go undone, compromising safety and compliance.

Leverage the Work of Others – LCPs build their leverageable MSDS databases with client labor vs. their own internal resources.

LCPs claims to be FASTER, BETTER, CHEAPER – The fact of the matter is, their client's are fortunate to get one out of three and will likely be zero for three. The client winds up paying more and getting far less, while doing much of the vendor's work for them and places safety and compliance at risk.

Checkpoint #3



- Are resources available to fill the operational gaps that can result in the transition from a full-service program to a LCP?

If not, is your organization prepared to

- Pay your LCP transactional fees to do the work?
- Risk compliance levels until labor can be allocated?

Program Performance



Menu of Transactional Fees

Service Type	3E Online	LCP Options
Cross-referencing	Included	D-I-Y or Pay More \$
MSDS Obtainment	Included	D-I-Y or Pay More \$
Document Upload & Scanning	Included	Pay More \$
Revision Verification	Included	D-I-Y or Pay More \$
MSDS Indexing	Included	D-I-Y or Pay More \$
Facility Tree Maintenance	Included	D-I-Y or Pay More \$
Inventory Management	Included	D-I-Y or Pay More \$
Administrators/Users	Included	Additional
Training	Included	Additional

Service Type	3E Online	LCP Options
Regulatory Analysis	Included	Additional
Multi-Lingual Interface	Included	Additional or Not Available
Chemical Analysis	Included	Additional or Not Available
Service Implementation	Included	Not Available or Limited
Dedicated Account Management	Included	Not Available or Limited
24-7-365 Product Support	Included	Not Available or Limited
Quality Assurance	Included	Rarely Implemented
MSDS Requests	Included	Not Available or Limited
Global MSDS Management	Available	Not Available or Limited

Conclusion



The regulatory landscape domestically and globally is becoming increasingly more complex and data-driven. With the phased acceptance of GHS (Globally Harmonized System) document, classification and labeling standards, we could see significant and sweeping changes in just a few a years.

Well-managed tools and processes enabling access to critical information that spans the ENTIRE chemical life cycle is a key to keeping pace with the ever-changing face of EH&S information management.

Questions?

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Thank You